



MARK PESTRELLA, Director

**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
REFER TO FILE

November 16, 2021

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

47 November 16, 2021

CELIA ZAVALA
EXECUTIVE OFFICER

**CONSTRUCTION-RELATED CONTRACT
CONSTRUCTION MANAGEMENT CORE SERVICE AREA
CAMPUS KILPATRICK WASTEWATER TREATMENT SYSTEM
REPLACEMENT PROJECT
APPROVE PROJECT SCOPE
ESTABLISH CAPITAL PROJECT
APPROVE APPROPRIATION ADJUSTMENT
SPECS. 7686; CAPITAL PROJECT NO. 87693
(FISCAL YEAR 2021-22)
(SUPERVISORIAL DISTRICT 3)
(3 VOTES)**

SUBJECT

Public Works is seeking Board approval to find that the Campus Kilpatrick Wastewater Treatment System Replacement Project is exempt from the California Environmental Quality Act, approve the project scope, establish Capital Project No. 87693 for the project, and approve an appropriation adjustment.

IT IS RECOMMENDED THAT THE BOARD:

1. Find that the Campus Kilpatrick Wastewater Treatment System Replacement Project is exempt from the California Environmental Quality Act for the reasons stated in this Board letter and in the record of the project.
2. Approve the project scope and establish the Campus Kilpatrick Wastewater Treatment System Replacement Project, Capital Project No. 87693.

3. Approve an appropriation adjustment transferring \$650,000 in prior year net County costs from Capital Project No. 87396, Probation Various Improvements, to Capital Assets-Buildings and Improvements under Capital Project No. 87693, Campus Kilpatrick Wastewater Treatment System Replacement Project, to fund design, County and consultant costs for preconstruction services.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions will find that the Campus Kilpatrick Wastewater Treatment System Replacement Project is exempt from the California Environmental Quality Act (CEQA), approve the project scope, establish Capital Project No. 87693, and approve appropriation adjustment.

Project Description and Background

Campus Kilpatrick, located at 427 South Encinal Canyon Road in Malibu, is a juvenile detention facility operated by the County of Los Angeles Probation Department. Wastewater generated from the facility is treated at a self-contained wastewater treatment system (WWTS) located immediately south of Encinal Canyon Road opposite the detention facility. The County Internal Services Department maintains the WWTS.

In November 2018, the Campus Kilpatrick WWTS was damaged beyond repair by the Woolsey Fire. The County installed a temporary packaged WWTS to allow the facility to resume service and house juveniles committed for treatment until a replacement permanent WWTS is installed. A detailed site selection process was undertaken to determine the preferred location for the replacement WWTS, taking into consideration environmental effects, future land use(s), maintenance access, constructability of new facilities, and cost-effectiveness. The existing WWTS site was ultimately selected as the most desirable location for the replacement permanent WWTS based on its proximity to the Campus Kilpatrick facility, the presence of the existing concrete pad and potential to utilize other existing facilities, and the least amount of grading or other site work required to install the replacement WWTS.

Installation of a replacement permanent WWTS is necessary because the County is currently leasing the temporary packaged WWTS, which must remain in operation until the replacement permanent WWTS is installed and approved for operation. Additionally, in accordance with the Coastal Development Permit requested for the project under the Santa Monica Mountains Local Coastal Program, the temporary WWTS must be removed, and the affected area restored.

Proposed Project

The Campus Kilpatrick Wastewater Treatment System Replacement Project includes installation of a prepackaged wastewater treatment system with a back-up emergency generator and upgrades to electrical service from Southern California Edison. The project also includes the construction of a concrete retaining wall and a new chain link fence, rehabilitation of the effluent pond, replacement of sewer lines, and installation of a 12,000 gallon above-ground recycled water storage tank for irrigation of the existing landscape at Campus Kilpatrick. In addition, the project includes removal of the temporary WWTS and subsequent habitat restoration of the impacted footprint.

The replacement permanent WWTS will have the same capacity as the permitted design capacity of the former WWTS. Additionally, the components of the replacement permanent WWTS will almost entirely be located within the fenced perimeter of the existing WWTS site footprint.

Implementation of Strategic Plan Goals

These recommendations support the County Strategic Plan: Strategy II.3, Make Environmental Sustainability Our Daily Reality. It promotes water conservation, recycle and reuse local water resources, and reduce stormwater pollution. It also improves water quality, reduces water consumption, and increases water supplies. In this case, the County is supporting these goals by implementing use of recycled water from the wastewater system for landscape irrigation, thereby reducing use of domestic water for irrigation and protecting the environment by preserving the habitat areas near the project.

FISCAL IMPACT/FINANCING

The costs for design services, permits and plan check fees, and consultant and County project management costs are estimated at \$650,000. The enclosed appropriation adjustment (Enclosure A) will transfer \$650,000 in prior year net County cost from Capital Project No. 87396, Probation Various Improvements, to Capital Assets-Buildings and Improvements under Capital Project No. 87693, Campus Kilpatrick Wastewater Treatment System Replacement Project, to fully fund these preconstruction services.

In November 2018, the President declared the Woolsey Fire a major disaster (Federal Emergency Management Agency [FEMA] DR-4407CA), which made Federal disaster aid available for associated damages across the County of Los Angeles. The County submitted a claim for significant Federal and State assistance from the FEMA and the California Office of Emergency Services for this project.

Once Federal and State assistance is confirmed, Public Works will return to the Board with recommendations to approve and fully fund the total project budget using a combination of Federal, State, and County funds.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

In accordance with the Board's Civic Art Policy, adopted on December 7, 2004, and last amended on August 4, 2020, the project is exempt from the Civic Art Allocation as it involves replacement of a building system and underground infrastructure.

ENVIRONMENTAL DOCUMENTATION

The Campus Kilpatrick Wastewater Treatment System Replacement Project is exempt from CEQA. The project, which authorizes the replacement of the former permanent wastewater treatment plant that was damaged by the Woolsey Fire and the installation of new sewer lines, a recycled water line, an above-ground recycled water storage tank for irrigation, and an electrical service conduit line, is within certain classes of projects that have been determined not to have a significant effect on the environment in that it meets the criteria set forth in Sections 15302 and 15303 of the State CEQA Guidelines and Classes 2 and 3 of the County's Environmental Document Reporting Procedures and CEQA Guidelines, Appendix G.

The project also includes a habitat restoration component that satisfies all conditions set forth by CEQA Guidelines, Section 15333, relating to the maintenance; restoration; enhancement; or protection of habitat for fish, plants, or wildlife. In addition, based on the project records, it will

comply with all applicable regulations, is not in a sensitive environment (as shown in the Preliminary Review assessment, Enclosure B), and there are no cumulative impacts, unusual circumstances, damage to scenic highways, listing on hazardous waste site lists compiled pursuant to Government Code Section 65962.5, or indications that the project may cause a substantial adverse change in the significance of a historical resource that would make the exemptions inapplicable.

Upon the Board's approval of the recommended actions, Public Works will file a Notice of Exemption with the Registrar-Recorder/County Clerk in accordance with Section 21152 of the California Public Resources Code.

Prior to starting construction, Public Works will obtain a Coastal Development Permit from the coastal permitting section of the Department of Regional Planning and environmental clearance from the FEMA. Construction is estimated to take 13 months upon Board approval of the construction contract.

CONTRACTING PROCESS

Public Works utilized a previously Board-approved on-call architect and engineer firm, PBWS Architects, to perform design services. Construction will be carried out utilizing a low bid delivery method.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

Approval of the recommended actions will have no impact on current County services or projects.

CONCLUSION

Please return one adopted copy of this Board letter to Public Works, Project Management Division II.

The Honorable Board of Supervisors

11/16/2021

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Pestrella". The signature is written in a cursive, flowing style.

MARK PESTRELLA, PE

Director

MP:VY:mm

Enclosures

c: Department of Arts and Culture
Auditor-Controller
Chief Executive Office (Capital Programs
Division)
County Counsel
Executive Office
Probation Department

October 05, 2021

COUNTY OF LOS ANGELES

REQUEST FOR APPROPRIATION ADJUSTMENT

DEPARTMENT OF CHIEF EXECUTIVE OFFICER

AUDITOR-CONTROLLER:

THE FOLLOWING APPROPRIATION ADJUSTMENT IS DEEMED NECESSARY BY THIS DEPARTMENT. PLEASE CONFIRM THE ACCOUNTING ENTRIES AND AVAILABLE BALANCES AND FORWARD TO THE CHIEF EXECUTIVE OFFICER FOR HER RECOMMENDATION OR ACTION.

ADJUSTMENT REQUESTED AND REASONS THEREFORE

FY 2021-22

3 - VOTES

SOURCES		USES	
PROBATION		PROBATION	
PROBATION VARIOUS IMPROVEMENTS		CAMPUS KILPATRICK WASTEWATER TREATMENT SYSTEM REPLACEMENT	
A01-CP-6014-65042-87396		A01-CP-6014-65042-87693	
CAPITAL ASSETS - B & I		CAPITAL ASSETS - B & I	
DECREASE APPROPRIATION	650,000	INCREASE APPROPRIATION	650,000

SOURCES TOTAL \$ **650,000**

USES TOTAL \$ **650,000**

JUSTIFICATION

Reflects an appropriation transfer from Probation Various Improvements, Capital Project No. 87396 to the Campus Kilpatrick Wastewater Treatment System Replacement, Capital Project No. 87693.

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

47 NOV 16 2021

James Yun

Digitally signed by James Yun
Date: 2021.09.07 09:28:08 -07'00'

AUTHORIZED SIGNATURE

JAMES YUN, MANAGER, CEO

BOARD OF SUPERVISOR'S APPROVAL (AS REQUESTED/REVISED)

CELIA ZAVALA
EXECUTIVE OFFICER

REFERRED TO THE CHIEF
EXECUTIVE OFFICER FOR---

- ACTION
- RECOMMENDATION

- APPROVED AS REQUESTED
- APPROVED AS REVISED

AUDITOR-CONTROLLER

BY Larfan

CHIEF EXECUTIVE OFFICER

BY [Signature]

B.A. NO. 034

DATE Sept 9, 2021

DATE 9/13/2021

Preliminary Review

Campus Kilpatrick Wastewater Treatment System Replacement Project County of Los Angeles, California

Prepared for | Los Angeles County Public Works
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Alhambra, California 91803-1331

Prepared by | Psomas
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August 2021

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SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THIS PRELIMINARY REVIEW

As discussed further below, the Campus Kilpatrick Wastewater Treatment System Replacement Project (CK WWTS Replacement Project, Project) site is located within the boundaries of the Santa Monica Mountains Local Coastal Program (SMMLCP). Specifically, areas surrounding the proposed new wastewater treatment system (WWTS) site are mapped as H1 habitat (highest biological significance), and WWTS site and all areas extending north of Encinal Canyon Road are located within the 100-foot buffer of H1 habitat. Therefore, to ensure the California Environmental Quality Act (CEQA) documentation to be prepared for the Project is based on substantial evidence given the sensitivity of the Project area, this Preliminary Review assessment was prepared and is based on the environmental checklist in Appendix G of the State CEQA Guidelines.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT EVALUATION

Based on the analysis presented in this Preliminary Review document, the Project is categorically exempt from CEQA. As discussed further below, all or portions of the Project would qualify under the following Categorical Exemptions: Class 2, "Replacement or Reconstruction"; Class 3, "New Construction or Conversion of Small Structures"; and Class 33, "Small Habitat Restoration Projects".

Class 2 Categorical Exemption

Pursuant to Section 15302 of the State CEQA Guidelines, a Class 2 exemption applies to the following type of projects:

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located in the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The Project is the replacement of the former permanent WWTS that was damaged in the Woolsey Fire. As discussed further in Section 2.0, the extent of damage combined with the need to meet more stringent Waste Discharge Requirements (WDRs), which pre-date the Woolsey Fire, resulted in a determination that a new, replacement WWTS would be necessary. The new permanent WWTS would be located on the site of the former WWTS immediately south of Encinal Canyon Road, would have the same purpose as the former WWTS (i.e., solely serving the wastewater treatment needs of the County's juvenile detention facility) and would have the same permitted capacity of the former WWTS. Therefore, the proposed Project would be consistent with the requirements of Section 15302 of the State CEQA Guidelines.

Class 3 Categorical Exemption

Pursuant to Section 15303 of the State CEQA Guidelines, a Class 3 exemption applies to the following type of projects:

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

Installation of the new permanent WWTS includes the construction and location of new equipment and facilities outside of the existing WWTS site. As discussed further in Section 2.0, operation of the new WWTS requires the installation of a new 10-inch (in) sewer line, 4-in recycled water line, recycled water storage tank, and 4-in electrical service conduit and line across and/or to the north of Encinal Canyon Road. The sewer line and electrical conduit would cross the roadway via jack-and-bore operations. The recycled water line would cross the roadway by replacing the existing recycled water line attached to the site of the culvert crossing. Utility line and tank installation on the north side of Encinal Canyon Road would involve shallow trenching and/or surficial grading. As discussed further in Section 2.0, the location of a concrete pad for the sludge tank would require a 330-sf expansion of the existing WWTS site. To accommodate this, the existing chain link fence would be removed and replaced with a 56-foot-long retaining wall and adjacent 3-foot-wide concrete swale. The location of all facilities outside the existing WWTS site was determined to minimize environmental effects, such as avoiding oak trees, jurisdictional waters, and otherwise undisturbed areas. Therefore, the proposed Project would be consistent with the requirements of Section 15303 of the State CEQA Guidelines.

Class 33 Categorical Exemption

Pursuant to Section 15333 of the State CEQA Guidelines, a Class 33 exemption applies to the following type of projects:

Class 33 consists of projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife provided that:

- a) There would be no significant adverse impact on endangered, rare or threatened species or their habitat pursuant to Section 15065,
- b) There are no hazardous materials at or around the project site that may be disturbed or removed, and
- c) The project would not result in impacts that are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The Project includes a small habitat restoration component that meets all conditions of Section 15333(a) through (c), as described below. As discussed further in Section 2.3, the emergency Coastal Development Permit issued for the temporary WWTS requires that the area disturbed by installation on this facility be restored. The temporary WWTS gravel pad encompasses an area of approximately 1,940 sf (0.04 acre). Therefore, the restoration Project is less than 5 acres. The purpose of the restoration is the maintenance and enhancement of vegetation in the area affected by installation of the temporary WWTS to stabilize the soil and avoid passive growth of non-native, weedy pioneer species that may subsequently invade adjacent H1 habitat areas that are beyond the disturbed and developed areas associated with both the temporary and permanent WWTSs.

With regard to Section 15333(a), Psomas biologists assessed the Project site and nearby areas through vegetation mapping and multiple instances of site reconnaissance in years preceding the Woolsey Fire. The restoration area contained disturbed chamise chaparral and sage scrub vegetation types, which included native plant species such as chamise and black sage along with non-native species such as black mustard and non-native grasses. Additionally, the placement of the temporary WWTS also encroached within the protected zone of one existing coast live oak tree; impacts for which would involve replacement planting at a ratio of 10:1. The vegetation on the temporary WWTS site prior to the fire did not represent habitat for any endangered, rare, or threatened plant or wildlife species. No wetlands are located within the activity areas on the

Project site, nor would any be affected by the Project. Therefore, the Project would not have an impact on federally listed Threatened or Endangered plant or wildlife species, nor would it result in removal of any federally designated critical habitat.

With regard to Section 15333(b), there are no sites within or near the Project site identified on the Hazardous Waste and Substances List (also called the Cortese List) compiled by the California Environmental Protection Agency (CalEPA), pursuant to Section 65962.5 of the *California Government Code* (CalEPA 2020). Implementation of the Project would involve the limited transport, storage, use, and/or disposal of common construction-related hazardous materials, including oil and grease, solvents, diesel fuel, and other chemicals in vehicles, trucks, and heavy equipment. These materials could be released into the environment in small amounts in the event of an accident. Implementation of the Project would not require the use of acutely hazardous materials or substances.

With regard to Section 15333(c), the County of Los Angeles is not pursuing any other projects in the area that, together with the proposed Project, would result in a significant cumulative impact. Also, the Project site and all surrounding lands are among the 80 percent of SMMNRA lands designated in the GMP as “Low Intensity Management Areas”, which is the lowest intensity land use designation and where emphasis would be on natural and cultural resource preservation (NPS 2002). Lands to the north, east and west of Campus Kilpatrick and Camp Miller, which include a portion of County-owned land and privately held lands, are largely comprised of steep hillsides that are not amenable to development, regardless of land use development controls. Because areas to the south of the County property are NPS lands and within a Low Intensity Management Area, they are not likely to be developed. There are no developed areas, other than Campus Kilpatrick and Camp Miller, within approximately ¼-mile of the site. When considering both the lack of developable land in the Project area and the lack of significant impacts requiring mitigation measures related to construction and operation of the Project, it can be concluded that the Project would not have any cumulatively considerable impacts.

Therefore, the proposed Project would be consistent with the requirements of Section 15333 of the State CEQA Guidelines.

Exceptions to a Categorical Exemption

Exemptions are subject to the additional conditions described in Section 15300.2, Exceptions, of the State CEQA Guidelines, as follows:

“(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.”

As noted above, the Project site is located within the boundaries of the Santa Monica Mountains Local Coastal Program (SMMLCP). Specifically, areas surrounding the proposed new wastewater treatment plant (WWTS) site are mapped as H1 habitat (highest biological significance), and WWTS site and all areas extending north of Encinal Canyon Road are located within the 100-foot buffer of H1 habitat. Therefore, the temporary WWTS site is mapped within H1 habitat and the new permanent WWTS and all related infrastructure to the north is within the H1 buffer. These designations in the SMMLCP constitute a sensitive environmental resource that is officially adopted by a local agency (County of Los Angeles). As noted above, this Preliminary Review

assessment has been prepared in light of the sensitivity of the Project site in the coastal zone, and has demonstrated that there would be no significant impacts related to any of the 21 environmental topics addressed in Appendix G of the State CEQA Guidelines. Section 3.4, Biological Resources, of this document summarizes the *Biological Assessment Report for the Campus Kilpatrick Wastewater Treatment Plant Project* (Biological Assessment Report) prepared by Psomas and dated December 2020 (Psomas 2020), which analyzes the impacts to biological resources on and near the Project site. The entirety of the Biological Assessment Report is provided in Appendix B.

As discussed in Section 3.4, the Project site is dominated by developed areas. The developed areas consist of various buildings/structures, appurtenant facilities (e.g., swimming pool, propane tank, aboveground utility infrastructure), paved roads, and hardscape and landscape areas. Ornamental landscaping areas contain various trees including eucalyptus (*Eucalyptus* sp.), Canary Island pine (*Pinus canariensis*), and Aleppo pine (*Pinus halepensis*); various non-native shrubs; and turf grass. Native habitat areas surrounding, but not within, the Project area, include California sagebrush scrub, chaparral, native and non-native grasslands, willow scrub, and coast live oak woodland. In the aftermath of the Woolsey Fire, essentially no shrub or herbaceous vegetation was present in the temporary WWTS pad area, which is the only Project area within H1 habitat. The Biological Assessment Report concluded there is no potential for sensitive plant or wildlife species on the Project site due to lack of suitable habitat. No impacts to these native habitat types are expected to occur from Project implementation. As such, despite being mapped in the SMMLCP as H1 (temporary WWTS only) and H1 buffer, the quality of the biological resources within the Project site is substantively disturbed and does not provide high quality habitat for sensitive plant and wildlife species that have potential to be present in the Santa Monica Mountains. Therefore, the Project would not be excepted from consistency with a Class 3 Categorical Exemption by consideration of the Project's location.

“(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.”

The LACFCD or other County of Los Angeles departments are not planning successive projects related to wastewater infrastructure in the area as the Project. Also, as discussed above, there are no developed areas, other than Campus Kilpatrick and Camp Miller, within approximately ¼-mile of the site. When considering both the lack of developable land in the Project area and the lack of significant impacts requiring mitigation measures related to construction and operation of the Project, it can be concluded that the Project would not have any cumulatively considerable impacts.

“(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”

As demonstrated by the Preliminary Review assessment presented in this document, there is substantial evidence that the Project would have no reasonable possibility of having a significant environmental effect due to unusual circumstances of any kind.

“(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.”

No officially designated scenic highways are located near the Project. The nearest designated or eligible State scenic highways include State Route (SR-) 1 (Pacific Coast Highway) located approximately 4.0 miles south of the site and Interstate (I-) 101 located approximately 4.25 miles north of the site (Caltrans 2020).

“(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.”

There are no sites within or near the Project site identified on the Hazardous Waste and Substances List (also called the Cortese List) compiled by the California Environmental Protection Agency (CalEPA), pursuant to Section 65962.5 of the *California Government Code* (CalEPA 2020).

“(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.”

Because the Campus Kilpatrick complex is recent, no part of Campus Kilpatrick is a historic resource. Further, implementation of the Project would not affect any existing structures in either Camp Miller or Campus Kilpatrick. The recycled water lines have been routed to avoid existing protected tree canopies, buildings, and other aspects of the built environment. The recycled water lines would connect at points of existing infrastructure situated in the south and northeast portions of Campus Kilpatrick and at the new recycled water tank. Therefore, there would be no impacts to historic resources due to construction or operation of the Project.

SECTION 2.0 ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND AND NEED

Campus Kilpatrick, located at 427 South Encinal Canyon Road, is a juvenile detention facility operated by the County of Los Angeles (County) Probation Department. Campus Kilpatrick, and the adjacent Camp Miller, were originally constructed in the 1960s. Campus Kilpatrick was recently redeveloped and reopened in 2017 as a newly built facility. Camp Miller was permanently vacated in 2016, but the property remains under the jurisdiction of the Probation Department. Wastewater generated at Campus Kilpatrick is treated at a self-contained WWTS located immediately south of Encinal Canyon Road opposite the detention facility. The County Internal Services Department (ISD) maintains the WWTS.

In March 2015, the Los Angeles Regional Water Quality Control Board (LARWQCB) adopted Waste Discharge Requirements Order No. R4-2015-0050 (2015 WDR) for both detention facilities. The 2015 WDR was terminated and replaced with LARWQCB Waste Discharge Requirements File No. 60-080, WDR Order No. R4-2019-024, Series No. 003, CL 2732, Global ID WDR1000001056, dated April 30, 2019 (2019 General WDR). In accordance with the newly adopted 2019 General WDR, the treated effluent used for land spray disposal or landscape irrigation must be able to meet Title 22 conventional pollutant parameters (e.g., biochemical oxygen demand, total suspended solids, total organic carbon, total nitrogen) as well as turbidity and total coliform limits.

In November 2018, the Woolsey Fire occurred and the detention facilities and WWTS were within the burn area. The original WWTS was damaged and the County installed a temporary packaged WWTS to allow residents to return to Campus Kilpatrick until repairs to the existing WWTS were completed. After further investigation, it was determined that the damage to the existing WWTS was so extensive that repairing the existing WWTS was considered infeasible and a decision was made to install a new WWTS instead. This determination was made in part because the new permanent WWTS must comply with the newly adopted 2019 General WDR, and this would require advanced On-site Wastewater Treatment Systems (OWTSs) that would be challenging to retrofit into the existing WWTS components during repair.

A detailed site selection process was undertaken to determine the preferred location for the new WWTS, with considerations including, but not limited to, environmental effects, future land use(s), maintenance access, constructability of new facilities, and cost-effectiveness. The existing WWTS site was eventually selected as the preferred location for the new, permanent WWTS. The distance from the detention facilities, presence of the existing concrete pad, potential to utilize existing facilities, and the most limited need for grading or other site work to install the new WWTS made the selected site the most desirable location.

Installation of the new WWTS is needed because the County is leasing the temporary WWTS. The temporary WWTS must remain in operation until the new permanent WWTS is installed and its operation approved by the LARWQCB. Additionally, consistent with the conditions of the Coastal Development Permit (CDP) acquired from the County Department of Regional Planning (DRP) pursuant to the Santa Monica Mountains Local Coastal Program (SMMLCP), the temporary WWTS must be removed and the area affected restored. Therefore, this preliminary review addresses both (1) installation and operation of the permanent WWTS and (2) removal of the temporary WWTS and subsequent habitat restoration of the impacted footprint.

2.2 ENVIRONMENTAL SETTING

The Campus Kilpatrick Wastewater Treatment Plant Project (Project) site is located within the County juvenile detention facilities on the north and south sides of Encinal Canyon Road in the unincorporated County and the Santa Monica Mountains. The City of Malibu is located approximately 3.5 miles to the south of the Project site along the Pacific Ocean coastline; the cities of Westlake Village and Thousand Oaks are located approximately 3 and 5 miles to the north and northwest, respectively. The County facilities are located on, and are immediately surrounded by, unincorporated County land that is largely undeveloped (i.e., undisturbed hillsides) with variable slopes. Parcels of National Park Service (NPS), State Parks, County, and private lands are interspersed throughout the surrounding area. The Project site is also within the Coastal Zone under the jurisdiction of the SMMLCP, which designates the Project site as P (Public and Semi-Public Facilities). The site is zoned IT (Institutional).

Developed land uses within approximately 0.5 mile of the developed portion of the Project site include an equestrian facility; scattered large-lot single-family residences; agricultural cultivation with row crops; and the Malibu Country Club. The next nearest receptors are three single-family homes accessed from Mulholland Highway that are located approximately 1,700 to 2,000 feet to the northwest of the nearest proposed WWTS components (i.e., recycled water tank and recycled water line terminus) and are about 250 to 300 feet higher in elevation than Campus Kilpatrick. Exhibit 1, Regional Location and Local Vicinity, depicts the Project site location and the surrounding land uses.

2.3 PROJECT DESCRIPTION

2.3.1 WWTS DESIGN

The design criteria of the permanent WWTS would be based on a Cloacina MEMPAC-M, which is a membrane bioreactor treatment package system with UV disinfection (MBR Plant). To help determine the appropriate sizing for the MBR Plant, the Probation Department provided the on-site population data presented in Table 1, Campus Kilpatrick Occupancy, below. It is noted that visitors are only allowed during the weekends and staff levels drop to 80 during this period. Therefore, the use of 140 staff at any given time at Campus Kilpatrick adequately represents the flux of staff and visitors throughout the week to estimate wastewater generation (i.e., influent).

**TABLE 1
CAMPUS KILPATRICK OCCUPANCY**

Population	Initial Occupancy	Maximum Occupancy
Residents	60	120
Staff ¹	140	140
<i>Totals</i>	<i>200</i>	<i>260</i>
¹ Total staff equal to 220 with a maximum of 140 staff on site at any one time. Source: Psomas 2020.		

The estimated influent flows were calculated based on 90 gallons per day (gpd) of wastewater generated for each resident and 25 gpd of wastewater generated for each staff. Future use(s) for the vacated Camp Miller property is unknown. As directed by the Probation Department, the sizing of the proposed MBR Plant was based on the addition of a 30 percent factor to accommodate potential future growth, and a 25 percent safety factor was applied to flow projections to allow for flexibility in the sizing of the MBR Plant. Based on these parameters and the occupancies



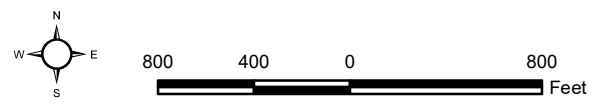
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Aerial Source: Esri, Maxar 2018

Regional Location and Local Vicinity

Exhibit 1

Campus Kilpatrick Wastewater Treatment System Replacement Project



presented in Table 1, the proposed MBR Plant will be designed to process initial (11,125 gpd), future (23,238 gpd), and maximum (34,857 gpd) flows generated by Campus Kilpatrick, and also possibly Camp Miller, without the need for future expansion of the WWTS system. The permit design capacity of the former WWTS is 45,000 gpd, and, as of 2018, the design flow was 20,100 gpd (Lee & Ro, Inc.). Please see Table 2, below, for a summary of the proposed WWTS flow calculations. As shown, future flows, which are conservatively estimated with both a 25 percent safety factor and a 1.5 peaking factor is below the design capacity (45,000 gpd) of the former WWTS.

**TABLE 2
ESTIMATED DAILY WASTEWATER GENERATION**

Population	Generation Factor	Generation in Gallons per Day		
		Flows at Initial Occupancy	Flows at Maximum Occupancy	Future Flows (30% Factor over Max Occupancy)
Residents	90	5,400	10,800	14,040
Staff	25	3,500	3,500	4,550
<i>Totals</i>	<i>N/A</i>	<i>8,900</i>	<i>14,300</i>	<i>18,590</i>
With 25% Safety Factor		11,125	17,875	23,238
Maximum Daily Flow with Peaking Factor of 1.5 over Future Flows				34,857
Source: Psomas 2020.				

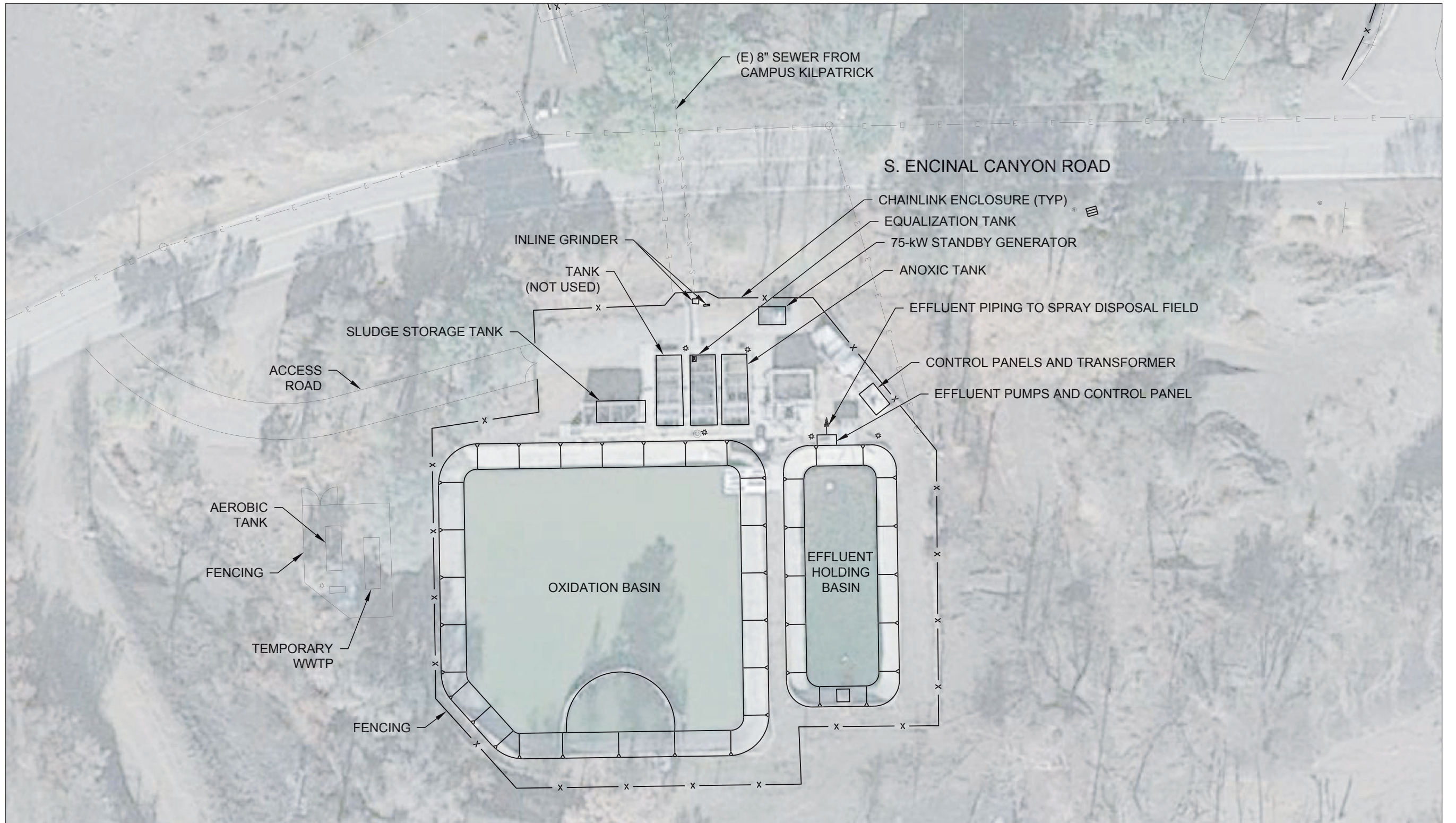
Additionally, the proposed MBR Plant with UV-disinfection would be designed to meet the LARWQCB effluent limits as presented in the 2019 WDR. The MBR Plant drawings and technical data must be submitted to the LARWQCB for review and approval prior to operation of the permanent MBR Plant. Subsequent to installation of the permanent WWTS, with approval from the LARWQCB to discharge, a portion of the recycled water meeting Title 22 regulations for disinfected tertiary recycled water can be used to irrigate Campus Kilpatrick’s landscaping and athletic fields. There would be sufficient recycled water to supply 100 percent of the anticipated landscape irrigation demand without the need for supplemental potable water or seasonal recycled water storage. The proposed recycled water storage tank would be installed above the existing irrigation system point of connection and would provide storage for two days of recycled water in peak season (i.e., July). Excess recycled water would be discharged to the existing spray disposal field by manually operating isolation valves to redirect the recycled water from the recycled water storage tank to the existing spray disposal fields.

Exhibit 2 shows the existing WWTS configuration, and Exhibit 3 shows the permanent WWTS configuration south of Encinal Canyon Road. Exhibits 4a and 4b show the proposed alignment of the new recycled water lines and the location of the new recycled water storage tank.

2.3.2 WWTS COMPONENTS

Wastewater flows from Campus Kilpatrick would flow via a new 10-inch (in) sewer line, including a portion that crosses Encinal Canyon Road, to a new lift station and then to the MBR Plant, both situated on the existing WWTS concrete pad. Sludge produced from the MBR Plant would be pumped to an existing, relocated sludge storage tank at the existing WWTS site and hauled off-site. Treated effluent would then be pumped via a portion of the existing recycled water line, including the length that crosses Encinal Canyon Road, and a new 4-in recycled water line. The recycled water line would connect to the new recycled water storage tank that would be located on the vacant area to the north of the northeastern most building at Campus Kilpatrick. The new utility lines required for the Project are discussed further below. The existing recycled water pipe

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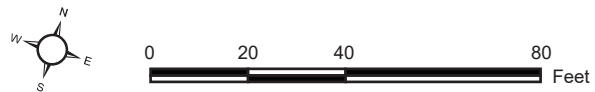


Source: Psomas, 2020

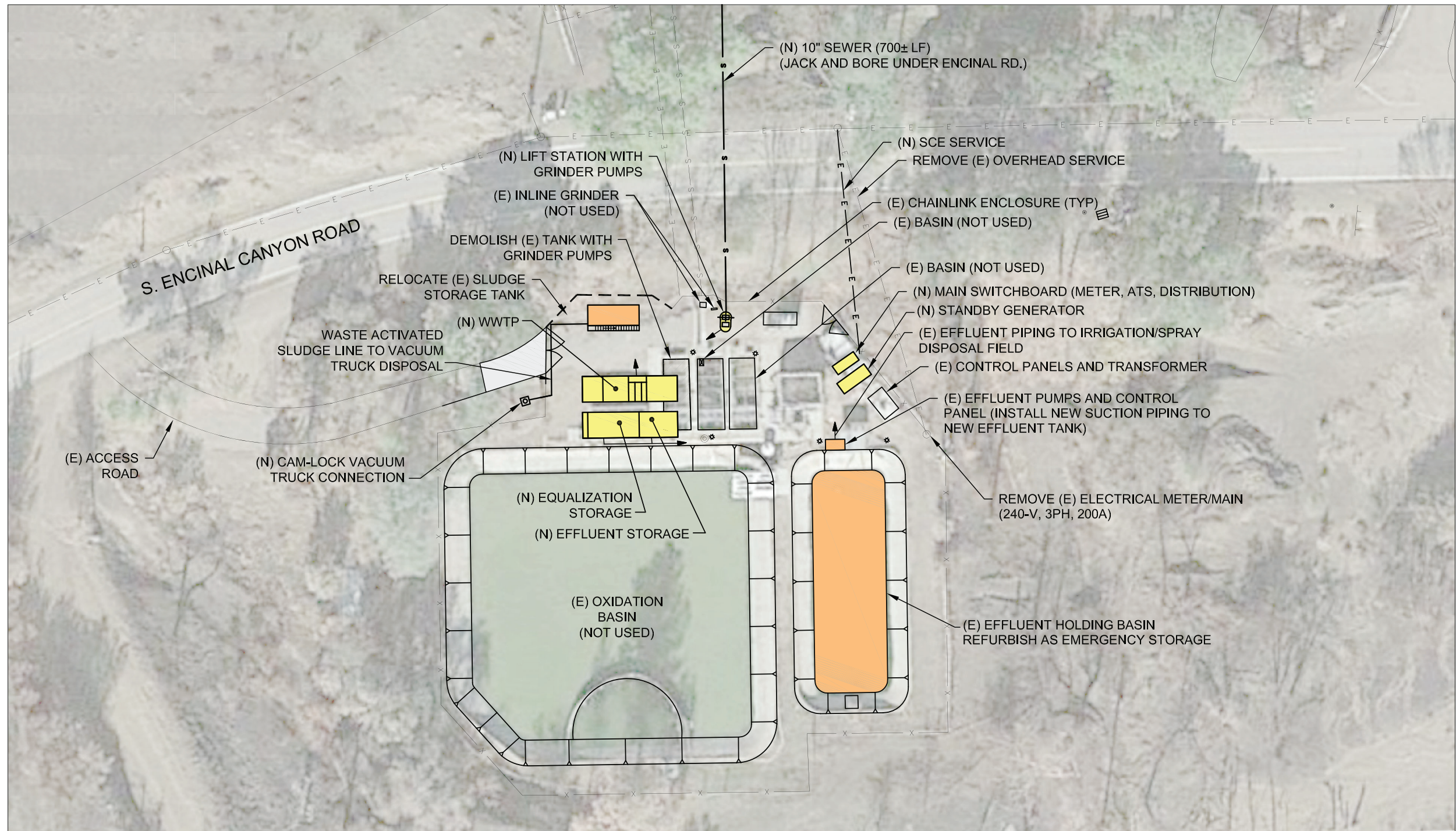
Existing WWTP and Temporary WWTP Configuration

Exhibit 2

Campus Kilpatrick Wastewater Treatment System Replacement Project



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NOTE:

1. SEE FIGURE 3-2 FOR COMPREHENSIVE MBR WWTP PROCESS SCHEMATIC.
2. (E) WWTP TO REMAIN IN SERVICE UNTIL (N) WWTP IS OPERATING.
3. (NOT USED) = NOT REQUIRED FOR NEW WWTP SYSTEM.

LEGEND

	REUSE EXISTING FACILITY
	PROPOSED EQUIPMENT
	PROPOSED PAVING IMPROVEMENTS
(E)	EXISTING
(N)	NEW

Source: Psomas, 2020

Permanent WWTP Configuration

Campus Kilpatrick Wastewater Treatment System Replacement Project

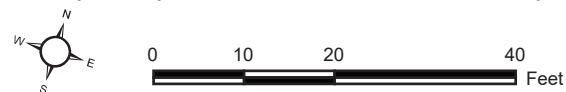
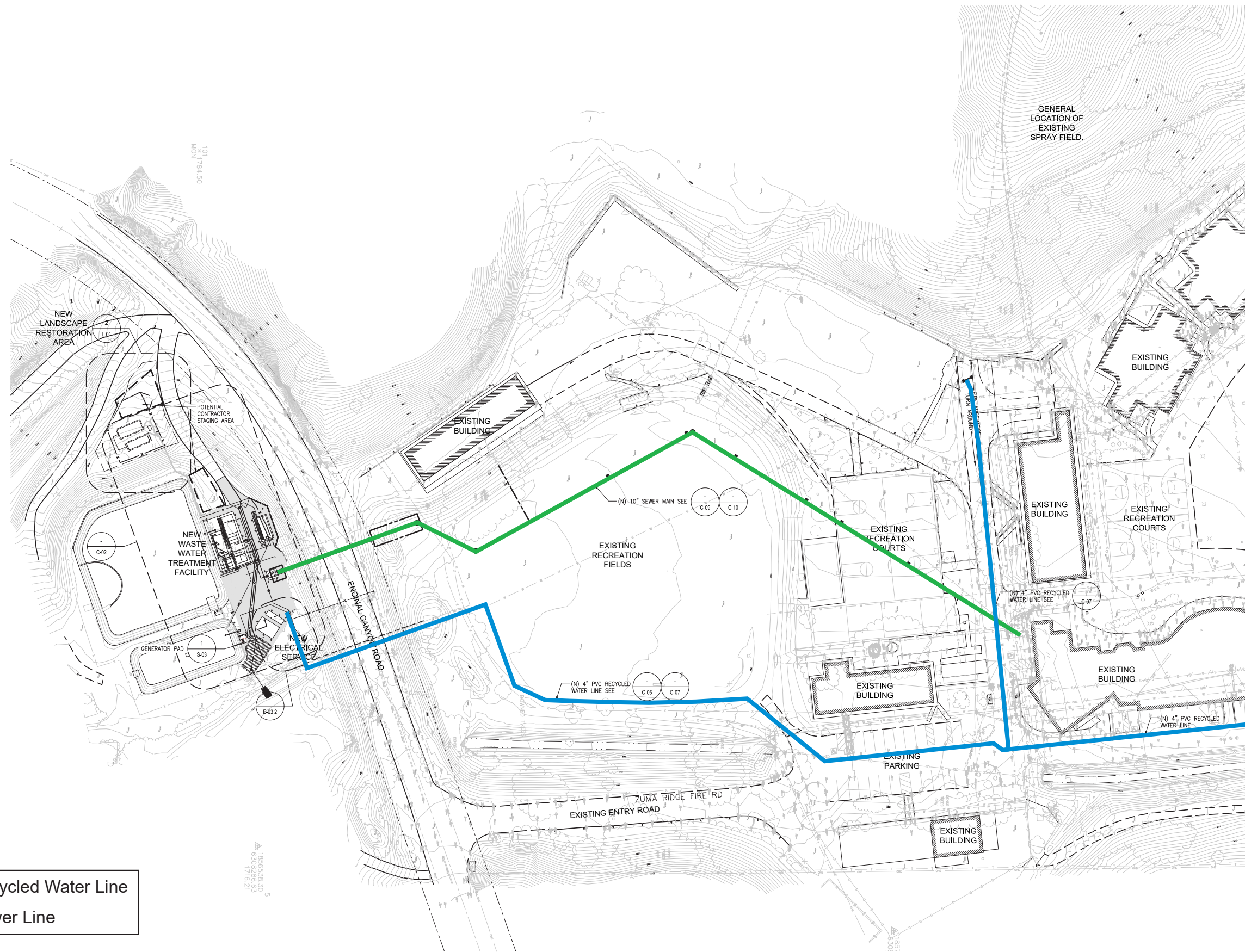


Exhibit 3



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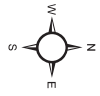
- Proposed Recycled Water Line
- Proposed Sewer Line

Source: PBWS Architects, 2021

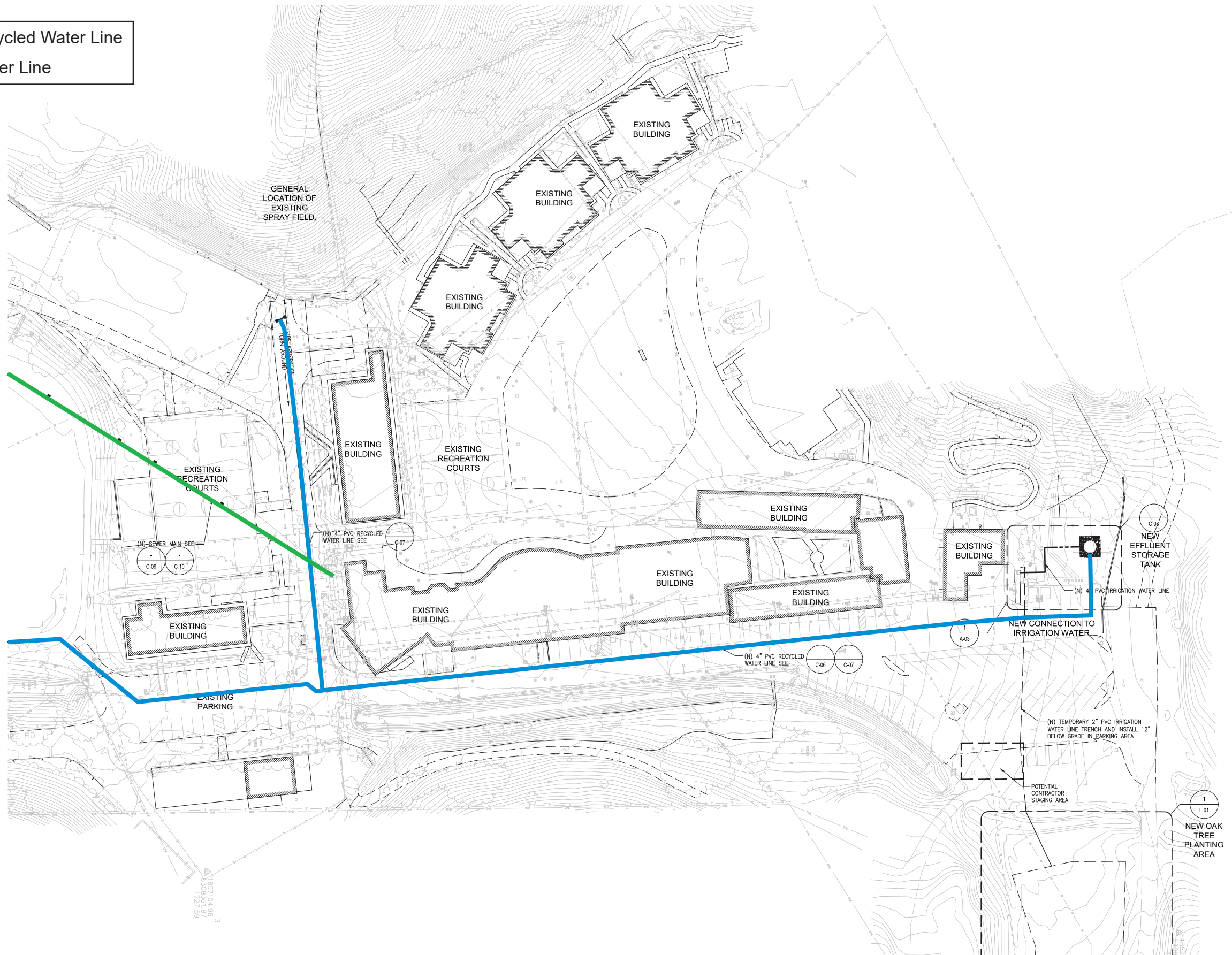
Locations of Sewer Line, Recycled Water Line, and Recycled Water Storage Tank

Exhibit 4a

Campus Kilpatrick Wastewater Treatment System Replacement Project



— Proposed Recycled Water Line
— Proposed Sewer Line



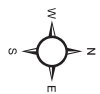
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Source: PBWS Architects, 2021

Proposed Locations of Sewer Line, Recycled Water Line, and Recycled Water Storage Tank

Exhibit 4b

Campus Kilpatrick Wastewater Treatment System Replacement Project



to the existing spray disposal field would be modified as required to deliver water to the new recycled water tank for irrigation. In the event of an emergency, effluent overflows from the permanent WWTS system would be directed to the proposed emergency storage pond (existing effluent pond to be converted to emergency storage) at the existing WWTS site, via pipelines extending from both the sludge tank and the effluent storage tank. Stormwater runoff would be collected in a three-foot-wide concrete ribbon gutter that would drain into a biofiltration basin northeast of the recycled water storage basin at the existing WWTS. The biofiltration basin would be piped to the new package lift station for drainage.

The new permanent WWTS components would be almost entirely located within the existing fenced perimeter at the existing WWTS location. Within this perimeter, the MBR Plant and related infrastructure would be situated on a 1,369-square foot (sf) reinforced concrete pad, which is a replacement of an existing 254 sf concrete pad. This expanded foundation would be located entirely on the existing gravel-covered surface within the WWTS site. The relocated sludge tank would also be located on a new reinforced concrete pad. This 722-sf pad would require a 330-sf expansion of the existing WWTS site; the existing chain link fence would be removed and replaced with an 8-foot-high and 56-foot-long retaining wall along the northwestern portion of the site (see Exhibit 3) to provide adequate space and support the weight of the relocated sludge tank and related infrastructure. A 3-foot-wide concrete swale, occupying an approximate 168 sf, would be installed on the north side of the retaining wall to collect and drain runoff. The proposed 10-in sewer line, 4-in recycled water line, 4-in electrical conduit, and recycled water storage tank would be the only new components situated outside the existing WWTS site.

Demolition and Relocation

To make space for the permanent WWTS components within the existing WWTS area, some existing facilities that are not going to be incorporated into the Project would be demolished. Other components would be relocated. The components to be demolished or relocated are within the existing WWTS concrete pad and are detailed on Exhibits 5 and 6.

Utilities and Access

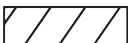
The existing 8-inch sewer pipe extending between the existing WWTS to Campus Kilpatrick is at the end of its useful life and requires replacement. Therefore, the Project includes the installation of approximately 700 linear feet (lf) of new 10-in sewer line between the WWTS and a connection point located immediately south of the Campus Kilpatrick administration buildings; and approximately 1,837 lf of 4-in recycled water line between the WWTS and a connection point located immediately west of the former Camp Miller kitchen building and a connection point at the proposed recycled water storage tank. Jack and bore (directional boring) operations would be used for installation of the new sewer line across Encinal Canyon Road. The segment of the recycled water line crossing Encinal Canyon Road would be located within an existing culvert and would replace the existing recycled water line attached to the side of the culvert crossing. The remainder of the proposed sewer line and proposed recycled water line would be installed by trenching.

As mentioned above, both the commercial power and the standby power sources at the existing WWTS are undersized to accommodate the power requirements for the new permanent WWTS. Installation of the new MBR Plant would require a new 480-V service from Southern California Edison (SCE). A set of new pole-mounted transformers would be installed by SCE on the existing utility pole on the north side of Encinal Canyon Road (within the public right-of-way). Within the existing WWTS site, electrical improvements would include: a new main switchboard with a meter/main breaker section, Automatic Transfer Switch (ATS), and Distribution Section; and a new 175-kilowatt (kW) rated standby generator. The generator would be housed in a sound-

NOTES TO CONTRACTOR

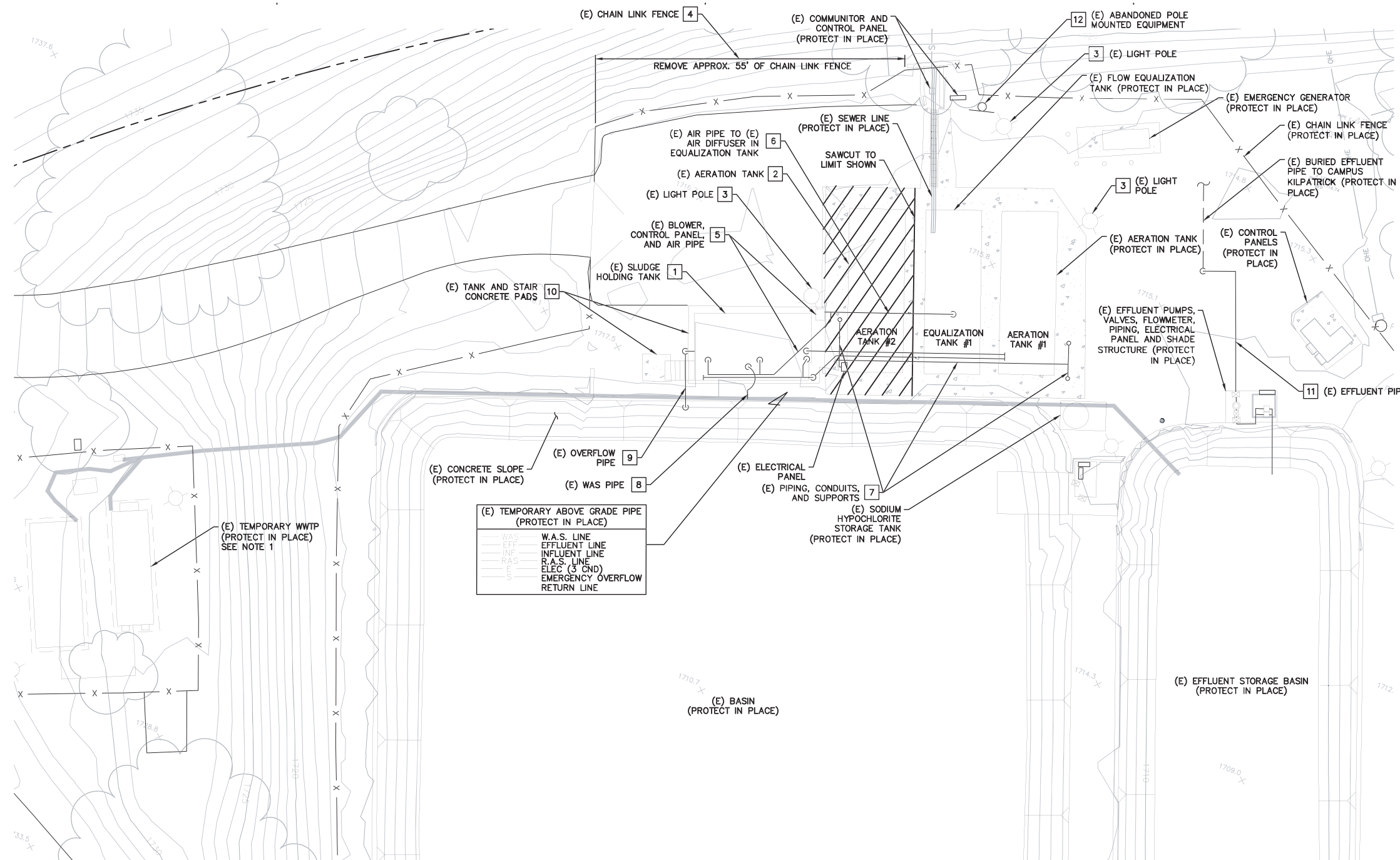
- (E) WWTP TO REMAIN IN SERVICE UNTIL (N) WWTP IS OPERATING. SEE "WWTP SHUTDOWN CRITERIA", THIS SHEET.
- CONTRACTOR RESPONSIBLE FOR SLUDGE REMOVAL DURING RELOCATION OF SLUDGE TANK.
- CONTRACTOR TO MINIMIZE DOWNTIME OF WWTP. SEE "WWTP SHUTDOWN CRITERIA" THIS SHEET.
- SEE "GEOTECHNICAL INVESTIGATION FOR IMPROVEMENTS AND REPLACEMENTS WASTEWATER TREATMENT PLANT CAMP KILPATRICK" PREPARED BY RMA GROUP AND DATED JULY 30, 2020. THIS REPORT IS INCLUDED IN THE CONTRACT DOCUMENTS AS APPENDIX "A".
- SEE ELECTRICAL SHEETS FOR ELECTRICAL DEMOLITIONS.
- ALL DEMOLITIONS SHALL BE IN ACCORDANCE WITH ALL LOCAL, COUNTY, STATE, AND FEDERAL REQUIREMENTS.

LEGEND

-  DEMOLISH FACILITY
- (E) EXISTING
- (N) NEW

DEMOLITION NOTES

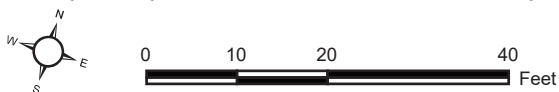
- RELOCATE (E) SLUDGE HOLDING TANK, STAIRS, AND WALKWAY. SEE SHT C-01 AND C-02 FOR NEW LOCATION. SEE NOTE 2.
- DEMOLISH AND REMOVE (E) CONCRETE TANK, GUIDE RAILS, PIPE, AND ELECTRICAL PANEL COMPLETE IN PLACE. SEE NOTE 4 FOR DEMOLITION OF CONCRETE TANK.
- RELOCATE (E) LIGHT AND POLE. SEE SHT C-01 FOR NEW LOCATION (THREE TOTAL).
- DEMOLISH AND REMOVE PORTION OF (E) CHAIN LINK FENCE COMPLETE IN PLACE.
- RELOCATE (E) BLOWER, PORTION OF AIR PIPE AND BLOWER CONTROL PANEL PER SHT C-04.
- DEMOLISH AND REMOVE PORTION OF (E) AIR PIPE FROM BLOWER TO (E) EQUALIZATION TANK AIR DIFFUSERS. RECONNECT (E) AIR DIFFUSERS TO (E) BLOWER. SEE SHT C-04.
- DEMOLISH AND REMOVE ABOVE GRADE PORTIONS OF (E) PIPING, CONDUIT, AND SUPPORTS.
- MODIFY (E) WAS PIPE. SEE SHT C-04.
- MODIFY (E) SLUDGE TANK OVERFLOW PIPE. SEE SHT C-04.
- DEMOLISH AND REMOVE (E) SLUDGE HOLDING TANK AND STAIR CONCRETE PADS.
- DEMOLISH AND REMOVE ABOVE GRADE PORTION OF (E) 3" GALVANIZED STL EFFLUENT PIPE AND FITTINGS. SEE SHT C-04 FOR (N) EFFLUENT PIPE. SEE NOTE 3.
- DEMOLISH AND REMOVE (E) ABANDONED POLE MOUNTED EQUIPMENT AND CONCRETE BASE COMPLETE.



(E) TEMPORARY ABOVE GRADE PIPE (PROTECT IN PLACE)	
WAS	W.A.S. LINE
EFF	EFFLUENT LINE
INF	INFLUENT LINE
R.A.S.	R.A.S. LINE
ELEC (3 CND)	ELEC (3 CND)
S	EMERGENCY OVERFLOW RETURN LINE

Existing WWTP Demolition Plan Phase 1

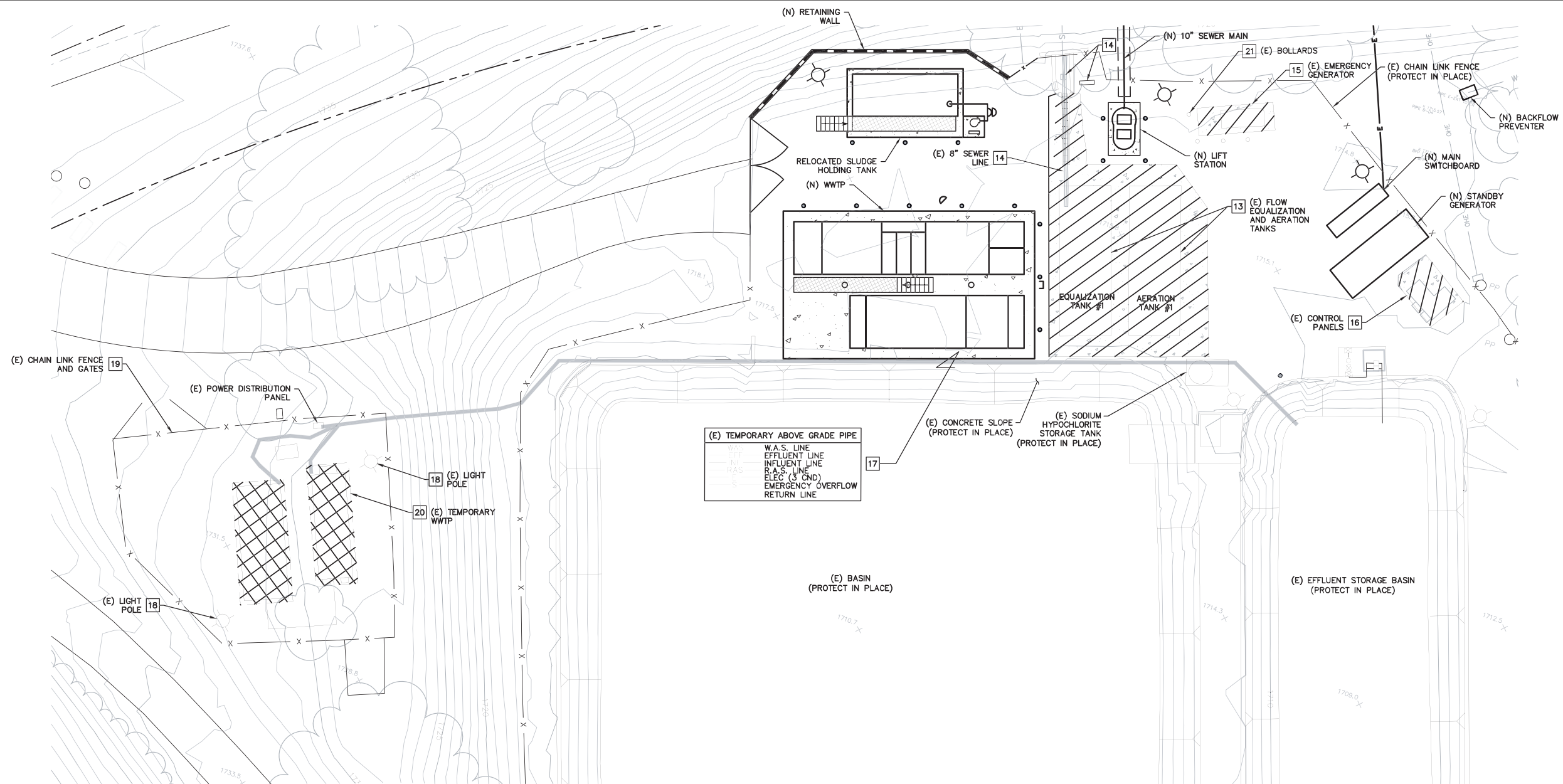
Campus Kilpatrick Wastewater Treatment System Replacement Project



Source: Psomas, 2020

Exhibit 5







DEMOLITION PLAN - PHASE 2

NOTES TO CONTRACTOR

1. SEE ELECTRICAL SHEETS FOR ELECTRICAL DEMOLITIONS.
2. ALL DEMOLITIONS SHALL BE IN ACCORDANCE WITH ALL LOCAL, COUNTY, STATE, AND FEDERAL REQUIREMENTS.
3. CONTRACTOR TO MINIMIZE DOWNTIME OF WASTEWATER TREATMENT PLAN. SEE "WWTP SHUTDOWN CRITERIA" THIS SHEET.
4. SEE "GEOTECHNICAL INVESTIGATION FOR IMPROVEMENTS AND REPLACEMENTS WASTEWATER TREATMENT PLANT CAMP KILPATRICK" PREPARED BY RMA GROUP AND DATED JULY 30, 2020. THIS REPORT IS INCLUDED IN THE CONTRACT DOCUMENTS AS APPENDIX "A".

LEGEND

-  DEMOLISH FACILITY
-  DEMOLISH FACILITY (BY OTHERS)
- (E) EXISTING
- (N) NEW

DEMOLITION NOTES

13. DEMOLISH AND REMOVE TOP 5' OF (E) FLOW EQUALIZATION AND AERATION CONCRETE TANKS INCLUDING PUMPS, AIR DIFFUSERS, PIPING, ELECTRICAL, HANDRAILS, GRATED TRENCH DRAIN, AND ALL OTHER ASSOCIATED APPURTENANCES. SEE NOTE 4 FOR DEMOLITION OF CONCRETE TANKS.
14. DEMOLISH AND REMOVE (E) GRINDER, CONCRETE WINGWALLS, 8" SEWER PIPE, GRINDER ELECTRIC PANEL COMPLETE. PLUG (E) 8" SEWER.
15. DEMOLISH AND REMOVE (E) EMERGENCY GENERATOR PER SHT E-3.3; DEMOLISH AND DISPOSE OF CONCRETE FOUNDATION COMPLETE.
16. DEMOLISH AND REMOVE (E) ELECTRIC DISTRIBUTION EQUIPMENT PER SHT E-3.4; DEMOLISH AND DISPOSE OF CONCRETE FOUNDATION COMPLETE.
17. DEMOLISH AND REMOVE (E) ABOVE GRADE TEMPORARY WWTP PIPING AND CONDUITS.
18. DEMOLISH AND REMOVE (E) LIGHT AND CONCRETE FOUNDATION COMPLETE.
19. DEMOLISH AND REMOVE (E) CHAIN LINK FENCE, GATE, POSTS, AND CONCRETE FOUNDATIONS COMPLETE.
20. (E) WWTP EQUIPMENT TO BE REMOVED BY OTHERS. CONTRACTOR TO REMOVE ALL ASSOCIATED PIPING, CONDUITS, AND APPURTENANCES NOT REMOVED BY OTHERS.
21. DEMOLISH (E) BOLLARDS SURROUNDING (E) EMERGENCY GENERATOR PER SHT E-3.3.

Source: Psomas, 2020

Existing WWTP Demolition Plan Phase 2

Campus Kilpatrick Wastewater Treatment System Replacement Project

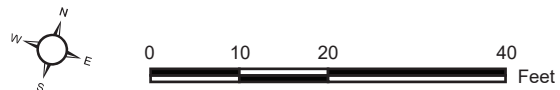


Exhibit 6

attenuated, weatherproof enclosure and have a base-mounted, 350-gallon diesel fuel tank with tank level and over-fill sensors. The generator would comply with South Coast Air Quality Management District (SCAQMD) requirements and have a diesel particulate filter to mitigate the emissions due to the close proximity to Campus Kilpatrick. Outside the existing WWTS site, a single 4-in electrical service conduit would be installed underground using directional boring, consistent with SCE Standards CD-125, from the main switchboard inside the WWTS site to the SCE utility pole outside the WWTS site on the north side of Encinal Canyon Road; it would be the Contractor's responsibility to install the service conduit per SCE specifications and drawings. Subsequent to conduit installation, SCE would run the electrical line through the conduit and connect to the SCE transformers. Exhibit 7, Service Conduit Specifications, shows the SCE specifications for the underground service conduit.

The eastern end of the access road is proposed to be widened slightly where the road meets the fencing. The purpose of this widening is to allow safe access as well as turnaround of larger vehicles. The widening at the end of the access road encompasses a total of approximately 26 sf of area.

2.3.3 CONSTRUCTION SCENARIO

The proposed Project would be constructed in one phase lasting approximately 12 months, anticipated to start in Summer 2021. The County will construct the Project during an 8-hour period within the 9-hour period of 7:00 AM and 4:00 PM Monday through Friday. There would be no construction activity on Saturday or Sunday, federal holidays that occur on weekdays, or at nighttime.

Equipment staging and parking for construction workers would be on County property, either within the disturbance limits at the WWTS or at the Camp Miller/Campus Kilpatrick sites. Construction would not require staging within the travel lanes of Encinal Canyon Road that would disrupt existing traffic patterns. It is possible that during the jack-and-bore operations for the new sewer line under Encinal Canyon Road, one or more vehicles or construction crew may temporarily be adjacent to or within the public right-of-way (ROW) adjacent to the paved travel lanes. However, every effort would be made to have all construction activity remain outside of the ROW for the safety of the public and the construction crew. Private construction workers' vehicles/pickup trucks would arrive and depart the Project site each workday. No street or lane closures, or street improvements, would be required to implement the Project.

Construction and demolition debris would be disposed of at Calabasas Landfill, located approximately 20 miles from the site, at 5300 Lost Hills Road in Agoura Hills. Demolition is anticipated to generate approximately 1,035 cubic yards (cy) of concrete and 36 cy of pavement that would be disposed off-site; this equates to an estimated 89 truck trips (round trip; 178 one-way trips) over the course of about 2 months, or about a 4 or 5 one-way trips per workday.

Earthmoving (i.e., grading and excavation) would be limited to areas of localized grading related to the access road (26 sf), WWTS site expansion with retaining wall and adjacent concrete swale (498 sf), recycled water tank pad (400 sf) that would be balanced on site. Approximately 1,300 cy of excavation would be required for trenching of the new sewer line. There would be a total of approximately 10,000 sf of area outside of the existing WWTS fence line that would be disturbed as part of Project implementation, including the recycled water line alignment. Much of this excavation would be used as backfill in the sewer line trench. For purposes of this analysis, to provide a conservative assessment it is assumed that approximately one-third of the excavated soils (435 cy) would be exported for disposal. This equates to an estimated 31 truck trips (round trip; 62 one-way trips) over the course of about 2 months, or 4 to 5 one-way trips per workday. Implementation of the proposed Project would require reuse or recycling of 50 percent of the

- 1 EXISTING 4456651E**
 Class H1
 50'
 RM: 1- TR OH 3-25KVA 16KV 120/240CD 120/208Y
 SN: _____
 SN: _____
 SN: _____
 RM: 1- FE CO MNT FOR ELF W/10' XA 100A 16KV 3P
 RM: 3- FE FUSE ELF 15KV 6A
 RM: 3- INS POLY W/PIN 16(25)KV CLMP #4-336 ACSR
 RM: 110- CD #4 STR AL QUADRUPLX W/ACSR NEUTRAL
 RM: 1- MTR KWH 15A 120/240 3P 4W
 RM: 1- SEC ROLLER (166-CLEVIS & SPOOL)
 RM: 1- RSR 3" TO 2" EXTENSION
 IN: 1- TR OH 3-25KVA 16KV 277/480Y 3P
 SN: _____
 SN: _____
 SN: _____
 IN: 1- XA SNGL DE HD COMP 10' W/BKT
 IN: 3- FE CO MNT FOR ELF 100A 16KV 1-EA
 IN: 3- FE FUSE ELF 15KV 6A
 IN: 3- INS POLY PIN 16KV VRT VICE NYLON
 IN: 1- RSR 4" TO 3" EXTENSION
 IN: 1- RSR PRECUT UNISTRUT W/ HARDWARE NO PVC
 IN: 1- TM 3-350 & 1-4/0 600V 3P UG TO OH
 IN: 1- CNN HYLUGS PM 3-350 1-4/0 12/16KV 3P
 IN: 130- CBL (3) 350 MCM, (1) 4/0 600V CLP PLEX
 IN: 1- RSR 3" TO 2" EXTENSION
 IN: 1- RSR PRECUT UNISTRUT W/ HARDWARE NO PVC
 IN: 1- MTR XRANGE CT BAR TO 600/5 277/480 3P 4W

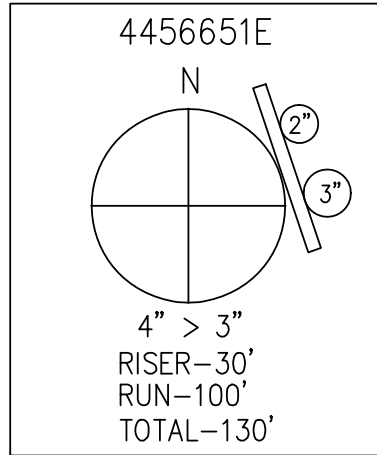
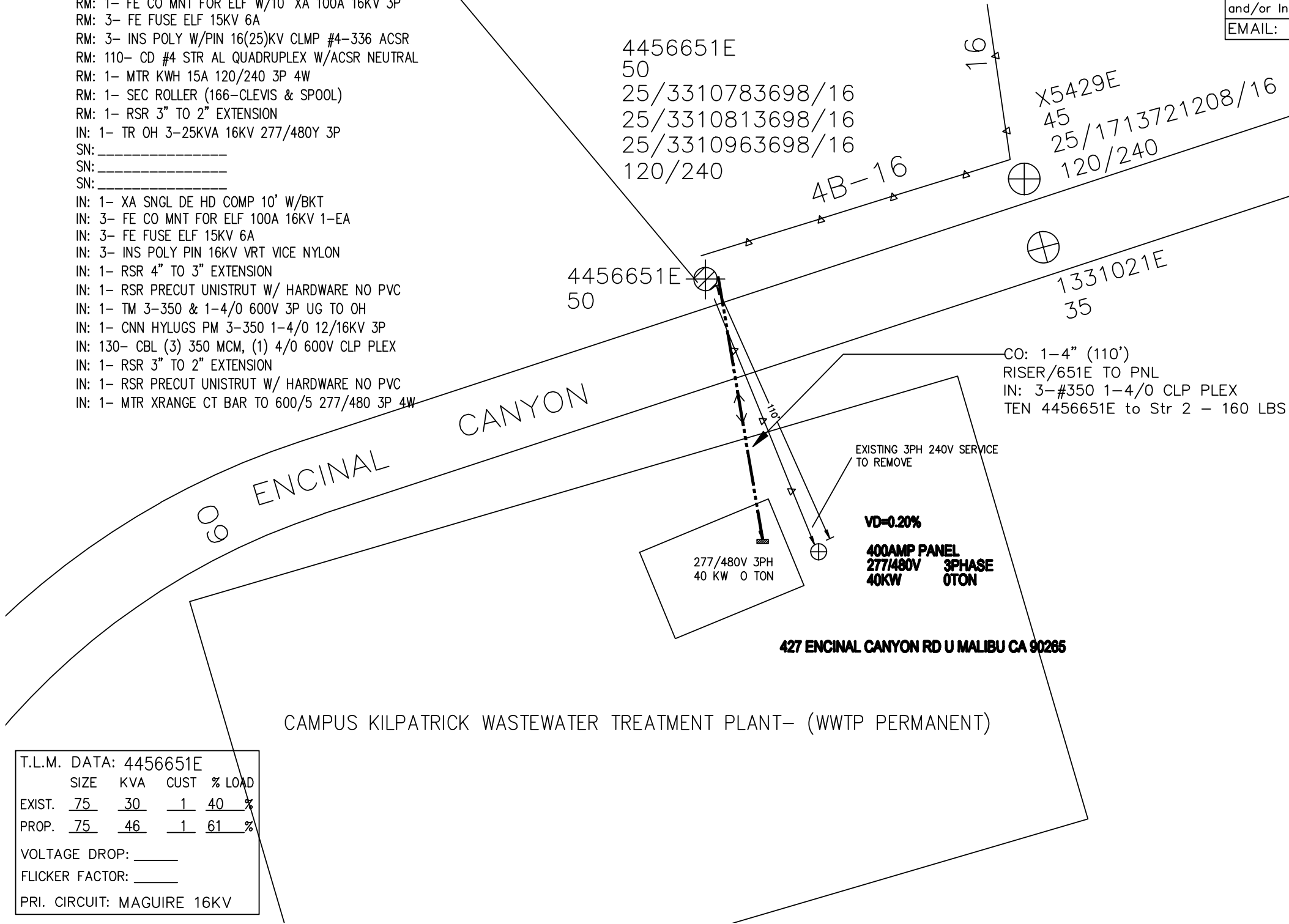
DUCT AND STRUCTURE INSPECTOR
 NAME: RYAN SOCIA
 PHONE: (805) 603-5367

SCE Inspection
 Contact SCE 48 Hours in advance
 for a Pre-Construction meeting
 and/or Inspection.
 EMAIL: RYAN.SOCIA@SCE.COM

PROJECT REQUIREMENTS (Y/N)

EDISON EASEMENT REQUIRED	<input type="checkbox"/>
PWRD 88 REQUIRED	<input type="checkbox"/>
UG CIVIL ONLY WORK ORDER	<input type="checkbox"/>
PERMIT REQUIRED	<input checked="" type="checkbox"/>
PERMIT TYPE: TRAFFIC	
OUTAGE REQUIRED	<input type="checkbox"/>
OUTAGE DATE: _____ TIME: _____	
TRAFFIC CONTROL REQUIRED	<input checked="" type="checkbox"/>
PED. TRAFFIC CONTROL REQ'D	<input type="checkbox"/>
CONVEYANCE LETTER REQ'D	<input type="checkbox"/>
ENVIRONMENTAL CLEARANCE REQ'D	<input type="checkbox"/>
CSD 140 (TLM) REQ'D	<input type="checkbox"/>

D124: Rev. 02/08/18



T.L.M. DATA: 4456651E

SIZE	KVA	CUST	% LOAD
EXIST. 75	30	1	40 %
PROP. 75	46	1	61 %

VOLTAGE DROP: _____
 FLICKER FACTOR: _____
 PRI. CIRCUIT: MAGUIRE 16KV

Source: Turpin & Rattan, 2020

Service Conduit Specifications

Campus Kilpatrick Wastewater Treatment System Replacement Project



Exhibit 7



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debris generated to meet the County's Construction and Demolition (C&D) Debris Recycling and Reuse Ordinance.

2.4 TEMPORARY WWTS DECOMMISSIONING AND SITE RESTORATION

As mentioned above, the emergency CDP for the temporary WWTS requires that the area disturbed by installation of this facility be restored. This restoration would be a separate action subsequent to the proposed WWTS installation and would be conducted by a separate contractor.

Installation of the temporary WWTS required surficial grading and placement of gravel in an area of approximately 1,940 sf. In the aftermath of the Woolsey Fire, essentially no shrub or herbaceous vegetation was present in this area. However, prior to the fire and installation of the temporary WWTS, this area contained disturbed chamise chaparral and sage scrub vegetation types, which included native plant species such as chamise and black sage along with non-native species such as black mustard and non-native grasses.

Restoration of the gravel pad area would involve minimal surficial grading to remove the gravel base and re-create pre-installation topography, which slopes gradually in a southerly direction. An area of approximately 3,675 sf, inclusive of the temporary WWTS site, would be restored. Native plant species, primarily shrubs and groundcover species consistent with the pre-fire vegetation types present in the area, would be established to stabilize the soil and avoid passive growth of non-native, weedy pioneer species in the pad area that may subsequently invade adjacent H1 habitat areas. The original soil conditions would be restored to facilitate germination of new plants, which may involve decompaction to a depth of six inches to one foot. The plant installation would result in minimal surface disturbance as it would be focused on dispersing a seed mix of appropriate plant species. Finally, a temporary irrigation system would be installed. This is expected to be stubbed from the new permanent WWTS, using a small portion of the tertiary treated effluent to establish the restored vegetation. The temporary irrigation system would be removed after the Project biologist determines that the native plant species are established.

The placement of the temporary WWTS also encroached on one existing coast live oak tree (tree number 801). Encroachment—soil disturbance within the tree's protected zone—occurred within 3 feet of this tree's trunk, which requires replacement planting at a rate of 10:1 per the Santa Monica Mountains Local Coastal Program. Replacement planting consistent with all conditions of the CDP required for the Project would occur immediately east of the northernmost Campus Kilpatrick buildings and adjacent parking lot.

The precise plant palette, details of the irrigation system, and oak tree locations would continue to be refined through consultation with the DRP Coastal Unit as part of the CDP process, which was ongoing at the time this Preliminary Review was prepared. However, for the purposes of this analysis, the above-described information is sufficient to assess potential impacts of the temporary WWTS decommissioning and site restoration.

2.5 PERMANENT WWTS MAINTENANCE

Long-term maintenance of the permanent WWTS would involve 1) the estimated quarterly sludge removals by a single, 10,000-gallon tanker-trailer and 2) routine inspection and maintenance of the WWTS and connected infrastructure (e.g., sewer line, recycled water tank, transformer) by County ISD staff. For routine inspection and maintenance, generally one or two vehicles with one or two workers, would be involved. These may be ISD staff that would already be present for maintenance of other infrastructure at Campus Kilpatrick or visits expressly for the WWTS facility. The vehicles would access the site either via the access road off Encinal Canyon Road to the south or via Miller Probation Camp Drive off Encinal Canyon Drive to the north.

SECTION 3.0 ENVIRONMENTAL CHECKLIST FORM

	3.1 <u>AESTHETICS</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The *Los Angeles County General Plan Update Draft Environmental Impact Report* (EIR) states that there are no specific views or corridors identified for conservation purposes. However, long-range views of, and from, the mountain ranges and hills throughout the Los Angeles basin are noted as a scenic resource (LACDRP 2014). Scenic vistas from the Project site include views of the surrounding Santa Monica Mountains. The surrounding hillsides ascend from the site with varying steepness. Because of the site topography, public views of the Project site are limited. Temporary views of the WWTS and Campus Kilpatrick may be seen intermittently by motorists on Encinal Canyon Road. However, the new WWTS infrastructure would be visually similar to what is present at the existing WWTS. Also, the proposed recycled water storage tank would be situated almost ¼-mile from Encinal Canyon Road and would not be noticeable to passing motorists. Finally, neither the proposed recycled water storage tank that would be located northeast of the Campus Kilpatrick support buildings nor the proposed WWTS infrastructure would obstruct views of the surrounding hillsides from within site. Therefore, neither short-term construction nor long-term operation of the Project would reduce or otherwise alter distant mountain views in or near the site. There would be no impact related to a scenic vista, and no mitigation is required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The nearest designated or eligible State scenic highways include State Route (SR-) 1 (Pacific Coast Highway) located approximately 4.0 miles south of the site, and Interstate (I-) 101 located approximately 4.25 miles north of the site (Caltrans 2020). Because of distance and intervening topography, the Project site is not visible from either of these highways. Construction

and operation of the Project would not substantially damage scenic resources within a designated scenic highway. There would be no impact, and no mitigation is required.

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

No Impact. As discussed under Threshold 2.1a, because of the site topography, public views of the Project site are limited. Temporary views of the WWTS and Campus Kilpatrick may be seen intermittently by motorists on Encinal Canyon Road. The new WWTS infrastructure would be visually similar to what is present at the existing WWTS. Also, the proposed recycled water storage tank would be situated almost ¼-mile from Encinal Canyon Road and would not be noticeable to passing motorists. Therefore, neither construction nor operation of the Project would substantially degrade the existing visual character or quality of public view of the site and its surroundings. There would be no impact, and no mitigation is required.

- d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

No Impact. Construction-related activities would not introduce new sources of substantial light or glare to the Project site or the surrounding area. No construction activities are proposed during the nighttime hours beyond 4:00 PM. There are two existing light poles at the WWTS facility; these would be relocated within the WWTS site as part of the Project. No new sources of light or glare would be introduced. There would be no impact related to light and glare from construction and operation of the Project, and no mitigation is required.

3.2	<u>AGRICULTURE AND FORESTRY RESOURCES</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

No Impact. The Project site and immediately surrounding area do not support any agricultural uses. The SMMLCP land use designation for the site is P (Public and Semi-Public Facilities), and the zoning is IT (Institutional). Review of maps by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) shows that the site is designated as Urban and Built Up Land. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or immediately adjacent to the site (FMMP 2020). Accordingly, there are no Williamson Act contracts applicable to the Project site. Therefore, no conversion of farmland or conflict with agricultural zoning would occur with the Project. Because the Project is not growth-inducing, it would not indirectly result in conversion of agriculture. There would be no impact to agriculture resources due to construction and operation of the Project, and no mitigation is required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As discussed under Threshold 2.2(a), there are no Williamson Act contracts applicable to the Project site, and the site is not zoned for agricultural use. There would be no impact to agriculture resources due to construction and operation of the Project, and no mitigation is required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code, Section 12220[g]), timberland (as defined by Public Resources Code, Section 4526), or timberland zoned Timberland Production (as defined by Government Code, Section 51104[g])?

No Impact. The Project site and surrounding area do not support any forest lands or timberland production activities. The SMMLCP land use designation for the site is P (Public and Semi-Public Facilities), and the zoning is IT (Institutional). Therefore, no conversion of forest land or conflict with forest zoning would occur with the Project. Because the Project is not growth-inducing, it would not indirectly result in conversion of forest lands. There would be no impact to forest resources due to construction and operation of the Project, and no mitigation is required.

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

No Impact. As discussed under Threshold 2.2(c), there are no forest lands on the Project site or surrounding areas, and the Project would not result in the loss or conversion of forest lands. There would be no impact to forest resources due to construction and operation of the Project, and no mitigation is required.

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

No Impact. The Project site and surrounding area do not support any agricultural uses, forest lands, or timberland production activities. The SMMLCP land use designation for the site is P (Public and Semi-Public Facilities), and the zoning is IT (Institutional). Review of maps by the California Department of Conservation FMMP shows that the site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2020). Accordingly, there are no Williamson Act contracts applicable to the Project site.

Therefore, no conversion of farmland or forest land or conflict with agricultural or forest zoning would occur with the Project. Because the Project is not growth-inducing, it would not indirectly result in conversion of agriculture or forest lands. There would be no impact to agriculture and forest resources due to construction and operation of the Project, and no mitigation is required.

3.3 <u>AIR QUALITY</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

REGULATORY SETTING

The Project site is in the Los Angeles County portion of the South Coast Air Basin (SoCAB). For air quality regulation and permitting, it is under the jurisdiction of the South Coast Air Quality Management District (South Coast AQMD). Both the U.S. Environmental Protection Agency (USEPA) and the State of California (State) have established health-based Ambient Air Quality Standards (AAQS) for air pollutants, which are known as “criteria pollutants”. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. The federal and State AAQS are shown in Table 3, California and National Ambient Air Quality Standards, on the following page.

Regional air quality is defined by whether the area has attained State and federal air quality standards, as determined by air quality data from various monitoring stations. Areas that are considered in “nonattainment” are required to prepare plans and implement measures that will bring the region into “attainment”. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as “maintenance”, and there must be a plan and measures established that will keep the region in attainment for the next ten years.

For the California Air Resources Board (CARB), an “unclassified” designation indicates that the air quality data for the area are incomplete and there are no standards to support a designation of attainment or nonattainment. Table 4, Attainment Status of Criteria Pollutants in the SoCAB, further below summarizes the attainment status of the SoCAB for the criteria pollutants.

**TABLE 3
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ^a	Secondary ^b
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM _{2.5}	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	–
SO ₂	24 Hour	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ^c	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	
Sulfates	24 Hour	25 µg/m ³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)		

O₃: ozone; µg/m³: micrograms per cubic meter; PM₁₀: large particulate matter; AAM: Annual Arithmetic Mean; PM_{2.5}: fine particulate matter; CO: carbon monoxide; mg/m³: milligrams per cubic meter; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; ppm: parts per million; km: kilometer; –: No Standard.

^a *National Primary Standards*: The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

^b *National Secondary Standards*: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^c On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016.

**TABLE 4
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN**

Pollutant	State	Federal
O ₃ (1-hour)	Nonattainment	Nonattainment
O ₃ (8-hour)		
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment/Nonattainment*
All others	Attainment/Unclassified	No Standards
O ₃ : ozone; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CO: carbon monoxide; NO ₂ : nitrogen dioxide; SO ₂ : sulfur dioxide. * Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards. Sources: USEPA 2020.		

O₃ is formed by photochemical reactions between NO_x and volatile organic compounds (VOCs) rather than being directly emitted. O₃ is the principal component of smog. Elevated O₃ concentrations cause eye and respiratory infection; reduce resistance to lung infection; and may aggravate pulmonary conditions in persons with lung disease. O₃ is also damaging to vegetation and untreated rubber. The entire SoCAB is designated as a nonattainment area for the State one-hour O₃ standard.

CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, headaches, and fatigue. The SoCAB is designated as an attainment area for federal CO standards.

NO₂ (a “whiskey brown”-colored gas) and nitric oxide (NO) (a colorless, odorless gas) are formed from combustion devices. These compounds are referred to as NO_x. NO_x is a primary component of the photochemical smog reaction. The severity of health effects of NO_x depends primarily on the concentration inhaled. Acute symptoms can include coughing, difficulty breathing, vomiting, headache, and eye irritation. Respiratory symptoms may also increase in severity after prolonged exposure.

SO₂ is a corrosive gas that is primarily formed from the combustion of fuels containing sulfur (e.g., from power plants) and heavy industry that use coal or oil as fuel. SO₂ irritates the respiratory tract and can result in lung disease and breathing problems for asthmatics. Atmospheric SO₂ also contributes to acid rain.

Lead is found in old paints and coatings, plumbing, and a variety of other materials including gasoline anti-knock additives. Once in the blood stream, lead can cause damage to the brain, nervous system, and other body systems. Children are highly susceptible to the effects of lead. However, lead emissions have significantly decreased due to the near elimination of the use of leaded gasoline.

Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air. Respirable particulate matter (i.e., PM10) derives from a variety of sources including road dust from paved and unpaved roads; diesel soot; combustion products; tire and brake abrasion; construction operations; and fires. Fuel combustion and certain industrial processes are primarily

responsible for fine particle (i.e., PM_{2.5}) levels. Coarse particles (PM₁₀) can accumulate in the respiratory system and aggravate health problems such as asthma. PM_{2.5} can deposit itself deep in the lungs and may contain substances that are harmful to human health.

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or in serious illness or that may pose a present or potential hazard to human health. TACs may be emitted from a variety of common sources, including motor vehicles, gasoline stations, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than the “criteria” pollutants previously discussed in that AAQS have not been established for them. TACs occurring at extremely low levels may still affect health, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts on human health are described by having carcinogenic risk and being chronic (i.e., of long duration) or acute (i.e., severe but of short duration). Diesel particulate matter (diesel PM) is a TAC and is responsible for the majority of California’s known cancer risk from outdoor air pollutants.

Sensitive Receptors

Sensitive receptors include, but are not limited to, children, the elderly, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. The Project area where the proposed WWTS is located is south of Campus Kilpatrick. Developed land uses within approximately 0.5 mile of the Project site, outside Campus Kilpatrick, include an equestrian facility, scattered large-lot single-family residences, agricultural cultivation with row crops, and the Malibu Country Club. The next nearest off-site receptors are the three single-family homes accessed from Mulholland Highway that are located approximately 1,700 to 2,000 feet to the northwest of the nearest proposed WWTS components (i.e., recycled water tank and recycled water line terminus). The nearest on-site sensitive receptors to the proposed WWTS components are at Campus Kilpatrick; portions of the recycled water line would be located adjacent to the campus buildings and approximately 670 feet north of the proposed WWTS south of Encinal Canyon Road. This is also where the majority of construction activity would occur.

Significance Criteria

Appendix G of the State CEQA Guidelines states that the significance criteria established by the applicable air quality management district may be relied upon to make significance determinations. The South Coast AQMD has established significance thresholds to assess the regional and localized impacts of Project-related air pollutant emissions; Table 5 on the following page presents the current significance thresholds.

**TABLE 5
SOUTH COAST AQMD AIR QUALITY SIGNIFICANCE THRESHOLDS**

Mass Daily Thresholds^a		
Pollutant	Construction	Operation
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TACs, Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic & Acute Hazard Index \geq 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ e for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants^{b, c}		
NO ₂ 1-hour average annual arithmetic mean	The South Coast AQMD is in attainment; the Project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^c & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM2.5 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^c & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (State) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (State)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20.0 ppm (State) and 35 ppm (federal) 9.0 ppm (State/federal)	
Lead 30-day average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (State) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	
<p>NOx: nitrogen oxides, lbs/day: pounds per day, VOC: volatile organic compound, PM10: respirable particulate matter with a diameter of 10 microns or less, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, SOx: sulfur oxides, CO: carbon monoxide, TACs: toxic air contaminants, GHG: greenhouse gases, MT/yr CO₂e: metric tons per year of carbon dioxide equivalents, NO₂: nitrogen dioxide, ppm: parts per million, $\mu\text{g}/\text{m}^3$: micrograms per cubic meter; South Coast AQMD: South Coast Air Quality Management District</p> <p>^a Source: South Coast AQMD CEQA Handbook (South Coast AQMD 1993) ^b Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated ^c Ambient air quality threshold is based on South Coast AQMD Rule 403</p> <p>Source: South Coast AQMD 2019</p>		

IMPACT ANALYSIS

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

Less than Significant Impact. The South Coast AQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. The South Coast AQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs).

On March 3, 2017, the South Coast AQMD adopted the 2016 AQMP, which is a regional and multi-agency effort (South Coast AQMD, CARB, Southern California Association of Governments [SCAG], and the USEPA). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards.

The two principal criteria for conformance to an AQMP are:

1. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards and
2. Whether the project would exceed the assumptions in the AQMP.

With respect to the first criterion, the analyses below under Threshold 2.3(b) demonstrate that the Project would not (1) generate short-term or long-term emissions of VOCs, oxides of nitrogen [NO_x, which are O₃ precursors], or PM_{2.5} that could potentially cause an increase in the frequency or severity of existing air quality violations; (2) cause or contribute to new violations; or (3) delay timely attainment of air quality standards.

With respect to the second criterion, the Project would not directly increase or modify SCAG's population, housing, or employment projections. The Project would accommodate existing and projected wastewater treatment demand within the local area of the Project site. Therefore, the Project would be consistent with the region's AQMP. There would be a less than significant impact, and no mitigation would be required.

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

Less than Significant Impact. The South Coast AQMD has developed significance thresholds to determine whether State and federal air quality standards would be violated or whether a substantial contribution to a violation would occur. These significance thresholds have been developed for the construction and operations phases of a project and examine the potential impacts of the project's emissions on both a regional and local context.

Construction Emissions – Regional

Criteria pollutant emissions would occur during construction from operation of construction equipment, demolition activities and earthmoving activities (which would generate fugitive dust), export of excavated soil and demolition debris, import of construction materials, and operation of vehicles driven to and from the site by construction workers.

Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program (CAPCOA 2018). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and county-specific information. CalEEMod has separate databases for specific counties and air districts, and the County of Los Angeles database was used for the Project.

The mass emissions significance thresholds (see Table 5 above) are based on the rate of emissions (i.e., pounds of pollutants emitted per day). Therefore, the quantity, duration, and intensity of construction activity are important in ensuring the analysis of worst case (i.e., maximum daily) emissions scenarios. The Project activities (e.g., asphalt removal, excavation, paving) are identified by start date and duration for Project activities. Each activity has associated off-road equipment (e.g., dozers, backhoes, cranes) and on-road vehicles (e.g., haul trucks, concrete trucks, worker commute vehicles).

Construction hauling truck trips were estimated based on the construction phase length and amount of debris or soil to export. Project-specific inputs can be found in the CalEEMod output data, located in Appendix A of this Initial Study. Dust control by watering was assumed, consistent with the requirements of South Coast AQMD Rule 403 for Fugitive Dust. Specifically, during construction of the Project, contractors would be required to comply with regional rules, which would assist in reducing short-term air pollutant emissions. South Coast AQMD Rule 402 requires that air pollutant emissions not be a nuisance off site. South Coast AQMD Rule 403 requires that fugitive dust be controlled with the best available control measures so that dust does not remain visible in the atmosphere beyond the property line of the emission source.

Maximum daily emissions for the peak workday of the Project are shown in Table 6 on the following page. If construction is delayed and/or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner construction equipment fleet mix and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval). As shown, all criteria pollutant emissions would be less than their respective thresholds. There would be less than significant impacts from construction of the Project, and no mitigation is required.

**TABLE 6
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS
(LBS/DAY)**

Project Component	VOC	NOx	CO	SOx	PM10	PM2.5
2021	2	26	19	<1	2	1
2022	5	15	17	<1	1	1
Maximum	5	26	19	<1	2	1
South Coast AQMD Daily Thresholds (Table 4-3)	75	100	550	150	150	55
Exceeds South Coast AQMD Thresholds?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compound(s); NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: inhalable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; South Coast AQMD: South Coast Air Quality Management District. Source: CalEEMod data in Appendix A.						

Construction Emissions – Local/Ambient Air Quality

The localized effects from the on-site portion of daily emissions were evaluated at receptor locations potentially impacted by construction of the Project, according to the South Coast AQMD’s localized significance threshold (LST) method, which utilizes on-site emissions rate look up tables and project-specific modeling, where appropriate. When quantifying mass emissions for localized analysis, only emissions that occur on site are considered. Consistent with the South Coast AQMD’s LST method guidelines, emissions related to off-site delivery/haul truck activity and employee trips are not considered in the evaluation of localized impacts.

LSTs are applicable to the following four criteria pollutants: NO₂, CO, PM10, and PM2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest receptor. For the LST CO and NO₂ exposure analysis, receptors who could be exposed for one hour or more are considered. For PM10 and PM2.5 exposure analysis, receptors who could be exposed for 24 hours are considered. The mass rate look-up tables were developed for each source receptor area and can be used to determine if a project may generate significant adverse localized air quality impacts. The South Coast AQMD provides LST mass rate look-up tables for projects that are less than or equal to five acres, accordingly, this is the appropriate method for the Project.

As shown in Table 7, localized emissions for all criteria pollutants from the Project would be less than their respective South Coast AQMD LSTs for all pollutants. There would be less than significant impacts from construction of the Project, and no mitigation is required.

**TABLE 7
ESTIMATED LOCALIZED CONSTRUCTION POLLUTANT EMISSIONS
(LBS/DAY)**

	NOx	CO	PM10	PM2.5
Maximum Emissions	18	14	1	<1
South Coast AQMD LSTs*	157	2,456	58	19
Exceeds South Coast AQMD Thresholds?	No	No	No	No
lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; South Coast AQMD: South Coast Air Quality Management District; LST: Localized Significance Threshold. * Thresholds for Source Receptor Area 2, Northwest Coastal LA County, 1-acre site, 205-meter receptor distance Source: South Coast AQMD 2009 (thresholds).				

Long-Term Operational Emissions

The ongoing operation of the Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from Project-generated vehicle trips and operation of WWTS treatment processes. The following section provides an analysis of potential air quality impacts to regional and local air quality with operation of the Project.

Operational emissions are comprised of area, energy, and mobile source emissions. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. There would be no mobile source emissions that would occur for the proposed WWTS with the exception of one truck trip to remove sludge from the WWTS on a quarterly basis. For routine inspection and maintenance, generally one or two workers would visit the Project site. These may be ISD staff that would already be present for maintenance of other infrastructure at Campus Kilpatrick or visits expressly for the WWTS. Peak daily emissions associated with these sources are shown in Table 8.

**TABLE 8
ESTIMATED PEAK DAILY OPERATIONAL EMISSIONS**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Area sources	1	<1	<1	<1	<1	<1
Energy sources	<1	<1	<1	<1	<1	<1
Mobile sources	<1	2	5	<1	2	<1
Total Operational Emissions*	1	2	5	<1	2	<1
South Coast AQMD Significance Thresholds (Table 7)	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; South Coast AQMD: South Coast Air Quality Management District. * Some totals do not add due to rounding. Note: CalEEMod model data sheets are included in Appendix A.						

As shown, the Project's operational emissions would be less than the South Coast AQMD significance thresholds for all criteria pollutants. There would be less than significant impacts from operation of the Project, and no mitigation would be required.

Cumulative Impacts (Construction and Operation)

The County of Los Angeles portion of the SoCAB is a nonattainment area for O₃, PM₁₀, and PM_{2.5}. As described above, construction emissions would be below the South Coast AQMD regional and localized significance thresholds, and operational emissions would be below South Coast AQMD regional significance thresholds. SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant would also be cumulatively less than significant (South Coast CAQMD 2003). Therefore, consistent with South Coast AQMD guidance, short-term construction emissions and long-term operational emissions of nonattainment pollutants would not be cumulatively considerable. There would be less than significant impact, and no mitigation would be required.

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

Less than Significant Impact. Exposure of sensitive receptors is addressed for the following situations: CO hotspots, criteria pollutants from on-site construction, and TACs from on-site construction.

Carbon Monoxide Hotspot

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at level of service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. As discussed previously under Threshold 2.3(b), there would be minimal maintenance trips associated with the Project, with one waste (i.e., sludge) hauler trip (10,000-gallon tractor-trailer) occurring quarterly and routine inspection and maintenance generally involving one or two workers visiting the site. Thus, the Project would neither cause new severe congestion nor significantly worsen existing congestion. There would be no potential for a CO hotspot or exposure of sensitive receptors to substantial, Project-generated local CO emissions. There would be a less than significant, and no mitigation would be required.

Criteria Pollutants from On-Site Construction

Exposure of persons to NO₂, CO, PM₁₀, and PM_{2.5} emissions is discussed in the LST analysis. As discussed, there would be a less than significant impact, and no mitigation would be required.

Toxic Air Contaminant (Diesel PM) Emissions from On-Site Construction

Construction activities would result in short-term, Project-generated emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., asphalt removal, excavation, and backfilling) and paving. CARB identified diesel PM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments—which determine

the exposure of sensitive receptors to TAC emissions—should be based on a 30- to 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with a project.

For the Project, there would be few pieces of off-road, heavy-duty diesel equipment in operation, and the construction period would be short when compared to a 30- to 70-year exposure period. In addition, the majority of construction equipment would be located approximately 670 feet from the nearest occupied buildings (Campus Kilpatrick). When considering these facts combined with the highly dispersive properties of diesel PM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, it can be concluded that TAC emissions during construction of the Project would not expose sensitive receptors to substantial emissions of TACs. There would be a less than significant impact, and no mitigation would be required.

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

Less than Significant Impact. During construction, the proposed Project would operate equipment that may generate odors resulting from on-site construction equipment's diesel exhaust emissions or paving operations. However, these odors would be temporary and would dissipate rapidly from the source with an increase in distance. The odors associated with construction vehicles would not arise to the magnitude of creating a public nuisance. Therefore, construction odors would be considered less than significant, and no mitigation would be required.

Objectionable odors attributable to land uses are generally associated with agricultural activities; landfills and transfer stations; the generation or treatment of sewage; the use or generation of chemicals; food processing; or other activities that generate unpleasant odors (South Coast AQMD 1993). Although the Project involves wastewater treatment processes, which would have the potential to cause odors, the proposed WWTS would be a replacement for both the temporary WWTS (i.e., package plant) operating currently and the former WWTS that served Campus Kilpatrick prior to the Woolsey Fire. Also, the proposed WWTS system would generally enclose many of the wastewater treatment processes, which would minimize the potential for odor release. In addition, the WWTS is located away from sensitive uses with the nearest sensitive use (Campus Kilpatrick) located approximately 670 feet away. The Project uses are also regulated from nuisance odors or other objectionable emissions by South Coast AQMD Rule 402. Rule 402 prohibits any the discharge from any source of air contaminants or other material, which would cause injury, detriment, nuisance, or annoyance to people or the public. There would be a less than significant impact, and no mitigation would be required.

3.4 <u>BIOLOGICAL RESOURCES</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT ANALYSIS

Information in this section is derived from *Biological Assessment Report for the Campus Kilpatrick Wastewater Treatment Plant Project* (Biological Assessment Report) prepared by Psomas and dated December 2020 (Psomas 2020). The entirety of the Biological Assessment Report is provided in Appendix B.

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

Less Than Significant Impact. The Project area is dominated by developed areas, including the existing WWTS and the Camp Miller and Campus Kilpatrick facilities and associated ornamental plantings. The developed areas consist of various buildings/structures, appurtenant facilities (e.g., swimming pool, propane tank, aboveground utility infrastructure), paved roads, and hardscape and landscape areas. Ornamental landscaping areas contain various trees including eucalyptus (*Eucalyptus* sp.), Canary Island pine (*Pinus canariensis*), and Aleppo pine (*Pinus halepensis*); various non-native shrubs; and turf grass.

Native habitat areas surround the Project area, including California sagebrush scrub, chaparral, native and non-native grasslands, willow scrub, and coast live oak woodland. No impacts to these habitat types are expected to occur from Project implementation.

Based on a review of the California Native Diversity Database (CNDDDB), the following federally and/or State-listed Endangered or Threatened wildlife species have been reported from the Project region:

- bank swallow (*Riparia riparia*, State Threatened)
- tidewater goby (*Eucyclogobius newberryi*, federally Endangered, California Department of Fish and Wildlife [CDFW] Species of Special Concern [SSC])
- southern steelhead (*Oncorhynchus mykiss irideus*, federally Endangered, CDFW SSC)
- California red-legged frog (*Rana draytonii*, federally Threatened, CDFW SSC)
- arroyo toad (*Anaxyrus californicus*, federally Endangered, CDFW SSC)
- coastal California gnatcatcher (*Polioptila californica*, federally Threatened, CDFW SSC)
- least Bell's vireo (*Vireo bellii pusilus*, federally Endangered, State Endangered)

The tidewater goby, southern steelhead, and California red-legged frog are not expected to occur due to lack of a perennial stream in the survey area. The arroyo toad is not expected to occur due to a lack of wash habitat. Although limited coastal sage scrub habitat is present, coastal California gnatcatcher would not be expected to occur because the habitat consists of small stature shrubs (e.g., slope above the swimming pool area) or consists of small patches of scrub surrounded by extensive chaparral, which is not preferred by the species. Similarly, although there is a small patch of willow scrub, least Bell's vireo would not be expected to occur due to the limited extent of habitat and because there are no larger areas of habitat in the general vicinity (e.g., creeks or rivers with riparian forest) known to be occupied by the species. Therefore, no Threatened or Endangered species are expected to occur in the Project area due to lack of suitable habitat. Two CDFW Fully Protected species have the potential to occur in the Project vicinity—golden eagle and American peregrine falcon—though the American peregrine falcon would only have the potential to occur for foraging.

In addition to the Threatened, Endangered, or Fully Protected species described above, several special status wildlife species have been reported from the region:

- Pacific [western] pond turtle (*Actinemys [Emys] marmorata*)
- silvery legless lizard (*Anniella pulchra pulchra*)
- coastal whiptail (*Aspidoscelis tigris stejnegeri*)
- Blainville's [coast] horned lizard (*Phrynosoma blainvillii*)
- western spadefoot (*Spea hammondi*)
- two-striped garter snake (*Thamnophis hammondi*)
- Cooper's hawk (*Accipiter cooperii*, nesting)
- tricolored blackbird (*Agelaius tricolor*)
- burrowing owl (*Athene cunicularia*)
- pallid bat (*Antrozous pallidus*)
- greater bonneted [western mastiff] bat (*Eumops perotis californicus*)
- western red bat (*Lasiurus blossevillii*)
- hoary bat (*Lasiurus cinereus*)
- Yuma [myotis] bat (*Myotis yumanensis*)
- American badger (*Taxidea taxus*)

Habitat for these species is generally absent from within the Project site; however, suitable habitat for these species is present in the natural areas surrounding the Project site. Several bat species may forage over the area and could roost in openings in buildings or in abandoned structures. The western pond turtle is not expected to occur due to lack of suitable habitat.

Based on a review of the CNDDDB and the California Native Plant Society Database, a total of 38 special status plant species are known to occur in the Project vicinity. Potentially suitable habitat for several of these species occur in the natural habitat areas that surround the Project site. Two special status species, Catalina mariposa lily (*Calochortus catalinae*) and Plummer's mariposa lily (*Calochortus plummerae*) have been observed in the vicinity of the Project site. Both species have a California Rare Plant Rank (CRPR) of 4.2, meaning that they have a limited distribution. Impacts to plant species that have a CRPR of 4.2 are not generally considered significant pursuant to CEQA though the SMMLCP considers impacts to all plants on the CRPR to be significant.

Because the Project site consists of developed areas and associated ornamental plantings, no special status plant species are expected to occur, and no potentially suitable habitat for special status wildlife species would be adversely affected. There is potential for special status plants and wildlife species to occur in the vicinity of the site, but these native habitat areas would not be affected by implementation of the Project. No impacts to special status plants or wildlife are anticipated, and no mitigation is required.

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

No Impact. Riparian habitat (i.e., willow scrub) occurs to the east of the Project site, but no riparian habitat or other sensitive natural communities occur on the site. Therefore, 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. There would be no impact, and no mitigation is required.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The riparian areas located east of the Project site have the potential to support wetland conditions. However, this area is outside the Project site limits. No wetland features occur within the WWTS site or near the recycled water lines and storage tank locations. Therefore, there would be no direct or indirect impacts to any state or federally protected wetlands, and no mitigation is required.

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

Less than Significant Impact. The federal Migratory Bird Treaty Act of 1918 (MBTA) protects the nests of all native bird species, including common species such as mourning dove (*Zenaidura macroura*), Anna's hummingbird (*Calypete anna*), and house finch (*Carpodacus mexicanus*). Nesting birds and raptors have the potential to occur in natural and non-natural features within and adjacent to the Project site. In addition to the MBTA, Sections 3503 and 3503.5 of the *California Fish and Game Code* protect nesting migratory birds and raptors, and impacts to

nesting birds, both on and adjacent to the Project site, would be considered a significant impact prior to mitigation.

Trees that are located within the Camp Miller and Campus Kilpatrick boundaries and adjacent to the WWTS site have the potential to support nesting birds and raptors. To comply with the MBTA and the *California Fish and Game Code*, one the following actions would be required: (1) performing construction activities outside the bird nesting season (i.e., March 1–September 15) and raptor nesting season (i.e., January 1–July 31); or (2) if, construction is initiated within the nesting seasons, performing pre-construction nesting surveys to identify active nests that should be avoided during construction. No vegetation removal may occur during the nesting periods described above without first being assessed for nesting activity. Through compliance with the MBTA and the *California Fish and Game Code*, there would be less than significant impacts to nesting birds and raptors, and no mitigation is required.

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

Less than Significant Impact. The Project site is located in an unincorporated portion of Los Angeles County, which would make any proposed impacts to oak trees subject to the provisions of the Los Angeles County Oak Tree Ordinance. Because the Project site is located in the Coastal Zone, the stricter provisions of the SMMLCP supersede the County's Oak Tree Ordinance. The SMMLCP regulates impacts to all native tree species that have one trunk that measures six inches or more in trunk diameter at breast height (dbh) or any native tree whose largest two trunks cumulatively measure eight inches or more in dbh. The protected zone for native trees is defined in the SMMLCP as the area under a tree that is either 5 feet outside the outer canopy edge or 15 feet from the trunk, whichever is greater. Exhibit 8, Native Tree Locations, shows the location, canopy, and tree root protection zone, as applicable, for all native trees surveyed within and near the County facilities.

Several oak and sycamore trees occur in the vicinity of the Project site. One coast live oak (*Quercus agrifolia*) had its protected zone encroached upon for installation of the temporary WWTS, which was authorized by Emergency Coastal Development Permit (CDP) No. RPPL2019005043. Encroachment exceeded 30 percent of the protected zone, which requires the establishment of 10 oak trees to offset this impact. Another coast live oak is located immediately north of the WWTS site. Minor grading would occur in the vicinity of this oak tree, but encroachment would affect less than 10 percent of the protected zone. Therefore, no mitigation in the form of replacement tree planting is required for this tree. Ground disturbance associated with trenching or micro-tunnelling to install the sewer line and recycled water line would occur in the vicinity of six other native trees, though these have been designed to avoid any encroachment that would reach the threshold for additional replacement tree planting. Through compliance with the requirements of the SMMLCP, including replacement planting of 10 oak trees to offset the impact sustained pursuant to implementation of the temporary WWTS under an Emergency CDP, there would be a less than significant impact related to conflict with the SMMLCP, and no mitigation is required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than Significant Impact. As discussed under Threshold 2.4e, above, the Project site is located in the Coastal Zone and is subject to the provisions of the SMMLCP. Special status habitat areas, referred to as Sensitive Environmental Resource Areas (SERAs), are located adjacent to the WWTS site. Specifically, areas surrounding the WWTS site are mapped as H1 habitat (highest



Aerial Source: Esri, Maxar 2018

Native Tree Locations

Campus Kilpatrick Wastewater Treatment System Replacement Project

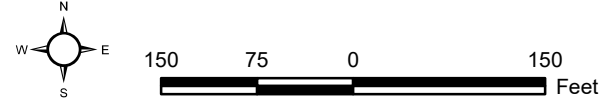


Exhibit 8



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biological significance). The WWTS site is located within the 100-foot buffer of H1 habitat, which extends north of Encinal Canyon Road.

Installation of the temporary WWTS occurred in H1 habitat as authorized by Emergency CDP No. RPPL2019005043. Vegetation impacts associated with installation of the temporary WWTS consisted of the removal of a combination of native shrubs (e.g., chamise [*Adenostoma fasciculata*] and black sage [*Salvia mellifera*]) along with non-native grasses and herbs such as shortpod mustard (*Hirschfeldia incana*) and slender wild oats (*Avena fatua*). Upon installation of the permanent WWTS, the temporary WWTS would be removed and the disturbance area would be restored as required by the Emergency CDP so that vegetation impacts in the H1 habitat are temporary. In addition, the post-restoration condition of the H1 habitat area would be an improvement over the pre-disturbance condition, which consisted of both native and non-native plants. Due to the temporary nature of the disturbance and the expected improvement of habitat conditions once the temporary WWTS is removed, impacts to sensitive habitat areas would be considered less than significant. No mitigation is required.

3.5	<u>CULTURAL RESOURCES</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT ANALYSIS

Information in this section is derived from (1) the Phase I Cultural Resource Assessment for the Camp Vernon Kilpatrick Replacement Project conducted by BonTerra Consulting (now Psomas) in 2012 (BonTerra Consulting 2012); and (2) the updated records search from the South-Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) requested by Psomas in 2020. Cultural resources records are presented as Appendix C to this Initial Study. Psomas also conducted a pedestrian survey on November 5, 2020 to search for cultural resources on the surface of the Project site. Surface visibility ranged from 0 to 40 percent due to the presence of vegetation or past development obscuring the ground. No cultural resources were observed during the pedestrian survey.

a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. The 2012 SCCIC records search and literature review did not identify any known historic resources within the Project site boundaries. The 2012 SCCIC record search did not identify any known historic resources. The 2020 record search conducted by Psomas was intended to find additional cultural resources, if any, located within a ¼-mile of the Project site that were not identified in the 2012 record search. The 2020 record search did not find any cultural resources sites located within ¼-mile of the Project site. The 2012 record search included two cultural resource studies that included a portion of the Project site, but the 2020 record search did not identify any additional studies that included any part of the Project site.

As discussed in Section 1.0, the Campus Kilpatrick complex was redeveloped and reopened in 2017. Except for the swimming pool, all Campus Kilpatrick facilities are essentially new. The existing condition of the Project site has also changed since the original research was conducted in 2012 because the Project site was within the burn zone of the 2018 Woolsey Fire. Campus Kilpatrick’s buildings were minimally affected by the Woolsey fire. However, Camp Miller’s facilities were extensively damaged, requiring several buildings to be demolished and removed, and the former WWTS was severely damaged, necessitating the proposed Project. Because the Campus Kilpatrick complex is recent, no part of Campus Kilpatrick is a historic resource. Further, implementation of the Project would not affect any existing structures in either Camp Miller or Campus Kilpatrick. The recycled water lines have been routed to avoid existing protected tree canopies, buildings, and other aspects of the built environment. The recycled water lines would connect at points of existing infrastructure situated in the south and northeast portions of Campus Kilpatrick and at the new recycled water tank. Therefore, there would be no impacts to historic resources, either in the built environment or subsurface, due to construction or operation of the Project, and no mitigation is required.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact. The 2012 SCCIC records search and literature review identified seven prehistoric resources within one mile of the Project site, but there are no known prehistoric resources within the Project boundaries. The closest prehistoric resource documented near the Project site is CA-LAN-717, a well-known rock art site known as the Cave of the Four Horsemen and listed in the National Register of Historic Places (NRHP). This site is located on Saddle Rock Ranch, approximately 4,500 feet east of the Project site. Additionally, sites CA-LAN-15 and CA-LAN-18 are recorded immediately west of CA-LAN-717 and can be considered loci of the larger site.

The 2020 records search conducted by Psomas was intended to find additional cultural resources, if any, located within a ¼-mile of the Project site that were not identified in the 2012 records search. The 2020 records search did not find any additional cultural resources located within the Project site. However, within ¼-mile of the site, two prehistoric isolates (P-19-004663 and P-19-101279) were discovered during an archaeological survey conducted in 2015. These resources would not be impacted by implementation of the Project. The 2012 records search included two cultural resources studies that included a portion of the Project site, but the 2020 records search did not identify any additional studies that included any part of the Project site.

The NAHC conducted a Sacred Lands File (SLF) search on October 16, 2020. The results concluded that the Project site does not contain any known sacred lands or tribal cultural resources. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area, only that there are no resources known to the NAHC.

No archaeological resources were identified within the Project site as a result of the records search or field survey. The built nature of the Project site suggests that the presence of buried prehistoric archaeological resources is unlikely, but there is always possibility of encountering archaeological deposits when disturbing native sediment. There is also a possibility that historic-period archaeological deposits related to Campus Kilpatrick and/or earlier developments at the site remain buried in the area. However, the earthmoving activities (i.e., grading and excavation) required for Project construction would be limited to areas that have been previously disturbed by prior construction and development and would be shallow, on the order of three feet in depth or less. Specifically, the Project would use localized, shallow grading to construct modifications of the WWTS access road (26sf), construct a minor expansion of the WWTS pad with retaining wall and adjacent concrete swale (498 sf), construct a new pad for the recycled water storage tank (400 sf), and install the new recycled water line (1,300 cy). The likelihood that unknown archaeological resources would be encountered during Project implementation is remote, and as such Project would not be expected to cause a substantial adverse change in the significance of an archaeological resource. Therefore, there would be less than significant impacts related to archaeological resources, and no mitigation is required.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. There is no indication that human remains are present in the Project site, including those interred outside formal cemeteries. In the unlikely event of an unanticipated encounter with human remains in Project site, the *California Health and Safety Code* and the *California Public Resources Code* require that any activity in the area of a potential find be halted and the Los Angeles County Coroner be notified. Specifically, if Native American human remains are encountered, Section 5097.98 of the Public Resources Code and Section

7050.5 of the California Health and Safety Code would be followed. If human remains are encountered, no further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin. Further, pursuant to Section 5097.98(b) of the Public Resources Code, remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County Coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours. Subsequently, the NAHC shall identify the person or persons it believes to be the "most likely descendant" (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains as provided in Section 5097.98 of the Public Resources Code. In the unlikely event that human remains are encountered during Project construction, compliance with existing regulations would ensure there is a less than significant impact, and no mitigation is required.

3.6 ENERGY	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

Less than Significant Impact. The Project would result in energy consumption from the construction phase related to construction equipment use and vehicle trips, including worker trips, equipment delivery, and export of demolition debris and excavated soil. Fuel energy consumed during construction would be temporary, finite, and the amount of fuel consumption necessary for a small-scale project would not represent a substantial demand on energy resources. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in other parts of California. The Project would not create a high enough demand for energy that would, in turn, require development of new energy sources. Therefore, the Project’s construction would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operation of the Project would use electricity related to wastewater treatment infrastructure. It is anticipated that approximately 1.5 million kilowatt hours per year is required. The use of this electricity is necessary to support the operations of Campus Kilpatrick. Therefore, the Project’s operation would not result in inefficient, wasteful, or unnecessary fuel consumption.

There would be a less than significant impact, and no mitigation is required.

b) Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

No Impact. As discussed above, the Project would use energy during construction and long-term operation of the Project, which is required to provide the necessary on-site wastewater treatment processes to support Campus Kilpatrick. The Los Angeles Countywide Sustainability Plan, named OurCounty, was adopted on August 9, 2019. OurCounty aims to uphold the Paris Climate Agreement by creating a fossil-fuel free Los Angeles County within the next three decades, with 160 health-focused strategies centered on communities that have been disproportionately affected by environmental pollution. OurCounty is organized around 12 goals, including, but not limited to powering unincorporated areas and County facilities with 100 percent renewable energy by 2025; increasing urban tree canopy coverage by 15 percent by 2035; diverting over 95 percent of waste from landfills; developing land-use tools to limit new development in high climate-hazard areas; and ensuring that all residents have safe and clean drinking water, and that rivers, lakes, and the ocean meet federal water quality standards.

The Project would be consistent with, and contribute to implementation of, OurCounty Los Angeles Countywide Sustainability Plan Strategy 2C promoting water and wastewater diversification (Los Angeles County 2019). The Project would meet wastewater treatment needs locally instead of expending relatively more energy to pipe wastewater to an off-site, distant WWTS. Also, the Project would utilize the tertiary-treated effluent to irrigate all landscaping and athletic fields. This indirectly reduces the energy associated with treatment and conveyance of potable water that would otherwise have been used for irrigation needs at Campus Kilpatrick in the future. As such, the Project would not conflict with or obstruct the County's policies related to energy use. There would be no impact, and no mitigation is required.

3.7	<u>GEOLOGY AND SOILS</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:					
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

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

iii) Seismic-related ground failure, including liquefaction?

No Impact. The Project site is not within an Alquist-Priolo Earthquake Fault Zone, and there are no known faults traversing the site. The Project site is not identified as susceptible to liquefaction (CGS 2016). Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake

fault or liquefaction. There would be no impact due to construction or operation of the Project, and no mitigation is required.

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

ii) Strong seismic ground shaking?

iv) Landslides?

Less than Significant Impact. As discussed above, there are no active or potentially active faults traversing the Project site. However, the site, as with the entire Southern California region, may be subject to strong ground shaking resulting from a major earthquake on one or more faults in the area within the lifetime of the Project. Seismic ground shaking from major earthquakes in the region is not anticipated to be greater than at any other sites in Southern California. While the Project site and proposed facilities could potentially be subject to moderate or severe seismic ground shaking, they would be designed and constructed in conformance with applicable seismic safety requirements of the 2019 California Building Code (CBC) and the American Water Works Association (AWWA), as applicable. Also, the Project would not involve construction of habitable structures or structures whose height, mass, or materials would pose a hazard in the event of an earthquake.

The Seismic Hazard Evaluation of the Point Dume Quadrangle indicates that some of the steep hillsides in the vicinity of the Project site may be susceptible to earthquake-induced landslides (CGS 2016). As previously discussed, the Project would not introduce habitable structures or structures that pose a hazard in the event of a landslide. There would be less than significant impacts due to exposure to substantial adverse effects from seismic ground shaking and landslides due to construction or operation of the Project, and no mitigation is required.

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

Less than Significant Impact. The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction activities. Because the Project site is within the SMMLCP, pursuant to Section 22.44.1340(H) et. seq. of the County of Los Angeles Municipal Code (LACMC), an Erosion and Sediment Control Plan (ESCP) would be required to address the control of construction-phase erosion, sedimentation, and polluted runoff. The ESCP must specify the temporary Best Management Practices (BMPs) that would be implemented to minimize erosion and sedimentation during construction and minimize pollution of runoff by construction chemicals and materials. Through compliance with the requirements of the LACMC during construction activities, there would be a less than significant impact related to soil erosion and loss of topsoil, and no mitigation is required. Operation of the Project would not impact soil erosion, because there would be no long-term increase in the amount of soils exposed at the surface.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

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

Less than Significant Impact. Liquefaction and landslides are addressed under Thresholds 2.7(a)(iii) and 2.7(a)(iv) above, and there would be no significant impacts associated with these conditions. Lateral spreading is a liquefaction-related phenomenon. As discussed above, there is no potential for liquefaction at the site; therefore, there would be no potential for lateral spreading. Land subsidence occur due to the loss of surface elevation as a result of the removal of subsurface support, such as removal of water, oil, or gas. The Project would not involve the removal of water or other media that would result in subsidence. Other soil engineering constraints, such as collapsible soils and expansive soils, would be addressed through compliance with the 2019 CBC and AWWA, as applicable. It is not anticipated that seismic and/or soil conditions would be limitations as the proposed infrastructure is similar to what is present on the site. Also, as discussed, the Project does not include any habitable structures or structures whose height, mass, or materials would pose a hazard in the presence of unstable geologic materials. Therefore, there would be a less than significant impact related to the potential presence of unstable geologic units or expansive soils due to construction or operation of the Project, and no mitigation is required.

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

No Impact. The Project is the installation of an alternative wastewater disposal system. As discussed above, it is expected that the underlying soils at the site would be capable of supporting the proposed WWTS system as it is similar to infrastructure serving Campus Kilpatrick currently. The Project would not involve the use of septic tanks. There would be no impact related to wastewater disposal due to construction or operation of the Project, and no mitigation is required.

f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The paleontological resources analysis is based on the results of a literature review and records search conducted through the Natural History Museum of Los Angeles County (LACM), an online search of localities listed on the Paleobiology Database (paleobiodb.org), and a review of geologic maps and arials. Dr. Sam McLeod, of the Vertebrate Paleontological department of the LACM conducted a records search on August 3, 2012 and October 16, 2020 to explore the presence of any previously documented nearby resources within the geologic formations underlying the Project site.

The elevated terrain around the periphery of the Project site has exposures of the Tertiary age Conejo Volcanics that are devoid of fossils. Most of the site itself has surficial deposits of terrestrial Quaternary Alluvium, derived as fan or fluvial deposits. These deposits typically do not contain significant vertebrate deposits in the uppermost layers. However, older Quaternary alluvium may underlie the younger alluvial material and could contain fossils.

The Project site does not contain any known paleontological resources. However, six nearby localities were positive for invertebrate and vertebrate fossils within the same sedimentary deposits that may occur in the Project area at depth. Deeper excavations that penetrate older Quaternary alluvial deposits in the central portion of the Project site should be considered sensitive for paleontological resources.

The earthmoving activities (i.e., grading and excavation) required for Project construction would be limited to areas that have been previously disturbed by prior construction and development and would be shallow, on the order of three feet in depth or less. Specifically, the Project would use localized, shallow grading to construct modifications of the WWTS access road (26 sf), construct a minor expansion of the WWTS pad with retaining wall and adjacent concrete swale (498 sf), construct a new pad for the recycled water storage tank (400 sf), and install the new recycled water line (1,300 cy). Therefore, earthmoving for Project construction would not penetrate older Quaternary alluvial deposits. The Project would not directly or indirectly destroy a unique paleontological resource. There would be no impact, and no mitigation is required.

3.8 GREENHOUSE GAS EMISSIONS	Potentially Significant Impact	Less Than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

REGULATORY SETTING

Climate change refers to any significant change in climate, such as the average temperature, precipitation, or wind patterns, over a period of time. Climate change may result from natural factors, natural processes, and/or human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth’s surface; this is attributed to an accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere, which in turn increases the Earth’s surface temperature. Some GHGs occur naturally and are emitted into the atmosphere through natural processes, while others are created and emitted solely through human activities. The majority of climate scientists attribute climate change to the increase in GHG emissions generated by human activities.

GHGs, as defined under California’s Assembly Bill (AB) 32, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. General discussions on climate change often include water vapor, O₃, and aerosols in the GHG category. Water vapor and atmospheric O₃ are not gases that are formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by regulatory bodies, such as CARB, or climate change groups, such as The Climate Registry, as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, O₃, or aerosols is provided herein.

GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both its potency and lifespan in the atmosphere as compared to CO₂. For example, since CH₄ and N₂O are approximately 21 and 310 times more powerful than CO₂, respectively, in their ability to trap heat in the atmosphere; they have GWPs of 21 and 310, respectively, whereas CO₂ has a GWP of 1. Carbon dioxide equivalent (CO₂e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the emission rate of that gas to produce the CO₂e emissions.

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California’s air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32, the California Global Warming Solutions Act of 2006 (*California Health and Safety Code* §38501), recognizes that California is the source of substantial amounts of GHG emissions. The statute states that:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, which is a reduction of approximately 16 percent from forecasted emission levels, with further reductions to follow (CARB 2011). To help achieve this reduction, on November 17, 2008, Governor Arnold Schwarzenegger signed Executive Order S-14-08, raising California's renewable energy goals to 33 percent by 2020.

California Executive Order B-30-15 (April 29, 2015) set an "interim" statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030 and directed State agencies with jurisdiction over GHG emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels.

On September 8, 2016, Governor Edmund G. "Jerry" Brown signed Senate Bill (SB) 32 to codify the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030 (Health and Safety Code Section 38566). This goal is expected to keep the State on track to meeting the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050. SB 32's findings state that CARB will "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature."

The County of Los Angeles has not formally adopted quantitative GHG emissions significance criterion to date. Beginning in April 2008, the South Coast AQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the South Coast AQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 metric tons of CO₂ equivalent per year (MTCO₂e/yr) for projects where the South Coast AQMD is the lead agency (South Coast AQMD 2008). In September 2010, the Working Group proposed that the 10,000 MTCO₂e/yr threshold be expanded to apply to industrial projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010). The Working Group has not convened since Fall 2010. The proposal has not been considered or approved for use by the South Coast AQMD Board. However, this threshold has been selected by as the most appropriate for the Project.

IMPACT ANALYSIS

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

Less than Significant Impact. As with the analysis in Section 2.3, Air Quality, the worst-case annual GHG emissions were calculated using CalEEMod Version 2016.3.2. GHG emissions from construction and operation of the Project would primarily be from vehicle engine exhaust from construction equipment, on-road hauling trucks, vendor trips, worker commuting trips, and long-term electricity use for the operation of the WWTS. The results are provided in MTCO₂e, and the CalEEMod data is provided in Appendix A of this Initial Study. Table 9, Estimated Greenhouse Gas Emissions from Project Implementation, summarizes the results of the GHG emissions modeling for the Project.

**TABLE 9
ESTIMATED GREENHOUSE GAS EMISSIONS FROM PROJECT IMPLEMENTATION**

Emission Type	Annual GHG Emissions (MTCO ₂ e)
Construction in 2021	267
Construction in 2022	236
Construction Emissions Total	770
Amortized Construction Emissions*	26
Operations Phase Emissions	440
Combined Amortized Construction and Operations Emissions	466
Threshold	10,000
Exceeds Threshold?	No
GHG: greenhouse gas; MTCO ₂ e: metric tons of carbon dioxide equivalent * Combined total amortized over 30 years CalEEMod output data is in Appendix A.	

As shown in Table 9, estimated total GHG emissions for Project construction would be 770 MTCO₂e. However, because impacts from a project's construction activities occur over a relatively short period of time, they contribute a relatively small portion of a project's lifetime GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, the South Coast AQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures address construction GHG emissions as part of operational GHG reduction strategies (South Coast AQMD 2008). The amortized construction emissions from the Project would be 26 MTCO₂e. Long-term operational phase emissions associated with the Project is primarily related to electricity usage. The combined amortized emissions and operations phase emissions would be 466 MTCO₂e, less than the South Coast AQMD screening level of 10,000 MTCO₂e/year. Therefore, GHG emissions would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As discussed above, the principal State plan and policy adopted for the purpose of reducing GHG emissions is AB 32. However, AB 32-related plans and regulations are being implemented at the statewide level, and compliance at the project level is not addressed.

As discussed previously in Section 2.3, the Los Angeles Countywide Sustainability Plan, named OurCounty, was adopted on August 9, 2019. OurCounty includes, but is not limited to, the following goals and milestones: powering unincorporated areas and County facilities with 100 percent renewable energy by 2025; increasing urban tree canopy coverage by 15 percent by 2035; diverting over 95 percent of waste from landfills; developing land-use tools to limit new development in high climate-hazard areas; and ensuring that all residents have safe and clean drinking water, and that rivers, lakes and the ocean meet federal water quality standards. This Project supports Strategy 2C of OurCounty which is to “Create an integrated and resilient water system” (Los Angeles County 2019). The Project involves development of the WWTS that would replace a facility damaged by recent wildfires and a temporary WWTS currently in operation. The development of replacement wastewater treatment facilities would provide local treatment necessary to support wastewater treatment needs for Campus Kilpatrick. As such, the Project would be consistent, and would not conflict, with the OurCounty plan. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. There would be a less than significant impact, and no mitigation is required.

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

IMPACT ANALYSIS

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

Less than Significant Impact. Maintenance activities may involve use of materials such as cleaning agents and solvents in small volumes and for a brief period. These materials would be handled in compliance with existing federal, State, and local regulations. As such, operation of the Project would not involve the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. There would be a less than significant impact, and no mitigation is required.

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

Less than Significant Impact. Implementation of the Project would involve the limited transport, storage, use, and/or disposal of common construction-related hazardous materials, including oil and grease, solvents, diesel fuel, and other chemicals in vehicles, trucks, and heavy equipment. These materials could be released into the environment in small amounts in the event of an

accident. Implementation of the Project would not require the use of acutely hazardous materials or substances. Operational use of hazardous materials is address in Threshold 2.9(a). To prevent environmental hazards, the handling of hazardous materials used in construction equipment would be conducted in accordance with existing regulations. These regulations include the transport of hazardous materials; on-site storage and use of hazardous materials; and procedures to implement in the event of a spill. In addition, the Project would be constructed in compliance with LACMC requirements pursuant to location within the SMMLCP boundaries. Compliance with these regulations would ensure that impacts related to use of common construction-related hazardous materials would be less than significant, and no mitigation is required.

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

No Impact. There are no existing or proposed schools within ¼-mile of the Project site. There would be no impact pertaining to hazardous emissions impacting schools within ¼-mile of the site, and no mitigation is required.

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

No Impact. There are no sites within or near the Project site identified on the Hazardous Waste and Substances List (also called the Cortese List) compiled by the California Environmental Protection Agency (CalEPA), pursuant to Section 65962.5 of the *California Government Code* (CalEPA 2020). There would be no impact related to identification on the Cortese List such that a significant hazard to the public or the environment would occur during construction or operation of the Project. There would be no impact, and no mitigation is required.

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

No Impact. The closest airport to the Project site is Camarillo Airport, which is located approximately 16 miles northwest of the Project site. There would be no impact related to air traffic due to construction or operation of the Project, and no mitigation is required.

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

Less than Significant Impact. Equipment staging and parking for construction workers would be on County property, either within the disturbance limits at the WWTS or at the Camp Miller/ Campus Kilpatrick sites. Construction would not require staging within the travel lanes of Encinal Canyon Road that would disrupt existing traffic patterns. It is possible that during the jack-and-bore operations for the new sewer line under Encinal Canyon Road, one or more vehicles or construction crew may temporarily be adjacent to or within the ROW adjacent to the paved travel lanes. All activities on or adjacent to public streets that could limit traffic flow, such as construction equipment delivery, would be conducted with traffic control measures per the *Standard Specifications for Public Works Construction* (Greenbook). Implementation of appropriate traffic control measures would ensure that existing circulation would not be impacted during Project construction in such a way that would physically impair or impede emergency response or evacuation. Operation of the Project would not impact emergency access, because the nominal

number of worker trips for inspection and maintenance activities would not demonstrably affect traffic flows. There would be a less than significant impact related to adopted emergency response or emergency evacuation plans, and no mitigation is required.

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

No Impact. The Project site is within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2020). However, the Project would not introduce new land uses to the site nor would there be an increase in the on-site population of Campus Kilpatrick compared to the existing condition. Therefore, the Project would not expose people or structures to risks from wildfires. There would be no impact, and no mitigation is required.

3.10 <u>HYDROLOGY AND WATER QUALITY</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The Project could result in short-term, construction-related impacts to surface water quality from grading and other construction activities. As discussed in Section 2.7, compliance with Section 22.44.1340(H) et. seq. of the LACMC, pursuant to the site's location within the SMMLCP, an ESCP would be required to address the control of construction-phase erosion, sedimentation, and polluted runoff. As discussed in Section 1.0, the Project has been designed to meet the LARWQCB effluent limits as presented in the 2019 General WDR. Construction and operation of the Project would not involve wastewater discharges that could violate standards or degrade water quality. There would be less than significant impacts related to surface water quality, and no mitigation is required.

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

Less than Significant Impact. Implementation of the Project would not substantively increase the amount of impervious surface area. The only locations that are currently pervious and would become impervious with Project construction is the approximately 400-sf of concrete pad for the recycled water storage tank and an expansion of 1,507 sf in concrete pads to support the new WWTS and relocated sludge tank. This nominal area of increased impervious surface area of approximately 1,900 sf would not quantitatively affect the amount of storm water runoff or groundwater recharge.

Construction of the Project would involve use of water to suppress fugitive dust emissions during grading activities. This water would be delivered to the construction areas in a water truck. The Project activities would require the use of municipal water supplies during construction activities; however, the amount of water to be used for dust control would be finite and would ensure that fugitive dust emissions do not pose a hazard to construction workers or surrounding receptors. Project construction and operation would result in less than significant impacts on groundwater supplies or groundwater recharge, and no mitigation is required.

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

- i) Result in substantial erosion or siltation on- or off-site?**
- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?**

Less than Significant Impact. As discussed under Threshold 2.10b above, there would not be a change in the amount of impervious surface area and associated generation of runoff that would not functionally change the drainage pattern of the Project site. Stormwater runoff would be collected in a three-foot-wide concrete ribbon gutter that would drain into a biofiltration basin northeast of the recycled water storage basin at the existing WWTS. The biofiltration basin would be piped to the new package lift station for drainage. In the area of the recycled water storage tank, runoff would continue to sheet flow over and around the concrete tank pad and be conveyed towards the existing on-site drainage infrastructure. The presence of the approximate 1,900 sf of new impervious surfaces would not alter the local drainage pattern such that there would be substantial erosion or siltation, flooding on- or off-site, or contribution to runoff that would not be accommodated by the existing drainage systems. Further, the surface water flows from irrigation using reclaimed water would be the same as existing flows using potable water, and the same spray disposal field would be used in the event there is excess recycled water that cannot be used for irrigation. There would be a less than significant impact, and no mitigation is required.

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

iv) **Impede or redirect flood flows?**

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

No Impact. Based on review of the Los Angeles County General Plan, the Project site is not within a 100-year flood hazard area, tsunami zone, or seiche zone (LACDRP 2014). There would be no impact, and no mitigation is required.

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

No Impact. As discussed under Threshold 2.10(a), the Project would not violate any water quality standards or waste discharge requirements under the jurisdiction of the LARWQCB. There is no groundwater basin underlying the Project area that is subject to the California Sustainable Groundwater Management Act (SGMA) of 2014. There would be no impact, and no mitigation is required.

3.11 LAND USE AND PLANNING	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

a) Would the project physically divide an established community?

No Impact. The Project site is not located in a residential area, nor is it surrounded by residential uses that make up an established community. There would be no impact related to dividing an established community due to construction or operation of the Project, and no mitigation is required.

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

No Impact. The Project does not propose to change any existing land use designation or zoning. As discussed further in Section 2.4, Biological Resources, the Project site is within the SMMLCP boundaries and, as such, would be required to acquire and implementation all conditions of a Coastal Development Permit. Therefore, implementation of the Project would not conflict with any applicable land use plan, policy, or regulation of the County adopted for the purpose of avoiding or mitigating an environmental effect. There would be no impact, and no mitigation is required.

3.12 MINERAL RESOURCES	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

- a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b) **Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No Impact. The California Geological Survey conducted a series of mineral land classification studies under the authority of the Surface Mining and Reclamation Act of 1975. The Project site is located within a Mineral Resource Zone-3 (MRZ-3) (DOC 1981). MRZ-3 indicates that the significance of mineral resources cannot be evaluated from available data. The Project site has not historically and is not now used as a mineral resource recovery area. There would be no impact to mineral resources due to construction or operation of the Project, and no mitigation is required.

3.13 NOISE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Results in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

NOISE AND VIBRATION BASICS AND TERMINOLOGY

Noise

“Sound” is a vibratory disturbance created by a moving or vibrating source and is capable of being detected. “Noise” is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance; interference with speech communication; sleep disturbance; and, in the extreme, hearing impairment (Caltrans 2013a).

Sound pressure levels are described in units called the decibel (dB). Decibels are measured on a logarithmic scale. A doubling of the energy of a noise source (such as doubling of traffic volume) would increase the noise level by 3 dB. The human ear is not equally sensitive to all frequencies within the sound spectrum. To accommodate this phenomenon, the A-scale was devised; the A-weighted decibel scale (dBA) approximates the frequency response of the average healthy ear when listening to most ordinary everyday sounds and is used in this analysis.

Human perception of noise has no simple correlation with acoustical energy. Due to subjective thresholds of tolerance, the annoyance of a given noise source is perceived very differently from person to person. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is approximately 60 dBA, while loud jet engine noises at 1,000 feet equate to 100 dBA, which can cause serious discomfort. Table 10 on the following page shows the relationship of various noise levels in dBA to commonly experienced noise events.

**TABLE 10
NOISE LEVELS FOR COMMON EVENTS**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet fly-over at 300 m (1,000 ft)	100	
Gas lawn mower at 1 m (3 ft)	90	
Diesel truck at 15 m (50 ft) at 80 km/hr (50 mph)	80	Food blender at 1 m (3 ft); garbage disposal at 1 m (3 ft)
Noisy urban area, daytime gas lawn mower at 30 m (100 ft)	70	Vacuum cleaner at 3 m (10 ft)
Commercial area, heavy traffic at 90 m (300 ft)	60	Normal speech at 1 m (3 ft)
Quiet urban daytime	50	Large business office, dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing
dBA: A-weighted decibels; m: meter; ft: feet; km/hr: kilometers per hour; mph: miles per hour		
Source: Caltrans 2013a.		

Two noise sources do not “sound twice as loud” as one source. As stated above, a doubling of noise sources results in a noise level increase of 3 dBA. It is widely accepted that (1) the average healthy ear can barely perceive changes of a 3 dBA increase or decrease, (2) a change of 5 dBA is readily perceptible, and (3) an increase (decrease) of 10 dBA sounds twice (half) as loud (Caltrans 2013a).

From the source to the receiver, noise changes both in the level and frequency spectrum. The most obvious change is the decrease in noise level as the distance from the source increases. Sound from a small localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern. For point sources, such as heating, ventilation, and air conditioning units or construction equipment, the sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance (i.e., if the noise level is 70 dBA at 25 feet, it is 64 dBA at 50 feet). Vehicle movement on a road makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over some time interval. The sound level attenuates or drops off at a rate of 3 dBA per doubling of distance for line sources.

A large object in the path between a noise source and a receiver can significantly attenuate noise levels at that receiver location. The amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain or landform features as well as man-made features (e.g., buildings and walls) can significantly alter noise exposure levels. For a noise barrier to work, it must be high enough and long enough to block the view from the receiver to a road or to the noise source. Effective noise barriers can reduce outdoor noise levels at the receptor by up to 15 dBA.

Several rating scales (or noise “metrics”) exist to analyze effects of noise on a community. These scales include the equivalent noise level (L_{eq}), including L_{max} and L_{min} , which are respectively the highest and lowest A-weighted sound levels that occur during a noise event, and the Community Noise Equivalent Level (CNEL). Average noise levels over a period of minutes or hours are usually expressed as dBA L_{eq} , which is the equivalent noise level for that period of time. The

period of time averaging may be specified; for example, Leq(3) would be a three-hour average. Noise of short duration (i.e., substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

To evaluate community noise impacts, CNEL was developed to account for human sensitivity to nighttime noise. CNEL represents the 24-hour average sound level with a penalty for noise occurring at night. The CNEL computation divides a 24-hour day into three periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assigned a 5-dBA penalty, and the nighttime sound levels are assigned a 10-dBA penalty prior to averaging with daytime hourly sound levels.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration displacement is the distance that a point on a surface moves away from its original static position. The instantaneous speed that a point on a surface moves is described as the velocity, and the rate of change of the speed is described as the acceleration. Each of these descriptors can be used to correlate vibration to human response, building damage, and acceptable equipment vibration levels. During construction of a project, the operation of construction equipment can cause groundborne vibration. During the operational phase of a project, receptors may be subject to levels of vibration that can cause annoyance due to noise generated from vibration of a structure or items within a structure. Analysis of this type of vibration is best measured in velocity and acceleration.

The three main wave types of concern in the propagation of groundborne vibrations are surface or Rayleigh waves, compression or P-waves, and shear or S-waves.

- Surface or Rayleigh waves travel along the ground surface. They carry most of their energy along an expanding cylindrical wave front, similar to the ripples produced by throwing a rock into a lake. The particle motion is more or less perpendicular to the direction of propagation (known as retrograde elliptical).
- Compression or P-waves are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal, in a push-pull motion. P-waves are analogous to airborne sound waves.
- Shear or S-waves are also body waves, carrying their energy along an expanding spherical wave front. Unlike P-waves, however, the particle motion is transverse, or perpendicular to the direction of propagation.

The peak particle velocity (ppv) or the root mean square (rms) velocity is usually used to describe vibration amplitudes. The ppv is defined as the maximum instantaneous peak of the vibration signal and the rms is defined as the square root of the average of the squared amplitude of the signal. The ppv is more appropriate for evaluating potential building damage and also used for evaluating human response.

The units for ppv velocity are normally inches per second (in/sec). Often, vibration is presented and discussed in dB units in order to compress the range of numbers required to describe the vibration. In this study, all ppv velocity levels are in in/sec and all vibration levels are in dB relative to one microinch per second. The threshold of perception is approximately 0.3 ppv. Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. Even the more persistent Rayleigh waves decrease relatively quickly as

they move away from the source of the vibration. Manmade vibration problems are, therefore, usually confined to short distances (500 feet or less) from the source.

Construction generally includes a wide range of activities that can generate groundborne vibration. In general, blasting and demolition of structures generate the highest vibrations. Heavy trucks can also generate groundborne vibrations, which vary depending on vehicle type, weight, and pavement conditions. Potholes, pavement joints, discontinuities, differential settlement of pavement, and other anomalies all increase the vibration levels from vehicles passing over a road surface. Construction vibration is normally of greater concern than vibration of normal traffic on streets and freeways with smooth pavement conditions. Trains generate substantial quantities of vibration due to their engines, steel wheels, and heavy loads.

REGULATORY SETTING

Federal

Surface transportation system noise is regulated by a host of agencies, including the Federal Transit Administration (FTA). Transit noise is regulated by the federal Urban Mass Transit Administration (UMTA), while freeways that are part of the interstate highway system are regulated by the Federal Highway Administration (FHWA). Although the Project is not under the jurisdiction of the FTA, the FTA is the only agency that has defined what constitutes significant construction and transportation source noise impacts from implementing a project. The FTA standards are based on extensive studies by the FTA and other governmental agencies on the human effects and reaction to noise from construction and transportation sources. The FTA recommends developing construction noise criteria on a project-specific basis that utilizes local noise ordinances if possible. However, local noise ordinances usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the noise impacts of construction activities. A project's construction noise criteria should take into account the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land uses.

State

On-Road Vehicle Noise

Sections 27200 to 27207 of the *California Vehicle Code* provide noise limits for vehicles operated in California. For vehicles over 10,000 pounds, noise is limited to 88 dB for vehicles manufactured before 1973, 86 dB for vehicles manufactured before 1975, 83 dB for vehicles manufactured before 1988, and 80 dB for vehicles manufactured after 1987. All measurements are based at 50 feet from the vehicle. For the Project, "on-road" vehicles over 10,000 pounds would include haul trucks and construction equipment delivery trucks/tractor trailers.

Off-Road Vehicle Noise

Sections 38365 to 38380 of the *California Vehicle Code* provides noise limits for off-highway motor vehicles operated in California, as follows: 92 dBA for vehicles manufactured before 1973, 88 dBA for vehicles manufactured before 1975, 86 dBA for vehicles manufactured before 1986, and 82 dBA for vehicles manufactured after December 31, 1985. All measurements are based on a distance of 50 feet from the vehicle.

County of Los Angeles

Construction Noise

Section 12.08 of the County of Los Angeles Municipal Code (County Code) contains the County's Noise Ordinance, which is designed to control unnecessary, excessive, and annoying sounds by setting limits that cannot be exceeded at adjacent properties. Section 12.08.440 of the County Code prohibits construction noise between the hours of 7:00 PM and 7:00 AM on weekdays, and at any time on Sunday or a federal holiday if it creates a disturbance across a residential or commercial property line. The County also sets the daytime (Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM) noise level limits. At single-family residences, the maximum noise level from mobile equipment (non-scheduled, intermittent, short-term operations for less than 30 days) is not to exceed 75 A-weighted decibels (dBA). The maximum noise level limit from stationary equipment (repetitively scheduled and relatively long-term operations of 10 days or more) at a single-family residence is 60 dBA.

Section 12.08.570(H) of the County Code includes the following exemption from the Noise Ordinance:

Public Health and Safety Activities. All transportation, flood control, and utility company maintenance and construction operations at any time on public right-of-way, and those situations which may occur on private real property deemed necessary to serve the best interest of the public and to protect the public's health and well-being, including but not limited to street sweeping, debris and limb removal, removal of downed wires, restoring electrical service, repairing traffic signals, unplugging sewers, snow removal, house moving, vacuuming catch basins, removal of damaged poles and vehicles, repair of water hydrants and mains, gas lines, oil lines, sewers, etc.

Construction Vibration

There are no applicable County standards for vibration-induced annoyance or structural damage from vibration and the County defers to other authoritative sources for evaluating these impacts. Groundborne vibration levels resulting from construction activities at the Project site were estimated using the California Department of Transportation (Caltrans) vibration damage potential guideline thresholds; shown in Table 11, Vibration Damage Threshold Criteria. The structural damage threshold for "newer residential structures" of 0.5 ppv in/sec was selected for this analysis. This threshold represents the vibration limits for structural damage to adjacent uses to the Project site. These uses would be limited to the Campus Kilpatrick buildings where the recycled water line and storage tank are located proximate.

**TABLE 11
VIBRATION DAMAGE THRESHOLD CRITERIA**

Structure and Condition	Maximum ppv (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
ppv: peak particle velocity; in/sec: inch(es) per second Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. Source: Caltrans 2013b		

The Caltrans vibration annoyance potential guideline thresholds are shown in Table 12, Vibration Annoyance Criteria. Based on the guidance in Table 12, the “strongly perceptible” vibration level of 0.9 ppv in/sec is considered the applicable threshold for a potentially significant vibration impact for human annoyance during construction of the Project.

**TABLE 12
VIBRATION ANNOYANCE CRITERIA**

Average Human Response	ppv (in/sec)
Severe	2.0
Strongly perceptible	0.9
Distinctly perceptible	0.24
Barely perceptible	0.035
ppv: peak particle velocity; in/sec: inch(es) per second Source: Caltrans 2013b	

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

Less than Significant Impact. Implementation of the Project would result in noise and vibration related to on-site construction equipment and haul truck traffic.

On-Site Construction Equipment Noise

Noise generated by construction activities would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. Construction noise levels reported in the USEPA’s *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* were used to estimate future construction noise levels for the Project (USEPA 1971).

Table 13 shows the noise levels associated with each construction phase at the nearest noise sensitive use. The nearest noise sensitive use is Campus Kilpatrick, which is located approximately 670 feet from the proposed WWTS. However, the proposed recycled water lines and storage tank would be constructed proximate to existing buildings at Campus Kilpatrick. Noise levels for the proposed recycled water lines were calculated for an average noise exposure occurring at the midway point of the recycled water lines. Noise levels from construction of the recycled water lines would be less when construction activities are located further away and higher when construction activities occur closer to Campus Kilpatrick buildings.

**TABLE 13
CONSTRUCTION NOISE LEVELS AT NEAREST
NOISE-SENSITIVE USE (CAMPUS KILPATRICK)**

Construction Phase	Average Noise Levels (L_{eq} dBA)	County Noise Limit for Stationary Equipment (L_{eq} dBA)	Exceeds Noise Limits?
Wastewater Treatment Plant Construction			
Ground Clearing/Demolition	61	80	No
Excavation (Site Preparation)	66	80	No
Foundation Construction	55	80	No
Building Construction	64	80	No
Paving	66	80	No
Recycled Water Line Construction			
Ground Clearing/Demolition	68	80	No
Excavation (Site Preparation)	63	80	No
Pipeline Construction	59	80	No
Paving	59	80	No
<small>L_{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures. Source: USEPA 1971.</small>			

As shown, average noise levels would be between 55-66 dBA L_{eq} for development of the WWTS and 59-68 dBA L_{eq} for development of the recycled water lines. Average construction noise levels would be less than the noise limits established within the County Code. There would be a less than significant impact, and no mitigation is required.

Off-Site Vehicular Noise

Demolition activities for the Project is anticipated to generate approximately 1,035 cy of concrete and 36 cy of pavement that would be disposed off-site; this equates to an estimated 89 truck trips (round trip; 178 one-way trips) over the course of about 2 months, or about 4 or 5 one-way trips per workday. Earthmoving (i.e., grading and excavation), subsequent to the demolitions phase, would result in the export of excavated soils (435 cy) for disposal. This equates to an estimated 31 truck trips (round trip; 62 one-way trips) over the course of about 2 months, or 4 to 5 one-way trips per workday. The addition of 4 to 5 truck trips per day, plus daily construction worker trips would not result in a substantial noise impact in the Project. There would be a less than significant impact, and no mitigation is required.

Operational Noise

Stationary Noise Sources

Operation of the proposed WWTS would not result in substantial noise exposure to the nearest noise sensitive use, Campus Kilpatrick, which is located approximately 670 feet to the north of the proposed facilities. Noise levels would be substantially attenuated over this distance such that noise levels would not be anticipated to exceed the noise limits established within Section 12.08.390, Exterior noise standards, of the County Code. For purposes of this analysis, the "Residential Properties" category under Section 12.08.390 is being applied, and this requires an exterior noise level of 50 dB from 7:00 AM to 10:00 PM (i.e., daytime) and 45 dB from 10:00 PM to 7:00 AM (i.e., nighttime). The WWTS engineer provided noise reading data taken proximate to a similar MBR facility constructed at another County facility, Descanso Gardens in La Cañada Flintridge. The Descanso Facility included enclosure and other features to attenuate noise generation, due to its proximity to the botanic garden. The WWTS engineer indicated that operation of the WWTS would be relatively quiet even without the enclosures and would not be run at full speed in most situations; it was suggested to add 5 dBA to the noise readings taken at the Descanso WWTS unit (Corbett 2020). The highest noise reading taken was 58 dBA at a distance of 25 feet; therefore, it is anticipated that the proposed WWTS would generate a maximum noise level of 63 dBA at 25 feet. Based on the distance between the WWTS site and Campus Kilpatrick, noise levels would approximately 34 dBA L_{eq} at the nearest noise sensitive use at Campus Kilpatrick. Therefore, the noise level from operation of the proposed WWTS would be below both the day and nighttime noise limits applicable to the Project site established within the County Code. The proposed recycled water lines would be buried, and operation of either the lines or the recycled water tank would not result in audible levels of noise. There would be a less than significant, and no mitigation is needed.

Vehicular Noise

There would be minimal traffic associated with Project operation. One 10,000-gallon tractor-trailer truck trip to remove sludge from the WWTS would occur on a quarterly basis. For routine inspection and maintenance, generally one or two workers would visit the Project site. These may be ISD staff that would already be present for maintenance of other infrastructure at Campus Kilpatrick or visits expressly for the WWTS. This small quantity of Project-related traffic would not result in a substantial increase in noise levels in the Project area. There would be a less than significant impact, and no mitigation would occur.

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

Less than Significant Impact. The County of Los Angeles uses a structural damage threshold for newer residences of 0.5 inches per second ppv (used here for other types of structures as well), and a human annoyance threshold of 0.9 inches per second ppv. The primary sources of vibration during Project construction are expected to be large bulldozers (used here to represent an excavator, for which vibration data is not available); and loaded trucks. A large bulldozer generates 0.089 inches per second ppv at 25 feet, and a loaded truck generates 0.076 inches per second ppv at 25 feet. Based on these estimated vibration levels, the vibration generated by construction of the Project is addressed below.

Wastewater Treatment Plant Construction

The development of the WWTS would not occur proximate to any vibration-sensitive uses. The nearest sensitive receptors to the site are the Campus Kilpatrick buildings located approximately 670 feet to the north of the WWTS. As shown in Table 14, based on typical propagation rates, the vibration level at the nearest receptor during construction of the WWTS would range from 0.000 to 0.002 inches per second ppv. The vibration levels at the nearest vibration-sensitive receptor would be well below the 0.5 inch per second ppv structural damage threshold and the 0.9 inch per second ppv annoyance threshold. There would be a less than significant impact related to WWTS construction, and no mitigation is required.

**TABLE 14
ESTIMATED VIBRATION LEVELS AT THE NEAREST SENSITIVE RECEPTORS**

Equipment	Vibration Levels (inches per second ppv)	
	Wastewater Treatment Plant	Recycled Water Lines and Storage Tank
	(at 670 feet from Receptor)	(at 8 feet from Receptor)
Large bulldozer	0.001	N/A
Small bulldozer	0.000	0.017
Jackhammer	0.000	0.193
Loaded trucks	0.001	0.420
Vibration Annoyance Threshold	0.9	0.9
Vibration Building Damage Threshold	0.5	0.5
Exceeds Threshold?	No	Yes
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971.		

Recycled Water Lines and Storage Tank Construction

The Project includes the installation of 700 lf of 10-in sewer line between the WWTS and a connection point located immediately south of the Campus Kilpatrick administration buildings; and approximately 1,837 lf of 4-in recycled water line between the WWTS and a connection point located immediately west of the former Camp Miller kitchen building and a connection point the proposed recycled water storage tank. The new recycled water storage tank would be located on the vacant area to the north of the northeastern most building at Campus Kilpatrick. As shown in Table 14, vibration levels were found to be below both the vibration-induced annoyance and building damage thresholds. There would be a less than significant impact related to construction of the recycled water lines and storage tank, and no mitigation is required.

WWTS Operation

The operation of the proposed WWTS and recycled water line and associated storage tank would not generate any perceptible levels of vibration at the nearest sensitive receptors, as the current temporary WWTS does not generate perceptible vibration. There would be no operational impact related to vibration, and no mitigation is required.

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

Less than Significant Impact. There are no airports within two miles of the Project site. The site is located outside the 65 dBA CNEL noise contours any airport. The Project would not introduce any new sensitive receptors to the site or surrounding area and is not a noise sensitive use. There would be a less than significant impact, and no mitigation is required.

3.14 POPULATION AND HOUSING	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

No Impact. The Project site does not include residential land uses, nor would the Project include habitable structures or other land uses that could directly induce population growth. Also, the Project does not involve the extension of new infrastructure that could serve future populations resulting in indirect population growth. The proposed WWTS is sized only to serve the existing and potential future populations of Campus Kilpatrick and Camp Miller. The Project would bring in County staff, contractors, and other authorized personnel to the Project site for the duration of the construction period. The local population (i.e., in Los Angeles County) could provide adequate skilled workers to satisfy the construction-related positions, and there would be no need to relocate workers from other areas. Thus, no indirect change in the population and housing is expected with the presence of construction crews on site. Operation of the Project would not impact population, because no additional County staff would be needed to perform routine maintenance. There would be no direct or indirect impact pertaining to population growth in the area as a result of the Project, and no mitigation is required.

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

No Impact. The Project would not displace existing housing or population on the site. There would be no impact due to construction or operation of the Project, and no mitigation is required.

3.15 PUBLIC SERVICES	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

- **Fire protection?**
- **Police protection?**
- **Schools?**
- **Parks?**
- **Other public facilities?**

No Impact. As discussed above in Section 2.14, Population and Housing, the Project would not involve the construction or operation of structures or infrastructure improvements that could directly or indirectly induce population growth that would generate demand for additional fire protection, police protection, school, park, or other public facility (such as library) services that would result in construction of new or expansion of existing government facilities. Also, implementation of the Project would not involve construction of facilities that would generate greater fire risk or would generate more calls for law enforcement than the existing condition. There would be no impact and no mitigation is required.

3.16 RECREATION	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. As discussed above in Section 2.14, Population and Housing, the Project would not involve the construction or operation of structures or infrastructure improvements that could directly or indirectly induce population growth, including during construction activities, that would generate demand for additional recreational facilities. The Project would not increase the use of existing park or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. There would be no impact related to use of existing recreation facilities, and no mitigation would be required.

3.17 <u>TRANSPORTATION</u>	Potentially Significant Impact	Less Than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT ANALYSIS

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

Less than Significant Impact. The County would plan to construct the Project during a maximum 8-hour period within the 9-hour period of 7:00 AM and 4:00 PM Monday through Friday. There would be no construction activity on Saturday or Sunday, federal holidays that occur on weekdays, or nighttime construction. As discussed in Section 1.0, there would be limited export soils or demolition debris, respectively. Demolition is anticipated to generate approximately 1,035 cy of concrete and 36 cy of pavement that would be disposed off-site; this equates to an estimated 13 truck trips (round trip; 26 one-way trips) over the course of about 2 months, or about a single one-way trip per workday. Earthmoving would be limited to localized areas of grading that would be balanced on site, except for a portion of the excavated soil from the new recycled water lines. An estimated 435 cy of excavated soil would be exported; this equates to an estimated 31 truck trips (round trip; 62 one-way trips) over the course of about 2 months, or 4 to 5 one-way trips per workday. Project construction traffic would be expected to travel the shortest path possible to and from Calabasas Landfill to the northeast, using Encinal Canyon Road, Kanan Road, and I-101. Between one and five one-way trips per day to and from the landfill over a finite period of several months would not be anticipated create congestion along roadways or at intersections in the Project area.

Long-term maintenance of the permanent WWTS would involve 1) the estimated quarterly sludge removals by a single, 10,000-gallon tanker-trailer and 2) routine inspection and maintenance of the WWTS and connected infrastructure (e.g., sewer line, recycled water tank, transformer) by County ISD staff. For routine inspection and maintenance, generally one or two vehicles with one or two workers, would be involved. These may be ISD staff that would already be present for maintenance of other infrastructure at Campus Kilpatrick or visits expressly for the WWTS facility. The existing temporary WWTS also requires sludge removal, so this vehicle trip would not be an addition over the existing condition. This nominal level of traffic associated with Project operation would have no effect on the local circulation system. Construction and operation of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. There would be no impact, and no mitigation is required.

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

No Impact. Section 15064.3(b) of the State CEQA Guidelines regards the criteria for analyzing transportation (not traffic/circulation) impacts based on a vehicle miles traveled (VMT) metric consistent with Senate Bill (SB) 743. Per the County's Transportation Impact Analysis Guidelines (July 23, 2020), land use projects generating less than 110 daily trips do not require a quantitative VMT analysis and are assumed to have less than significant impacts to transportation. As detailed under Threshold 2.17(a), Project operation would generate, at most, 2-3 trips per month. Therefore, the Project would not conflict with or be inconsistent with Section 15064.3(b) of the State CEQA Guidelines. There would be no impact, and no mitigation is required.

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

No Impact. The Project would not involve any permanent change to the road configurations in the Project area and would not change land use, or traffic related to the land use, on the site that would represent an incompatible use. Operation of the Project would involve periodic maintenance trips that would use the existing circulation system. Therefore, construction and operation of the Project would not increase traffic hazards or be an incompatible use. There would be no impact, and no mitigation is required.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. Equipment staging and parking for construction workers would be on County property, either within the disturbance limits at the WWTS or at the Camp Miller/Campus Kilpatrick sites. Construction would not require staging within the travel lanes of Encinal Canyon Road that would disrupt existing traffic patterns. All activities on or adjacent to public streets that could limit traffic flow, such as construction equipment delivery, would be conducted with traffic control measures per the *Standard Specifications for Public Works Construction* (Greenbook) to ensure that existing circulation would not be impacted during Project construction in such a way that would physically impair or impede emergency response or evacuation. Operation of the Project would not impact emergency access, because the nominal number of worker trips for inspection and maintenance activities would not demonstrably affect traffic flows. There would be a less than significant impact related to adopted emergency access, and no mitigation is required.

3.18 <u>TRIBAL CULTURAL RESOURCES</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Not Applicable			

IMPACT ANALYSIS

Information in this section is derived in part from (1) the Phase I Cultural Resource Assessment for the Camp Vernon Kilpatrick Replacement Project conducted by BonTerra Consulting (now Psomas) in 2012 (BonTerra Consulting 2012) and (2) the updated records search from the SCCIC and the NAHC requested by Psomas in 2020. The 2020 cultural resources records search results are presented as Appendix C to this Initial Study.

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)**

Less than Significant Impact. As discussed further in Section 2.5, Cultural Resources, the 2012 SCCIC records search and literature review identified seven prehistoric resources within one mile of the Project site, but there are no known prehistoric resources within the Project boundaries. The closest prehistoric resource documented near the Project site is CA-LAN-717, a well-known rock art site known as the Cave of the Four Horsemen and listed in the NRHP. This site is located on Saddle Rock Ranch, approximately 4,500 feet east of the Project site. Additionally, sites CA-LAN-15 and CA-LAN-18 are recorded immediately west of CA-LAN-717 and can be considered loci of the larger site. The 2020 records search did not find any cultural resources located within the Project site. However, within ¼-mile of the site, two prehistoric isolates (P-19-004663 and P-19-101279) were discovered during an archaeological survey conducted in 2015. These resources would not be impacted by implementation of the Project. The 2012 records search included two cultural resources studies that included a portion of the Project site, but the

2020 records search did not identify any additional studies that included any part of the Project site.

The NAHC conducted a SLF search on October 16, 2020. The results concluded that the Project site does not contain any known sacred lands or tribal cultural resources. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any given project area, only that there are no resources known to the NAHC.

As such, there are no known archaeological resources, including tribal cultural resources known to the NAHC, on the Project site. The built nature of the Project site suggests that the presence of buried prehistoric archaeological resources is unlikely, but there is always possibility of encountering archaeological deposits when disturbing native sediment. However, the earthmoving activities (i.e., grading and excavation) required for Project construction would be limited to areas that have been previously disturbed by prior construction and development and would be shallow, on the order of three feet in depth or less. Specifically, the Project would involve localized, shallow grading to construct modifications of the WWTS access road (26 sf), construct a minor expansion of the WWTS pad with retaining wall and adjacent concrete swale (498 sf), construct a new pad for the recycled water storage tank (400 sf), and install the new recycled water line (1,300 cy). The likelihood that unknown archaeological resources would be encountered during Project implementation is remote, and as such the Project would not be expected to cause a substantial adverse change in the significance of an archaeological resource.

Also, there is no indication that human remains are present in the Project site, including those interred outside formal cemeteries. In the unlikely event of an unanticipated encounter with human remains in Project site, the *California Health and Safety Code* and the *California Public Resources Code* require that any activity in the area of a potential find be halted and the Los Angeles County Coroner be notified. Specifically, if Native American human remains are encountered, Section 5097.98 of the Public Resources Code and Section 7050.5 of the California Health and Safety Code would be followed. If human remains are encountered, no further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to the origin. Further, pursuant to Section 5097.98(b) of the Public Resources Code, remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County Coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours. Subsequently, the NAHC shall identify the person or persons it believes to be the "most likely descendant" (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains as provided in Section 5097.98 of the Public Resources Code. In the unlikely event that human remains are encountered during Project construction, compliance with existing regulations would ensure there is a less than significant impact, and no mitigation is required.

Therefore, there would be less than significant impacts related to encounter of unknown tribal cultural resources, and no mitigation is required.

- b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code**

Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Native American consultation pursuant to Assembly Bill (AB) 52 applies only for projects that require CEQA review under a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report. Therefore, consultation under AB 52 is not applicable to this Project as, based on the analysis presented in this Initial Study, a Categorical Exemption is anticipated to be the appropriate CEQA documentation. Therefore, no significance finding is established for this checklist question.

3.19 UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT ANALYSIS

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

No Impact. Implementation of the Project would not require or result in the relocation or construction of new or expanded water, storm water drainage, natural gas, or telecommunication facilities. The Project itself is the construction of new wastewater treatment facilities, whose environmental impacts are addressed in this Initial Study. As part of the Project, new electric facilities would be installed. However, implementation of the Project would not result in the relocation or construction of additional or expanded wastewater treatment or electric facilities. The new wastewater treatment and electric facilities are sized only to serve the existing and potential future population of Campus Kilpatrick and Camp Miller. There would be no impacts, and no mitigation is required.

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

No Impact. A limited volume of water would be used during construction for dust suppression. There would be no long-term demand for water as a result of the Project. On the contrary, potable water use for irrigation of landscaping and athletic fields would be reduced from the existing conditions with Project implementation. Based on the nominal water use expected during

construction, the Project's demands would be met with existing supplies. There would be no impact, and no mitigation is required.

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

No Impact. The proposed WWTS facility would not connect to municipal wastewater treatment facilities. It would be sized to serve the County facilities only. There would be no impact related to wastewater treatment capacity, and no mitigation is required.

- d) **Would the generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

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

Less than Significant Impact. A finite volume of solid waste would be generated during construction, including demolition materials (e.g., concrete, asphalt, fill), construction materials packaging, and miscellaneous waste such as food wrappers and beverage containers. An estimated 1,506 cy of sediment and demolition debris would be excavated during construction activity. This analysis assumes all material excavated soil is exported for disposal at Calabasas Landfill, which is a conservative assumption as the Project would be required to reuse or recycle 50 percent of the debris generated to meet the County's C&D Debris Recycling and Reuse Ordinance.

The estimated 1,506 cy of sediment and demolition debris would represent approximately 0.01 percent of the landfill's remaining permitted capacity of 11,071,716 cy as of December 31, 2018 (the most currently publicly available information) (LADPW 2019). Therefore, construction of the Project would not directly exceed capacity of Calabasas Landfill. All waste generated during the construction period would be handled and disposed of in compliance with all applicable federal, State, and local statutes and regulations related to solid waste, including the County's C&D Ordinance. Additionally, operation of the Project would not impact solid waste disposal, because the routine maintenance activity would generate a negligible amount of solid waste. There would be a less than significant impact related to solid waste, and no mitigation is required.

3.20 <u>WILDFIRE</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IMPACT ANALYSIS

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

Less than Significant Impact. As discussed in Section 2.9, Hazards and Hazardous Materials, the Project site is within a VHFHSZ) (CAL FIRE 2020). Equipment staging and parking for construction workers would be on County property, either within the disturbance limits at the WWTS or at the Camp Miller/Campus Kilpatrick sites. Construction would not require staging within the travel lanes of Encinal Canyon Road that would disrupt existing traffic patterns. It is possible that during the jack-and-bore operations for the new sewer line under Encinal Canyon Road, one or more vehicles or construction crew may temporarily be near or within the ROW adjacent to the paved travel lanes. All activities on or adjacent to public streets that could limit traffic flow, such as construction equipment delivery, would be conducted with traffic control measures per the *Standard Specifications for Public Works Construction* (Greenbook). Implementation of appropriate traffic control measures would ensure that existing circulation would not be impacted during Project construction in such a way that would physically impair or impede emergency response or evacuation. Operation of the Project would not impact emergency access, because the nominal number of worker trips for inspection and maintenance activities would not demonstrably affect traffic flows. There would be a less than significant impact related to adopted emergency response or emergency evacuation plans, and no mitigation is required.

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

Less than Significant Impact. As discussed in Section 1.2 of this Preliminary Review, the County facilities are located on, and are immediately surrounded by, unincorporated County land that is largely undeveloped (i.e., undisturbed hillsides) with variable slopes. Both Campus Kilpatrick and former Camp Miller are located on lands that are relatively flat to gently descending to the south.

The surrounding hillsides generally ascend at slopes of approximately 1.5 to 1 (horizontal to vertical). However, some near-vertical slopes with bedrock outcrops are present. Prominent rock outcrops are present to the northwest and to the north at elevations of approximately 150 feet to 200 feet above the Project site. Similarly, the proposed WWTS site is relatively flat with more gentle slopes situated to the southeast, south, and southwest. It is acknowledged that the presence of slopes within VHFHSZ-designated areas is a contributing factor to the speed and/or direction of wildfire spread. While the Project site is within a VHFHSZ, the Project would not introduce new land uses to the site nor would there be an increase in the on-site population of Campus Kilpatrick compared to the existing condition. A WWTS has served Campus Kilpatrick and Camp Miller for many decades, in the same location as presently proposed. A temporary package WWTS, located immediately west of the existing WWTS site, has been operating in the interim since the Woolsey Fire. The new permanent WWTS would serve the same population, have the same capacity, and be situated on the same site as the former WWTS. Therefore, in itself, replacement of the WWTS does not affect susceptibility of the County facilities to wildfire hazards or exacerbate the risk of exposure to wildfire due to slope or other factors. There would be a less than significant impact, and no mitigation is required.

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

Less than Significant Impact. As discussed under Threshold 2.20(b), while the Project is within a VHFHSZ, the Project is the replacement of infrastructure and would neither change land uses nor increase the on-site population already present at Campus Kilpatrick. Implementation of the new, permanent WWTS would involve installation of new wet (sewer line, recycled water line, recycled water storage tank) and dry (electrical) utilities. The sewer line, recycled water line, and recycled water tank would be located outside of the existing WWTS site to connect to Campus Kilpatrick (see Exhibits 4a and 4b). The pipelines would be located underground and the storage tank, because it would contain water and connect to underground pipelines, would not represent a potential to start or exacerbate a wildfire.

The Project would replace two existing 240 kV pole mounted transformers with two 480 kV pole mounted transformers. The increase in voltage does not correlate to an increased risk of an ignition event that could contribute to a wildfire. Also, the transformers would be grounded at the pole per SCE specifications. A 75 kW generator with a subbase diesel fuel tank would be replaced with a new 175 kW generator with a subbase diesel fuel tank, which would be located within the existing WWTS site. The increased power output of the generator does not correlate to an increased risk of an ignition event that could contribute to a wildfire. Further, the diesel tank would have double containment and leak sensors, and the generator would be completely enclosed. Additionally, an overhead electric line is being removed and replaced with an underground service conduit as part of the Project. This would reduce the fire risk associated with overhead electric lines compared to the existing conditions. All electrical infrastructure required as part of the Project would be installed and grounded per California Electrical Code and SCE specifications, where applicable. As such, implementation of the proposed WWTS, including infrastructure, and removing the temporary WWTS, would not exacerbate wildfire risks in the VHFHSZ. There would be a less than significant impact, and no mitigation is required.

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

No Impact. While the Project site is within a VHFHSZ, there are no land uses located downslope or downstream of the on-site drainage that parallels the entrance road that would be adversely affected by post-fire changes in slope stability or drainage. Additionally, as discussed above, the Project involves installation of a new permanent WWTS to replace both the temporary WWTS and the former, fire damaged WWTS located on the same site south of Encinal Canyon Road. Therefore, the presence of the new permanent WWTS would not result in exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. There would be no impact, and no mitigation is required.

3.21 <u>MANDATORY FINDINGS OF SIGNIFICANCE</u>	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

MANDATORY FINDINGS OF SIGNIFICANCE ANALYSIS

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

Less than Significant Impact. As discussed in Section 2.4, Biological Resources, there are no sensitive biological resources on or near the Project site. There is potential for nesting birds and raptors to be present on and near the Project site; therefore, Project construction would be required to comply with the requirements of the MBTA and the *California Fish and Game Code*. The Project would not degrade the quality of the environment; would not substantially reduce the habitat of fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not reduce the number of or restrict the range of a Rare or Endangered plant or animal. As discussed in Section 2.5, Cultural Resources and 2.7, Geology and Soils, no significant impacts would occur to historic, archaeological, and/or paleontological resources. Therefore, the Project does not have the potential to eliminate important examples of the major periods of California history or prehistory.

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

Less than Significant Impact. The Project site is within the Santa Monica Mountains National Recreation Area (SMMNRA), for which a General Management Plan (GMP) was adopted by the National Park Service (NPS) in 2003. The Project site and all surrounding lands are among the 80 percent of SMMNRA lands designated in the GMP as “Low Intensity Management Areas”, which is the lowest intensity land use designation and where emphasis would be on natural and cultural resource preservation (NPS 2002). Lands to the north, east and west of Campus Kilpatrick and Camp Miller, which include a portion of County-owned land and privately held lands, are largely comprised of steep hillsides that are not amenable to development, regardless of land use development controls. Because areas to the south of the County property are NPS lands and within a Low Intensity Management Area, they are not likely to be developed. There are no developed areas, other than Campus Kilpatrick and Camp Miller, within approximately ¼-mile of the site. It should also be noted that should there be any projects in the site vicinity, they would be subject to the same regulations as the Project, where applicable, and would be subject to project-specific CEQA review prior to implementation. When considering both the lack of developable land in the Project area and the lack of significant impacts requiring mitigation measures related to construction and operation of the Project, it can be concluded that the Project would not have any cumulatively considerable impacts.

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

Less than Significant Impact. As shown in the analysis in Sections 2.1 through 2.20 above, the Project would not have environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly. There would be less than significant environmental impacts due to construction and operation of the proposed WWTS and decommissioning of the temporary WWTS for all topical analyses.

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APPENDIX A
CALEEMOD DATA

Camp Kilpatrick WWTP - Los Angeles-South Coast County, Annual

Camp Kilpatrick WWTP
Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	6.75	1000sqft	0.15	6,750.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	399.04	CH4 Intensity (lb/MW hr)	0	N2O Intensity (lb/MW hr)	0

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CO2 intensity factor based on SCE 2020 data

Land Use -

Construction Phase - Developer provided schedule

Off-road Equipment - No architectural coating phase

Off-road Equipment -

Off-road Equipment -

Demolition -

Grading -

Architectural Coating - No painting

Vehicle Trips - Only 1 HDD per quarter to remove sludge.

Energy Use - Client provided

Water And Wastewater - Based on client data

Solid Waste -

Construction Off-road Equipment Mitigation -

Operational Off-Road Equipment -

Stationary Sources - Emergency Generators and Fire Pumps - Monthly testing for a Generac SD250

Off-road Equipment - Assumed construction quantities

Trips and VMT - Assumed truck trips

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	0.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	0.00
tblArchitecturalCoating	EF_Residential_Exterior	50.00	0.00
tblArchitecturalCoating	EF_Residential_Interior	50.00	0.00
tblConstructionPhase	NumDays	5.00	1.00
tblConstructionPhase	NumDays	100.00	132.00
tblConstructionPhase	NumDays	10.00	44.00
tblConstructionPhase	NumDays	2.00	44.00
tblConstructionPhase	NumDays	5.00	10.00
tblConstructionPhase	NumDays	1.00	44.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	21.75
tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblGrading	MaterialExported	0.00	435.00
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	CH4IntensityFactor	0.029	0
tblProjectCharacteristics	CO2IntensityFactor	702.44	399.04
tblProjectCharacteristics	N2OIntensityFactor	0.006	0
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	389.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	1.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	12.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	20.00
tblVehicleTrips	ST_TR	1.50	0.00
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	0.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	IndoorWaterUseRate	1,560,937.50	12,722,805.00
tblWater	SepticTankPercent	10.33	0.00

2.0 Emissions Summary

2.1 Overall Construction Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0636	0.6327	0.5438	1.0500e-003	0.0514	0.0304	0.0818	0.0150	0.0287	0.0437	0.0000	92.8291	92.8291	0.0191	0.0000	93.3062
2022	0.0453	0.4534	0.4718	7.8000e-004	3.4000e-003	0.0236	0.0270	9.1000e-004	0.0217	0.0227	0.0000	68.3352	68.3352	0.0208	0.0000	68.8546
Maximum	0.0636	0.6327	0.5438	1.0500e-003	0.0514	0.0304	0.0818	0.0150	0.0287	0.0437	0.0000	92.8291	92.8291	0.0208	0.0000	93.3062

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0636	0.6327	0.5438	1.0500e-003	0.0278	0.0304	0.0582	8.0000e-003	0.0287	0.0367	0.0000	92.8290	92.8290	0.0191	0.0000	93.3061
2022	0.0453	0.4534	0.4718	7.8000e-004	3.4000e-003	0.0236	0.0270	9.1000e-004	0.0217	0.0227	0.0000	68.3351	68.3351	0.0208	0.0000	68.8545
Maximum	0.0636	0.6327	0.5438	1.0500e-003	0.0278	0.0304	0.0582	8.0000e-003	0.0287	0.0367	0.0000	92.8290	92.8290	0.0208	0.0000	93.3061

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	43.09	0.00	21.70	44.00	0.00	10.55	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	7-1-2021	9-30-2021	0.2787	0.2787
2	10-1-2021	12-31-2021	0.2692	0.2692
3	1-1-2022	3-31-2022	0.2517	0.2517
4	4-1-2022	6-30-2022	0.2483	0.2483
5	7-1-2022	9-30-2022	0.0000	0.0000
		Highest	0.2787	0.2787

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Decommissioning	Demolition	5/20/2021	6/2/2021	5	10	
2	Demolition	Demolition	6/7/2021	8/6/2021	5	44	
3	Site Preparation	Site Preparation	8/9/2021	10/8/2021	5	44	
4	Grading	Grading	10/11/2021	12/10/2021	5	44	
5	Building Construction	Building Construction	12/13/2021	6/15/2022	5	132	
6	Paving	Paving	6/16/2022	6/30/2022	5	10	
7	Architectural Coating	Architectural Coating	7/1/2022	7/1/2022	5	1	

Acres of Grading (Site Preparation Phase): 22

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 10,125; Non-Residential Outdoor: 3,375; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20

Category	tons/yr										MT/yr					
Off-Road	3.9800e-003	0.0393	0.0282	6.0000e-005		1.8400e-003	1.8400e-003		1.7700e-003	1.7700e-003	0.0000	5.2061	5.2061	9.7000e-004	0.0000	5.2303
Total	3.9800e-003	0.0393	0.0282	6.0000e-005		1.8400e-003	1.8400e-003		1.7700e-003	1.7700e-003	0.0000	5.2061	5.2061	9.7000e-004	0.0000	5.2303

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.0000e-005	2.7700e-003	6.5000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	6.0000e-005	0.0000	0.7623	0.7623	5.0000e-005	0.0000	0.7636
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	8.0000e-005	9.5000e-004	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2472	0.2472	1.0000e-005	0.0000	0.2474
Total	1.9000e-004	2.8500e-003	1.6000e-003	1.0000e-005	4.4000e-004	1.0000e-005	4.6000e-004	1.2000e-004	1.0000e-005	1.3000e-004	0.0000	1.0095	1.0095	6.0000e-005	0.0000	1.0110

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.9800e-003	0.0393	0.0282	6.0000e-005		1.8400e-003	1.8400e-003		1.7700e-003	1.7700e-003	0.0000	5.2061	5.2061	9.7000e-004	0.0000	5.2303
Total	3.9800e-003	0.0393	0.0282	6.0000e-005		1.8400e-003	1.8400e-003		1.7700e-003	1.7700e-003	0.0000	5.2061	5.2061	9.7000e-004	0.0000	5.2303

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.0000e-005	2.7700e-003	6.5000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	6.0000e-005	0.0000	0.7623	0.7623	5.0000e-005	0.0000	0.7636
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	8.0000e-005	9.5000e-004	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2472	0.2472	1.0000e-005	0.0000	0.2474
Total	1.9000e-004	2.8500e-003	1.6000e-003	1.0000e-005	4.4000e-004	1.0000e-005	4.6000e-004	1.2000e-004	1.0000e-005	1.3000e-004	0.0000	1.0095	1.0095	6.0000e-005	0.0000	1.0110

3.3 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0141	0.0000	0.0141	2.1300e-003	0.0000	2.1300e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0179	0.1632	0.1703	2.7000e-004		9.1700e-003	9.1700e-003		8.7400e-003	8.7400e-003	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301
Total	0.0179	0.1632	0.1703	2.7000e-004	0.0141	9.1700e-003	0.0232	2.1300e-003	8.7400e-003	0.0109	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.5000e-004	0.0180	4.1900e-003	5.0000e-005	1.1000e-003	5.0000e-005	1.1500e-003	3.0000e-004	5.0000e-005	3.5000e-004	0.0000	4.9506	4.9506	3.4000e-004	0.0000	4.9592
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	1.5200e-003	0.0187	0.0127	7.0000e-005	3.5700e-003	7.0000e-005	3.6400e-003	9.5000e-004	7.0000e-005	1.0200e-003	0.0000	7.1757	7.1757	4.1000e-004	0.0000	7.1859

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.3300e-003	0.0000	6.3300e-003	9.6000e-004	0.0000	9.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0179	0.1632	0.1703	2.7000e-004		9.1700e-003	9.1700e-003		8.7400e-003	8.7400e-003	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301
Total	0.0179	0.1632	0.1703	2.7000e-004	6.3300e-003	9.1700e-003	0.0155	9.6000e-004	8.7400e-003	9.7000e-003	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Hauling	5.5000e-004	0.0180	4.1900e-003	5.0000e-005	1.1000e-003	5.0000e-005	1.1500e-003	3.0000e-004	5.0000e-005	3.5000e-004	0.0000	4.9506	4.9506	3.4000e-004	0.0000	4.9592
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	1.5200e-003	0.0187	0.0127	7.0000e-005	3.5700e-003	7.0000e-005	3.6400e-003	9.5000e-004	7.0000e-005	1.0200e-003	0.0000	7.1757	7.1757	4.1000e-004	0.0000	7.1859

3.4 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0119	0.0000	0.0119	1.2900e-003	0.0000	1.2900e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0144	0.1760	0.0906	2.2000e-004		6.7400e-003	6.7400e-003		6.2000e-003	6.2000e-003	0.0000	19.2397	19.2397	6.2200e-003	0.0000	19.3953
Total	0.0144	0.1760	0.0906	2.2000e-004	0.0119	6.7400e-003	0.0187	1.2900e-003	6.2000e-003	7.4900e-003	0.0000	19.2397	19.2397	6.2200e-003	0.0000	19.3953

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.8000e-004	3.8000e-004	4.2500e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1125	1.1125	3.0000e-005	0.0000	1.1134
Total	4.8000e-004	3.8000e-004	4.2500e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1125	1.1125	3.0000e-005	0.0000	1.1134

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.3700e-003	0.0000	5.3700e-003	5.8000e-004	0.0000	5.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0144	0.1760	0.0906	2.2000e-004		6.7400e-003	6.7400e-003		6.2000e-003	6.2000e-003	0.0000	19.2397	19.2397	6.2200e-003	0.0000	19.3952
Total	0.0144	0.1760	0.0906	2.2000e-004	5.3700e-003	6.7400e-003	0.0121	5.8000e-004	6.2000e-003	6.7800e-003	0.0000	19.2397	19.2397	6.2200e-003	0.0000	19.3952

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.8000e-004	3.8000e-004	4.2500e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1125	1.1125	3.0000e-005	0.0000	1.1134
Total	4.8000e-004	3.8000e-004	4.2500e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1125	1.1125	3.0000e-005	0.0000	1.1134

3.5 Grading - 2021

Unmitigated Construction On-Site

Off-Road	0.0179	0.1632	0.1703	2.7000e-004		9.1700e-003	9.1700e-003		8.7400e-003	8.7400e-003	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301
Total	0.0179	0.1632	0.1703	2.7000e-004	7.6300e-003	9.1700e-003	0.0168	4.1900e-003	8.7400e-003	0.0129	0.0000	23.4210	23.4210	4.3600e-003	0.0000	23.5301

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.3000e-004	7.6400e-003	1.7800e-003	2.0000e-005	4.7000e-004	2.0000e-005	4.9000e-004	1.3000e-004	2.0000e-005	1.5000e-004	0.0000	2.1050	2.1050	1.5000e-004	0.0000	2.1086
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	1.2000e-003	8.3900e-003	0.0103	4.0000e-005	2.9400e-003	4.0000e-005	2.9800e-003	7.8000e-004	4.0000e-005	8.2000e-004	0.0000	4.3300	4.3300	2.2000e-004	0.0000	4.3353

3.6 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.8100e-003	0.0599	0.0545	9.0000e-005		3.3600e-003	3.3600e-003		3.0900e-003	3.0900e-003	0.0000	7.5062	7.5062	2.4300e-003	0.0000	7.5668
Total	5.8100e-003	0.0599	0.0545	9.0000e-005		3.3600e-003	3.3600e-003		3.0900e-003	3.0900e-003	0.0000	7.5062	7.5062	2.4300e-003	0.0000	7.5668

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.0000e-005	7.4000e-004	2.0000e-004	0.0000	5.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1849	0.1849	1.0000e-005	0.0000	0.1852
Worker	1.0000e-004	8.0000e-005	8.5000e-004	0.0000	2.5000e-004	0.0000	2.5000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2225	0.2225	1.0000e-005	0.0000	0.2227
Total	1.2000e-004	8.2000e-004	1.0500e-003	0.0000	3.0000e-004	0.0000	3.0000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.4074	0.4074	2.0000e-005	0.0000	0.4078

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.8100e-003	0.0599	0.0545	9.0000e-005		3.3600e-003	3.3600e-003		3.0900e-003	3.0900e-003	0.0000	7.5061	7.5061	2.4300e-003	0.0000	7.5668
Total	5.8100e-003	0.0599	0.0545	9.0000e-005		3.3600e-003	3.3600e-003		3.0900e-003	3.0900e-003	0.0000	7.5061	7.5061	2.4300e-003	0.0000	7.5668

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.0000e-005	7.4000e-004	2.0000e-004	0.0000	5.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1849	0.1849	1.0000e-005	0.0000	0.1852
Worker	1.0000e-004	8.0000e-005	8.5000e-004	0.0000	2.5000e-004	0.0000	2.5000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2225	0.2225	1.0000e-005	0.0000	0.2227
Total	1.2000e-004	8.2000e-004	1.0500e-003	0.0000	3.0000e-004	0.0000	3.0000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.4074	0.4074	2.0000e-005	0.0000	0.4078

3.6 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0405	0.4145	0.4220	6.7000e-004		0.0219	0.0219		0.0202	0.0202	0.0000	59.0871	59.0871	0.0191	0.0000	59.5649
Total	0.0405	0.4145	0.4220	6.7000e-004		0.0219	0.0219		0.0202	0.0202	0.0000	59.0871	59.0871	0.0191	0.0000	59.5649

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.7000e-004	5.5300e-003	1.4900e-003	1.0000e-005	3.7000e-004	1.0000e-005	3.8000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.4416	1.4416	9.0000e-005	0.0000	1.4437
Worker	7.1000e-004	5.4000e-004	6.1700e-003	2.0000e-005	1.9400e-003	2.0000e-005	1.9600e-003	5.2000e-004	1.0000e-005	5.3000e-004	0.0000	1.6889	1.6889	5.0000e-005	0.0000	1.6900
Total	8.8000e-004	6.0700e-003	7.6600e-003	3.0000e-005	2.3100e-003	3.0000e-005	2.3400e-003	6.3000e-004	2.0000e-005	6.5000e-004	0.0000	3.1304	3.1304	1.4000e-004	0.0000	3.1337

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0405	0.4145	0.4220	6.7000e-004		0.0219	0.0219		0.0202	0.0202	0.0000	59.0871	59.0871	0.0191	0.0000	59.5648
Total	0.0405	0.4145	0.4220	6.7000e-004		0.0219	0.0219		0.0202	0.0202	0.0000	59.0871	59.0871	0.0191	0.0000	59.5648

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.7000e-004	5.5300e-003	1.4900e-003	1.0000e-005	3.7000e-004	1.0000e-005	3.8000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.4416	1.4416	9.0000e-005	0.0000	1.4437
Worker	7.1000e-004	5.4000e-004	6.1700e-003	2.0000e-005	1.9400e-003	2.0000e-005	1.9600e-003	5.2000e-004	1.0000e-005	5.3000e-004	0.0000	1.6889	1.6889	5.0000e-005	0.0000	1.6900
Total	8.8000e-004	6.0700e-003	7.6600e-003	3.0000e-005	2.3100e-003	3.0000e-005	2.3400e-003	6.3000e-004	2.0000e-005	6.5000e-004	0.0000	3.1304	3.1304	1.4000e-004	0.0000	3.1337

3.7 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.5600e-003	0.0326	0.0387	6.0000e-005		1.6300e-003	1.6300e-003		1.5200e-003	1.5200e-003	0.0000	5.1683	5.1683	1.5100e-003	0.0000	5.2059
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	3.5600e-003	0.0326	0.0387	6.0000e-005		1.6300e-003	1.6300e-003		1.5200e-003	1.5200e-003	0.0000	5.1683	5.1683	1.5100e-003	0.0000	5.2059

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-004	3.0000e-004	3.4500e-003	1.0000e-005	1.0800e-003	1.0000e-005	1.0900e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9446	0.9446	3.0000e-005	0.0000	0.9453
Total	4.0000e-004	3.0000e-004	3.4500e-003	1.0000e-005	1.0800e-003	1.0000e-005	1.0900e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9446	0.9446	3.0000e-005	0.0000	0.9453

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.5600e-003	0.0326	0.0387	6.0000e-005		1.6300e-003	1.6300e-003		1.5200e-003	1.5200e-003	0.0000	5.1683	5.1683	1.5100e-003	0.0000	5.2059

Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	3.5600e-003	0.0326	0.0387	6.0000e-005		1.6300e-003	1.6300e-003		1.5200e-003	1.5200e-003	0.0000	5.1683	5.1683	1.5100e-003	0.0000	5.2059

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-004	3.0000e-004	3.4500e-003	1.0000e-005	1.0800e-003	1.0000e-005	1.0900e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9446	0.9446	3.0000e-005	0.0000	0.9453
Total	4.0000e-004	3.0000e-004	3.4500e-003	1.0000e-005	1.0800e-003	1.0000e-005	1.0900e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9446	0.9446	3.0000e-005	0.0000	0.9453

3.8 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	2.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	4.7700e-003	4.7700e-003	0.0000	0.0000	4.7700e-003
Total	0.0000	0.0000	2.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	4.7700e-003	4.7700e-003	0.0000	0.0000	4.7700e-003

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	146813	26.5733	0.0000	0.0000	26.5733
Total		26.5733	0.0000	0.0000	26.5733

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	146813	26.5733	0.0000	0.0000	26.5733
Total		26.5733	0.0000	0.0000	26.5733

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0275	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	1.8000e-004
Unmitigated	0.0275	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	1.8000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
SubCategory	tons/yr										MT/yr						
Architectural Coating	3.1300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0244					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	0.0000	1.8000e-004
Total	0.0275	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	0.0000	1.8000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
SubCategory	tons/yr										MT/yr						
Architectural Coating	3.1300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0244					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	0.0000	1.8000e-004
Total	0.0275	0.0000	9.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.7000e-004	1.7000e-004	0.0000	0.0000	0.0000	1.8000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e

Category	MT/yr			
Mitigated	34.4867	0.0155	9.7900e-003	37.7912
Unmitigated	34.4867	0.0155	9.7900e-003	37.7912

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.7228 / 0	34.4867	0.0155	9.7900e-003	37.7912
Total		34.4867	0.0155	9.7900e-003	37.7912

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.7228 / 0	34.4867	0.0155	9.7900e-003	37.7912
Total		34.4867	0.0155	9.7900e-003	37.7912

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1.6990	0.1004	0.0000	4.2093
Unmitigated	1.6990	0.1004	0.0000	4.2093

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	8.37	1.6990	0.1004	0.0000	4.2093
Total		1.6990	0.1004	0.0000	4.2093

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	8.37	1.6990	0.1004	0.0000	4.2093
Total		1.6990	0.1004	0.0000	4.2093

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	1	12	389	0.73	Diesel

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					

Emergency Generator - Diesel (200 - 200 HP)	3.8300e-003	0.0107	9.7700e-003	2.0000e-005		5.6000e-004	5.6000e-004		5.6000e-004	5.6000e-004	0.0000	1.7776	1.7776	2.5000e-004	0.0000	1.7838
Total	3.8300e-003	0.0107	9.7700e-003	2.0000e-005		5.6000e-004	5.6000e-004		5.6000e-004	5.6000e-004	0.0000	1.7776	1.7776	2.5000e-004	0.0000	1.7838

11.0 Vegetation

Camp Kilpatrick WWTP - Los Angeles-South Coast County, Winter

Camp Kilpatrick WWTP
Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	6.75	1000sqft	0.15	6,750.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	399.04	CH4 Intensity (lb/MW hr)	0	N2O Intensity (lb/MW hr)	0

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CO2 intensity factor based on SCE 2020 data

Land Use -

Construction Phase - Developer provided schedule

Off-road Equipment - No architectural coating phase

Off-road Equipment -

Off-road Equipment -

Demolition -

Grading -

Architectural Coating - No painting

Vehicle Trips - Only 1 HDD per quarter to remove sludge.

Energy Use - Client provided

Water And Wastewater - Based on client data

Solid Waste -

Construction Off-road Equipment Mitigation -

Operational Off-Road Equipment -

Stationary Sources - Emergency Generators and Fire Pumps - Monthly testing for a Generac SD250

Off-road Equipment - Assumed construction quantities

Trips and VMT - Assumed truck trips

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	0.00
tblArchitecturalCoating	EF_Residential_Exterior	50.00	0.00
tblArchitecturalCoating	EF_Residential_Interior	50.00	0.00
tblConstructionPhase	NumDays	5.00	1.00
tblConstructionPhase	NumDays	100.00	132.00
tblConstructionPhase	NumDays	10.00	44.00
tblConstructionPhase	NumDays	2.00	44.00
tblConstructionPhase	NumDays	5.00	10.00
tblConstructionPhase	NumDays	1.00	44.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	21.75
tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblGrading	MaterialExported	0.00	435.00
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00

tblProjectCharacteristics	CH4IntensityFactor	0.029	0
tblProjectCharacteristics	CO2IntensityFactor	702.44	399.04
tblProjectCharacteristics	N2OIntensityFactor	0.006	0
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	389.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	1.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	12.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	20.00
tblVehicleTrips	ST_TR	1.50	0.00
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	0.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	IndoorWaterUseRate	1,560,937.50	12,722,805.00
tblWater	SepticTankPercent	10.33	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8689	8.4148	8.1299	0.0153	0.8868	0.4480	1.2960	0.4494	0.4122	0.8398	0.0000	1,494.7417	1,494.7417	0.3595	0.0000	1,500.5957
2022	15.6476	7.1267	7.6453	0.0131	0.2012	0.3724	0.4989	0.0534	0.3426	0.3533	0.0000	1,222.0471	1,222.0471	0.3596	0.0000	1,229.7184
Maximum	15.6476	8.4148	8.1299	0.0153	0.8868	0.4480	1.2960	0.4494	0.4122	0.8398	0.0000	1,494.7417	1,494.7417	0.3596	0.0000	1,500.5957

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8689	8.4148	8.1299	0.0153	0.4721	0.4480	0.8814	0.2217	0.4122	0.6121	0.0000	1,494.7417	1,494.7417	0.3595	0.0000	1,500.5957
2022	15.6476	7.1267	7.6453	0.0131	0.2012	0.3724	0.4989	0.0534	0.3426	0.3533	0.0000	1,222.0471	1,222.0471	0.3596	0.0000	1,229.7184
Maximum	15.6476	8.4148	8.1299	0.0153	0.4721	0.4480	0.8814	0.2217	0.4122	0.6121	0.0000	1,494.7417	1,494.7417	0.3596	0.0000	1,500.5957

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	38.11	0.00	23.10	45.29	0.00	19.08	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational
Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Stationary	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.7892	1.7842	1.6284	3.0700e-003	0.0000	0.0939	0.0939	0.0000	0.0939	0.0939		326.5725	326.5725	0.0458	0.0000	327.7172

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Stationary	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.7892	1.7842	1.6284	3.0700e-003	0.0000	0.0939	0.0939	0.0000	0.0939	0.0939		326.5725	326.5725	0.0458	0.0000	327.7172

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Decommissioning	Demolition	5/20/2021	6/2/2021	5	10	
2	Demolition	Demolition	6/7/2021	8/6/2021	5	44	
3	Site Preparation	Site Preparation	8/9/2021	10/8/2021	5	44	
4	Grading	Grading	10/11/2021	12/10/2021	5	44	
5	Building Construction	Building Construction	12/13/2021	6/15/2022	5	132	
6	Paving	Paving	6/16/2022	6/30/2022	5	10	
7	Architectural Coating	Architectural Coating	7/1/2022	7/1/2022	5	1	

Acres of Grading (Site Preparation Phase): 22

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 10,125; Non-Residential Outdoor: 3,375; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	0	6.00	78	0.48
Decommissioning	Concrete/Industrial Saws	1	8.00	81	0.73
Decommissioning	Rubber Tired Dozers	0	1.00	247	0.40
Decommissioning	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Decommissioning	Cranes	1	8.00	231	0.29

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
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Demolition	4	10.00	0.00	127.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	54.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	3.00	1.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	0	1.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Decommissioning	2	5.00	0.00	20.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Decommissioning - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531		1,147.7427	1,147.7427	0.2139		1,153.0912
Total	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531		1,147.7427	1,147.7427	0.2139		1,153.0912

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0171	0.5431	0.1334	1.5300e-003	0.0350	1.6700e-003	0.0366	9.5900e-003	1.6000e-003	0.0112		166.3566	166.3566	0.0119		166.6540
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520
Total	0.0409	0.5594	0.3175	2.0700e-003	0.0909	2.1200e-003	0.0930	0.0244	2.0200e-003	0.0264		219.9692	219.9692	0.0135		220.3060

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531	0.0000	1,147.7427	1,147.7427	0.2139		1,153.0912
Total	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531	0.0000	1,147.7427	1,147.7427	0.2139		1,153.0912

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0171	0.5431	0.1334	1.5300e-003	0.0350	1.6700e-003	0.0366	9.5900e-003	1.6000e-003	0.0112		166.3566	166.3566	0.0119		166.6540
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520
Total	0.0409	0.5594	0.3175	2.0700e-003	0.0909	2.1200e-003	0.0930	0.0244	2.0200e-003	0.0264		219.9692	219.9692	0.0135		220.3060

3.3 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.6251	0.0000	0.6251	0.0946	0.0000	0.0946			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.6251	0.4073	1.0324	0.0946	0.3886	0.4832		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0247	0.7837	0.1925	2.2100e-003	0.0496	2.4100e-003	0.0520	0.0136	2.3100e-003	0.0159		240.0829	240.0829	0.0172		240.5120
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
Total	0.0723	0.8163	0.5608	3.2900e-003	0.1614	3.3100e-003	0.1647	0.0433	3.1400e-003	0.0464		347.3080	347.3080	0.0203		347.8160

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2813	0.0000	0.2813	0.0426	0.0000	0.0426			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.2813	0.4073	0.6886	0.0426	0.3886	0.4312	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0247	0.7837	0.1925	2.2100e-003	0.0496	2.4100e-003	0.0520	0.0136	2.3100e-003	0.0159		240.0829	240.0829	0.0172		240.5120
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
Total	0.0723	0.8163	0.5608	3.2900e-003	0.1614	3.3100e-003	0.1647	0.0433	3.1400e-003	0.0464		347.3080	347.3080	0.0203		347.8160

3.4 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000

Off-Road	0.6403	7.8204	4.0274	9.7300e-003		0.2995	0.2995		0.2755	0.2755		942.5842	942.5842	0.3049		950.2055
Total	0.6403	7.8204	4.0274	9.7300e-003	0.5303	0.2995	0.8297	0.0573	0.2755	0.3328		942.5842	942.5842	0.3049		950.2055

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520
Total	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2386	0.0000	0.2386	0.0258	0.0000	0.0258			0.0000			0.0000
Off-Road	0.6403	7.8204	4.0274	9.7300e-003		0.2995	0.2995		0.2755	0.2755	0.0000	942.5842	942.5842	0.3049		950.2055
Total	0.6403	7.8204	4.0274	9.7300e-003	0.2386	0.2995	0.5381	0.0258	0.2755	0.3013	0.0000	942.5842	942.5842	0.3049		950.2055

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520
Total	0.0238	0.0163	0.1841	5.4000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		53.6126	53.6126	1.5800e-003		53.6520

3.5 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7539	0.0000	0.7539	0.4140	0.0000	0.4140			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.7539	0.4073	1.1612	0.4140	0.3886	0.8026		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0105	0.3332	0.0819	9.4000e-004	0.0211	1.0300e-003	0.0221	5.7900e-003	9.8000e-004	6.7800e-003		102.0825	102.0825	7.3000e-003		102.2649
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
Total	0.0582	0.3659	0.4501	2.0200e-003	0.1329	1.9300e-003	0.1348	0.0354	1.8100e-003	0.0373		209.3076	209.3076	0.0105		209.5689

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3393	0.0000	0.3393	0.1863	0.0000	0.1863			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.3393	0.4073	0.7466	0.1863	0.3886	0.5749	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0105	0.3332	0.0819	9.4000e-004	0.0211	1.0300e-003	0.0221	5.7900e-003	9.8000e-004	6.7800e-003		102.0825	102.0825	7.3000e-003		102.2649
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0477	0.0326	0.3683	1.0800e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		107.2251	107.2251	3.1600e-003		107.3040
Total	0.0582	0.3659	0.4501	2.0200e-003	0.1329	1.9300e-003	0.1348	0.0354	1.8100e-003	0.0373		209.3076	209.3076	0.0105		209.5689

3.6 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.1900e-003	0.0969	0.0281	2.5000e-004	6.4000e-003	2.0000e-004	6.6100e-003	1.8400e-003	2.0000e-004	2.0400e-003		26.7346	26.7346	1.7300e-003		26.7777
Worker	0.0143	9.7800e-003	0.1105	3.2000e-004	0.0335	2.7000e-004	0.0338	8.8900e-003	2.5000e-004	9.1400e-003		32.1675	32.1675	9.5000e-004		32.1912
Total	0.0175	0.1067	0.1386	5.7000e-004	0.0399	4.7000e-004	0.0404	0.0107	4.5000e-004	0.0112		58.9021	58.9021	2.6800e-003		58.9689

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.1900e-003	0.0969	0.0281	2.5000e-004	6.4000e-003	2.0000e-004	6.6100e-003	1.8400e-003	2.0000e-004	2.0400e-003		26.7346	26.7346	1.7300e-003		26.7777
Worker	0.0143	9.7800e-003	0.1105	3.2000e-004	0.0335	2.7000e-004	0.0338	8.8900e-003	2.5000e-004	9.1400e-003		32.1675	32.1675	9.5000e-004		32.1912
Total	0.0175	0.1067	0.1386	5.7000e-004	0.0399	4.7000e-004	0.0404	0.0107	4.5000e-004	0.0112		58.9021	58.9021	2.6800e-003		58.9689

3.6 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652

Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.0000e-003	0.0921	0.0266	2.5000e-004	6.4000e-003	1.8000e-004	6.5800e-003	1.8400e-003	1.7000e-004	2.0100e-003		26.4970	26.4970	1.6700e-003		26.5387
Worker	0.0134	8.8400e-003	0.1018	3.1000e-004	0.0335	2.6000e-004	0.0338	8.8900e-003	2.4000e-004	9.1300e-003		31.0371	31.0371	8.5000e-004		31.0585
Total	0.0164	0.1009	0.1283	5.6000e-004	0.0399	4.4000e-004	0.0404	0.0107	4.1000e-004	0.0111		57.5341	57.5341	2.5200e-003		57.5971

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.9393	1,103.9393	0.3570		1,112.8652
Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.9393	1,103.9393	0.3570		1,112.8652

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.0000e-003	0.0921	0.0266	2.5000e-004	6.4000e-003	1.8000e-004	6.5800e-003	1.8400e-003	1.7000e-004	2.0100e-003		26.4970	26.4970	1.6700e-003		26.5387
Worker	0.0134	8.8400e-003	0.1018	3.1000e-004	0.0335	2.6000e-004	0.0338	8.8900e-003	2.4000e-004	9.1300e-003		31.0371	31.0371	8.5000e-004		31.0585
Total	0.0164	0.1009	0.1283	5.6000e-004	0.0399	4.4000e-004	0.0404	0.0107	4.1000e-004	0.0111		57.5341	57.5341	2.5200e-003		57.5971

3.7 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035.8246	1,035.8246	0.3017		1,043.3677
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035.8246	1,035.8246	0.3017		1,043.3677

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0806	0.0530	0.6105	1.8700e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		186.2225	186.2225	5.1300e-003		186.3507
Total	0.0806	0.0530	0.6105	1.8700e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		186.2225	186.2225	5.1300e-003		186.3507

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035.8246	1,035.8246	0.3017		1,043.3677
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035.8246	1,035.8246	0.3017		1,043.3677

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0806	0.0530	0.6105	1.8700e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		186.2225	186.2225	5.1300e-003		186.3507
Total	0.0806	0.0530	0.6105	1.8700e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		186.2225	186.2225	5.1300e-003		186.3507

3.8 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	15.6431					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	15.6431	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	4.4800e-003	2.9500e-003	0.0339	1.0000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.3457	10.3457	2.8000e-004		10.3528
Total	4.4800e-003	2.9500e-003	0.0339	1.0000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.3457	10.3457	2.8000e-004		10.3528

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	15.6431					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	15.6431	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	4.4800e-003	2.9500e-003	0.0339	1.0000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.3457	10.3457	2.8000e-004		10.3528
Total	4.4800e-003	2.9500e-003	0.0339	1.0000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.3457	10.3457	2.8000e-004		10.3528

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
--	-----	-----	----	-----	---------------	--------------	------------	----------------	---------------	-------------	----------	-----------	-----------	-----	-----	------

Category	lb/day										lb/day					
	NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Unmitigated	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0171					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1337					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Total	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0171					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1337					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Total	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	1	12	389	0.73	Diesel

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Emergency Generator - Diesel (200 - 200 HP)	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156

11.0 Vegetation

Camp Kilpatrick WWTP - Los Angeles-South Coast County, Summer

Camp Kilpatrick WWTP
Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	6.75	1000sqft	0.15	6,750.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	399.04	CH4 Intensity (lb/MW hr)	0	N2O Intensity (lb/MW hr)	0

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CO2 intensity factor based on SCE 2020 data

Land Use -

Construction Phase - Developer provided schedule

Off-road Equipment - No architectural coating phase

Off-road Equipment -

Off-road Equipment -

Demolition -

Grading -

Architectural Coating - No painting

Vehicle Trips - Only 1 HDD per quarter to remove sludge.

Energy Use - Client provided

Water And Wastewater - Based on client data

Solid Waste -

Construction Off-road Equipment Mitigation -

Operational Off-Road Equipment -

Stationary Sources - Emergency Generators and Fire Pumps - Monthly testing for a Generac SD250

Off-road Equipment - Assumed construction quantities

Trips and VMT - Assumed truck trips

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	0.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	0.00
tblArchitecturalCoating	EF_Residential_Exterior	50.00	0.00
tblArchitecturalCoating	EF_Residential_Interior	50.00	0.00
tblConstructionPhase	NumDays	5.00	1.00
tblConstructionPhase	NumDays	100.00	132.00
tblConstructionPhase	NumDays	10.00	44.00
tblConstructionPhase	NumDays	2.00	44.00
tblConstructionPhase	NumDays	5.00	10.00
tblConstructionPhase	NumDays	1.00	44.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	21.75
tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblGrading	MaterialExported	0.00	435.00
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblProjectCharacteristics	CH4IntensityFactor	0.029	0
tblProjectCharacteristics	CO2IntensityFactor	702.44	399.04
tblProjectCharacteristics	N2OIntensityFactor	0.006	0
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	389.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	1.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	12.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblTripsAndVMT	HaulingTripNumber	0.00	20.00
tblVehicleTrips	ST_TR	1.50	0.00
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	0.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	IndoorWaterUseRate	1,560,937.50	12,722,805.00
tblWater	SepticTankPercent	10.33	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8635	8.4067	8.1534	0.0154	0.8868	0.4480	1.2960	0.4494	0.4122	0.8398	0.0000	1,505.6259	1,505.6259	0.3594	0.0000	1,511.4703
2022	0.7192	7.1261	7.7037	0.0133	0.2012	0.3724	0.4989	0.0534	0.3426	0.3533	0.0000	1,233.5928	1,233.5928	0.3595	0.0000	1,241.2724
Maximum	0.8635	8.4067	8.1534	0.0154	0.8868	0.4480	1.2960	0.4494	0.4122	0.8398	0.0000	1,505.6259	1,505.6259	0.3595	0.0000	1,511.4703

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8635	8.4067	8.1534	0.0154	0.4721	0.4480	0.8814	0.2217	0.4122	0.6121	0.0000	1,505.6259	1,505.6259	0.3594	0.0000	1,511.4703
2022	0.7192	7.1261	7.7037	0.0133	0.2012	0.3724	0.4989	0.0534	0.3426	0.3533	0.0000	1,233.5928	1,233.5928	0.3595	0.0000	1,241.2724
Maximum	0.8635	8.4067	8.1534	0.0154	0.4721	0.4480	0.8814	0.2217	0.4122	0.6121	0.0000	1,505.6259	1,505.6259	0.3595	0.0000	1,511.4703

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	38.11	0.00	23.10	45.29	0.00	19.08	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Stationary	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.7892	1.7842	1.6284	3.0700e-003	0.0000	0.0939	0.0939	0.0000	0.0939	0.0939		326.5725	326.5725	0.0458	0.0000	327.7172

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Stationary	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.7892	1.7842	1.6284	3.0700e-003	0.0000	0.0939	0.0939	0.0000	0.0939	0.0939		326.5725	326.5725	0.0458	0.0000	327.7172

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Decommissioning	Demolition	5/20/2021	6/2/2021	5	10	
2	Demolition	Demolition	6/7/2021	8/6/2021	5	44	
3	Site Preparation	Site Preparation	8/9/2021	10/8/2021	5	44	
4	Grading	Grading	10/11/2021	12/10/2021	5	44	
5	Building Construction	Building Construction	12/13/2021	6/15/2022	5	132	
6	Paving	Paving	6/16/2022	6/30/2022	5	10	
7	Architectural Coating	Architectural Coating	7/1/2022	7/1/2022	5	1	

Acres of Grading (Site Preparation Phase): 22

Demolition	4	10.00	0.00	127.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	54.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	3.00	1.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	0	1.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Decommissioning	2	5.00	0.00	20.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Decommissioning - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531		1,147.7427	1,147.7427	0.2139		1,153.0912
Total	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531		1,147.7427	1,147.7427	0.2139		1,153.0912

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0167	0.5365	0.1258	1.5600e-003	0.0350	1.6500e-003	0.0366	9.5900e-003	1.5800e-003	0.0112		169.2893	169.2893	0.0115		169.5765
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804
Total	0.0381	0.5512	0.3272	2.1300e-003	0.0909	2.1000e-003	0.0930	0.0244	2.0000e-003	0.0264		226.2277	226.2277	0.0132		226.5569

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531	0.0000	1,147.7427	1,147.7427	0.2139		1,153.0912
Total	0.7950	7.8555	5.6439	0.0120		0.3687	0.3687		0.3531	0.3531	0.0000	1,147.7427	1,147.7427	0.2139		1,153.0912

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0167	0.5365	0.1258	1.5600e-003	0.0350	1.6500e-003	0.0366	9.5900e-003	1.5800e-003	0.0112		169.2893	169.2893	0.0115		169.5765
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804
Total	0.0381	0.5512	0.3272	2.1300e-003	0.0909	2.1000e-003	0.0930	0.0244	2.0000e-003	0.0264		226.2277	226.2277	0.0132		226.5569

3.3 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.6251	0.0000	0.6251	0.0946	0.0000	0.0946			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.6251	0.4073	1.0324	0.0946	0.3886	0.4832		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0241	0.7743	0.1815	2.2500e-003	0.0496	2.3800e-003	0.0520	0.0136	2.2700e-003	0.0159		244.3152	244.3152	0.0166		244.7297
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
Total	0.0669	0.8037	0.5843	3.3900e-003	0.1614	3.2800e-003	0.1647	0.0433	3.1000e-003	0.0464		358.1922	358.1922	0.0199		358.6906

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2813	0.0000	0.2813	0.0426	0.0000	0.0426			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.2813	0.4073	0.6886	0.0426	0.3886	0.4312	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0241	0.7743	0.1815	2.2500e-003	0.0496	2.3800e-003	0.0520	0.0136	2.2700e-003	0.0159		244.3152	244.3152	0.0166		244.7297
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
Total	0.0669	0.8037	0.5843	3.3900e-003	0.1614	3.2800e-003	0.1647	0.0433	3.1000e-003	0.0464		358.1922	358.1922	0.0199		358.6906

3.4 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000

Off-Road	0.6403	7.8204	4.0274	9.7300e-003		0.2995	0.2995		0.2755	0.2755		942.5842	942.5842	0.3049		950.2055
Total	0.6403	7.8204	4.0274	9.7300e-003	0.5303	0.2995	0.8297	0.0573	0.2755	0.3328		942.5842	942.5842	0.3049		950.2055

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804
Total	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2386	0.0000	0.2386	0.0258	0.0000	0.0258			0.0000			0.0000
Off-Road	0.6403	7.8204	4.0274	9.7300e-003		0.2995	0.2995		0.2755	0.2755	0.0000	942.5842	942.5842	0.3049		950.2055
Total	0.6403	7.8204	4.0274	9.7300e-003	0.2386	0.2995	0.5381	0.0258	0.2755	0.3013	0.0000	942.5842	942.5842	0.3049		950.2055

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804
Total	0.0214	0.0147	0.2014	5.7000e-004	0.0559	4.5000e-004	0.0563	0.0148	4.2000e-004	0.0152		56.9385	56.9385	1.6800e-003		56.9804

3.5 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7539	0.0000	0.7539	0.4140	0.0000	0.4140			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886		1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.7539	0.4073	1.1612	0.4140	0.3886	0.8026		1,147.4338	1,147.4338	0.2138		1,152.7797

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0102	0.3292	0.0772	9.6000e-004	0.0211	1.0100e-003	0.0221	5.7900e-003	9.7000e-004	6.7600e-003		103.8820	103.8820	7.0500e-003		104.0583
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
Total	0.0531	0.3587	0.4800	2.1000e-003	0.1329	1.9100e-003	0.1348	0.0354	1.8000e-003	0.0372		217.7590	217.7590	0.0104		218.0192

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3393	0.0000	0.3393	0.1863	0.0000	0.1863			0.0000			0.0000
Off-Road	0.7965	7.2530	7.5691	0.0120		0.4073	0.4073		0.3886	0.3886	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797
Total	0.7965	7.2530	7.5691	0.0120	0.3393	0.4073	0.7466	0.1863	0.3886	0.5749	0.0000	1,147.4338	1,147.4338	0.2138		1,152.7797

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0102	0.3292	0.0772	9.6000e-004	0.0211	1.0100e-003	0.0221	5.7900e-003	9.7000e-004	6.7600e-003		103.8820	103.8820	7.0500e-003		104.0583
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0429	0.0295	0.4028	1.1400e-003	0.1118	9.0000e-004	0.1127	0.0296	8.3000e-004	0.0305		113.8770	113.8770	3.3600e-003		113.9609
Total	0.0531	0.3587	0.4800	2.1000e-003	0.1329	1.9100e-003	0.1348	0.0354	1.8000e-003	0.0372		217.7590	217.7590	0.0104		218.0192

3.6 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.0400e-003	0.0971	0.0254	2.6000e-004	6.4000e-003	2.0000e-004	6.6000e-003	1.8400e-003	1.9000e-004	2.0300e-003		27.4881	27.4881	1.6200e-003		27.5286
Worker	0.0129	8.8400e-003	0.1208	3.4000e-004	0.0335	2.7000e-004	0.0338	8.8900e-003	2.5000e-004	9.1400e-003		34.1631	34.1631	1.0100e-003		34.1883
Total	0.0159	0.1059	0.1462	6.0000e-004	0.0399	4.7000e-004	0.0404	0.0107	4.4000e-004	0.0112		61.6512	61.6512	2.6300e-003		61.7168

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.0400e-003	0.0971	0.0254	2.6000e-004	6.4000e-003	2.0000e-004	6.6000e-003	1.8400e-003	1.9000e-004	2.0300e-003		27.4881	27.4881	1.6200e-003		27.5286
Worker	0.0129	8.8400e-003	0.1208	3.4000e-004	0.0335	2.7000e-004	0.0338	8.8900e-003	2.5000e-004	9.1400e-003		34.1631	34.1631	1.0100e-003		34.1883
Total	0.0159	0.1059	0.1462	6.0000e-004	0.0399	4.7000e-004	0.0404	0.0107	4.4000e-004	0.0112		61.6512	61.6512	2.6300e-003		61.7168

3.6 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652

Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	2.8500e-003	0.0923	0.0240	2.5000e-004	6.4000e-003	1.7000e-004	6.5800e-003	1.8400e-003	1.7000e-004	2.0100e-003		27.2486	27.2486	1.5600e-003		27.2877
Worker	0.0121	7.9800e-003	0.1115	3.3000e-004	0.0335	2.6000e-004	0.0338	8.8900e-003	2.4000e-004	9.1300e-003		32.9614	32.9614	9.1000e-004		32.9841
Total	0.0149	0.1003	0.1355	5.8000e-004	0.0399	4.3000e-004	0.0404	0.0107	4.1000e-004	0.0111		60.2100	60.2100	2.4700e-003		60.2718

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.9393	1,103.9393	0.3570		1,112.8652
Total	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.9393	1,103.9393	0.3570		1,112.8652

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000			0.0000
Vendor	2.8500e-003	0.0923	0.0240	2.5000e-004	6.4000e-003	1.7000e-004	6.5800e-003	1.8400e-003	1.7000e-004	2.0100e-003		27.2486	27.2486	1.5600e-003			27.2877
Worker	0.0121	7.9800e-003	0.1115	3.3000e-004	0.0335	2.6000e-004	0.0338	8.8900e-003	2.4000e-004	9.1300e-003		32.9614	32.9614	9.1000e-004			32.9841
Total	0.0149	0.1003	0.1355	5.8000e-004	0.0399	4.3000e-004	0.0404	0.0107	4.1000e-004	0.0111		60.2100	60.2100	2.4700e-003			60.2718

3.7 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	lb/day										lb/day						
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035.8246	1,035.8246	0.3017			1,043.3677
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000				0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758		1,035.8246	1,035.8246	0.3017			1,043.3677

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0723	0.0479	0.6689	1.9800e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		197.7682	197.7682	5.4600e-003		197.9047
Total	0.0723	0.0479	0.6689	1.9800e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		197.7682	197.7682	5.4600e-003		197.9047

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035.8246	1,035.8246	0.3017		1,043.3677
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.6469	5.9174	7.0348	0.0113		0.2961	0.2961		0.2758	0.2758	0.0000	1,035.8246	1,035.8246	0.3017		1,043.3677

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0723	0.0479	0.6689	1.9800e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		197.7682	197.7682	5.4600e-003		197.9047
Total	0.0723	0.0479	0.6689	1.9800e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4500e-003	0.0548		197.7682	197.7682	5.4600e-003		197.9047

3.8 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	4.0200e-003	2.6600e-003	0.0372	1.1000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.9871	10.9871	3.0000e-004		10.9947
Total	4.0200e-003	2.6600e-003	0.0372	1.1000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.9871	10.9871	3.0000e-004		10.9947

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	4.0200e-003	2.6600e-003	0.0372	1.1000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.9871	10.9871	3.0000e-004		10.9947
Total	4.0200e-003	2.6600e-003	0.0372	1.1000e-004	0.0112	9.0000e-005	0.0113	2.9600e-003	8.0000e-005	3.0400e-003		10.9871	10.9871	3.0000e-004		10.9947

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
--	-----	-----	----	-----	---------------	--------------	------------	----------------	---------------	-------------	----------	-----------	-----------	-----	-----	------

Category	lb/day										lb/day					
	NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Unmitigated	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0171					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1337					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Total	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0171					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1337					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.0000e-005	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003
Total	0.1509	1.0000e-005	6.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.4800e-003	1.4800e-003	0.0000		1.5700e-003

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	1	12	389	0.73	Diesel

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	lb/day										lb/day					
Emergency Generator - Diesel (200 - 200 HP)	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156
Total	0.6384	1.7842	1.6277	3.0700e-003		0.0939	0.0939		0.0939	0.0939		326.5710	326.5710	0.0458		327.7156

11.0 Vegetation

APPENDIX B
BIOLOGICAL ASSESSMENT REPORT

Biological Assessment Report

Campus Kilpatrick Wastewater Treatment Plant Project County of Los Angeles, California

**Coastal Development Permit No. RPPL-2020001385
Assessor Parcel Numbers 4471-003-900, 4471-004-902, 4471-004-903**

Prepared for | Los Angeles County Public Works
Project Management Division II
900 South Fremont Avenue
Alhambra, California 91803

Prepared by | Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
Contact: David T. Hughes, Senior Project Manager
T: (626) 204-6530

May 6, 2021

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EXHIBITS

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3 Survey Area	1
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ATTACHMENTS

Attachment

- A Biological Report Checklist
- B Site Photographs
- C Special Status Plants Potential to Occur Summary Table
- D Special Status Wildlife Potential to Occur Summary Table
- E Compendium of Plant Species Observed
- F Compendium of Wildlife Species Observed
- G Native Tree Survey Report
- H Biologist Qualifications

1.0 INTRODUCTION

This Biological Assessment Report presents the findings of a literature review and biological field survey for the Campus Vernon Kilpatrick Juvenile Probation Facility (Campus Kilpatrick), located in the Santa Monica Mountains (hereinafter referred to as the “Project site”) in Los Angeles County, California (Exhibit 1). Psomas Senior Project Manager David Hughes conducted a general survey of the Project site on June 14, 2018. The purpose of the survey was to identify and evaluate potential biological constraints that would affect the implementation of the Campus Kilpatrick Wastewater Treatment Plant Project (Project). The findings of this report are based on observations made during the field visit referenced above as well as previous biological assessments that were performed on the Project site in 2012 and 2015 for earlier projects at the Campus Kilpatrick site and during incidental field visits in 2019 and 2020.

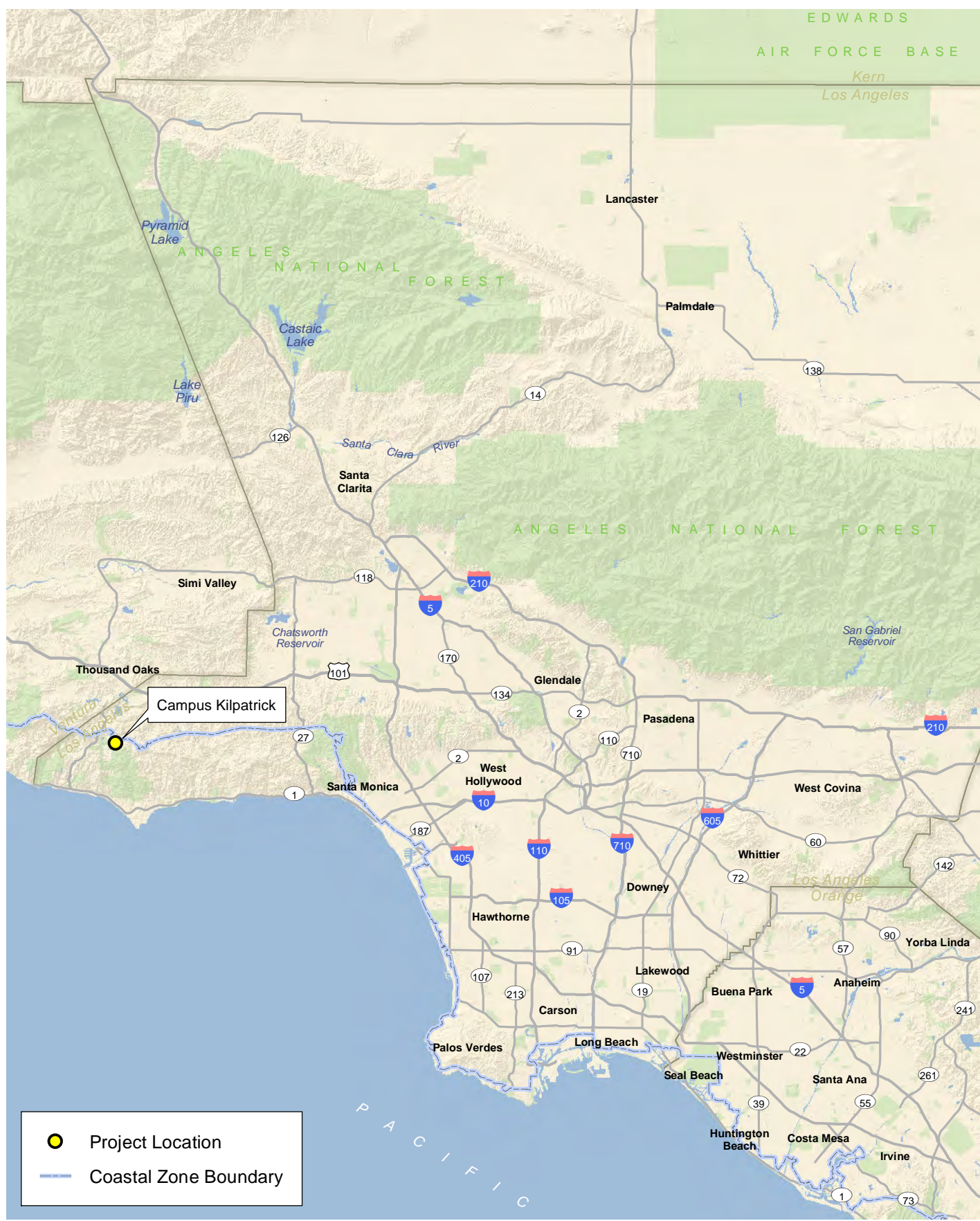
A list of responsible parties for this Project is provided in Table 1. A checklist of Biological Assessment Report requirements is provided in Attachment A.

**TABLE 1
RESPONSIBLE PARTIES**



Task/Role	Responsible Parties			
	Entity/Company	Contact	Address	Phone Number
Project Applicant	Los Angeles County Public Works	Elizabeth Ajaelo	900 S. Fremont Avenue Suite 240 Alhambra, CA 91803	(626) 300-3241
Project Agent/ Project Biologist	Psomas	David Hughes	225 South Lake Avenue, Suite 1000 Pasadena, CA 91101	(626) 204-6530
Property Owner	Los Angeles County Chief Executive Office Real Estate Division	Dean Lehman Rick Hernandez	320 West Temple Street 7 th Floor Los Angeles, CA 90012	(213) 974-4300

1.1 PROJECT LOCATION

The Campus Kilpatrick site is located at 427 South Encinal Canyon Road in Los Angeles County (Exhibit 2), consisting of Assessor Parcel Numbers 4471-003-900, 4471-004-902, and 4471-004-903. The overall 20-acre survey area for this report consists of the recently renovated Campus Kilpatrick facility, the unoccupied Camp Fred Miller site (south of Campus Kilpatrick), and the facility’s wastewater treatment plant (WWTP) located south of Encinal Canyon Road (Exhibit 3). The Campus Kilpatrick site is located on the U.S. Geological Survey’s (USGS’) 7.5-minute Point Dume topographic quadrangle (Exhibit 4). The facility is generally surrounded by natural open space area with ridges to the north, west, and east and topography slopes towards the south. Developed land uses within approximately 0.5 mile of the developed portion of the Project site include an equestrian facility; scattered large-lot single-family residences; agricultural cultivation with row crops; and the Malibu Country Club. Elevation ranges from 1,740 to 1,840 feet above mean sea level (msl). Zuma Canyon Creek is a blue-line stream that extends from north to south through the survey area.



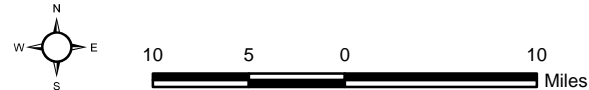
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	Project Location
	Coastal Zone Boundary

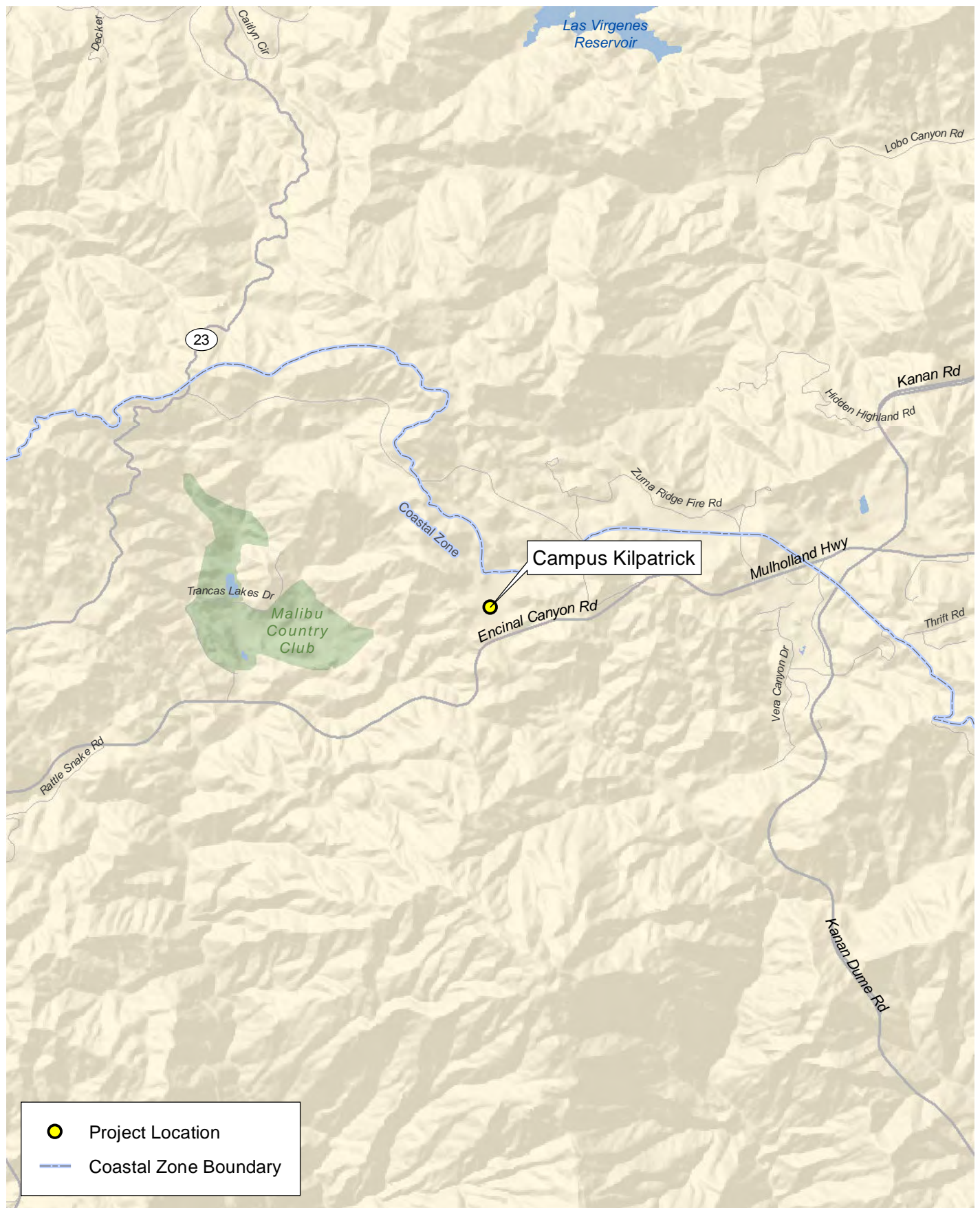
Regional Location

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit 1



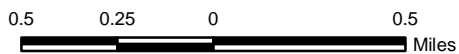
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Local Vicinity

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit 2



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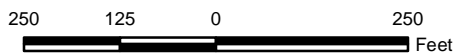


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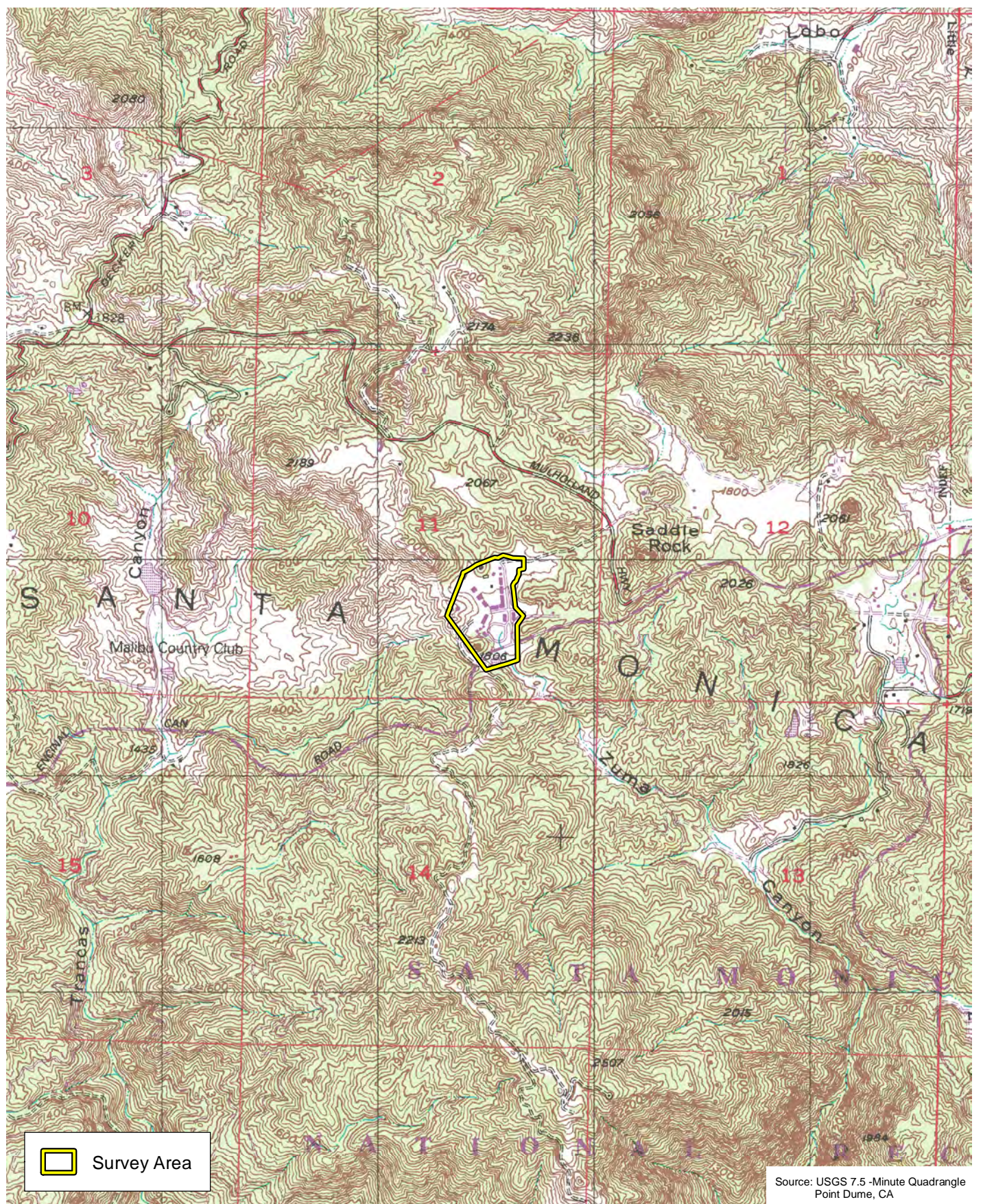
Survey Area

Exhibit 3

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



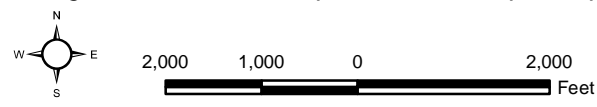
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U.S. Geological Survey 7.5-Minute Quadrangle

Exhibit 4

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



The survey area is located within the Santa Monica Mountains Coastal Zone, which is located in the unincorporated portion of the Santa Monica Mountains west of the City of Los Angeles, east of Ventura County, and south of the coastal zone boundary, excluding the City of Malibu. The Coastal Zone extends inland from the shoreline approximately 5 miles and encompasses approximately 81 square miles. The Santa Monica Mountains Local Coastal Program (LCP) consists of the Coastal Zone Plan and implementing actions, including the Community Standards District; amendments to Subdivision Ordinance and the Zoning Ordinance; Titles 21 and 22 of the County Code; and a zoning consistency program. Development applications must be submitted to the Coastal Unit of the Los Angeles County Department of Regional Planning (LACDRP) and found consistent with the Santa Monica Mountains LCP to be issued a Coastal Development Permit (CDP).

1.2 PROJECT DESCRIPTION

The Campus Kilpatrick site was affected by the Woolsey Fire in November 2018, which included significant damage to the WWTP that is south of Encinal Canyon Road. To allow the site to function, Los Angeles County Public Works (LACPW) installed a temporary WWTP immediately to the west of the existing WWTP facility in November 2019. Presently, LACPW proposes to install a WWTP to replace the temporary system which will be located largely on the existing developed footprint of the permanent WWTP site. Minor grading will be performed into the Encinal Canyon Road embankment to expand the WWTP footprint by approximately 300 square feet. Wastewater from Campus Kilpatrick would flow to the permanent WWTP and sludge that is produced would be pumped to an existing, relocated sludge storage tank at the existing WWTP site and hauled off-site. Construction includes installation of a new 10-inch sewer line to replace the existing 8-inch deteriorated sewer line, to connect the Campus Kilpatrick facility to the permanent WWTP. A new 4-inch recycled water line will also be installed. The sewer line will be installed via jack-and-bore operations under Encinal Canyon Road and then via trenching through the Camp Miller facility. Jack-and-bore operations include excavating a pit on either side of Encinal Canyon Road and then performing directional drilling to run pipe under the road. The recycled water line will be trenched northward from the WWTP site and will then pass above-ground through a culvert under Encinal Canyon Road. North of Encinal Canyon Road, the recycled water line will again be trenched as it passes through the Camp Miller facility and the parking lot before reaching a recycled water storage tank that will be installed in the northeastern portion of the Campus Kilpatrick site. Recycled water that is transported to the water storage tank would be used to irrigate on-site landscaping.

1.3 SURVEY METHODS

Psomas Senior Project Manager David Hughes conducted general plant and wildlife surveys, including vegetation mapping, on June 14, 2018. The survey area for this report consists of the property boundary for the Campus Kilpatrick and Camp Miller sites, the WWTP site, and areas within approximately 200 feet of these sites. Mr. Hughes assessed the project site on November 24, 2019 and January 3, 2020 for the presence of fire-following plant species (specifically Braunton's milkvetch [*Astragalus brauntonii*]) in the aftermath of the Woolsey Fire. These assessments were performed during site meetings to review fire damage to the facility and to determine an appropriate location for the permanent wastewater treatment site.

Prior to the survey, Psomas conducted a literature search to identify special status plants, wildlife, and vegetation types known from the general vicinity of the survey area. The California Native Plant Society's (CNPS') Inventory of Rare and Endangered Vascular Plants of California (CNPS 2020) and the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CDFW 2020) were reviewed prior to the survey to identify special status plants, wildlife, and habitats known to occur in the vicinity of the Project site. Database searches included the U.S. Geological Survey's (USGS') Point Dume, Malibu Beach, Triunfo Pass, Calabasas,

Thousand Oaks, and Newbury Park 7.5-minute quadrangles. A search of the CNPS' and CDFW's databases was conducted in 2018 prior to the field survey and revisited in 2020 to identify any changes that had occurred since 2018. Nomenclature for vegetation types generally follows that of Sawyer et al. (2009). Plants were identified using Baldwin et al. (2012) and the Jepson Flora Project (2012). Vegetation was mapped in the field on a 1-inch equals 50 feet (1" = 50') scale color aerial. In the event the tree canopy covered another vegetation type (e.g., oak canopy over a road), the vegetation was mapped as the corresponding vegetation type for the canopy.

2.0 EXISTING RESOURCES

2.1 SOILS

Two soil types occur in the Project survey area: Kayiwish association, 0 to 9 percent slopes and Cotharin-Talepop association, 15 to 75 percent slopes (Exhibit 5). The majority of the survey area contains Kayiwish association which is a volcanic soil that is moderately well drained. Cotharin-Talepop association is a well-drained loamy soil type that occurs generally along the eastern and western edges of the survey area.

2.2 VEGETATION TYPES

Vegetation types in the survey area consist of California sagebrush scrub, chaparral, native and non-native grasslands, willow scrub, coast live oak woodland, ruderal, ornamental plantings, and developed (buildings, roads, trails) (Exhibit 6). These vegetation types are described below. Representative photos of the site are included in Attachment B.

California sagebrush scrub occurs on the steep slopes by the water tower on the west side of the survey area and just inside of the fence on Campus Kilpatrick's northern border. Within the survey area, California sagebrush scrub is dominated by California sagebrush (*Artemisia californica*). Other plant species that occur in this vegetation type include California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), bigpod lilac (*Ceanothus megacarpus*), laurel sumac (*Malosma laurina*), white sage (*Salvia apiana*), toyon (*Heteromeles arbutifolia*), white currant (*Ribes indecorum*), and blue elderberry (*Sambucus nigra* ssp. *caerulea*).

Chaparral occurs on the western slopes of the survey area. Within the survey area, chaparral is dominated by chamise (*Adenostoma fasciculatum*). Other plant species that occur in this vegetation type include ribbonshanks (*Adenostoma sparsifolium*), bigberry manzanita (*Arctostaphylos glauca*), chaparral yucca (*Hesperoyucca whipplei*), black sage, poison oak (*Toxicodendron diversilobum*), golden yarrow (*Eriophyllum confertiflorum*), sawtooth goldenbush (*Hazardia squarrosa*), and woolly blue curls (*Trichostema lanatum*).

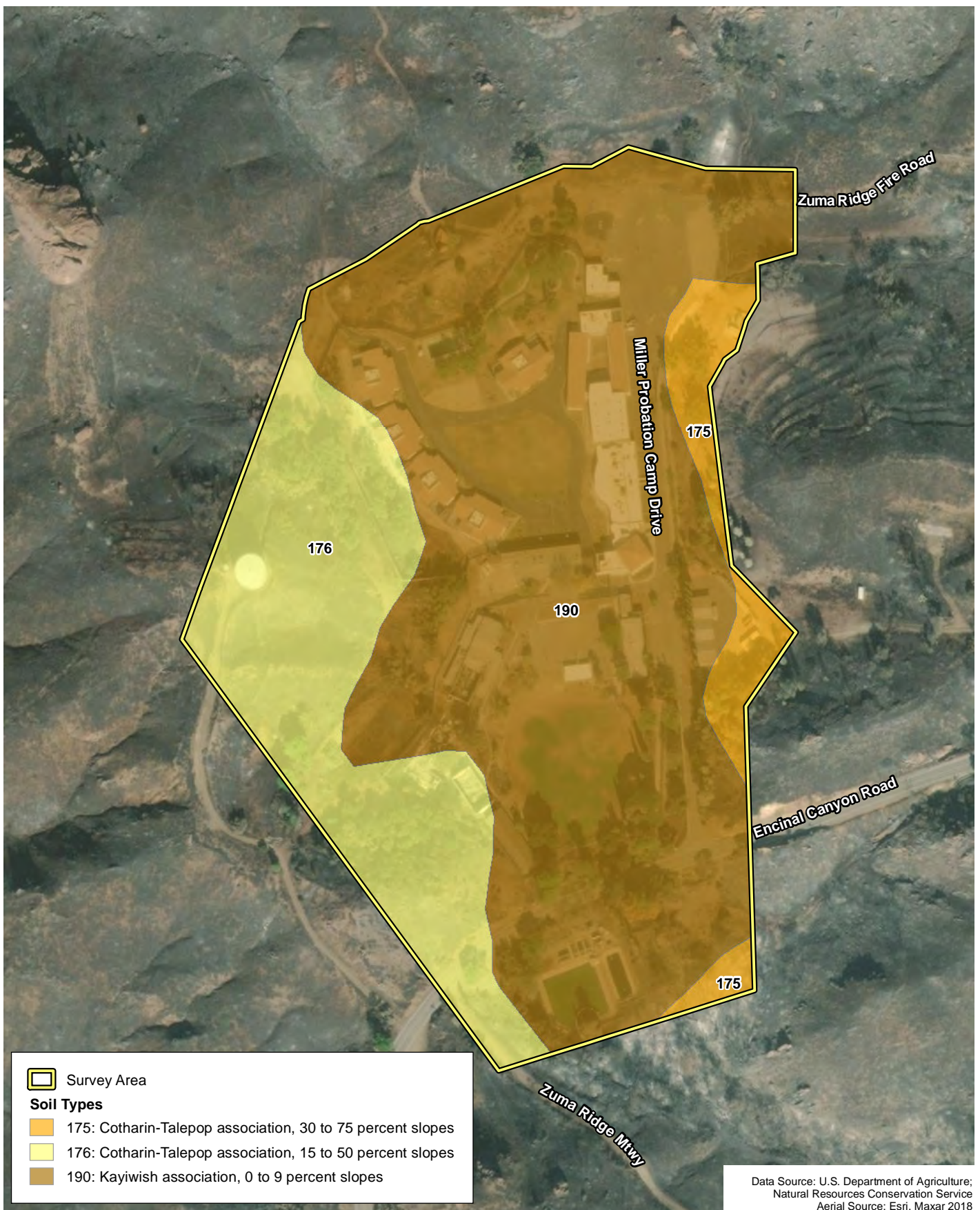
Native grasslands occur in patches on the slopes around the perimeter of the facility fencing. They are comprised of native plant species such as foothill needlegrass (*Stipa lepida*), purple needlegrass (*Stipa pulchra*), and western blue-eyed grass (*Sisyrinchium bellum*). Some non-native species, primarily slender wild oat (*Avena barbata*), also occur in native grasslands.

Non-native grasslands occur in areas directly adjacent to the facility's fence and along unpaved access roads, where they are disturbed by annual fuel modification and weed-abatement activities. This vegetation types contains mostly non-native species such as slender wild oat, rippgut grass (*Bromus diandrus*), onionweed (*Asphodelus fistulosus*), red-stemmed filaree (*Erodium cicutarium*), and white-stemmed filaree (*Erodium moschatum*). Some native species also occur at low densities in non-native grasslands, including scattered foothill needlegrass, purple needlegrass, and western blue-eyed grass.

Willow scrub occurs in a small patch in the southeastern portion of the survey area, along Zuma Creek. Drainage from the facilities is carried through a culvert under the road and empties into Zuma Creek near the sewage treatment pond. Species observed include willows (*Salix* spp.), mule fat (*Baccharis salicifolia*), and poison hemlock (*Conium maculatum*).

Coast live oak woodland occurs primarily on the slopes around the perimeter of the facility. The woodland is dominated by coast live oak (*Quercus agrifolia*) and California scrub oak (*Quercus berberidifolia*). Other species present include western poison oak, mugwort

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Survey Area

Soil Types

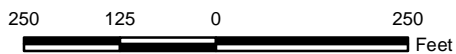
- 175: Cotharin-Talepop association, 30 to 75 percent slopes
- 176: Cotharin-Talepop association, 15 to 50 percent slopes
- 190: Kayiwish association, 0 to 9 percent slopes

Data Source: U.S. Department of Agriculture; Natural Resources Conservation Service
Aerial Source: Esri, Maxar 2018

Soil Map

Exhibit 5

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



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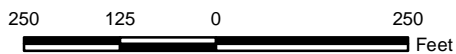
Aerial Source: Esri, Maxar 2018

	Survey Area
	WWTP (Permanent)
	WWTP (Temporary)
	Existing WWTP Facility
	Proposed 4-inch Recycled Water Line
	Proposed 10-inch Sewer Line
Vegetation Types	
	California Sagebrush Scrub (1.16 acres)
	Chaparral (3.04 acres)
	Native Grasslands (2.06 acres)
	Non-Native Grasslands (2.16 acres)
	Willow Scrub (0.56 acres)
	Coast Live Oak Woodland (3.46 acres)
	Ruderal (0.0002 acres)
	Ornamental Plantings (8.91 acres)
	Developed (10.11 acres)
Special Status Species	
	Catalina mariposa lily
	Plummer's mariposa lily

Existing Vegetation and Biological Resources

Exhibit 6

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



(*Artemisia douglasiana*), Pacific sanicle (*Sanicula crassicaulis*), and sticky cinquefoil (*Drymocallis glandulosa* ssp. *wrangelliana*). This vegetation type also includes small groupings and individual oak trees.

Ruderal vegetation occurs in small patches adjacent to the facilities' developed areas. Ruderal species are weedy plant species that grow following disturbance and often include non-native annual species. The primary native ruderal species within this vegetation type is telegraph weed (*Heterotheca grandiflora*). Non-native ruderal species include slender wild oat, soft chess brome (*Bromus hordeaceus*), filarees (*Erodium* spp.), and tocalote (*Centaurea melitensis*).

Ornamental vegetation occurs throughout the facilities. Ornamental species include eucalyptus (*Eucalyptus* sp.), Canary Island pine (*Pinus canariensis*), Aleppo pine (*Pinus halepensis*), California incense cedar (*Calocedrus decurrens*), California redwood (*Sequoia sempervirens*), various non-native shrubs, and turf grasses.

Developed areas include buildings, paved areas, concrete-lined channels, compacted dirt roads, and the wastewater treatment plant.

2.3 WILDLIFE

Amphibian species observed or expected to occur in the survey area include the garden slender salamander (*Batrachoseps major major*), western toad (*Anaxyrus [Bufo] boreas*), and Baja California treefrog (*Pseudacris hypochondriaca [Hyla regilla]*). All these species would be expected in the native habitats surrounding the facilities. Reptile species observed or expected to occur in the survey area include western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), alligator lizard (*Elgaria multicarinata*), red coachwhip (*Coluber [Masticophis] flagellum piceus*), gopher snake (*Pituophis catenifer*), common kingsnake (*Lampropeltis getula*), and western rattlesnake (*Crotalus oreganus*). Any lizard species listed would be expected to occur both inside the facilities and in the natural areas surrounding the facilities, while the snake species would be expected primarily in the natural areas surrounding the facilities.

Bird species observed or expected to occur in the natural areas surrounding the facilities include red-shouldered hawk (*Buteo lineatus*), red-tailed hawk (*Buteo jamaicensis*), black-chinned hummingbird (*Archilochus alexandri*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Picoides nuttallii*), northern flicker (*Colaptes auratus*), Pacific-slope flycatcher (*Empidonax difficilis*), ash-throated flycatcher (*Myiarchus cinerascens*), western scrub-jay (*Aphelocoma californica*), common raven (*Corvus corax*), mountain chickadee (*Poecile gambeli*), oak titmouse (*Baeolophus inornatus*), Bewick's wren (*Thryomanes bewickii*), house wren (*Troglodytes aedon*), wrentit (*Chamaea fasciata*), California thrasher (*Toxostoma redivivum*), phainopepla (*Phainopepla nitens*), orange-crowned warbler (*Oreothlypis celata*), Wilson's warbler (*Cardellina pusilla*), spotted towhee (*Pipilo maculatus*), California towhee (*Pipilo crissalis*), and dark-eyed junco (*Junco hyemalis*). Bird species expected to occur within the facilities include mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), northern mockingbird (*Mimus polyglottos*), Brewer's blackbird (*Euphagus cyanocephalus*), house finch (*Carpodacus mexicanus*), and lesser goldfinch (*Carduelis psaltria*). Raptors may also forage in the turf grass areas within the facility.

Mammal species observed or expected to occur both within the facilities and in the natural areas surrounding the facilities include Virginia opossum (*Didelphis virginiana*), desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), and northern raccoon (*Procyon lotor*). Additional species expected to occur in the natural areas surrounding the facilities include dusky-footed woodrat (*Neotoma fuscipes*), California vole (*Microtus californicus*), coyote

(*Canis latrans*), common gray fox (*Urocyon cinereoargenteus*), striped skunk (*Mephitis mephitis*), bobcat (*Lynx rufus*), and mule deer (*Odocoileus hemionus*). Bat species with potential to forage in the survey area include Yuma bat [Yuma myotis] (*Myotis yumanensis*), canyon bat [western pipistrelle] (*Parastrellus [Pipistrellus] hesperus*), big brown bat (*Eptesicus fuscus*), Brazilian free-tailed bat (*Tadarida brasiliensis*), and greater bonneted bat [western mastiff bat] (*Eumops perotis*). The Yuma bat, big brown bat, and Brazilian free-tailed bat have potential to roost in buildings (if there are available openings or abandoned buildings) and trees within the facilities, while the canyon bat and greater bonneted bat could roost in rock crevices or cliff faces nearby the survey area.

2.4 SPECIAL STATUS VEGETATION TYPES

2.4.1 Coastal Sage Scrub

Coastal sage scrub occurs throughout the undeveloped foothills of Southern California. It has high potential to support special status plant and wildlife species. California sagebrush scrub, a type of coastal sage scrub, occurs on the hill above the swimming pool and on the hill with the water tank in the survey area.

2.4.2 Native Grassland

Native grasslands have declined by approximately 99 percent in their historic range in California (Noss and Peters 1995). In the mid-nineteenth century, heavy grazing by cattle and sheep caused native perennials to be replaced by fast-growing annual grasses, which are able to take advantage of spring rains and produce seeds before the dry heat of summer. The native perennial grasses, which are more palatable to livestock than annuals, were damaged by grazing and trampling. Native grasslands have also been lost to development and conversion to agriculture. Native grassland occurs at several places around the perimeter of the facility.

2.4.3 Oak Woodland

Oak forests and woodlands provide food, cover, and nesting or denning habitat for many wildlife species. There are areas to the west of the Campus Kilpatrick site that contain dense oak trees, with other areas containing individual oak trees or small groupings of oaks.

Oak trees are protected by the County of Los Angeles Oak Tree Ordinance (CLAOTO, Section 22.56.2060 of the Los Angeles County Code). This regulation protects oak trees (any species in the genus *Quercus*) that are at least 8 inches in diameter (or for trees with multiple trunks, having 2 trunks with a combined diameter of at least 12 inches), as measured 4.5 feet above natural grade. A heritage oak tree, as defined by the oak tree ordinance, measures 36 inches or more in diameter, as measured 4.5 feet above natural grade, or any oak of less than 36 inches in diameter having a significant historical or cultural importance. Prior to impacting any oak species, a permit application must be submitted to the County of Los Angeles that includes an oak tree report with a detailed analysis of the oaks on the Project site.

Under the CLAOTO, the County of Los Angeles asserts jurisdiction over the “protected zone” of all oak trees that meet the minimum size requirement described above. The protected zone is defined in the CLAOTO as areas within 5 feet of the outer dripline, at least 15 feet from the trunk. Impacts to oak trees can be categorized as either (1) removal, in which an entire tree needs to be removed for Project implementation; (2) encroachment, consisting of any soil disturbance (e.g., excavation, vehicle operation, grade changes) within the protected zone of an oak; and (3) tree trimming that exceeds the limits described in the CLAOTO (medium pruning of branches less than two inches in diameter).

The County of Los Angeles also analyzes impacts to oak woodlands as a vegetation type under the *Los Angeles County Oak Woodlands Conservation Management Plan* rather than just impacts to individual trees under the CLAOTO. Under this Management Plan, each oak tree's "area of influence" is identified (ten times the tree canopy area). If there is overlap with another oak tree's area of influence, these overlapping zones would constitute an oak woodland.

2.4.4 Riparian/Jurisdictional Areas

Riparian vegetation (willow scrub) typically occurs along stream courses and intermittent drainages that are subject to seasonal flooding. In general, riparian vegetation can provide important biological functions for an ecosystem such as cover and water sources for wildlife; filtration of runoff water and groundwater recharge; and flood control and sediment stabilization. Due to the reduction in range of riparian vegetation throughout Southern California, these areas are considered a special status vegetation type. Drainages, which may include wetlands and "Waters of the U.S.", are protected under Section 404 of the Clean Water Act and are under the jurisdiction of the U.S. Army Corps of Engineers (USACE). "Waters of the U.S." include navigable coastal and inland waters, lakes, rivers, and streams and their tributaries; interstate waters and their tributaries; wetlands adjacent to such waters; intermittent streams; and other waters that could affect interstate commerce. In addition, if drainages in the survey area meet the criteria established by Section 1600 of the *California Fish and Game Code*, the CDFW may require a Streambed Alteration Agreement prior to any modification of the bed, bank, or channel of streambeds in the survey area.

Psomas (then BonTerra Consulting) conducted a jurisdictional delineation in the survey area on July 20, 2012, to define the extent of resources under the jurisdiction of the USACE, the Regional Water Quality Control Board (RWQCB), the CDFW, and the California Coastal Commission (CCC) (BonTerra Consulting 2012a). Jurisdictional features in the survey area consist of a concrete-lined channel that runs along the eastern boundary of Campus Kilpatrick, a narrow earthen bottom channel in the northwestern corner of the survey area, and a natural streambed that drains from north to south to Zuma Creek. Regulatory permits or agreements from these agencies would be required prior to any alteration of these jurisdictional features.

2.5 SPECIAL STATUS PLANT AND WILDLIFE SPECIES

Plants or wildlife may be considered "special status" due to declining populations; vulnerability to habitat change; or restricted distributions. Certain special status species that have been listed as Threatened or Endangered under the State and/or Federal Endangered Species Acts are described below. Tables that summarize the potential for special status plant and wildlife species are provided in Attachments C and D. The potential for these species to occur in the survey area is discussed below.

2.5.1 Special Status Plant Species

Several special status plant species have been reported from the Project vicinity (CDFW 2020; CNPS 2020); however, only Threatened or Endangered species or those with a California Rare Plant Rank (CRPR) of 1 or 2 typically present constraints to development. The following federally and/or State-listed Endangered, Threatened, or Rare species have been reported in the Project region: Braunton's milk-vetch (*Astragalus brauntonii*, federally Endangered, CRPR 1B.1), San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*, federally proposed Threatened and State Endangered, CRPR 1B.1), Santa Susana tarplant (*Deinandra minthornii*, State Rare, CRPR 1B.2), Agoura Hills dudleya (*Dudleya cymosa* ssp. *agouensis*, federally Threatened, CRPR 1B.2), marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*, federally threatened, State Rare, CRPR 1B.2), Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*, federally threatened, CRPR 1B.1), conejo dudleya (*Dudleya parva*, federally threatened, CRPR 1B.2), Verity's dudleya

(*Dudleya verityi*, federally Threatened, CRPR 1B.2), conejo buckwheat (*Eriogonum crocatum*, State Rare, CRPR 1B.2), California Orcutt grass (*Orcuttia californica*, federally and State Endangered, CRPR List 1B.1), and Lyon's pentachaeta (*Pentachaeta lyonii*, federally and State Endangered, CRPR List 1B.1). Habitat for these species is generally absent from within the facilities; however, suitable habitat for these species is present in the natural areas surrounding the facilities. Focused surveys for special status plants were conducted in spring/summer 2012; none of these species were observed in the survey area (BonTerra Consulting 2012b). Additional plant surveys were conducted in 2015 in the northern portion of the Project site that did not observe any of these species. It should be noted that Braunton's milk-vetch is a fire-follower (i.e., it only blooms after fire or other disturbance) and therefore, it is not reliably detectable during surveys unless a fire or some other disturbance has recently occurred. Braunton's milk-vetch has not been observed in areas that were burned by the Woolsey Fire. This species is a short-lived perennial woody shrub and fairly conspicuous (i.e., it persists for a period of several years and is characterized by greyish-green foliage that can be observed throughout the year). Because this species has not been observed during field visits to the survey area since the Woolsey Fire, this species is likely absent from the survey area.

In addition to the listed species above, several species that are not federal or State-listed species but are considered to have special status due to their inclusion in the CRPR are known to occur in the Project vicinity. The following CRPR 1B and 2 species have been reported in the Project region: Coulter's saltbush (*Atriplex coulteri*, CRPR 1B.2), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*, CRPR 1B.2), Malibu baccharis (*Baccharis malibuensis*, CRPR 1B.1), round-leaved filaree (*California macrophylla*, CRPR 1B.1), slender mariposa lily (*Calochortus clavatus* var. *gracilis*, CRPR 1B.2), southern tarplant (*Centromadia parryi* ssp. *australis*, CRPR 1B.1), Orcutt's pincushion (*Chaenactis glabrisculata* var. *orcuttiana*, CRPR 1B.1), Parry's spineflower (*Chorizanthe parryi* var. *parryi*, CRPR 1B.1), dune larkspur (*Delphinium parryi* ssp. *blockmaniae*, CRPR 1B.2), Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*, CRPR 1B.1), many-stemmed dudleya (*Dudleya multicaulis*, CRPR 1B.2), mesa horkelia (*Horkelia cuneata* var. *puberula*, CRPR 1B.1), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*, CRPR 1B.2), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*, CRPR 1B.1), white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*, CRPR 1B.3), Ojai navarretia (*Navarretia ojaiensis*, CRPR 1B.1), chaparral nolina (*Nolina cismontana*, CRPR 1B.2), Nuttall's scrub oak (*Quercus dumosa*, CRPR 1B.1), chaparral ragwort (*Senecio aphanactis*, CRPR 2B.2), Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*, CRPR 2B.2), and California screw-moss (*Tortula californica*, CRPR 1B.2). Habitat for these species is generally absent from within the facilities; however, potentially suitable habitat for the Malibu baccharis, round-leaved filaree, and slender mariposa lily is present in the natural areas surrounding the facilities.

Several species that are designated as CRPR 3 and 4 are also known to occur in the Project's vicinity. These species include western spleenwort (*Asplenium vespertinum*, CRPR 4.2), Catalina mariposa lily (*Calochortus catalinae*, CRPR 4.2), club-haired mariposa-lily (*Calochortus clavatus* var. *clavatus*, CRPR 4.3), Plummer's mariposa lily (*Calochortus plummerae*, CRPR 4.2), island mountain-mahogany (*Cercocarpus betuloides* var. *blancheae*, CRPR 4.3), small-flowered morning glory (*Convolvulus simulans*, CRPR 4.2), western dichondra (*Dichondra occidentalis*, CRPR 4.2), vernal barley (*Hordeum intercedens*, CRPR 3.2), fragrant pitcher plant (*Lepechinia fragrans*, CRPR 4.2), ocellated Humboldt lily (*Lilium humboldtii* ssp. *ocellatum*, CRPR 4.2), Hubby's phacelia (*Phacelia hubbyii*, CRPR 4.2), and Michael's rein orchid (*Piperia michaelii*, CRPR 4.2). Two CRPR 4 species, Catalina mariposa lily and Plummer's mariposa lily have been observed in areas surrounding Campus Kilpatrick, but outside of the proposed disturbance areas for the Project.

Focused surveys for all special status plants were conducted in spring/summer 2012; Catalina mariposa lily and Plummer's mariposa lily were observed (BonTerra Consulting 2012b). A total of 1,184 individuals of Catalina mariposa lily were observed in 4 general locations and 94 individuals

of Plummer's mariposa lily were observed in 3 locations (Exhibit 6). All of these populations are located outside the Campus Kilpatrick perimeter fence; none occur within the facility fencing. Additional botanical surveys were conducted in 2015 and 2018 per CDFW protocols that did not survey the entire survey area but focused on areas around the debris basin to the north of the Campus Kilpatrick facility and the WWTP south of Encinal Canyon Road. These additional visits did not identify any special status plant species and confirmed the locations of Plummer's mariposa lily and Catalina mariposa lily populations that were previously mapped. No new populations of these species were observed. A compendium of plant species observed in the survey area during the 2012, 2015, 2018 site visits is presented in Attachment E.

As described in Section 1.3, site assessments were performed in November 2019 and January 2020 to determine the presence of the federally-Endangered Braunton's milkvetch which can be preliminarily identified outside of its blooming period. This short-lived perennial species would require examination of its flowers for positive identification but no plants were observed that could potentially be this species.

2.5.2 Special Status Wildlife Species

Several special status wildlife species have been reported from the Project region (CDFW 2018); however, only Threatened or Endangered species typically present constraints to development. The only federally and/or State-listed Endangered or Threatened species that has been reported from the Project region (USGS Point Dume 7.5-minute quadrangle) is the bank swallow (*Riparia*, State Threatened), which was last reported from this area in 1964 (at Lake Sherwood) and is now considered extirpated as a breeder in Southern California (CDFW 2018). Threatened and Endangered species reported from neighboring USGS quadrangles (i.e., USGS Newbury Park, Thousand Oaks, Calabasas 7.5-minute quadrangles) include tidewater goby (*Eucyclogobius newberryi*, federally Endangered, CDFW Species of Special Concern [SSC]), southern steelhead (*Oncorhynchus mykiss irideus*, federally Endangered, CDFW SSC), California red-legged frog (*Rana draytonii*, federally Threatened, CDFW SSC), arroyo toad (*Anaxyrus californicus*, federally Endangered, CDFW SSC), coastal California gnatcatcher (*Poliioptila californica*, federally Threatened, CDFW SSC), and least Bell's vireo (*Vireo bellii pusilus*, federally Endangered, State Endangered). The tidewater goby, southern steelhead, and California red-legged frog are not expected to occur due to lack of a perennial stream in the survey area. The arroyo toad is not expected to occur due to a lack of wash habitat. Although limited coastal sage scrub habitat is present, coastal California gnatcatcher would not be expected to occur because the habitat consists of small stature shrubs (e.g., slope above the pool area) or consists of small patches of scrub surrounded by extensive chaparral, which is not preferred by the species. Similarly, although there is a small patch of willow scrub, least Bell's vireo would not be expected to occur due to the limited extent of habitat and because there are no larger areas of habitat in the general vicinity (e.g., creeks or rivers with riparian forest) known to be occupied by the species. Therefore, no Threatened or Endangered species are expected to occur in the survey area due to lack of suitable habitat.

In addition to species formally listed by the resource agencies, several special status wildlife species have been reported from the region: Pacific [western] pond turtle (*Actinemys [Emys] marmorata*), Blainville's [coast] horned lizard (*Phrynosoma blainvillii*), two-striped garter snake (*Thamnophis hammondi*), Cooper's hawk (*Accipiter cooperii*, nesting), golden eagle (*Aquila chrysaetos*, CDFW Fully Protected), greater bonneted [western mastiff] bat (*Eumops perotis*), western red bat (*Lasiurus blossevillii*), hoary bat (*Lasiurus cinereus*), Yuma [myotis] bat (*Myotis yumanensis*), and American badger (*Taxidea taxus*). Habitat for these species is generally absent from within the facilities; however, suitable habitat for these species is present in the natural areas surrounding the facilities. Several bat species may forage over the

facility and could roost in openings in buildings or in abandoned structures. The western pond turtle is not expected to occur due to lack of suitable habitat.

A compendium of wildlife species observed during site surveys is provided in Attachment F.

2.6 SENSITIVE ENVIRONMENTAL RESOURCE AREAS

As stated above, Campus Kilpatrick is located within the Coastal Zone and is subject to the requirements of the Santa Monica Mountains LCP. One of the conservation goals of the LCP is to protect Sensitive Environmental Resource Areas (SERAs) from disruption of their habitat values. SERAs are separated into two habitat categories: H1 habitat (areas of highest biological significance, rarity, and sensitivity) and H2 habitat (areas of high biological significance, rarity, and sensitivity that are important for the ecological vitality and diversity of the Santa Monica Mountains). Areas occupied by existing, legally-established structures and their fuel modification areas required by the Los Angeles County Fire Department do not constitute H1 or H2 habitat areas. Outside of H1 habitat areas, the LCP identifies an H1 Buffer Zone that is 100 feet outside of H1 habitat and an H1 Quiet Zone that extends 100 feet from the Buffer Zone.

H1 habitat is located south of Encinal Canyon Road and is comprised of native riparian habitat areas that drain toward Zuma Creek (Exhibit 7). The H1 Buffer Zone and H1 Quiet Zone extend northward to areas north of Encinal Canyon Road into the Camp Miller area. H2 habitat generally surrounds the entire survey area and extends into the southeastern, northeastern, and northwestern portions of the survey area.

The vegetation map that was prepared for this report is generally consistent with the SERAs as mapped in the LCP. Areas that are identified as H1 consist of native coastal scrub, chaparral, and riparian vegetation communities. The area where the temporary WWTP was installed is in H1 habitat, but contained disturbed habitat that consisted of a combination of native shrubs such as black sage and California buckwheat along with shortpod mustard (*Hirschfeldia incana*) and non-native grass species.

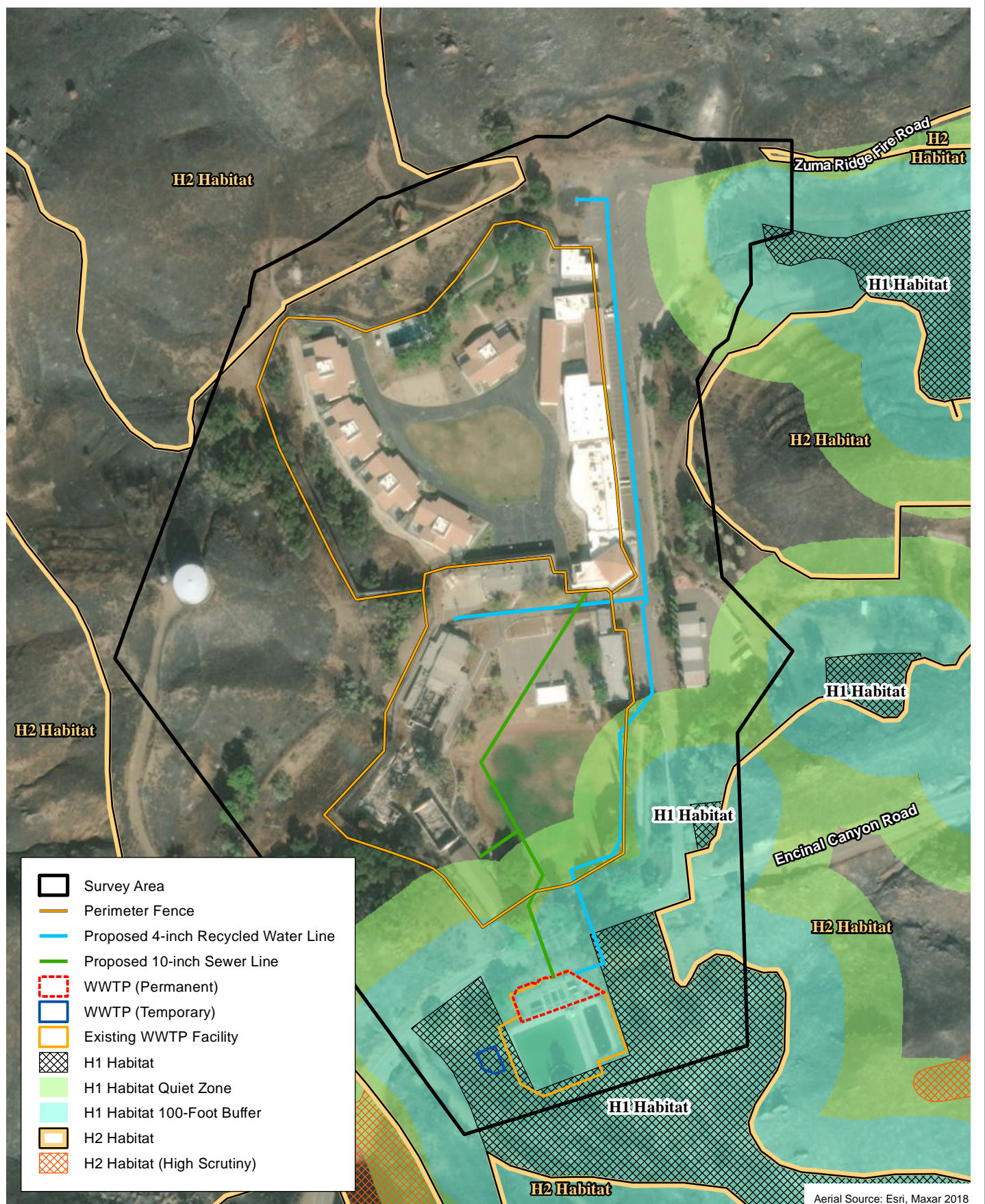
H2 habitat areas north of Encinal Canyon Road consist of coast live oak, chaparral, California sagebrush scrub, and native grasslands.

2.7 NATIVE TREES

Oak tree removal in unincorporated sections of Los Angeles County is typically regulated by Section 22.56.2050 of the Los Angeles County Code. However, since Campus Kilpatrick is located in the Coastal Zone, the requirements of Section 22.44.950 of the Santa Monica Mountains LCP supersede the previous section. To comply with these requirements, all native trees that have a trunk that is at least six inches in diameter at breast height (dbh) or any two trunks that combine to measure at least eight inches dbh must be documented in a tree report.

The survey area contains several native trees including coast live oaks (*Quercus agrifolia*), western sycamore trees (*Platanus racemosa*). Other native tree species include coast redwood (*Sequoia sempervirens*) and white alder (*Alnus rhombifolia*). Several coast redwood trees occur east of the WWTP site; though this species is native to California it is not native to the Santa Monica Mountains. One white alder was planted inside the Campus Kilpatrick site as part of the site's landscaping.

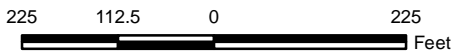
The removal of native trees is regulated by the Santa Monica Mountains LCP as are construction activities that encroach into root protection zone of native trees. The root protection zone is defined as five feet outside a tree's outer canopy and at least 15 feet from the trunk.



Sensitive Environmental Habitat Areas

Exhibit 7

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



Native trees that occur in the Project survey area are shown on Exhibit 8. A native tree survey report that documents all trees in the vicinity of the Project site is provided in Attachment G.

2.8 JURISDICTIONAL WATERS

Water generally drains from north to south in the survey area. From areas north of Campus Kilpatrick, water drains into a concrete trapezoidal channel along the eastern edge of the property. This channel flows through a culvert that passes under Encinal Canyon and reaches an unnamed tributary to Zuma Canyon Creek. The locations of jurisdictional waters in the survey area are provided in Exhibit 9.

2.9 WILDLIFE MOVEMENT

The overall landscape around the survey area consists primarily of undeveloped open space within the Santa Monica Mountains National Recreation Area. Construction activities will occur in areas that are already developed or in areas that contain non-native ornamental vegetation. Project activities are not expected to have a significant effect on wildlife movement through the area.

2.9.1 Nesting Birds/Raptors

The Migratory Bird Treaty Act (MBTA) prohibits the taking of migratory birds and their nests and eggs. Active raptor nests are protected by Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. Areas within and surrounding the Campus Kilpatrick site contain large trees that could support nesting raptors as well as abundant shrub communities that would support other nesting birds. Vegetation removal activities should be conducted outside the peak nesting season (February 1 to September 15) to avoid impacts on nesting birds and raptors. If vegetation removal is to occur during the peak nesting season, a nesting bird survey would be required prior to removal of vegetation.



Aerial Source: Esri, Maxar 2018

Native Tree Locations

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

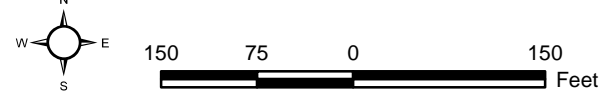
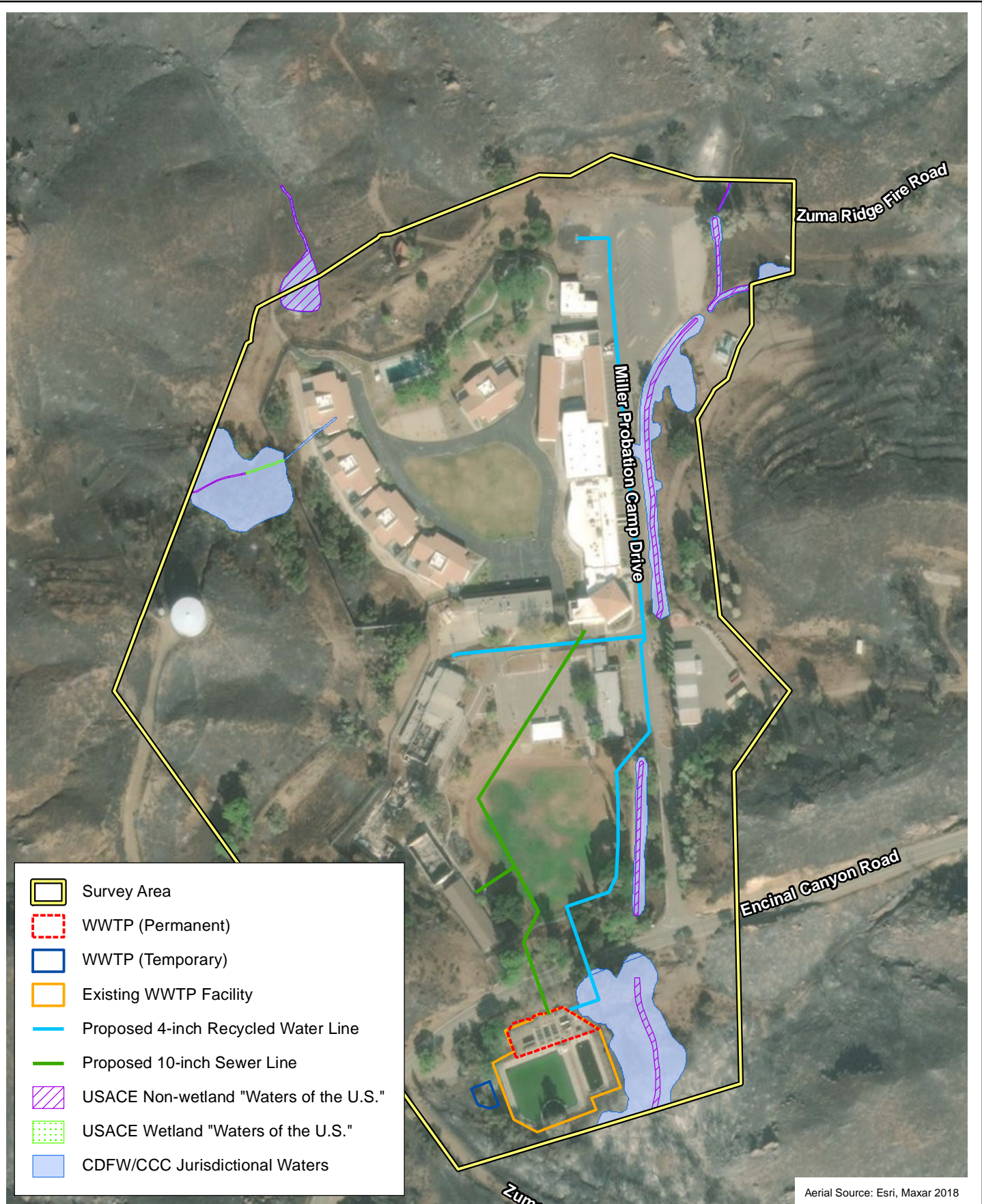


Exhibit 8



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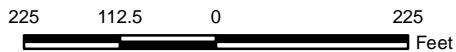


Aerial Source: Esri, Maxar 2018

Jurisdictional Waters

Exhibit 9

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility



3.0 PROJECT IMPACTS

As described in Section 1.2, proposed Project activities include (1) the installation and subsequent removal of a temporary WWTP in the area immediately west of the existing WWTP site; (2) installation of a permanent WWTP largely in the developed footprint of the existing WWTP; (3) minor grading northward into the Encinal Canyon road embankment to expand the existing WWTP footprint by approximately 300 square feet; (4) trenching for sewer and recycled water line installation northward from the WWTP site through the Camp Miller area; and (5) construction of a new recycled water storage tank that would be located in the northeastern portion of the Campus Kilpatrick site. This section includes a discussion of the impacts these projects are expected to have on sensitive biological resources.

3.1 VEGETATION TYPES/SPECIAL STATUS HABITATS

Proposed activities are expected to have a minor impact on special status vegetation. The temporary WWTP site is located in an area that contained disturbed chamise chaparral vegetation. The permanent WWTP will be located largely within the existing developed footprint of the existing WWTP facility with minor grading into the road embankment of Encinal Canyon Road. The road embankment generally contains ornamental pine trees with non-native grasses in the understory, though this grading may slightly extend into the root protection zone of one coast live oak (less than ten percent encroachment). Installation of new sewer and recycled water lines will occur northward from the existing WWTP area, under Encinal Canyon Road and through the Camp Miller area where ornamental vegetation occurs. Additional trenching and the installation of the recycled water tank will occur in developed areas of the Campus Kilpatrick facility.

Project construction activities are not expected to affect any sensitive vegetation types or areas that have the potential to support special status plant or wildlife species.

3.2 JURISDICTIONAL RESOURCES

The temporary and permanent WWTP sites and the other associated ground-disturbing activities are not located in any jurisdictional “waters of the United States” or “waters of the State” and no impacts to jurisdictional waters will occur.

3.3 OAK TREES

Several trees occur in the vicinity of the proposed Project. This section describes the trees that may be affected by Project activities and discusses the type and quantity of impacts. Table 2 provides a summary of trees that are discussed in this section.

**TABLE 2
SUMMARY OF TREES TO BE AFFECTED BY PROJECT ACTIVITIES**

Tree No.	Species	DBH (inches)	Height (ft)	Canopy Diameter (ft)	Health Rating ^a	Root Protection Zone ^b (sq ft)	Disturbance Type	Approximate Disturbance Area (sq ft)	Tree Removal	Tree Encroach	Percent Encroach
773	western sycamore <i>Platanus racemosa</i>	19.5	60	25	4	962	Trenching ^c	50		X	5%
776	coast live oak <i>Quercus agrifolia</i>	4.5, 4.0, 3.5, 2.0, 1.5, 1.5, 1.0, 1.0, 1.0, 1.0,	20	15	2	706	Trenching ^c	30		X	4%
795	coast live oak <i>Quercus agrifolia</i>	23.3	40	30	4	1,256	Trenching ^c	40		X	3%
796	coast live oak <i>Quercus agrifolia</i>	6.1, 2.7, 1.5	15	12	2	706	Tunneling ^d	60		X	8%
798	coast live oak <i>Quercus agrifolia</i>	5.7, 5.0, 4.5, 4.5, 4.0, 2.5, 2.5, 2.5, 2.0, 1.0, 1.0	10	10	3	706	Grading ^e	50		X	7%
801	coast live oak <i>Quercus agrifolia</i>	7.7, 6.1	15	15	3	706	Surficial grading ^f	330		X	46%
812	coast redwood ^g <i>Sequoia sempervirens</i>	12.0, 11.0, 11.0	50	15	3	706	Trenching ^c	40		X	6%
813	coast redwood ^g <i>Sequoia sempervirens</i>	14.0	50	15	3	706	Trenching ^c	40		X	6%

DBH: diameter at breast height; ft: feet; sq ft: square feet

^a Trees are rated on a scale of 1 to 5, as follows: 1=Very Poor, 2=Poor, 3=Fair, 4=Good, and 5=Excellent.

^b The root protection zone for each tree extends five feet beyond the tree's canopy edge and is at least 15 feet from the trunk.

^c Trenching will involve excavating a width of approximately two feet and a depth of up to four feet.

^d Tunneling will occur under Tree 796 so that while work will occur under this tree, it is not expected to affect it.

^e Grading involves soil disturbance to a depth of several feet to expand the footprint of the wastewater treatment plant location.

^f Surficial grading involves soil disturbance to a depth of up to several inches to create level ground.

^g Coast redwood is a species that is native to California but not to the Santa Monica Mountains.

Installation of the temporary WWTP encroached within three feet of the trunk of one coast live oak tree (number 801) that has two trunks measuring 6.1 and 7.7 inches in diameter. Encroachment consisted of surficial grading to create a level area for the installation of the temporary WWTP and the placement gravel on which the equipment was placed. Because encroachment affected more than 30 percent of the root protection zone of this tree and affected soil within three feet of the trunk, compensatory mitigation in the form of 10 replacement trees is required.

Tree 773 is a western sycamore and trees 776 and 795 are coast live oaks. Trenching for the installation of recycled water lines will occur within the root protection zone of these trees. Trees 776 and 795 are located on the northern and southern edges, respectively, of Encinal Canyon Road. The recycled water lines will pass through an existing culvert under Encinal Canyon Road so that there will be no ground disturbance under these trees between their trunk and Encinal Canyon Road. Trenching will consist of excavating a linear area approximately two feet wide and up to four feet deep. Trenching will occur along the periphery of the root protection zone of Tree 773. Trenching will not affect more than 10 percent of any tree's root protection zone so that no tree mitigation is required.

798 is a multi-trunk tree that likely re-sprouted from a cut stump. It is near the top of the Encinal Canyon Road embankment and may experience minor encroachment when a portion of the embankment is graded for expansion of the new WWTP footprint. Any encroachment would be on the edges of the root protection zone and would be less than ten percent of the protection zone.

Trees 801 and 802 are coast redwoods (*Sequoia sempervirens*) that are part of a row of trees located along the east side of the Project area. The recycled water line will be trenched between two of these trees. This will affect less than 10 percent of the root protection zone of these trees. While coast redwoods are native to California, they are not native to the Santa Monica Mountains. Because these trees were presumably planted for landscaping purposes, mitigation for impacts to them should not be required regardless of the amount of disturbance these trees will experience.

3.4 SPECIAL STATUS PLANT SPECIES

Two special status plant species have been observed in the survey area: Plummer's mariposa lily and Catalina mariposa lily (both species are CRPR 4.2). Lily locations have only been documented outside the facility's perimeter fencing and are not located in any of the proposed Project areas. Therefore, no impacts to special status plant species are anticipated from proposed Project construction.

3.5 SPECIAL STATUS WILDLIFE SPECIES

Several special status bird and mammal species have the potential to occur in the survey area for this assessment, though there is very limited potential for special status species to occur in Project construction areas. Pre-construction biological surveys and avoidance of vegetation removal during the nesting season will result in no impacts on special status wildlife species.

3.6 SANTA MONICA MOUNTAINS COASTAL ZONE PLAN

Campus Kilpatrick is located within the coastal zone; as such, a CDP would need to be obtained prior to Project construction. The installation of the temporary WWTP occurred in H1 habitat though the area contained disturbed habitat conditions, containing sparse native shrub species interspersed with non-native herbaceous species such as shortpod mustard and slender wild oat grass. As required by Condition 5 of the Emergency Coastal Development Permit for the

temporary WWTP (Permit No. RPPL2019005043), native chaparral-sage scrub habitat will be restored in this disturbance area.

The footprint of the existing WWTP (where the new WWTP will be installed) is located in the H1 Buffer Zone. Additional Project construction activities will occur in the H1 Buffer Zone including grading to expand the WWTP footprint and trenching for water/sewer line installation. Trenching will also extend northward into the H1 Quiet Zone. No native vegetation types will be impacted by construction of the new WWTP.

3.7 WILDLIFE MOVEMENT

The proposed Project largely occurs on the existing developed footprint for the WWTP. The water and sewer lines will be installed below ground, most of which is behind the Camp Miller security fence. Therefore, the proposed Project is not expected to impact wildlife movement.

3.8 NESTING BIRDS/RAPTORS

Bird species have potential to nest in native and non-native vegetation that occurs in survey area. Raptor species have potential to nest in oak trees and a limited potential to nest in ornamental trees that occur in the vicinity of the proposed Project. Active bird and raptor nests are protected by the MBTA and California *Fish and Game Code*. If possible, vegetation removal should occur outside the peak nesting season (February 1 to September 15) to avoid impacts on nesting birds and raptors. If vegetation removal would occur during the peak nesting season, a qualified biological monitor should inspect any vegetation for the presence of active bird nests. Due to the limited need to remove vegetation, there are few nesting opportunities in the Project construction area. Pre-construction biological surveys during the nesting season will prevent any impacts to active bird or raptor nests.

4.0 RECOMMENDATIONS TO MINIMIZE OR AVOID IMPACTS TO BIOLOGICAL RESOURCES

The following is a summary of potential biological constraints to the proposed Project and a list of recommendations to ensure that the Project is consistent with regulations protecting biological resources.

1. To protect migratory birds in compliance with the MBTA, any vegetation removal should occur between September 16 and January 31. If clearing occurs between February 1 and September 15, a qualified Biologist should perform a pre-construction survey to detect any active nesting locations. A buffer zone is designated by a qualified Biologist around a nest to allow construction to proceed while minimizing disturbance to the active nest.
2. A survey for active raptor nests is recommended prior to commencement of any construction activities during the raptor nesting season (February 1 to June 30). Restrictions may be placed on construction activities in the vicinity of any active nest observed until the nest is no longer active as determined by a qualified Biologist. A buffer zone is designated by a qualified Biologist around a nest to allow construction to proceed while minimizing disturbance to the active nest.
3. The presence of a Biological Monitor during all vegetation clearing and periodically throughout construction is recommended to assist with permit compliance.
4. To prevent unintended impacts to native trees in the vicinity of proposed Project construction, a Certified Arborist shall oversee the installation of protective fencing around the root protection zone of all native trees. The Certified Arborist shall be present during all ground disturbing activities that may encroach into the root protection zone of a native tree to help construction workers avoid or minimize these impacts.

5.0 REFERENCES

- Baldwin, B.G., D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken (Eds.). 2012. *The Jepson Manual: Vascular Plants of California* (2nd ed.). Berkeley, CA: University of California Press.
- BonTerra Consulting. 2012a. *Jurisdictional Delineation Report, Camp Vernon Kilpatrick Replacement Project, Los Angeles County, California*. Irvine, CA: BonTerra Consulting.
- . 2012b. *Results of Special Status Plant Surveys for the Camp Kilpatrick Facility in Los Angeles County, California*. Irvine, CA: BonTerra Consulting.
- California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Database. Records of Occurrence for the USGS Point Dume, Triunfo Pass, and Malibu Beach 7.5-minute quadrangles. Sacramento, CA: CDFW, Natural Heritage Division.
- California Native Plant Society (CNPS). February 2020. Electronic Inventory of Rare and Endangered Vascular Plants of California. Records of Occurrence for the USGS Point Dume, Triunfo Pass, and Malibu Beach 7.5-minute quadrangles. Sacramento, CA: CNPS. <http://www.cnps.org/inventory>.
- Jepson Flora Project. 2012 (v. 1.0). *Jepson eFlora*. <http://ucjeps.berkeley.edu/IJM.html>.
- Los Angeles, County of. 2012 (August 14, current through). *Los Angeles, California County Code* (Title 22, Planning and Zoning; Chapter 22.56, Conditional Use Permits, Variances, Nonconforming Uses, Temporary Uses and Director's Review; Section 22.56.2060, Damaging or removing oak trees prohibited—Permit requirements). Tallahassee, FL: Municipal Code Corporation for the County. <http://search.municode.com/html/16274/index.htm>.
- Noss, R.F. and R.L. Peters. 1995. *Endangered Ecosystems: a Status Report on America's Vanishing Habitat and Wildlife*. Washington, D.C.: Defenders of Wildlife.
- Sawyer, J.O., T. Keeler-Wolf, and J.M. Evans. 2009. *A Manual of California Vegetation* (2nd ed.). Sacramento, CA: CNPS.

ATTACHMENT A
BIOLOGICAL REPORT CHECKLIST

Santa Monica Mountains Biological Assessment Checklist	Page	Initials
Title Page		
A. Project name.	Title page	
B. County identification numbers (Project number, Permit number, APNs)	Title page	
C. Applicant name and contact information	Title page	
D. Name and affiliation of preparer.	Title page	
E. Date.	Title page	
I. Project and Survey Description		
A. Project description.		
1. Project name, type of report, address of project.	1	
2. County application identification numbers including APNs.	1	
3. Applicant name and contact information.	1	
4. Parcel and acreage information.	1	
5. Location.		
a. Map of regional features showing project location, including watershed boundaries, proximity to public lands, streams, drainages, and roads in region.	Exhibits 3 and 4	
b. Color aerial photograph(s) showing regional context of project, project parcel(s), existing development, open space, etc.	Exhibit 3	
6. Detailed description of proposed project, including area of vegetation removal, modification, or disturbance, grading volumes, etc.	2	
B. Description of major natural features.		
1. Landforms and geomorphology.	2	
2. Drainage and wetland features.	9	
3. Soils (soil/geological map optional).	3 Exhibit 5	
C. Methodology of biological survey.		
1. Date(s) of survey(s).	1	
2. Detailed description of survey methods.	2	
II. Biological Characteristics of the site		
A. Flora.		
1. Map of vegetation communities, specifying system used (the use of Sawyer et al. 2009 is recommended)	Exhibit 6	
2. Map of project site showing the habitat areas (H1, H2, H2 "High Scrutiny", H3 Habitat) from the LUP Biological Resources map.	Exhibit 7	
3. Vegetation cover table, with acreages of each vegetation type (can be a legend in map)	Exhibit 6	
4. Location, trunk, diameter, and canopy extent mapped for each protected tree (oak, sycamore, walnut, bay) that is within 25 feet of any portion of the proposed development (on-site or off-site). Note: for protected oaks (>5" DBH) on or within 200' of property, an oak tree report is required. Include oak tree reports in an appendix	Exhibit 8	

Santa Monica Mountains Biological Assessment Checklist	Page	Initials
B. Fauna.		
1. Discussion of species observed; description of wildlife community.	3	
C. Sensitive species.		
1. Table of possible sensitive species and possible sensitive vegetation, including brief description of potential impacts to any sensitive species.	Attachments C and D	
2. Maps of occurrence for sensitive species observed	Exhibit 6	
D. List of flora and fauna observed or known from site	Attachments E and F	
E. Survey Checklist (see Part B, Survey Checklist, above)		
III. Bibliography		
A. Bibliography of references cited in text	12	
IV. Appendices		
A. Site photographs (color)	Attachment B	
B. Qualifications of biologists and other contributors	Attachment H	
C. Oak tree report for sites with jurisdictional native oak trees (if applicable)	Attachment G	

ATTACHMENT B
SITE PHOTOGRAPHS

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Photo Locations

Exhibit B-1

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

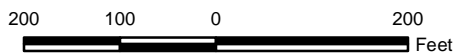




Photo Location 1. December 2019. Overview of project site with temporary wastewater treatment plant in foreground.



Photo Location 2. December 2019. View of permanent wastewater treatment plant site to the left with oxidation basin to the right.

Photo Locations

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit B-2





Photo Location 5. January 2020. Overview of permanent wastewater treatment plant project site.



Photo Location 6. May 2020. Overview of permanent wastewater treatment plant project site.

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Photo Locations

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit B-4





Photo Location 3. May 2019. Pre-construction view of temporary wastewater treatment plant location.



Photo Location 4. May 2019. Pre-construction view of temporary wastewater treatment plant location.

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Photo Locations

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit B-3





Photo Location 7. June 2018. View of conditions in Camp Miller where recycled water line will be installed.



Photo Location 8. June 2018. View of conditions in Camp Miller where recycled water line will be installed.

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Photo Locations

Biological Assessment Report for the Campus Kilpatrick Juvenile Probation Facility

Exhibit B-5



ATTACHMENT C

SPECIAL STATUS PLANTS POTENTIAL TO OCCUR SUMMARY TABLE

**SPECIAL STATUS PLANT SPECIES KNOWN TO OCCUR
IN THE SURVEY AREA VICINITY**

Species	Status			Habitat Suitability Within the Survey Area and Survey Results
	USFWS	CDFW	CRPR	
<i>Asplenium vesperinum</i> western spleenwort	—	—	4.2	May occur; potentially suitable habitat present.
<i>Astragalus brauntonii</i> Braunton's milk-vetch	FE	—	1B.1	May occur; potentially suitable habitat present, though generally only detectable in post-disturbance conditions.
<i>Atriplex coulteri</i> Coulter's saltbush	—	—	1B.2	Not expected to occur; no suitable habitat present.
<i>Atriplex pacifica</i> south coast saltscale	—	—	1B.2	Not expected to occur; no suitable habitat present.
<i>Atriplex parishii</i> Parish's brittle scale	—	—	1B.1	Limited potential to occur due to general lack of clay soils.
<i>Atriplex serenana</i> var. <i> davidsonii</i> Davidson's saltscale	—	—	1B.2	Not expected to occur; potentially suitable habitat present, but above known elevational range.
<i>Baccharis malibuensis</i> Malibu baccharis	—	—	1B.1	Not expected to occur; potentially suitable habitat present, but above known elevational range.
<i>California macrophylla</i> round-leaved filaree	—	—	1B.2	Limited potential to occur due to general lack of clay soils.
<i>Calochortus catalinae</i> Catalina mariposa lily	—	—	4.2	Expected to occur; observed during previous botanical surveys.
<i>Calochortus clavatus</i> var. <i> clavatus</i> club-haired mariposa-lily	—	—	4.3	May occur; potentially suitable habitat present.
<i>Calochortus clavatus</i> var. <i> gracilis</i> slender mariposa-lily	—	—	1B.2	May occur; potentially suitable habitat present.
<i>Calochortus plummerae</i> Plummer's mariposa-lily	—	—	4.2	Expected to occur in survey area; may occur in project disturbance area; observed in the survey area during previous botanical surveys.
<i>Centromadia parryi</i> ssp. <i> australis</i> southern tarplant	—	—	1B.1	May occur; potentially suitable habitat present.
<i>Cercocarpus betuloides</i> var. <i> blancheae</i> island mountain-mahogany	—	—	4.3	Not expected to occur; woody perennial not observed on site.
<i>Chaenactis glabriuscula</i> var. <i> orcuttiana</i> Orcutt's pincushion	—	—	1B.1	Not expected to occur; potentially suitable habitat present, but above known elevational range.
<i>Chorizanthe parryi</i> var. <i> fernandina</i> San Fernando Valley spineflower	FPT	SE	1B.1	May occur; potentially suitable habitat present.
<i>Chorizanthe parryi</i> var. <i> parryi</i> Parry's spineflower	—	—	1B.1	May occur; potentially suitable habitat present.
<i>Convolvulus simulans</i> small-flowered morning glory	—	—	4.2	May occur; potentially suitable habitat present.
<i>Deinandra minthornii</i> Santa Susana tarplant	—	SR	1B.2	May occur; potentially suitable habitat present.
<i>Delphinium parryi</i> ssp. <i> blochmaniae</i> dune larkspur	—	—	1B.2	Not expected to occur; no suitable habitat present.
<i>Dichondra occidentalis</i> western dichondra	—	—	4.2	May occur; potentially suitable habitat present.

**SPECIAL STATUS PLANT SPECIES KNOWN TO OCCUR
IN THE SURVEY AREA VICINITY**

Species	Status			Habitat Suitability Within the Survey Area and Survey Results
	USFWS	CDFW	CRPR	
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i> Blochman's dudleya	—	—	1B.1	Limited potential to occur due to general lack of clay soils. Project site also above the species' known elevational range.
<i>Dudleya cymosa</i> ssp. <i>agourensis</i> Agoura Hills dudleya	FT	—	1B.2	May occur in survey area, but not expected to occur in project area; volcanic soils not present in project area.
<i>Dudleya cymosa</i> ssp. <i>marcescens</i> marcescent dudleya	FT	SR	1B.2	May occur in survey area, but not expected to occur in project area; volcanic soils not present in project area.
<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> Santa Monica dudleya	FT	—	1B.1	May occur; potentially suitable habitat present.
<i>Dudleya multicaulis</i> many-stemmed dudleya	—	—	1B.2	May occur; potentially suitable habitat present.
<i>Dudleya parva</i> conejo dudleya	FT	—	1B.2	May occur; potentially suitable habitat present.
<i>Dudleya verityi</i> Verity's dudleya	FT	—	1B.1	Limited potential to occur due to general lack of clay soils. Project site also above the species' known elevational range.
<i>Eriogonum crocatum</i> Conejo buckwheat	—	SR	1B.2	Limited potential to occur due to general lack of clay soils. Project site also above the species' known elevational range.
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	—	—	1B.1	May occur in survey area; not expected to occur within proposed disturbance limits.
<i>Hordeum intercedens</i> vernal barley	—	—	3.2	Not expected to occur; no suitable habitat present.
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	—	—	1B.2	Not expected to occur; outside elevational range.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	—	—	1B.1	Not expected to occur; no suitable habitat present.
<i>Lepechinia fragrans</i> fragrant pitcher plant	—	—	4.2	May occur; potentially suitable habitat present.
<i>Lilium humboldtii</i> ssp. <i>ocellatum</i> ocellated Humboldt lily	—	—	4.2	May occur in survey area; not expected to occur within proposed disturbance limits.
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella	—	—	1B.3	May occur in survey area; not expected to occur within proposed disturbance limits.
<i>Monardella sinuata</i> ssp. <i>gerryi</i> Gerry's curly-leaved monardella	—	—	1B.1	Not expected to occur; potentially suitable habitat present, but above known elevational range.
<i>Navarretia ojaiensis</i> Ojai navarretia	—	—	1B.1	Limited potential to occur due to general lack of clay soils.
<i>Nolina cismontana</i> chaparral nolina	—	—	1B.2	May occur; potentially suitable habitat present.
<i>Orcuttia californica</i> California Orcutt grass	FE	SE	1B.1	Not expected to occur; no suitable vernal pool habitat present.

**SPECIAL STATUS PLANT SPECIES KNOWN TO OCCUR
IN THE SURVEY AREA VICINITY**

Species	Status			Habitat Suitability Within the Survey Area and Survey Results
	USFWS	CDFW	CRPR	
<i>Pentachaeta lyonii</i> Lyon's pentachaeta	FE	SE	1B.1	May occur; potentially suitable habitat present.
<i>Phacelia hubblyi</i> Hubby's phacelia	—	—	4.2	May occur; potentially suitable habitat present.
<i>Piperia michaelii</i> Michael's rein orchid	—	—	4.2	May occur; potentially suitable habitat present.
<i>Quercus dumosa</i> Nuttall's scrub oak	—	—	1B.1	Not expected to occur; not observed on site.
<i>Senecio aphanactis</i> chaparral ragwort	—	—	2B.2	May occur in survey area; not expected to occur within proposed disturbance limits.
<i>Sidalcea neomexicana</i> Salt Spring checkerbloom	—	—	2B.2	Not expected to occur; no suitable habitat present.
<i>Spermolepis lateriflora</i> western bristly scaleseed	—	—	2A	Not expected to occur; no suitable habitat present; presumed extinct in California.
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	—	—	2B.2	May occur; potentially suitable habitat present.
<i>Tortula californica</i> California screw moss	—	—	1B.2	May occur; potentially suitable habitat present.
USFWS: U.S. Fish and Wildlife Service; CDFW: California Department of Fish and Wildlife; CRPR: California Rare Plant Rank				
LEGEND:				
Federal (USFWS)		State (CDFW)		
FE	Endangered	SE	Endangered	
FT	Threatened	SR	Rare	
FPT	Proposed Threatened	ST	Threatened	
California Rare Plant Rank (CRPR)				
1B	Plants Rare, Threatened, or Endangered in California and Elsewhere			
2A	Plants Presumed Extirpated or Extinct in California But Not Elsewhere.			
2B	Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere			
3	Plants About Which We Need More Information - A Review List			
4	Plants of Limited Distribution – A Watch List			
California Native Plant Society (CNPS) Threat Rank Extensions				
.1	Seriously threatened in California (high degree/immediacy of threat)			
.2	Fairly threatened in California (moderate degree/immediacy of threat)			
.3	Not very threatened in California			
Note: Items in boldface type denote special status species that were observed.				

ATTACHMENT D

SPECIAL STATUS WILDLIFE POTENTIAL TO OCCUR SUMMARY TABLE

**SPECIAL STATUS WILDLIFE SPECIES
POTENTIALLY OCCURRING IN THE PROJECT REGION**

Species	Status		Potential for Occurrence on the Project Site
	USFWS	CDFW	
Fish			
<i>Eucyclogobius newberryi</i> tidewater goby	FE	SSC	No potential to occur; no suitable habitat present.
<i>Gila orcutti</i> arroyo chub	—	SSC	No potential to occur; no suitable habitat present.
<i>Oncorhynchus mykiss irideus</i> steelhead	FE	—	No potential to occur; no suitable habitat present.
Amphibians			
<i>Anaxyrus californicus</i> arroyo toad	FE	SSC	No potential to occur; no suitable habitat present.
<i>Rana draytonii</i> California red-legged frog	FT	SSC	No potential to occur; no suitable habitat present.
<i>Spea hammondii</i> western spadefoot	—	SSC	Not expected to occur; ponding water for breeding not present.
Reptiles			
<i>Anniella</i> spp. California legless lizard	—	SSC	May occur; potentially suitable habitat present.
<i>Anniella stebbinsi</i> Southern California legless lizard	—	SSC	May occur; potentially suitable habitat present.
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	—	SSC	May occur; potentially suitable habitat present.
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	—	—	May occur; potentially suitable habitat present.
<i>Emys marmorata</i> western pond turtle	—	SSC	Not expected to occur; no suitable habitat present.
<i>Lampropeltis zonata (pulchra)</i> California mountain kingsnake (San Diego population)	—	—	May occur; potentially suitable habitat present.
<i>Phrynosoma blainvillii</i> coast horned lizard	—	SSC	Not expected to occur; no suitable habitat present.
<i>Thamnophis hammondii</i> two-striped garter snake	—	SSC	No potential to occur; no suitable habitat present.
Birds			
<i>Accipiter cooperii</i> Cooper's hawk	—	—	May occur; suitable foraging and potentially suitable nesting habitat present.
<i>Agelaius tricolor</i> tricolored blackbird	—	SSC	Not expected to occur; no suitable habitat present.
<i>Aimophila ruficeps canescens</i> Southern California rufous-crowned sparrow	—	—	May occur; potentially suitable habitat present.
<i>Aquila chrysaetos</i> golden eagle	—	FP	May occur; potentially suitable foraging and nesting habitat present.
<i>Athene cunicularia</i> burrowing owl	—	SSC	Not expected to occur; open grassland areas too limited in extent for occupation.

**SPECIAL STATUS WILDLIFE SPECIES
POTENTIALLY OCCURRING IN THE PROJECT REGION**

Species	Status		Potential for Occurrence on the Project Site
	USFWS	CDFW	
<i>Buteo swainsoni</i> Swainson's hawk	—	ST	May occur for foraging only; potentially suitable foraging, but this species does not nest in the region.
<i>Falco peregrinus anatum</i> American peregrine falcon	—	FP	May occur for foraging only; potentially suitable foraging, but no suitable nesting habitat present.
<i>Polioptila californica californica</i> coastal California gnatcatcher	FT	SSC	Not expected to occur; suitable habitat present, but scrub habitat occurs in small patches surrounded by trees and chaparral.
<i>Riparia riparia</i> bank swallow	—	ST	Not expected to occur; no suitable habitat present.
<i>Vireo bellii pusillus</i> least Bell's vireo	FE	SE	Not expected to occur; no suitable habitat present.
Mammals			
<i>Antrozous pallidus</i> pallid bat	—	SSC	May occur; potentially suitable foraging and roosting habitat adjacent to project disturbance area.
<i>Euderma maculatum</i> spotted bat	—	SSC	Not expected to occur; no suitable habitat present.
<i>Eumops perotis californicus</i> western mastiff bat	—	SSC	May occur for foraging only; potentially suitable foraging, but no suitable roosting habitat present.
<i>Lasiurus blossevillii</i> western red bat	—	SSC	May occur; potentially suitable foraging and roosting habitat present adjacent to project disturbance area.
<i>Lasiurus cinereus</i> hoary bat	—	SSC	May occur; potentially suitable foraging and roosting habitat present adjacent to project disturbance area.
<i>Macrotis californicus</i> California leaf-nosed bat	—	SSC	Not expected to occur; outside known range.
<i>Myotis ciliolabrum</i> western small-footed myotis	—	—	May occur; potentially suitable habitat present adjacent to project disturbance area.
<i>Myotis yumanensis</i> Yuma myotis	—	—	May occur; potentially suitable foraging but no suitable roosting habitat present.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	—	SSC	Not expected to occur; no potentially suitable habitat present.
<i>Taxidea taxus</i> American badger	—	SSC	May occur; potentially suitable habitat present.
USFWS: U.S. Fish and Wildlife Service; CDFW: California Department of Fish and Wildlife.			
LEGEND			
Federal (USFWS)		State (CDFW)	
FE	Endangered	SE	Endangered
FT	Threatened	ST	Threatened
		SSC	Species of Special Concern
		FP	Fully Protected

ATTACHMENT E

COMPENDIUM OF PLANT SPECIES OBSERVED

All species included in the following compendium were observed during field surveys conducted on April 25, May 9, June 4, and July 5, 2012; May 3, May 13, and June 29, 2017; and June 14, 2018

**TABLE E-1
PLANT COMPENDIUM**

Species	
Scientific Name	Common Name
PTERIDOPHYTES - FERNS AND ALLIES	
<i>PTERIDACEAE</i> - BRAKE FAMILY	
<i>Pentagramma triangularis</i> ssp. <i>triangularis</i>	goldenback fern
<i>SELAGINELLACEAE</i> - SPIKE-MOSS FAMILY	
<i>Selaginella bigelovii</i>	Bigelow"s or bushy spike-moss
GYMNOSPERMS – NAKED-SEEDED PLANTS	
<i>CUPRESSACEAE</i> - CYPRESS FAMILY	
<i>Calocedrus decurrens</i>	California incense-cedar
<i>Sequoia sempervirens</i>	coast redwood
<i>PINACEAE</i> - PINE FAMILY	
<i>Pinus canariensis</i> *	Canary Island pine
<i>Pinus halepensis</i> *	Aleppo pine
ANGIOSPERMAE - FLOWERING PLANTS	
EUDICOTS	
<i>ADOXACEAE</i> - MUSKROOT FAMILY	
<i>Sambucus nigra</i> ssp. <i>caerulea</i> [<i>S. mexicana</i>]	blue elderberry
<i>ANACARDIACEAE</i> - SUMAC FAMILY	
<i>Malosma laurina</i>	laurel sumac
<i>Rhus ovata</i>	sugar bush
<i>Toxicodendron diversilobum</i>	western poison oak
<i>APIACEAE</i> - CARROT FAMILY	
<i>Conium maculatum</i> *	poison hemlock
<i>Foeniculum vulgare</i> *	sweet fennel
<i>Lomatium dasycarpum</i> ssp. <i>dasycarpum</i>	woolly-fruited lomatium
<i>Sanicula crassicaulis</i>	Pacific sanicle
<i>APOCYNACEAE</i> – DOGBANE AND MILKWEED FAMILY	
<i>Asclepias fasciculatus</i>	narrow-leaved milkweed
<i>ASTERACEAE</i> - SUNFLOWER FAMILY	
<i>Acourtia microcephala</i>	sacapellote
<i>Agoseris retrorsa</i>	spear-leaved agoseris
<i>Artemisia californica</i>	California sagebrush
<i>Artemisia dracunculus</i>	tarragon
<i>Baccharis salicifolia</i> ssp. <i>salicifolia</i> [<i>B. salicifolia</i>]	mule fat
<i>Carduus pycnocephalus</i> ssp. <i>pycnocephalus</i> *	Italian thistle
<i>Centaurea melitensis</i> *	totalote, Malta star-thistle
<i>Cirsium vulgare</i> *	bull thistle
<i>Corethrogyne filaginifolia</i> [<i>Lessingia filaginifolia</i>]	California-aster
<i>Deinandra</i> sp.	tarplant
<i>Dimorphotheca ecklonis</i> [<i>Osteospermum ecklonis</i>]*	blue and white daisybush
<i>Eriophyllum confertiflorum</i>	golden-yarrow
<i>Gazania linearis</i> *	gazania
<i>Grindelia camporum</i>	white-stem gumplant

**TABLE E-1
PLANT COMPENDIUM**

Species	
Scientific Name	Common Name
<i>Hazardia squarrosa</i>	saw-toothed goldenbush
<i>Hedypnois cretica</i> *	Crete weed
<i>Helianthus gracilentus</i>	slender sunflower
<i>Heterotheca grandiflora</i>	telegraph weed
<i>Hypochaeris glabra</i> *	smooth cat's-ear
<i>Logfia</i> sp.	cottonrose
<i>Madia gracilis</i>	gumweed
<i>Malacothrix saxatilis</i> var. <i>tenuifolia</i>	slender-leaved malacothrix
<i>Matricaria discoidea</i> *	pineapple weed
<i>Pseudognaphalium biolettii</i>	bicolored everlasting, Bioletti's cudweed
<i>Pseudognaphalium californicum</i>	California everlasting
<i>Rafinesquia californica</i>	California chicory
<i>Silybum marianum</i> *	milk thistle
<i>Sonchus asper</i> ssp. <i>asper</i> *	prickly sow thistle
<i>Sonchus oleraceus</i> *	common sow thistle
<i>Stephanomeria</i> sp.	wreath plant
<i>Taraxacum officinale</i> *	common dandelion
<i>Uropappus lindleyi</i>	silver puffs
<i>Venegasia carpesioides</i>	canyon sunflower
BORAGINACEAE - BORAGE FAMILY	
<i>Eucrypta chrysanthemifolia</i>	common eucrypta
<i>Pectocarya</i> sp.	pectocarya
<i>Phacelia cicutaria</i>	caterpillar phacelia
<i>Plagiobothrys nothofulvus</i>	rusty popcornflower
BRASSICACEAE (CRUCIFERAE) - MUSTARD FAMILY	
<i>Hirschfeldia incana</i> *	shortpod mustard
<i>Raphanus raphanistrum</i> *	jointed charlock
<i>Sisymbrium irio</i> *	London rocket
<i>Sisymbrium officinale</i> *	hedge mustard
CACTACEAE - CACTUS FAMILY	
<i>Opuntia ficus-indica</i> *	mission prickly-pear
CARYOPHYLLACEAE - PINK FAMILY	
<i>Silene gallica</i> *	small-flower catchfly
<i>Silene laciniata</i> ssp. <i>laciniata</i>	Mexican pink
CISTACEAE - ROCK-ROSE FAMILY	
<i>Cistus incanus</i> *	purple rock-rose
CUCURBITACEAE - GOURD FAMILY	
<i>Marah macrocarpus</i>	chilicothe
ERICACEAE - HEATH FAMILY	
<i>Arctostaphylos glauca</i>	bigberry manzanita
EUPHORBIACEAE - SPURGE FAMILY	
<i>Euphorbia terracina</i> *	Geraldton carnation weed
<i>Ricinus communis</i> *	castor bean

**TABLE E-1
PLANT COMPENDIUM**

Species	
Scientific Name	Common Name
<i>FABACEAE (LEGUMINOSAE) - LEGUME FAMILY</i>	
<i>Acmispon americanus</i> [<i>Lotus purshianus</i>]	Spanish lotus
<i>Acmispon strigosus</i> [<i>Lotus strigosus</i>]	strigose lotus
<i>Acmispon glaber</i> var. <i>glaber</i> [<i>Lotus scoparius</i> var. <i>scoparius</i>]	coastal deerweed
<i>Lathyrus vestitus</i> ssp. <i>vestitus</i>	chaparral sweet pea
<i>Lupinus albifrons</i> var. <i>albifrons</i>	silver lupine
<i>Lupinus bicolor</i>	miniature lupine
<i>Lupinus truncatus</i>	truncate lupine/collar lupine
<i>Medicago polymorpha</i> *	California burclover
<i>Melilotus indica</i> *	sourclover
<i>Robinia pseudoacacia</i> *	black locust
<i>Trifolium hirtum</i> *	rose clover
<i>Vicia cf. benghalensis</i> *	purple vetch
<i>FAGACEAE - OAK/BEECH FAMILY</i>	
<i>Quercus agrifolia</i>	coast live oak
<i>Quercus berberidifolia</i>	scrub oak/California scrub oak
<i>GERANIACEAE - GERANIUM FAMILY</i>	
<i>Erodium cicutarium</i> *	red-stemmed filaree
<i>Erodium moschatum</i> *	white-stemmed filaree
<i>GROSSULARIACEAE - GOOSEBERRY FAMILY</i>	
<i>Ribes aureum</i>	golden currant
<i>Ribes indecorum</i>	white-flowered currant
<i>Ribes speciosum</i>	fuchsia-flowered gooseberry
<i>LAMIACEAE (LABIATAE) - MINT FAMILY</i>	
<i>Salvia mellifera</i>	black sage
<i>Trichostema lanatum</i>	woolly blue curls
<i>MALVACEAE - MALLOW FAMILY</i>	
<i>Malva parviflora</i> *	cheeseweed
<i>MYRSINACEAE - MYRSINE FAMILY</i>	
<i>Anagallis arvensis</i> *	scarlet pimpernel
<i>MYRTACEAE - MYRTLE FAMILY</i>	
<i>Eucalyptus</i> sp.*	gum
<i>ONAGRACEAE - EVENING PRIMROSE FAMILY</i>	
<i>Camissonia micrantha</i>	small primrose
<i>Clarkia</i> sp.	clarkia
<i>Clarkia purpurea</i>	winecup clarkia
<i>Epilobium canum</i>	California fuchsia
<i>Epilobium ciliatum</i>	willow-herb
<i>OROBANCHACEAE - BROOMRAPE FAMILY</i>	
<i>Cordylanthus rigidus</i> ssp. <i>setigerus</i>	dark-topped bird's beak
<i>Orobanche fasciculata</i>	clustered broomrape

**TABLE E-1
PLANT COMPENDIUM**

Species	
Scientific Name	Common Name
OXALIDACEAE - WOOD-SORREL FAMILY	
<i>Oxalis corniculata</i> *	yellow sorrel
PAEONIACEAE - PEONY FAMILY	
<i>Paeonia californica</i>	California peony
PAPAVERACEAE - POPPY FAMILY	
<i>Eschscholzia californica</i>	California poppy
PHRYMACEAE - LOPSEED FAMILY	
<i>Mimulus aurantiacus</i> ssp. <i>pubescens</i>	orange bush monkeyflower
PLANTAGINACEAE - PLANTAIN FAMILY	
<i>Penstemon heterophyllus</i>	foothill penstemon
<i>Plantago erecta</i>	dwarf plantain/California plantain
<i>Plantago lanceolata</i> *	English plantain
<i>Veronica anagallis-aquatica</i> *	water speedwell
POLYGONACEAE - BUCKWHEAT FAMILY	
<i>Eriogonum elongatum</i> var. <i>elongatum</i>	long-stemmed wild buckwheat
<i>Eriogonum fasciculatum</i>	California buckwheat
<i>Rumex conglomeratus</i> *	whorled dock
<i>Rumex crispus</i> *	curly dock
PORTULACACEAE – PURSLANE FAMILY	
<i>Portulaca oleracea</i> *	common purslane
RANUNCULACEAE - CROWFOOT FAMILY	
<i>Clematis</i> sp.	Virgin's bower
RHAMNACEAE - BUCKTHORN FAMILY	
<i>Ceanothus megacarpus</i> ssp. <i>megacarpus</i>	bigpod ceanothus
<i>Ceanothus spinosus</i>	greenbark ceanothus
<i>Rhamnus ilicifolia</i>	hollyleaf redberry
ROSACEAE - ROSE FAMILY	
<i>Adenostoma fasciculatum</i>	chamise
<i>Adenostoma sparsifolium</i>	red shank, ribbonwood
<i>Cercocarpus betuloides</i> var. <i>betuloides</i>	birch-leaf mountain-mahogany
<i>Heteromeles arbutifolia</i>	toyon/Christmas berry
<i>Drymocallis glandulosa</i> ssp. <i>wrangelliana</i> [<i>Potentilla glandulosa</i> ssp. <i>wrangelliana</i>]	sticky cinquefoil
RUBIACEAE - MADDER FAMILY	
<i>Galium</i> sp.	bedstraw
<i>Galium andrewsii</i>	phlox-leaved bedstraw
<i>Galium angustifolium</i>	narrowly leaved bedstraw
<i>Galium aparine</i>	goose grass
<i>Galium nuttallii</i> ssp. <i>nuttallii</i>	San Diego bedstraw
SALICACEAE - WILLOW FAMILY	
<i>Salix</i> sp.	willow
SOLANACEAE - NIGHTSHADE FAMILY	
<i>Solanum umbelliferum</i>	blue witch

**TABLE E-1
PLANT COMPENDIUM**

Species	
Scientific Name	Common Name
VISCACEAE - MISTLETOE FAMILY	
<i>Phoradendron serotinum</i> ssp. <i>tomentosum</i> [<i>Phoradendron villosum</i>]	oak mistletoe
VITACEAE – GRAPE FAMILY	
<i>Vitis vinifera</i> *	Cultivated grape
MONOCOTYLEDONES - MONOCOTS	
AGAVACEAE - CENTURY PLANT FAMILY	
<i>Hesperoyucca whipplei</i> [<i>Yucca whipplei</i>]	chaparral yucca
<i>Yucca aloifolia</i> *	Spanish dagger
ARECACEAE (PALMAE) - PALM FAMILY	
<i>Washingtonia robusta</i> *	Mexican fan palm
ASPHODELACEAE - ASPHODEL FAMILY	
<i>Asphodelus fistulosus</i> *	onionweed
CYPERACEAE - SEDGE FAMILY	
<i>Cyperus cf. esculentus</i>	yellow umbrella-sedge/nutgrass
IRIDACEAE - IRIS FAMILY	
<i>Sisyrinchium bellum</i>	western blue-eyed grass
LILIACEAE - LILY FAMILY	
<i>Calochortus catalinae</i>	Catalina mariposa lily
<i>Calochortus plummerae</i>	Plummer's mariposa lily
MELANTHIAECAE - FALSE-HELLEBORE FAMILY	
<i>Toxicoscordion fremontii</i>	Fremont's death camas
POACEAE [GRAMINEAE] - GRASS FAMILY	
<i>Avena barbata</i> *	slender wild oat
<i>Bromus diandrus</i> *	ripgut grass
<i>Bromus hordeaceus</i> *	soft chess
<i>Elymus condensatus</i> [<i>Leymus condensatus</i>]	giant wild rye
<i>Festuca</i> sp. [<i>Vulpia</i> sp.]	fescue
<i>Hordeum murinum</i> var. <i>leporinum</i> *	hare barley
<i>Lamarckia aurea</i> *	goldentop
<i>Melica imperfecta</i>	little California melic grass
<i>Poa annua</i> *	annual bluegrass
<i>Polypogon monspeliensis</i> *	annual beard grass
<i>Schismus barbatus</i> *	Mediterranean schismus
<i>Stipa lepida</i> [<i>Nassella lepida</i>]	foothill needlegrass
<i>Stipa pulchra</i> [<i>Nassella pulchra</i>]	purple needlegrass
THEMIDACEAE - BRODIAEA FAMILY	
<i>Dichelostemma capitatum</i>	blue dicks
TYPHACEAE - CATTAIL FAMILY	
<i>Typha angustifolia</i>	narrow-leaved cattail
* non-native species cf. appears similar to	

ATTACHMENT F

COMPENDIUM OF WILDLIFE SPECIES OBSERVED

All species included in the following compendium were observed during field surveys conducted on May 9, 2012 and August 24, 2014

**TABLE F-1
WILDLIFE COMPENDIUM**

SPECIES	
Scientific Name	Common Name
LIZARDS	
PHRYNOSOMATIDAE - SPINY LIZARD FAMILY	
<i>Sceloporus occidentalis</i>	western fence lizard
<i>Uta stansburiana elegans</i>	western side-blotched lizard
BIRDS	
ACCIPITRIDAE - HAWK FAMILY	
<i>Buteo jamaicensis</i>	red-tailed hawk
CAPRIMULGIDAE - GOATSUCKER FAMILY	
<i>Phalaenoptilus nuttallii</i>	common poorwill
TROCHILIDAE - HUMMINGBIRD FAMILY	
<i>Calypte anna</i>	Anna's hummingbird
PICIDAE - WOODPECKER FAMILY	
<i>Melanerpes formicivorus</i>	acorn woodpecker
TYRANNIDAE - TYRANT FLYCATCHER FAMILY	
<i>Empidonax difficilis</i>	Pacific-slope flycatcher
<i>Sayornis nigricans</i>	black phoebe
<i>Myiarchus cinerascens</i>	ash-throated flycatcher
CORVIDAE - JAY AND CROW FAMILY	
<i>Aphelocoma californica</i>	western scrub-jay
<i>Corvus corax</i>	common raven
PARIDAE - TITMOUSE FAMILY	
<i>Poecile gambeli</i>	mountain chickadee
TROGLODYTIDAE - WREN FAMILY	
<i>Troglodytes aedon</i>	house wren
<i>Thryomanes bewickii</i>	Bewick's wren
TURDIDAE - THRUSH FAMILY	
<i>Sialia mexicana</i>	western bluebird
PARULIDAE - WOOD-WARBLER FAMILY	
<i>Oreothypis celata</i>	orange-crowned warbler
<i>Cardellina pusilla</i>	Wilson's warbler
EMBERIZIDAE - SPARROW FAMILY	
<i>Pipilo maculatus</i>	spotted towhee
<i>Melospiza crissalis</i>	California towhee
<i>Melospiza melodia</i>	song sparrow
<i>Junco hyemalis</i>	dark-eyed junco
CARDINALIDAE - CARDINALS, GROSBEAKS AND ALLIES FAMILY	
<i>Pheucticus melanocephalus</i>	black-headed grosbeak
<i>Passerina caerulea</i>	blue grosbeak
<i>Passerina amoena</i>	lazuli bunting
ICTERIDAE - BLACKBIRD, COWBIRD AND ORIOLE FAMILY	
<i>Molothrus ater*</i>	brown-headed cowbird
<i>Icterus bullockii</i>	Bullock's oriole

**TABLE F-1
WILDLIFE COMPENDIUM**

SPECIES	
Scientific Name	Common Name
FRINGILLIDAE - FINCH FAMILY	
<i>Haemorhous mexicanus</i>	house finch
<i>Carduelis psaltria</i>	lesser goldfinch
MAMMALS	
VESPERTILIONIDAE – VESPER BATS	
<i>Parastrellus hesperus</i>	canyon bat
MOLOSSIDAE – FREE-TAILED BATS	
<i>Tadarida brasiliensis</i>	Brazilian free-tailed bat
LEPORIDAE – HARES AND RABBITS	
<i>Sylvilagus audubonii</i>	desert cottontail
LEPORIDAE - HARE AND RABBIT FAMILY	
<i>Sylvilagus audubonii</i>	desert cottontail
* introduced	

ATTACHMENT G
NATIVE TREE SURVEY REPORT

May 6, 2021

Elizabeth Ajaelo
Project Manager
Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, California 91802

VIA EMAIL
EJaelo@dpw.lacounty.gov

Subject: Native Tree Survey Report for the Campus Kilpatrick Wastewater Treatment Plant Project,
Los Angeles County, California

Dear Ms. Ajaelo:

The purpose of this Letter Report is to document occurrences of oak trees, oak woodlands, and other native trees that are subject to regulation by the County of Los Angeles and the State of California at the Campus Vernon Kilpatrick Juvenile Probation Facility (Campus Kilpatrick) site. Potential impacts to these tree resources from proposed project activities are also evaluated with recommendations to avoid and/or minimize impacts to trees.

Tree resources in the survey area for this report were originally documented in 2012 and 2015 to determine tree impacts that would result from the Campus Kilpatrick Renovation project. This report is an extension of that earlier tree survey and has been updated to include trees that are located south and west of the Campus Kilpatrick site.

PROJECT LOCATION

Campus Kilpatrick is located in an unincorporated portion of Los Angeles County in the Santa Monica Mountains at 427 South Encinal Canyon Road (Exhibit 1). The survey area for this report consists of an approximate 20-acre area that encompasses the recently renovated Campus Kilpatrick facility, the unoccupied Camp Fred Miller site, and the facility's wastewater treatment plant (WWTP) located south of Encinal Canyon Road (Exhibit 2).

PROJECT DESCRIPTION

The Campus Kilpatrick site was damaged in November 2018 by the Woolsey Fire, which included significant damage to the facility's WWTP. Los Angeles County Public Works (LACPW) proposes to perform repair and construction activities intended to remedy the damage from the Woolsey Fire. A temporary WWTP was installed in November 2019 to the west of the pre-existing WWTP. Currently, LACPW proposes to install a new permanent WWTP on the footprint of the pre-existing WWTP. Additional activities include installation of new sewer and recycled water lines that extend northward from the WWTP site. The sewer line will be tunneled under Encinal Canyon Road and then trenched through the Camp Miller facility. A new recycled water line will be trenched northward from the WWTP site and then pass above-ground through a culvert that is under Encinal Canyon Road. North of Encinal Canyon Road the lines will be installed via trenching through the Camp Miller facility and the Campus Kilpatrick parking lot

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before reaching a recycled water storage tank that will be installed in the northeastern portion of the Campus Kilpatrick site.

Additionally, minor grading will be performed along the northern edge of the WWTP developed footprint to increase the available area by approximately 300 square feet for the new WWTP.

REGULATORY BACKGROUND

The County of Los Angeles Oak Tree Ordinance (CLAOTO, Section 22.56.2050 of the Los Angeles County Code) protects oak trees (any species in the genus *Quercus*) whose trunk diameter at breast height (dbh) measure at least 8 inches (or, for trees with multiple trunks, having 2 trunks with a combined dbh of at least 12 inches), as measured 4.5 feet above natural grade. Heritage oak trees, as defined by the CLAOTO, include trees that either measure 36 inches or more in trunk diameter or have a significant historical or cultural importance. Prior to impacting any oak species, the CLAOTO requires that a permit application be submitted to the County of Los Angeles that includes any Oak Tree Report with an analysis of the oaks on the project site and a plan to mitigate impacts to oak trees.

Under the CLAOTO, the County of Los Angeles asserts jurisdiction over the “protected zone” of all oak trees that meet the minimum size requirement described above. The protected zone is defined in the CLAOTO as areas within 5 feet of the outer dripline, at least 15 feet from the trunk. Impacts to oak trees can be categorized as either (1) removal, in which an entire tree needs to be removed for project implementation; (2) encroachment, consisting of any soil disturbance (e.g., excavation, vehicle operation, grade changes) within the protected zone of an oak; and (3) tree trimming that exceeds the limits described in the CLAOTO (medium pruning of branches less than two inches in diameter).

The County of Los Angeles also analyzes impacts to oak woodlands as a vegetation type under the *Los Angeles County Oak Woodlands Conservation Management Plan* rather than just impacts to individual trees under the CLAOTO. Under this Management Plan, all oak trees with a dbh of at least five inches are to be documented. The size of each tree’s canopy is to be mapped and their “area of influence” is identified (defined as the area ten times the tree canopy area). Wherever there is overlap among the area of influence of these trees, this would constitute an oak woodland and any impacts within that woodland area would require mitigation.

Because Campus Kilpatrick is located in the Santa Monica Mountains Coastal Zone, impacts to all native trees, greater than five inches dbh are subject to regulation by the Santa Monica Mountains Local Coastal Program (LCP) that is administered by the Los Angeles County Department of Regional Planning (LACDRP). The LACDRP asserts jurisdiction over the same protected zone of these native trees as defined in the CLAOTO (i.e., areas within 5 feet of the outer dripline of a tree, at least 15 feet from the trunk).

METHODS

Psomas Certified Arborist David Hughes (International Society of Arboriculture Certification No. WE-7752A) performed a survey of trees within and adjacent to the Camp Miller site on June 14, 2018. Mr. Hughes previously surveyed areas within and adjacent to the Campus Kilpatrick site in 2012 and 2015, which included areas along the northern, western, and southwestern boundary of the current survey area. The survey area for this report expands the previous survey area to include trees to the west and south of Campus Kilpatrick (Exhibit 2).

A numbered aluminum tag was affixed to the north side of each tree that was assessed for this tree survey. Trees that could not be tagged were given identifying numbers. A previous oak tree survey was performed in 2005 and the numbers affixed to those trees were utilized for this survey. Therefore, trees

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numbered between 1 and 139 were tagged during the 2005 survey (and reassessed during the 2012 survey); trees numbered between 701 and 774 were tagged as part of the 2012 and 2015 surveys, and trees numbered 775 through 813 were tagged for the 2018 survey. The following criteria were included as part of the assessment for each tree in the survey area:

- The trunk dbh for each tree was measured approximately 4.5 feet above natural grade.
- In the case of trees with multiple trunks, the number of trunks was recorded and the dbh was measured for each trunk. The two largest trunk diameters were combined to determine the total dbh for each tree.
- The height of each tree was visually estimated from mean natural grade to the highest living branch.
- The diameter of each tree's living canopy was estimated at its widest point and mapped on an aerial photograph.
- The locations of all oaks that met the criteria for protection described above were recorded using a hand-held global positioning system (GPS) unit and were marked on an aerial photograph.

Tree aesthetics were evaluated with respect to overall form and symmetry, crown balance, branching pattern, and broken branches. Trees were rated on a scale of 1 to 5, as follows: 1=Very Poor, 2=Poor, 3=Fair, 4=Good, and 5=Excellent. The health of each tree was similarly assessed on a scale of 1 to 5, and was based on visual evidence of vigor (e.g., the amount of foliage); leaf color and size; presence of branch or twig dieback; severity of insect infestation; presence of disease, heart rot, fire damage, and/or mechanical damage; amount of new growth; appearance of bark; and rate of callous development over wounds. In addition, the health assessment considered such elements as structural integrity; presence of decay; weak branch attachments; and the presence of exposed roots due to soil erosion.

RESULTS

The tree survey identified several trees in the vicinity of proposed construction activities. One coast live oak tree (*Quercus agrifolia*, No. 801) was severely encroached upon when the temporary WWTP was installed as ground disturbance occurred within three feet of this tree's trunk and affected over 40 percent of the root protection zone.

Four other coast live oaks are in the vicinity of proposed construction activities, along with 1 western sycamore (*Platanus racemosa*) and 2 coast redwoods (*Sequoia sempervirens*). Potential impacts to these trees are as follows:

- Tree number 773 is a western sycamore that is located adjacent to a concrete storm drain channel outside of the facility's perimeter fence. A recycled water line will be installed along the periphery of this tree's root protection of zone by trenching. Less than 10 percent of this tree's root protection zone will be encroached upon.
- Tree number 776 is a coast live oak located along the northern edge of Encinal Canyon Road. This tree appears to be the result of a mature tree that was cut down with multiple small shoots growing from the cut stump. It is located above a culvert that passes under Encinal Canyon Road. Trenching will occur within the tree's root protection zone on its north side only. Less than 10 percent of this tree's root protection zone will be affected.
- Tree number 795, a coast live oak, is located along the southern edge of Encinal Canyon Road. It is located above the culvert that passes under Encinal Canyon Road. Trenching will occur within

the tree’s root protection zone on its south side only. Less than 10 percent of this tree’s root protection zone will be affected.

- Tree number 796, a coast live oak, is located along the southern edge of Encinal Canyon Road, near the new WWTP site. Tunneling will occur under this tree, so that no impacts to this tree are expected. Less than 10 percent of this tree’s root protection zone will be affected.
- Trees 812 and 813 are coast redwoods that are part of a row of trees located along the east side of the WWTP area. The recycled water line will be trenched between two of these trees. This will affect less than 10 percent of the root protection zone of these trees. While coast redwoods are native to California, they are not native to the Santa Monica Mountains. Because these trees were presumably planted for landscaping purposes, mitigation for impacts to them should not be required regardless of the amount of disturbance these trees will experience.

The trees described above are summarized below in Table 1. The locations of all trees in the survey area are shown on Exhibit 3 and the collected data for all trees in the survey area are provided in Attachment A.

**TABLE 1
 SUMMARY OF TREES TO BE AFFECTED BY PROJECT ACTIVITIES**

Tree No.	Species	DBH (inches)	Height (ft)	Canopy Diameter (ft)	Health Rating*	Aesthetic Rating*	Tree Removal	Tree Encroach	Percent Encroach
773	western sycamore <i>Platanus racemosa</i>	19.5	60	25	4	4		X	5%
776	coast live oak <i>Quercus agrifolia</i>	4.5, 4.0, 3.5, 2.0, 1.5, 1.5, 1.0, 1.0, 1.0, 1.0,	20	15	2	2		X	4%
795	coast live oak <i>Quercus agrifolia</i>	23.3	40	30	4	4		X	3%
796	coast live oak <i>Quercus agrifolia</i>	6.1, 2.7, 1.5	15	12	2	3		X	8%
801	coast live oak <i>Quercus agrifolia</i>	7.7, 6.1	15	15	3	3		X	46%
812	coast redwood <i>Sequoia sempervirens</i>	12.0, 11.0, 11.0	50	15	3	3		X	6%
813	coast redwood <i>Sequoia sempervirens</i>	14.0	50	15	3	3		X	6%

DBH: diameter at breast height; ft: feet
 * Trees are rated on a scale of 1 to 5, as follows: 1=Very Poor, 2=Poor, 3=Fair, 4=Good, and 5=Excellent.

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Other trees that occur in the survey area include a variety of non-native trees that are not protected by the CLAOTO or the Santa Monica Mountains LCP such as Aleppo pines (*Pinus halepensis*), Canary Island pines (*Pinus canariensis*), white mulberry (*Morus alba*), locust (*Robinia* sp.), blue gum (*Eucalyptus globulus*), Italian cypress (*Cupressus sempervirens*), and burr oak (*Quercus macrocarpa*). As noted above, there is a line of several coast redwoods along the eastern edge of the existing WWTP. These trees are native to California and their locations are shown on Exhibit 3, but they are not native to the Santa Monica Mountains and they should not be subject to regulation by the Santa Monica Mountains LCP.

As described above, the extent of oak woodlands is determined by the boundaries of each oak tree's area of influence when there is overlap between the areas of influence. The extent of oak woodlands in the survey area is provided in Exhibit 4.

Protective fencing, as required by the CLAOTO, shall be placed along the protected zone of any oak tree that is in the vicinity of project construction. Operating outside the protected zone will avoid the need for follow-up monitoring to assess long-term effects of encroachment. Any earth-disturbing work or vehicle operation within the protected zone of an oak tree should be monitored by a Certified Arborist to minimize the impact of construction activities. Similarly, if any oak tree branches need to be trimmed to provide for construction vehicle access, this trimming should be monitored by a Certified Arborist.

Please contact David Hughes at (626) 351-2000 with any questions or comments.

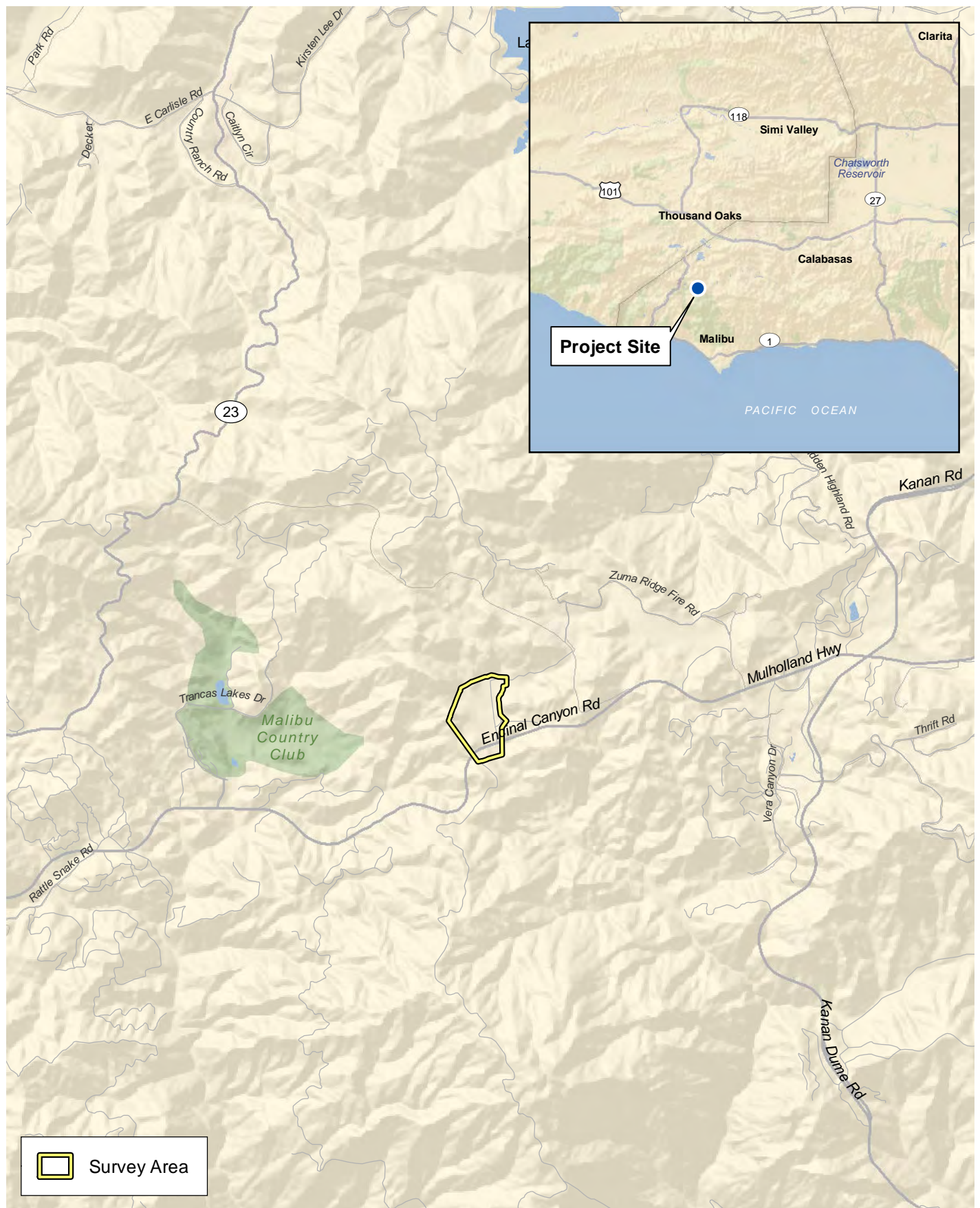
Sincerely,


P S O M A S



David T. Hughes
Certified Arborist
International Society of Arboriculture
Certificate No. WE-7752A

Enclosures: Exhibits 1 – 4
Attachment A – Oak Tree Survey Data Summary



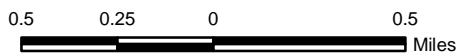
 Survey Area

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Local Vicinity

Native Tree Survey for the Campus Kilpatrick Wastewater Treatment Plant Project

Exhibit 1



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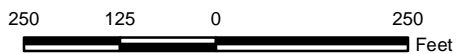


Aerial Source: Esri, Maxar 2018

Project Areas

Native Tree Survey for the Campus Kilpatrick Wastewater Treatment Plant Project

Exhibit 2





Aerial Source: Esri, Maxar 2018

Native Tree Locations

Native Tree Survey for the Campus Kilpatrick Wastewater Treatment Plant Project

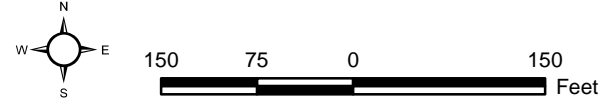
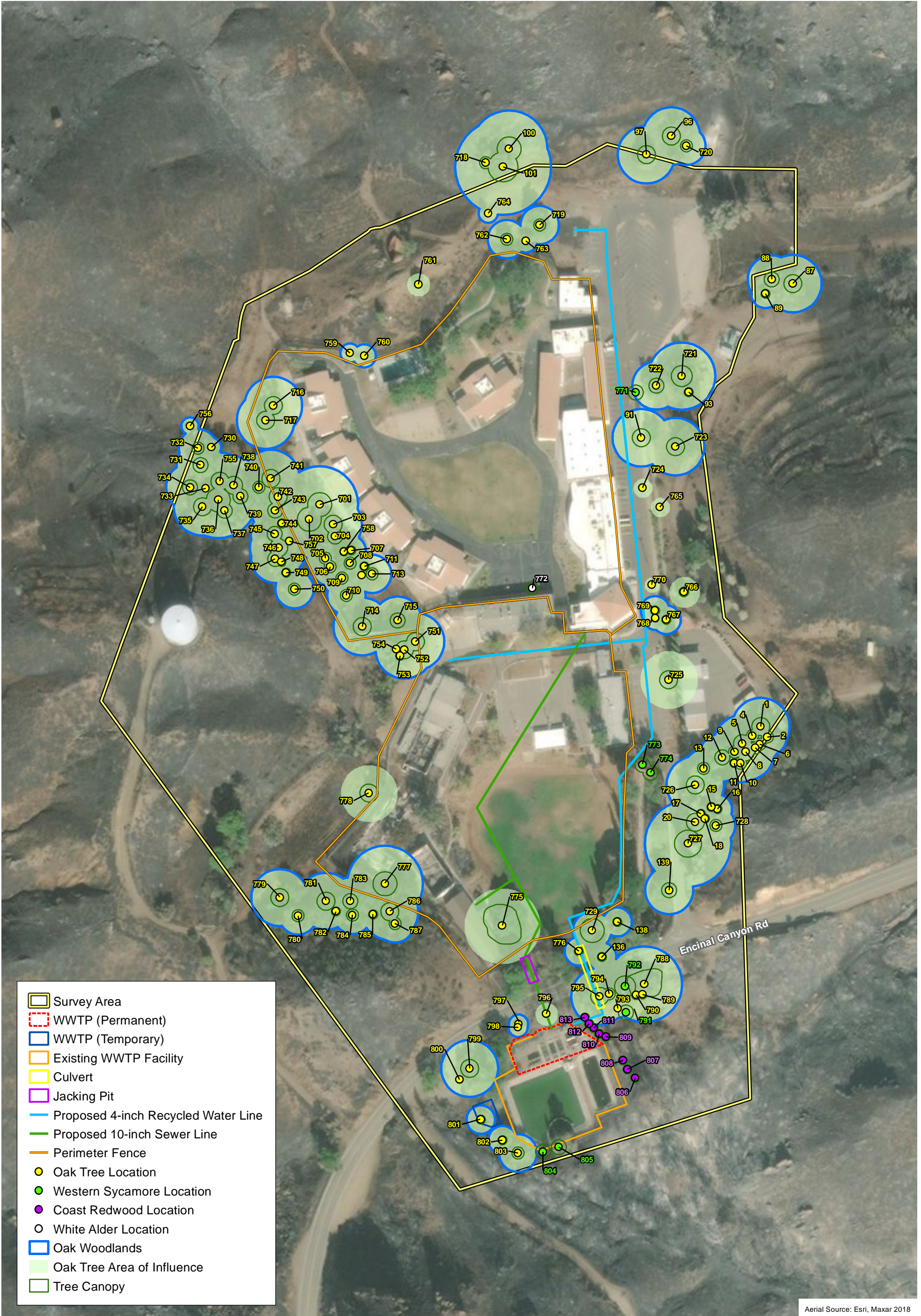


Exhibit 3



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- Survey Area
- WWTP (Permanent)
- WWTP (Temporary)
- Existing WWTP Facility
- Culvert
- Jacking Pit
- Proposed 4-inch Recycled Water Line
- Proposed 10-inch Sewer Line
- Perimeter Fence
- Oak Tree Location
- Western Sycamore Location
- Coast Redwood Location
- White Alder Location
- Oak Woodlands
- Oak Tree Area of Influence
- Tree Canopy

Aerial Source: Esri, Maxar 2018

Oak Woodland Extent

Native Tree Survey for the Campus Kilpatrick Wastewater Treatment Plant Project

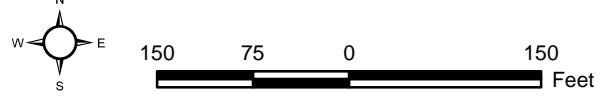


Exhibit 4



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ATTACHMENT A
OAK TREE SURVEY DATA SUMMARY

OAK TREE SURVEY DATA SUMMARY

Tree No.	Species	Number of Trunks	Trunk Diameter (DBH) (in)	Sum of Two Trunks	Height (feet)	Canopy (feet)	Aesthetic Rating	Health Rating	Regulated by		Proposed Impact		
									CLAOTO	CDFW	Removal	Encroach	Trimming
1	<i>Quercus agrifolia</i>	1	23.6	23.6	40	30	4	4	X				
2	<i>Quercus agrifolia</i>	1	15.7	15.7	35	20	3	2	X				
4	<i>Quercus agrifolia</i>	1	10.6	10.6	25	20	2	2	X				
5	<i>Quercus agrifolia</i>	3	9.4, 8.7, 8.3	18.1	30	30	2	2	X				
6	<i>Quercus agrifolia</i>	1	15.4	15.4	35	20	4	4	X				
7	<i>Quercus agrifolia</i>	1	18.1	18.1	30	20	4	4	X				
8	<i>Quercus agrifolia</i>	1	17.1	17.1	35	30	4	4	X				
9	<i>Quercus agrifolia</i>	1	16.7	16.7	35	20	3	4	X				
9	<i>Quercus agrifolia</i>	1	16.5	16.5	30	20	4	4	X				
10	<i>Quercus agrifolia</i>	1	13.8	13.8	35	20	3	3	X				
11	<i>Quercus agrifolia</i>	1	10.2	10.2	35	15	2	3	X				
12	<i>Quercus agrifolia</i>	1	17.3	17.3	50	25	4	4	X				
13	<i>Quercus agrifolia</i>	1	14.6	14.6	25	20	4	3	X				
15	<i>Quercus agrifolia</i>	1	11.6	11.6	25	15	3	2	X				
16	<i>Quercus agrifolia</i>	1	10.8	10.8	30	15	3	2	X				
17	<i>Quercus agrifolia</i>	1	14.0	14.0	25	15	3	3	X				
18	<i>Quercus agrifolia</i>	1	10.2	10.2	25	15	3	3	X				
20	<i>Quercus agrifolia</i>	3	17.5, 17.3, 14.6	34.8	40	30	4	4	X				
87	<i>Quercus agrifolia</i>	1	28.3	28.3	40	30	4	4	X	X			
88	<i>Quercus agrifolia</i>	1	28.7	28.7	40	25	4	3	X	X			
89	<i>Quercus agrifolia</i>	1	11.2	11.2	25	15	4	5	X				
91	<i>Quercus agrifolia</i>	2	19.1, 15.9	35.0	30	30	4	4	X	X			
93	<i>Quercus agrifolia</i>	5	2.0–10.2	17.3	15	15	3	5	X				
96	<i>Quercus agrifolia</i>	2	19.3, 16.5	35.8	40	30	3	3	X				
97	<i>Quercus agrifolia</i>	1	25.6	25.6	45	30	5	4	X				
100	<i>Quercus agrifolia</i>	1	29.9	29.9	45	40	4	2	X				
101	<i>Quercus agrifolia</i>	2	21.7, 21.3	42.9	60	50	5	4	X				
136	<i>Quercus agrifolia</i>	1	12.8	12.8	20	15	4	4	X				
138	<i>Quercus agrifolia</i>	1	14.4	14.4	20	15	4	4	X				
139	<i>Quercus agrifolia</i>	1	27.6	27.6	30	25	4	4	X				
701	<i>Quercus agrifolia</i>	1	28.7	28.7	60	40	5	5	X				

OAK TREE SURVEY DATA SUMMARY

Tree No.	Species	Number of Trunks	Trunk Diameter (DBH) (in)	Sum of Two Trunks	Height (feet)	Canopy (feet)	Aesthetic Rating	Health Rating	Regulated by		Proposed Impact		
									CLAOTO	CDFW	Removal	Encroach	Trimming
702	<i>Quercus agrifolia</i>	2	27.6, 22.4	50.0	50	40	4	4	X				
703	<i>Quercus agrifolia</i>	1	20.9	20.9	40	30	4	4	X				
704	<i>Quercus agrifolia</i>	3	11.8, 11.6, 6.7	23.4	30	25	3	4	X				
705	<i>Quercus agrifolia</i>	2	16.7, 9.6	26.4	45	20	4	4	X				
706	<i>Quercus agrifolia</i>	3	12.2, 8.1, 6.3	20.3	25	20	2	3	X				
707	<i>Quercus agrifolia</i>	1	10.6	10.6	12	15	2	2	X				
708	<i>Quercus agrifolia</i>	1	15.4	15.4	25	20	3	5	X				
709	<i>Quercus agrifolia</i>	5	3.5-8.7	16.8	25	20	2	4	X				
710	<i>Quercus agrifolia</i>	3	20.1, 6.3, 5.9	26.4	30	20	2	4	X				
711	<i>Quercus agrifolia</i>	3	9.4, 8.5, 3.1	17.9	30	15	3	4	X				
712	<i>Quercus agrifolia</i>	1	15.4	15.4	15	10	1	1	X				
713	<i>Quercus agrifolia</i>	2	16.1, 5.9	22.0	20	20	3	4	X				
714	<i>Quercus agrifolia</i>	2	15.0, 15.0	15.0	20	30	4	4	X				
715	<i>Quercus agrifolia</i>	1	16.1	16.1	35	25	4	5	X				
716	<i>Quercus agrifolia</i>	1	22.4	22.4	30	30	4	3	X				
717	<i>Quercus agrifolia</i>	2	18.9, 16.9	35.8	30	30	4	3	X				
718	<i>Quercus agrifolia</i>	3	15.4, 9.4, 6.3	24.8	30	20	2	2	X				
719	<i>Quercus agrifolia</i>	1	46.1	46.1	50	20	3	1	X				
720	<i>Quercus agrifolia</i>	3	10.8, 9.1, 8.7	19.9	30	20	3	3	X				
721	<i>Quercus agrifolia</i>	1	32.3	32.3	40	35	5	5	X				
722	<i>Quercus agrifolia</i>	2	13.8, 10.2	24.0	30	25	3	4	X	X			
723	<i>Quercus agrifolia</i>	1	29.1	29.1	40	30	5	5	X				
724	<i>Quercus agrifolia</i>	1	6.8	6.8	10	10	3	4	X	X			
725	<i>Quercus agrifolia</i>	2	18.1, 15.4	33.5	30	30	3	2	X				
726	<i>Quercus agrifolia</i>	1	18.5	18.5	40	30	4	4	X				
727	<i>Quercus agrifolia</i>	1	33.5	33.5	45	45	4	4	X				
728	<i>Quercus agrifolia</i>	1	15.6	15.6	25	20	4	4	X				
729	<i>Quercus agrifolia</i>	1	22.6	22.6	20	20	4	4	X				
730	<i>Quercus agrifolia</i>	1	14.8	14.8	20	10	1	3	X				
731	<i>Quercus agrifolia</i>	2	33.1, 20.1	53.1	30	25	4	4	X				
732	<i>Quercus agrifolia</i>	2	16.9, 14.8	31.7	30	20	3	4	X				

OAK TREE SURVEY DATA SUMMARY

Tree No.	Species	Number of Trunks	Trunk Diameter (DBH) (in)	Sum of Two Trunks	Height (feet)	Canopy (feet)	Aesthetic Rating	Health Rating	Regulated by		Proposed Impact		
									CLAOTO	CDFW	Removal	Encroach	Trimming
733	<i>Quercus agrifolia</i>	1	14.2	14.2	6	6	1	1	X	X			
734	<i>Quercus agrifolia</i>	1	21.3	21.3	30	25	4	4	X	X			
735	<i>Quercus agrifolia</i>	1	22.0	22.0	40	30	4	4	X	X			
736	<i>Quercus agrifolia</i>	1	27.6	27.6	35	40	4	4	X	X			
737	<i>Quercus agrifolia</i>	1	22.4	22.4	45	25	4	5	X	X			
738	<i>Quercus agrifolia</i>	3	19.3, 10.2, 9.4	29.5	35	30	3	4	X	X			
739	<i>Quercus agrifolia</i>	2	20.1, 10.2	30.3	40	25	2	3	X	X			
740	<i>Quercus agrifolia</i>	1	19.1	19.1	40	20	4	4	X	X			
741	<i>Quercus agrifolia</i>	1	32.1	32.1	30	30	4	4	X	X			
742	<i>Quercus agrifolia</i>	1	20.3	20.3	40	30	3	4	X				
743	<i>Quercus agrifolia</i>	1	14.2, 11.6	25.8	30	25	3	3	X				
744	<i>Quercus agrifolia</i>	1	13.4	13.4	30	15	4	5	X				
745	<i>Quercus agrifolia</i>	1	24	24.0	40	25	4	5	X				
746	<i>Quercus agrifolia</i>	2	15.0, 12.6	27.6	35	30	3	4	X				
747	<i>Quercus agrifolia</i>	1	15.2	15.2	35	25	4	4	X				
748	<i>Quercus agrifolia</i>	1	12.4	12.4	20	15	3	4	X				
749	<i>Quercus agrifolia</i>	1	12.2	12.2	20	15	3	4	X				
750	<i>Quercus agrifolia</i>	2	17.7, 16.5	34.3	30	20	4	4	X				
751	<i>Quercus agrifolia</i>	1	24.4	24.4	30	30	2	2	X				
752	<i>Quercus agrifolia</i>	1	15.4	15.4	40	30	3	3	X				
753	<i>Quercus agrifolia</i>	1	11.4	11.4	25	15	4	4	X				
754	<i>Quercus agrifolia</i>	1	8.9	8.9	15	10	3	4	X				
755	<i>Quercus agrifolia</i>	1	22.0	22.0	35	30	4	4	X				
756	<i>Quercus agrifolia</i>	1	5.0	5.0	12	9	3	3					
757	<i>Quercus agrifolia</i>	1	7.8	7.8	25	12	3	3					
758	<i>Quercus agrifolia</i>	1	7.5	7.5	25	14	3	3					
759	<i>Quercus agrifolia</i>	8	1.0–2.0	4.0	10	10	1	3					
760	<i>Quercus agrifolia</i>	5	1.5–5.0	8.0	15	12	1	3					
761	<i>Quercus agrifolia</i>	6	1.0–3.0	6.0	12	12	1	3					
762	<i>Quercus agrifolia</i>	8	1.0–4.0	7.0	15	20	1	3					
763	<i>Quercus agrifolia</i>	6	1.0–3.0	6.0	12	12	1	3					

OAK TREE SURVEY DATA SUMMARY

Tree No.	Species	Number of Trunks	Trunk Diameter (DBH) (in)	Sum of Two Trunks	Height (feet)	Canopy (feet)	Aesthetic Rating	Health Rating	Regulated by		Proposed Impact		
									CLAOTO	CDFW	Removal	Encroach	Trimming
764	<i>Quercus agrifolia</i>	6	1.0–3.0	6.0	10	10	1	3					
765	<i>Quercus agrifolia</i>	6	1.0–1.0	2.0	6	10	1	3					
766	<i>Quercus agrifolia</i>	3	6.5, 6.0, 5.0	12.5	18	16	3	3	X				
767	<i>Quercus agrifolia</i>	3	5.0, 2.5, 2.0	7.5	20	15	2	3					
768	<i>Quercus agrifolia</i>	3	4.0, 2.0, 1.5	6.0	15	12	2	3					
769	<i>Quercus agrifolia</i>	2	3.5, 1.5	5.0	20	15	2	3					
770	<i>Quercus agrifolia</i>	4	3.0, 2.5, 2.5, 2.0	5.5	10	8	2	3					
771	<i>Platanus racemosa</i>	1	22.5	22.5	60	25	4	4		X			
772	<i>Alnus rhombifolia</i>	1	6.5	6.5	35	20	2	2					
773	<i>Platanus racemosa</i>	1	19.5	19.5	60	25	4	4		X			
774	<i>Platanus racemosa</i>	1	16.0	16.0	60	25	4	4		X			
775	<i>Quercus agrifolia</i>	2	37.5, 14.6	52.1	50	20	4	4	X				
776	<i>Quercus agrifolia</i>	8	1.0–4.5	8.5	20	15	3	2					
777	<i>Quercus agrifolia</i>	1	33.4	33.4	40	40	4	4	X				
778	<i>Quercus agrifolia</i>	1	32.1	32.1	40	30	4	3	X				
779	<i>Quercus agrifolia</i>	1	39.6	39.6	40	30	4	4	X				
780	<i>Quercus agrifolia</i>	1	21.6	21.6	20	20	3	3	X				
781	<i>Quercus agrifolia</i>	1	18.3	18.3	40	30	5	4	X				
782	<i>Quercus agrifolia</i>	1	12.4	12.4	35	15	4	4	X				
783	<i>Quercus agrifolia</i>	1	17.9	17.9	40	25	4	4	X				
784	<i>Quercus agrifolia</i>	1	16.8	16.8	35	20	4	4	X				
785	<i>Quercus agrifolia</i>	1	7.4	7.4	25	15	4	4					
786	<i>Quercus agrifolia</i>	1	17.7	17.7	30	30	4	4	X				
787	<i>Quercus agrifolia</i>	1	15.3	15.3	25	20	4	4	X				
788	<i>Quercus agrifolia</i>	1	28.1	28.1	40	40	5	4	X	X			
789	<i>Quercus agrifolia</i>	1	11.4	11.4	30	15	3	3	X	X		X	
790	<i>Quercus agrifolia</i>	1	9.2	9.2	25	15	3	3	X	X		X	
791	<i>Platanus racemosa</i>	1	16.8	16.8	60	50	4	4		X		X	
792	<i>Platanus racemosa</i>	2	19.5, 17.1	36.5	60	40	4	4					
793	<i>Quercus agrifolia</i>	3	5.3, 3.9, 3.5	9.2	12	10	3	3					
794	<i>Quercus agrifolia</i>	1	20.7	20.7	30	20	4	4	X				

OAK TREE SURVEY DATA SUMMARY

Tree No.	Species	Number of Trunks	Trunk Diameter (DBH) (in)	Sum of Two Trunks	Height (feet)	Canopy (feet)	Aesthetic Rating	Health Rating	Regulated by		Proposed Impact		
									CLAOTO	CDFW	Removal	Encroach	Trimming
795	<i>Quercus agrifolia</i>	1	23.3	23.3	40	30	4	4	X				
796	<i>Quercus agrifolia</i>	3	6.1, 2.7, 1.5	8.8	15	12	3	2					
797	<i>Quercus agrifolia</i>	1	5.1	5.1	10	10	3	2					
798	<i>Quercus agrifolia</i>	11	1.0–5.7	10.6	10	10	3	2					
799	<i>Quercus agrifolia</i>	4	12.0–19.3	38.1	30	15	4	3	X				
800	<i>Quercus agrifolia</i>	1	6.4	6.4	10	12	3	3					
801	<i>Quercus agrifolia</i>	2	7.7, 6.1	13.8	15	15	3	3	X			X	
802	<i>Quercus agrifolia</i>	2	12.5, 7.5	20.0	20	15	3	2	X				
803	<i>Quercus agrifolia</i>	1	15.2	15.2	30	20	3	2	X				
804	<i>Platanus racemosa</i>	1	18.0	18.0	40	25	3	2					
805	<i>Platanus racemosa</i>	1	16.0	16.0	40	25	3	2					
806	<i>Sequoia sempervirens</i>	1	16.0	16.0	50	15	2	2					
807	<i>Sequoia sempervirens</i>	2	15.0, 12.0	27.0	50	15	2	2					
808	<i>Sequoia sempervirens</i>	1	10.0	10.0	30	15	2	2					
809	<i>Sequoia sempervirens</i>	1	8.0	8.0	25	15	2	2					
810	<i>Sequoia sempervirens</i>	2	11.0, 9.0	20.0	50	15	2	2					
811	<i>Sequoia sempervirens</i>	1	16.0	16.0	50	15	2	2					
812	<i>Sequoia sempervirens</i>	3	12.0, 11.0, 11.0	23.0	50	15	3	3					
813	<i>Sequoia sempervirens</i>	1	14.0	14.0	50	15	3	3					

ATTACHMENT H
BIOLOGIST QUALIFICATIONS

David Hughes

Senior Project Manager/Certified Arborist



EDUCATION

2003/MS/Ecological Restoration and Management/University of Wisconsin, Madison

1991/BS/Ecology, Behavior and Evolution/University of California, San Diego

CERTIFICATIONS

Certified Arborist/WE-7752A/International Society of Arboriculture

Certified Ecological Restoration Practitioner/No. 243/Society for Ecological Restoration

Trained Practitioner, California Rapid Assessment Method, Riverine and Depressional Wetland Modules/

U.S. Army Corps of Engineers Jurisdictional Delineation Training/Richard Chinn Environmental Training, Inc.

PROFESSIONAL AFFILIATIONS

Western Chapter, International Society of Arboriculture

California Society for Ecological Restoration

EXPERIENCE

With Psomas: 17 years/With Other Firms for: 1 year

David Hughes is a Senior Project Manager and Certified Arborist with 18 years of experience in environmental consulting, specifically, mitigation planning, habitat assessments, restoration monitoring, wetland delineations, botanical surveys, and regulatory permitting. David has been a Certified Arborist by the International Society of Arboriculture since 2006 with expertise in tree inventories, appraisals, construction protection plans, replacement/mitigation plans, and construction monitoring. He has extensive experience working with assisting both private and public entities with obtaining regulatory authorizations from a variety of city, county, state, and federal agencies.

Experience

Tesoro del Valle Residential Development Project, Restoration and Regulatory Services, Los Angeles County: Mr. Hughes is the Project Manager for the 800-acre Tesoro del Valle project site and has performed the following to facilitate environmental approvals for the project: special status botanical surveys, oak tree surveys pursuant to the Los Angeles County Oak Tree Ordinance, delineation of jurisdictional waters, and preparation of mitigation plans to offset impacts to special status plant and wildlife species. Mr. Hughes also prepared the Biota Report that was approved by the Los Angeles County Significant Ecological Area Technical Advisory Committee. Mr. Hughes worked with resource agency staff to acquire permit pursuant to Sections 401 and 404 of the Clean Water Act and Section 1600 of the California Fish and Game Code.

Arroyo Simi Channel Clearing Project, Essex Property Trust, Simi Valley, Ventura County, CA: Mr. Hughes is the Project Manager, Regulatory Specialist, and Biologist for the Arroyo Simi Channel Clearing project which involves the removal of sediment and vegetation within an earthen bottom portion of the Arroyo Simi to meet requirements of the Ventura County Watershed Protection District. Mr. Hughes performed a biological constraints survey and jurisdictional delineation surveys to facilitate the acquisition of regulatory permits for the required clearing. Mr. Hughes provided general coordination and oversight of focused biological surveys with the client and the Watershed Protection District to allow work to proceed.

Burbank Debris Basin Maintenance Project, Restoration and Regulatory Services, Los Angeles County: Mr. Hughes served as Project Manager to assist the City of Burbank acquire regulatory permits to authorize maintenance of 21 flood control facilities. In order to acquire the permits, Mr. Hughes performed a delineation of jurisdictional waters for all of the subject facilities; prepared a biological constraints analysis to determine the potential for special status species to occur at each facility; performed a special status botanical survey; and developed a habitat mitigation program to compensate for the loss of vegetation removed through this maintenance program. Additionally, Mr. Hughes managed

other staff members during the performance of focused surveys for the coastal California gnatcatcher and least Bell's vireo.

Arroyo Seco Canyon Project Initial Study/Mitigated Negative Declaration, Pasadena, CA: Mr. Hughes provided biological and regulatory permitting services for the Arroyo Seco Canyon Project, which proposes improvements in three areas along the Upper Arroyo Seco in the City of Pasadena, north of Devil's Gate Dam. The purpose of the Project is to increase the water infiltration into the Raymond Basin to supplement the Pasadena Water and Power's drinking water supplies. Mr. Hughes performed a native tree survey in accordance with requirements set forth in the City of Pasadena's Tree Ordinance and prepared a tree survey report. David also performed a delineation of jurisdictional waters to document the type and quantity of streambed resources under the jurisdiction of regulatory agencies. The delineation included a functional analysis of the streambed characteristics using CRAM. Mr. Hughes subsequently prepared regulatory permit applications, identified appropriate on-site mitigation opportunities, and worked with agency staff to issue permits that would allow construction to proceed.

Sterling Development Project, Restoration and Regulatory Services, West Hills, CA. The project consists of an approximate 200-home residential development along with associated infrastructure. Mr. Hughes serves as the Project Manager for this project and has provided regulatory permitting and mitigation planning services; performed a delineation of jurisdictional waters; prepared a tree protection and mitigation plan to minimize construction impacts; conducted special status botanical surveys; and currently oversees mitigation implementation, which includes the establishment of several Rare or Endangered plant species. This project has required ongoing coordination with the City of Los Angeles, the County of Los Angeles, the CDFW, the California Department of Toxic Substances Control, the RWQCB, and the USACE.

University of California, Los Angeles, On-Call Contract Tree Inventory Studies, Los Angeles, CA: Mr. Hughes has performed tree inventory studies as part of an On-Call Contract. Projects for which tree studies have been performed include: the Pauley Pavilion Expansion Project, the Northwest Housing Infill Project, the Weyburn Terrace Housing Project, and the Wasserman Eye Research Center Project, all of which are located on the University of California, Los Angeles (UCLA) campus. Tree inventory methods followed requirements set forth in the UCLA Long Range Development Plan, a programmatic Environmental Impact Report that addresses all campus projects and the City of Los Angeles Tree Protection Ordinance.

Feasibility Studies for the Los Angeles River, Santa Clara River, and Malibu Creek Watersheds, Los Angeles County, CA: Restoration Ecologist on this project. David performed CRAM surveys in 46 soft-bottom channels for which the Los Angeles County Department of Public Works is responsible for maintaining sufficient flood water capacity. A total of 60 CRAM Assessment Areas were evaluated as part of these studies that were performed to assist Public Works in updating their Waste Discharge Permit with the Los Angeles RWQCB. The Feasibility Studies were prepared to analyze how adequate flood conveyance capacity can be maintained in these various vegetated channels while preserving wildlife habitat to the extent practicable. The CRAM surveys helped to identify

the channels that had the greatest ecological functioning and also identified stressors that affected the channels per the CRAM protocol.

Orange County Transportation Authority Baseline Biological Surveys for Acquired Properties, Orange County, CA: David served as the Regulatory/California Rapid Assessment Method (CRAM) Specialist for this project, which provides biological support services for the Orange County Transportation Authority (OCTA), including biological surveys and associated documentation. This work effort has allowed OCTA to establish a biological baseline of five acquired properties, with special attention to species covered under the draft OCTA National Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP). David mapped vegetation communities, performed botanical surveys, and performed a jurisdictional delineation to identify wetlands and non-wetland “Waters of the U.S.” and “Waters of the State” on the project sites. David included an evaluation of the sites using CRAM to further characterize the ecological quality of these resources.

Pacoima Dam Sediment Removal Project, Los Angeles County, CA: Regulatory Specialist for jurisdictional delineation and various biological surveys associated with this Los Angeles County Public Works project. The project involves the removal of excess sediment from Pacoima Reservoir to restore its original water storage capacity. David performed a jurisdictional delineation to identify the extent of waters regulated by the USACE, CDFW, and RWQCB and prepared a summary report that included a CRAM functional analysis.

Los Angeles Department of Water and Power As-Needed Regulatory Permitting Services, Los Angeles County, CA: Regulatory Permitting Specialist for the preparation of Jurisdictional Delineations (JDs) under MBC Aquatics Los Angeles Department of Water and Power (LADWP) On-Call Receiving Water Monitoring Services. Psomas has conducted 21 JDs and various biological services for LADWP from 2017-2020. David has performed JDs under this on-call contract and provided habitat restoration monitoring services. He has completed 12 JDs for LADWP in Los Angeles County including Dry Canyon Reservoir Drain Line Remediation Project, Elizabeth Tunnel Seismic Enhancement and Fairmont Sedimentation Plant Projects, Barren Ridge Renewable Transmission Line and Bee Canyon Sag Pipe Projects, PP1/PP2 Transmission Line Conversion Project Between Haskell Canyon and Sylmar Switching Stations, Debris Flow Hazard Remediation and Drainage Improvement Project at the San Francisquito Power Plant No. 2, Bouquet Inlet-Outlet Pipeline Project, Ivanhoe and Silver Lake Reservoirs Jurisdictional Waters Assessment, Bouquet Canyon Creek Vegetation Maintenance Project, Haskell Canyon Vegetation Maintenance Project, Elizabeth Tunnel Rehabilitation and Water, Resiliency Project, Rinaldi to Tarzana Electrical Transmission Alignment Project, and Rosamond Switching Station Project. Additional completed projects include the Barren Ridge Switching Station Project in Kern County and the Electrical Tower 289-1 Revegetation Project and Apex Generating Station to Crystal Sub-Station Transmission Line Project in Clark County, Nevada.

APPENDIX C

CULTURAL AND PALEONTOLOGICAL RESOURCES DATA



PHASE I CULTURAL RESOURCES ASSESSMENT

CAMP VERNON KILPATRICK REPLACEMENT PROJECT

Prepared for | County of Los Angeles Department of Public Works
Architectural Engineering Division
900 South Fremont Avenue
Alhambra, California 91803
Attn: Derryk Ly

USGS Point Dume, CA 7.5-Minute Quadrangles in
Township 1 South; Range 19 West, Section 11 (S.B.B.M).

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August 2012

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- D Site Photographs
- E Historic Resources Assessment Report (Daly 2012)
- F Personnel Qualifications

NATIONAL ARCHAEOLOGICAL DATABASE (NADB) INFORMATION SHEET

**PHASE I CULTURAL RESOURCES ASSESSMENT:
CAMP VERNON KILPATRICK REPLACEMENT PROJECT**

by

Patrick Maxon, M.A., RPA

August 2012

Submitted by:

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Submitted to:

County of Los Angeles Department of Public Works
Architectural Engineering Division
900 South Fremont Avenue
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USGS Point Dume, CA 7.5-Minute Quadrangles in Township 1 South; Range 19 West, Section 11 (S.B.B.M).

BonTerra Consulting

Project Number: CoLADPW J184

Key Words: Camp Vernon Kilpatrick, USGS Point Dume

MANAGEMENT SUMMARY

PURPOSE AND SCOPE

BonTerra Consulting undertook this project as part of California Environmental Quality Act (CEQA) requirements for the proposed Camp Vernon Kilpatrick Replacement Project. This Phase I cultural resources study was designed to identify, evaluate, and develop appropriate mitigation measures for any significant cultural resources present on the project site. The format of this report follows *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format* (Office of Historic Preservation 1990).

DATES OF INVESTIGATION

Patrick Maxon, RPA conducted a cultural resources literature review on May 29, 2012, at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (Appendix A). A paleontological review request was received from Samuel McLeod, of the Natural History Museum of Los Angeles (LACM) on August 3, 2012 (Appendix B). Native American consultation was initiated on July 11, 2012, with a letter to the Native American Heritage Commission (NAHC). The NAHC completed its Sacred Lands File Search and responded on July 13, 2012. Letters were sent to Native American tribes and individuals on July 13, 2012 (Appendix C). A cultural resources survey of the property was conducted by Mr. Maxon and architectural historian Pamela Daly on June 12, 2012. Site photographs are in Appendix D.

Pamela Daly, M.S.H.P. of Daly and Associates completed a historic evaluation of the Camp Kilpatrick built environment resources, which is summarized herein and attached as Appendix E.

This report was completed in August 2012.

FINDINGS OF THE INVESTIGATION

No significant cultural resources were discovered on the project site during the survey. The existing Camp Kilpatrick built environment was determined not eligible for the California Register of Historical Resources. No significant archaeological sites are present on the project site. The igneous nature of bedrock in the vicinity of the project site suggests no fossil resources are present in the subsurface.

INVESTIGATION CONSTRAINTS

The majority of the project site has been developed as part of the Camp Kilpatrick facility. Little undisturbed open space remains on the property except in the elevated areas along the western and southern margins of the area surveyed.

RECOMMENDATIONS/MITIGATION MEASURES

There is a possibility that buried sites and/or human remains may remain buried in the subsurface of the project site. And deeper excavations that penetrate into older Quaternary alluvial deposits in the central portion of the project site could produce paleontological resources.

The following Mitigation Measures (MMs) were developed to ensure that any impacts to these resources would be reduced to a less than significant level.

MM 1 Should archaeological resources be found during ground-disturbing activities for the project, a qualified Archaeologist shall be retained to first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” pursuant to Section 21083.2(g) of the *California Public Resources Code* (PRC) or a “historical resource” pursuant to Section 15064.5(a) of the CEQA Guidelines. If the archaeological resource is determined to be a “unique archaeological resource” or a “historical resource”, the Archaeologist shall formulate a mitigation plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed sections. Potential mitigation could include planning construction to avoid the resource; protection and preservation in place; and/or data recovery excavation of a representative sample of the site’s constituents.

If the Archaeologist determines that the archaeological resource is not a “unique archaeological resource” or “historical resource”, s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County of Los Angeles and to the CHRIS at the SCCIC.

MM 2 Prior to the commencement of ground-disturbing activities in native soils, a qualified Paleontologist shall be retained to monitor excavations into the older Quaternary alluvium that lies below the younger Quaternary alluvium exposed at the surface. The schedule and extent of monitoring activities shall be established by the Supervising Paleontologist in coordination with Contractor and County staff at the Project’s pre-grade meeting, and as grading activities commence. Because it is often difficult to distinguish between older and younger Quaternary alluvium on sight, for the purposes of this mitigation measure, a qualified Paleontologist shall be retained to monitor excavations into native soils 5 feet below ground surface or deeper (i.e., grading and excavation for footings and utility trenches). It shall be the responsibility of the Supervising Paleontologist to demonstrate, to the satisfaction of the County, the appropriate level of monitoring necessary based on the on-site soils and final grading plans, when available. All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If a fossil discovery occurs during grading operations when a Paleontological Monitor is not present, grading shall be diverted around the area until the Monitor can survey the area. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to the County of Los Angeles or other appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.

MM 3 If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (*California Public Resources Code* §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the *California Health and Safety Code*. The MLD shall make his/her recommendation within 48 hours of being granted access to the site.

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 (*California Health and Safety Code §7050.5*). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (*California Public Resources Code §5097.98*).

DISPOSITION OF DATA

This report will be filed with the County of Los Angeles; with BonTerra Consulting; and at the SCCIC. All field notes and other documentation related to the study are on file at BonTerra Consulting.

1.0 UNDERTAKING INFORMATION/INTRODUCTION

1.1 CONTRACTING DATA

The County of Los Angeles retained BonTerra Consulting to conduct a Phase I cultural resources study for the proposed Camp Vernon Kilpatrick Replacement Project (“project”). This report details the findings of the investigation and offers management recommendations and mitigation measures to reduce impacts to cultural resources to a less than significant levels.

1.2 UNDERTAKING

The County of Los Angeles Department of Public Works (County) is proposing to replace the existing Camp Kilpatrick Detention Center, a juvenile detention center, with newly designed facilities intended to create a more supportive and treatment-oriented environment. Established in 1962, Camp Kilpatrick is located in unincorporated Los Angeles County at 427 South Encinal Canyon Road near the City of Malibu, California. Camp Kilpatrick is located immediately to the north of Camp Miller, which is also a County of Los Angeles juvenile detention center. No improvements are proposed at Camp Miller, which would remain operational during construction of the project.

The physical design of the proposed camp is centered on evidence-based treatment programs that rehabilitate juveniles. Specifically, replacing the large dormitory with four small cottages is intended to enhance rehabilitation therapy and programs. The physical design of the facility is intended to maximize collaboration with partnering agencies, including the Department of Mental Health, Juvenile Court Health Services, Los Angeles County Office of Education, and Community and Religious Based Organizations.

Currently, Camp Kilpatrick has a rated bed capacity of 125 minors and consists of 13 structures with a total of approximately 45,000 square feet. The proposed project would replace the existing camp with a similar building square footage and capacity. No increase in juvenile capacity would be accommodated. The proposed project will support green building and be designed for a minimum rating of a Leadership in Energy and Environmental Design (LEED) Silver Certification.

1.3 EXHIBITS

Exhibit 1 depicts the regional vicinity and specific location of the project site on a portion of the U.S. Geological Survey’s (USGS’) Point Dume 7.5-minute quadrangle, in Township 1 South; Range 19 West, Section 7 (S.B.B.M). Exhibit 2 depicts the project site in an aerial photograph.

1.4 PROJECT PERSONNEL

Patrick Maxon, M.A., RPA completed a literature review at the South Central Coastal Information Center (SCCIC), Native American consultation, the field survey, and authored this report. Ms. Pamela Daly of Daly and Associates completed the built environment evaluation report. Refer to Appendix F for qualifications.

2.0 REGULATORY SETTING

This section contains a discussion of the applicable laws, ordinances, regulations, and standards that govern cultural resources and must be adhered to both prior to and during project implementation. The report is intended to satisfy the requirements of the California Environmental Quality Act (CEQA) regulations (14 *California Code of Regulations* [CCR] §15064.5 and *California Public Resources Code* [PRC] §21083.2). It is understood that there is no federal action under the National Environmental Policy Act (NEPA) and thus no cultural resources analysis is required under Section 106 of the National Historic Preservation Act (16 *United States Code* [USC] 470f) and its implementing regulations at 36 *Code of Federal Regulations* [CFR] 800, Protection of Historic Properties).

2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

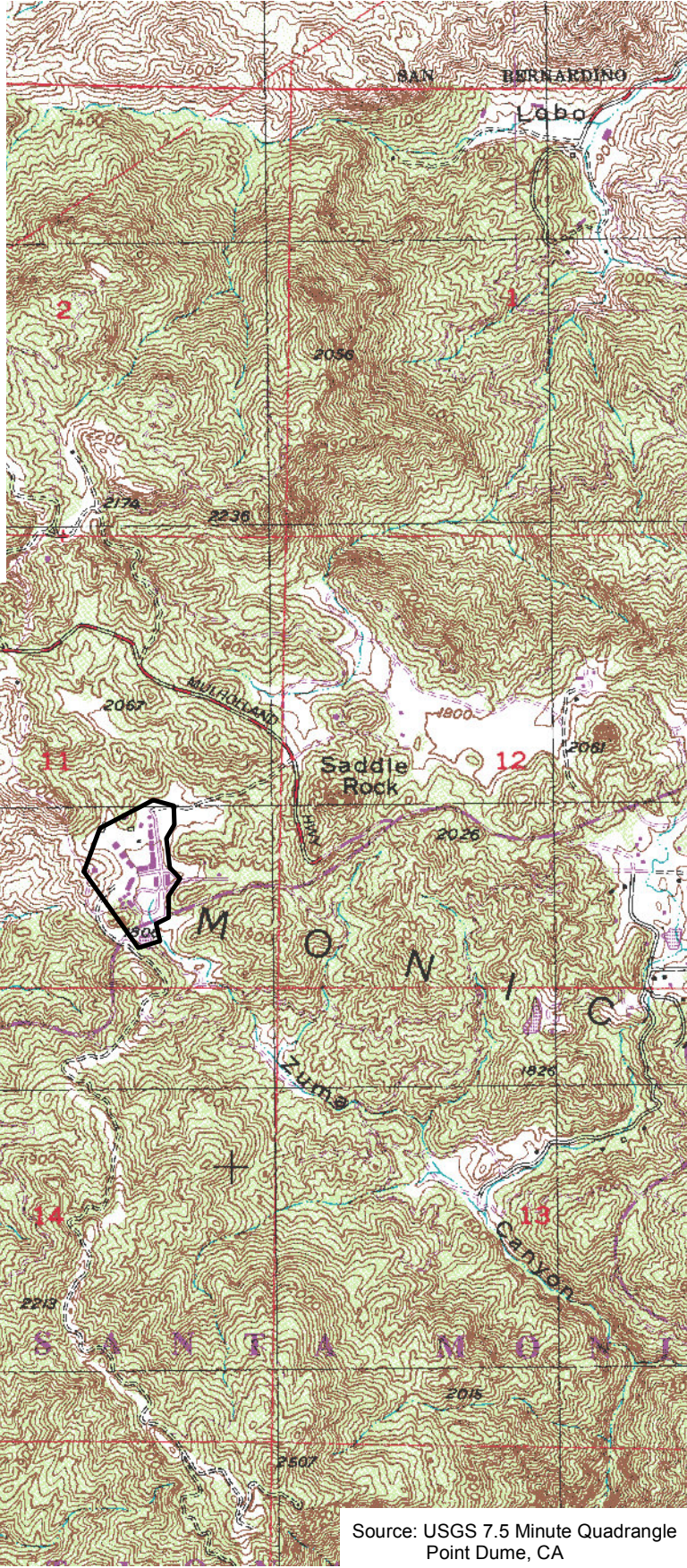
CEQA requires a lead agency to determine whether a project would have a significant effect on one or more historical resources. According to Section 15064.5(a) of the State CEQA Guidelines, a “historical resource” is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC §21084.1); a resource included in a local register of historical resources (14 CCR §15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR §15064.5[a][3]).

Section 5024.1 of the PRC, Section 15064.5 of the State CEQA Guidelines (14 CCR), and Sections 21083.2 and 21084.1 of the CEQA Statutes were used as the basic guidelines for the cultural resources study. PRC 5024.1 requires evaluation of historical resources to determine their eligibility for listing in the CRHR. The purposes of the CRHR are to maintain listings of the State’s historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP) (per the criteria listed at 36 CFR §60.4), are stated below (PRC §5024.1).

The quality of significance in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California is present in any object, building, structure, site, area, place, record, or manuscript that possesses integrity of location, design, setting, materials, workmanship, feeling and association and that:

- (a) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
- (b) Is associated with the lives of persons important in our past; or
- (c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (d) Has yielded, or may be likely to yield, information important in prehistory or history.

According to Section 15064.5(a)(3)(A–D) of the State CEQA Guidelines (14 CCR), a resource is considered historically significant if it meets the criteria for listing in the NRHP (per the criteria listed at 36 CFR 60.4). Impacts that affect those characteristics of the resource that qualify it for the NRHP or that would adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from the proposed project are considered significant if the project



Source: USGS 7.5 Minute Quadrangle Point Dume, CA

Local Vicinity

Camp Kilpatrick Camp Replacement Project

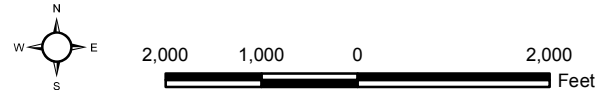
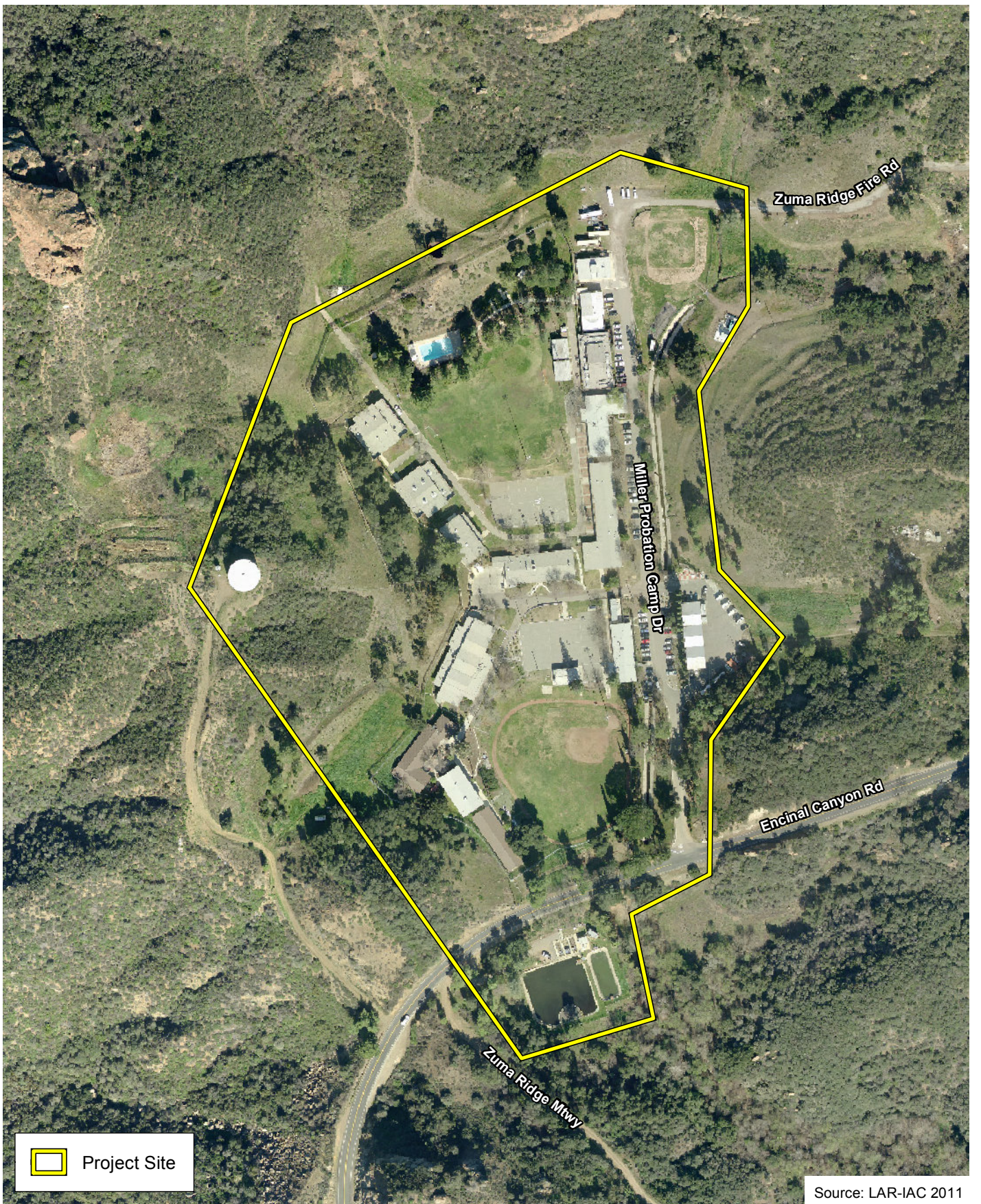



Exhibit 1



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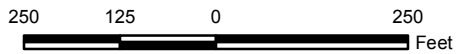
 Project Site

Source: LAR-IAC 2011

Project Site

Exhibit 2

Camp Kilpatrick Camp Replacement Project



Bonterra
CONSULTING

(1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource that contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

The purpose of a cultural resources investigation is to evaluate whether any cultural resources remain exposed on the surface of a project site or whether any cultural resources can reasonably be expected to exist in the subsurface. If resources are discovered, management recommendations would be required to evaluate the resources for CRHR eligibility.

Broad mitigation guidelines for treating historical resources are codified in Section 15126.4(b) of the CEQA Guidelines. To the extent feasible, public agencies should seek to avoid significant effects to historical resources, with preservation in place being the preferred alternative. If not feasible, a data recovery plan shall be prepared to guide subsequent excavation. Mitigation for historical resources such as buildings, bridges, and other structures that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Weeks and Grimmer 1995) will generally be considered mitigated below a level of significance.

2.2 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the CRHR is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change". Certain resources are determined by the statute to be automatically included in the CRHR, including California properties formally determined eligible for, or listed in, the National Register of Historic Places (NRHP, PRC §5024.1).

The CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the NRHP and those formally Determined Eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward;
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion in the CRHR.

Other resources which may be nominated to the CRHR include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.

A historic resource eligible for listing in the CRHR must meet one or more of the criteria of significance described above (PRC §5024.1) and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its

significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity under the CRHR is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that a historic resource may not retain sufficient integrity to meet criteria for listing in the NRHP, but it may still be eligible for listing in the CRHR.

2.3 SENATE BILL 18

Senate Bill (SB) 18 (*California Government Code* §65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. There is no general or specific plan amendment or adoption required for this project; therefore, formal consultation under SB 18 is not necessary. However, informal scoping was undertaken with local tribes through notification via informational letter.

2.4 HUMAN REMAINS

Section 7050.5 of the *California Health and Safety Code* provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Section 5097.98 of the PRC states that, if the Coroner determines that the remains are of Native American origin, s/he must notify the NAHC within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descended from the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

3.0 NATURAL SETTING

The project site is located in the high country of the Santa Monica Mountains, immediately west of the intersection of Mullholland Highway and Encinal Canyon Road, near the City of Malibu, California in unincorporated Los Angeles County. The Santa Monica Mountains were created by repeated episodes of uplifting and submergence by the Raymond Fault

The main, built portion of the project site is developed with the structures related to Camp Kilpatrick, while coastal sage scrub and chaparral covers the higher elevated ridges and knoll tops west of the camp.

The highest site elevation is approximately 1,850 feet above mean sea level (msl) in the west-northwest corner of the project site, and the lowest site elevation is approximately 1,700 feet above msl in the southern end of the project site nearest Encinal Canyon Road.

4.0 **CULTURAL SETTING**

4.1 **PREHISTORIC**

The prehistory of coastal Southern California has been described by a number of authors who generally agree on at least four major prehistoric periods (Wallace 1955; Warren 1968; Koerper and Drover 1983). These four sequential periods of time, sometimes called Horizons and sometimes Traditions, are each characterized by time-sensitive artifacts. The periods then are not arbitrary, but likely reflect material/cultural changes at those times.

The earliest occupations of the Southern California coast are debated to begin as early as 50,000 years before present, or “BP” (Bada et al. 1974).¹ The earliest radiocarbon dates, however, were derived from Los Angeles Man and Laguna Woman at 23,600 and 17,150 years BP, respectively (Berger et al. 1971). Unfortunately, little is known of the material culture of finds of this antiquity. The earliest archaeological culture known in any detail is that of San Dieguito, named after the drainage of the same name near Del Mar, California where implements dating to 8,000 years BP were found. Although the subsistence strategy of this tradition is unknown, Warren (1968:2) has inferred a hunting economy (cf. Koerper and Drover 1983; Drover et al. 1983). Typical artifacts would include percussion flaked implements, elongated knives, domed scrapers, teshoa flakes, crescentics, and an absence of millingstone tools.

The next prehistoric period for coastal Southern California is termed “Millingstone” and “Encinitas” by Wallace (1955) and Warren (1968), respectively. The Millingstone Horizon or Encinitas Tradition are very similar as described by each author and have a time span beginning about 7,000 to 8,000 years BP and ending between 3,000 to 4,000 years BP. The onset of Holocene climatic conditions may have brought about the cultural changes associated with this period. Processing tools like manos and metates (millingstone) reflect an increased dependence on plant foods. Projectiles are rare but, when found, suggest the use of the atlatl or throwing stick. The material culture characteristic of this period is longer-lived the further one travels south of Santa Barbara.

The third period following Encinitas, or Millingstone, is known as the “Intermediate Horizon” and “Campbell Tradition” by Wallace (1955) and Warren (1968), respectively. Numerous, smaller projectile points suggesting increased hunting and the introduction of the use of the bow and arrow characterize this period. It is during the Intermediate Horizon that true maritime exploitation and occupation of the Channel Islands flourishes (Meighan 1959). The duration of this period is roughly 3,000 to 1,000 years BP. In general, the emphasis seems to shift from the hard seed orientation of the Milling Stone Tradition to the growing practice of balanophagy (acorn consumption) and processing of other soft, pulpy seeds. While mortars and pestles become more common in comparison to manos and metates, the latter survive into European contact times attesting to the use of hard seeds in the diet.

Several traits make an appearance rather late in the Tradition; these include pottery and ground painting, which give rise to speculation that significant culture contact from the southeast was occurring (Meighan 1954). This complex is thought to owe its basic cultural orientations to the Southwestern United States.

A general picture emerges through time of growing population pressure resulting in intensified land use patterns. Increases in population or siltation of coastal estuaries are examples of intensifying the local carrying capacity. Occasionally, siltation may actually progress to the point of making an estuary less productive, resulting in local populations adapting to other environments such as acorn processing.

¹ “Before Present” assumes that 1950 is “present”.

During the “Late Prehistoric” Period from about 1,000 BP to European contact in the year 1769, exploitation of many food resources, particularly marine resources among coastal groups, continued to intensify. The material culture in this period increased in complexity in terms of the abundance and diversity of artifacts being produced. The recovery and identification of a number of small projectile points during this period likely suggests a greater utilization of the bow and arrow, which was likely introduced near the end of the Intermediate Period. Shell beads, ornaments, and other elements of material culture continue to be ornate, varied, and widely distributed; the latter evidence suggests elaborate trade networks. Warren’s (1968) scheme divides the late prehistoric period into several regional traditions. Western Riverside County, Orange County, and the Los Angeles Basin area are considered part of the “Shoshonean” tradition, which may be related to a possible incursion of Tadic speakers into these areas during this period.

In the few centuries prior to European contact, the archaeological record reveals substantial increases in the indigenous population (Wallace 1955:223). Some village sites may have contained as many as 1,500 individuals. Apparently, many of these village sites were occupied throughout the year rather than seasonally. This shift in settlement strategy was likely influenced by improved food procurement and storage technology, which enabled population growth and may have helped stimulate changes in sociopolitical organization.

4.2 ETHNOGRAPHIC

The project area was occupied during the Late Prehistoric Period by the Native American societies commonly known to anthropologists as the Chumash and the Gabrielino (Kroeber 1925; Grant 1978a; Bean and Smith 1978). The two tribal groups shared a fluid border region near the project site. The term “Gabrielino” identifies those Native Americans who were under the control of the Spanish Mission San Gabriel. The overwhelming numbers of Gabrielino were of the same ethnic nationality and language group who generally referred to themselves as *Tongva*. Their territory extended from northern Orange County north to the San Fernando Valley in Los Angeles County. Chumash territory extended from Malibu in the south to the San Luis Obispo area to the north.

The language of the Gabrielino was derived from the Tadic family, part of the Uto-Aztecan linguistic stock. This feature was shared with the Juaneño/Luiseño, Serrano, and Cahuilla Native American groups located in what is now San Bernardino and Riverside Counties. The Chumash, north of the Tongva, appear to be of an isolated and deep origin, representing origins quite different from that of the local languages (Mithun 1999:304).

Chumash

The Chumash subgroup that resided in the vicinity of the current study area is known as the Ventureño Chumash (those Chumash groups associated with Mission San Buenaventura), the most southerly of the Chumash subgroups. The Ventureño Chumash territory, aside from the fairly level Oxnard Plain, was primarily mountainous and stretched from the headwaters of the Ventura and Santa Clara Rivers and Mt. Pinós in the north to Malibu Canyon to the east. The village of *Humaliwo*, on the coast at the mouth of Malibu Creek, was the historic seat of the area’s paramount chief who presided over the area of the eastern Santa Monica Mountains (Wlodarski 1996:19). The traditional western boundary was placed just east of the headwaters of the Santa Ynez and Cuyama Rivers. To the south was the Pacific Ocean (Grant 1978a:506). The Ventureño Chumash were in contact with the Gabrielino, especially the western Tongva, the people who occupied the area to the east and south (Bean and Smith 1978:547), and some overlap of the two groups occurred within a border zone that included the area around Malibu.

Kroeber (1925) estimated the Chumash population at 8,000 to 10,000 at first contact with the Spanish, which occurred with the arrival of the Cabrillo expedition on October 12, 1542. Brown (1967 in Grant 1978a) estimates the population at 15,000, while Cook and Heizer (1965:21) believe 18,000 to 22,000 to be the correct figure.

Villages were made up of several hemispherical dwellings; storehouses; one or more sweat houses; a cemetery marked off by rows of stones or planks and usually placed away from the living area; a circular ceremonial area of tule mats; and a game field surrounded by low walls (Landberg 1965 in Koerper 1987:12). Houses were sometimes as large as 15 meters in diameter and housed as many as 50 to 70 individuals. These dwellings were circular, constructed of poles arched together and covered with layers of woven grass. The houses were divided into rooms, and beds made of wooden platforms raised above the ground were placed in the sleeping areas (Kroeber 1925:557–558).

The Chumash fashioned exquisite baskets used for a variety of tasks. They were used as plates and bowls; as seed beaters; for collecting foodstuffs; for straining and leaching; for fishing; for gambling; for storage; and for ritual purposes. Some of the baskets were woven so tightly that they held water and, when coated with asphaltum, could store water for extended periods (Miller 1988:49).

The coastal groups constructed the plank canoe, or “tomol”, allowing them to regularly cross to the Channel Islands and maintain an active trade. The separate planks were lashed together and caulked with asphalt. The canoes held, by some accounts, up to 20 people who probably employed double-bladed paddles to negotiate the sea (Kroeber 1925:558). Complex and advanced equipment for the exploitation of marine resources complemented the plank canoes.

Art flourished in the Chumash area, manifesting itself in the form of elaborate rock paintings and complex, skillfully executed artifacts of shell, bone, stone, and wood. Both utilitarian tools as well as ceremonial and ritual objects were highly decorated with various dyes and binding agents. Chumash rock art is the equal of any native art in the United States. The rock art has been associated with ritual observances and is usually found at remote locations. Cupules—pit and groove petroglyphs—are an ancient art form seen earliest in Asia. Often found near rock art sites, cupules may have been utilized to hold pigment or to serve some non-utilitarian, ritual function (Miller 1988:132-134). Pictographs usually employ a variety of colors and many are of abstract designs, perhaps suggesting that the Chumash were on the verge of a written language (Grant 1978b). Some goods were produced by guild-like associations of part-time craft specialists (Blackburn 1975 and Hudson 1977 in Koerper 1987:11).

Gabrielino/Tongva

The Gabrielino arrived in the Los Angeles Basin probably before 500 BCE as part of the so-called Shoshonean (Takic speaking) Wedge from the Great Basin region. The Gabrielino/Tongva gradually displaced the indigenous peoples, who were probably Hokan speakers. Large, permanent villages were established in the fertile lowlands along rivers and streams and in sheltered areas along the coast. Eventually, Gabrielino territory encompassed the greater Los Angeles Basin; coastal regions from Topanga Canyon in the north to perhaps as far south as Aliso Creek; as well as the islands of San Clemente, San Nicholas, and Santa Catalina. Gabrielino population may have numbered as many as 10,000 individuals at its peak in the Precontact Period (Bean and Smith 1978:538–540).

4.3 HISTORY

As part of this project, a historic context and evaluation of Camp Kilpatrick was completed and attached to this document. The historic report describes the history of this area, property, and that of Camp Kilpatrick in detail and is included as Appendix E.

5.0 METHODS

5.1 CULTURAL RESOURCES RECORDS SEARCH

A literature review of documents on file at the SCCIC at California State University, Fullerton was completed by Patrick Maxon on May 29, 2012 (Appendix A). The review consisted of an examination of the U.S. Geological Survey's (USGS) Point Dume 7.5-minute quadrangle to evaluate the project area for any sites recorded or cultural resources studies conducted on the parcel and within a one-mile radius. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS) and houses records concerning archaeological and historic resources in Orange, Los Angeles, and Ventura Counties. The records search provided data on known archaeological and built environment resources as well as previous studies within one mile of the project site. Data sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility (DOE), historic maps, and the Historic Property Data File (HPDF) maintained by the California Office of Historic Preservation (OHP). The HPDF contains listings for the CRHR and/or NRHP, California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI).

5.2 PALEONTOLOGICAL RESOURCES RECORDS SEARCH

A paleontological records search for the proposed project was requested from the Natural History Museum of Los Angeles County. A response was received from Samuel McLeod, Vertebrate Paleontologist, on August 3, 2012, (refer to Appendix B).

5.3 NATIVE AMERICAN SCOPING

An inquiry was made of the NAHC to request a review of the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the project vicinity that are not documented on other databases. The NAHC completed its Sacred Lands File search on July 13, 2012, and also provided a list of Native American groups and individuals who may have knowledge of Native American cultural resources not formally listed on any database. Each of these groups and individuals were mailed an informational letter on July 13, 2012, describing the project and requesting any information regarding resources that may exist on or near the project site. Information regarding the results of the Native American coordination/consultation is provided in Appendix C.

5.4 FIELD SURVEY

An archaeological survey of the project site was conducted by BonTerra Consulting Archaeologist Patrick Maxon, RPA on June 12, 2012. It included a meeting with County representatives; pedestrian survey of the Camp grounds; and further survey of the elevated areas (surrounding the large water tank) to the west of the camp.

The historic resource assessment was conducted by Pamela Daly, M.S.H.P., Senior Architectural Historian. To identify and evaluate the buildings, structures, and features that are associated with the Camp Kilpatrick complex, a multi-step methodology was used. An inspection of the existing structures and associated features, combined with a review of accessible archival sources regarding Camp Kilpatrick, were performed to document existing

conditions and to assist in assessing and evaluating the property for significance. Photographs were taken of buildings and structures, including photographs of architectural details or other points of interest, during the on-site survey. The photographs were used to prepare the California Office of Historic Preservation Historical Resources Inventory Form (DPR Form series) to document the current built environment of Camp Kilpatrick.

6.0 **RESULTS**

6.1 **CULTURAL RESOURCES RECORDS SEARCH**

6.1.1 **Sites**

The SCCIC lists five previously recorded resources within one mile of the project site. None are located on the project site or within ½ mile of the project site.

One of these sites (CA-LAN-717) is located on Saddle Rock Ranch; is a well known rock art site known as the Cave of the Four Horsemen; and is listed in the NRHP. It is located approximately 4,500 feet east of the project site. Sites CA-LAN-15 and CA-LAN-18 are recorded immediately west of CA-LAN-717 and can be considered loci of the larger site.

The 1943 Triunfo Pass historic USGS quadrangle includes the placename Filbrick Ranch, which is within the current project site.

Table 1 briefly describes the known cultural resources within one mile of the project site.

**TABLE 1
CULTURAL RESOURCES ON OR WITHIN
ONE MILE OF THE PROJECT SITE**

Site Number	Recorder (Year)	Comment
CA-LAN-15	Mohr (1949)	Lithics and midden. Related to CA-LAN-717.
CA-LAN-18	Bierman and Eberhart (1949)	Lithics and midden. Related to CA-LAN-717.
CA-LAN-717	Clelow (1977)	Cave of the Four Horsemen. NRHP Site No. 82004617.
CA-LAN-527	Leonard (1973)	Lithics. Site record lost.
CA-LAN-528H	Wlodarski and Conrad (2006)	Single-family Home.
CA-LAN-2156	King (1993)	Mano, fire altered rock. Possible oven
CA-LAN-2177	King (1993)	Lithics and shell midden

6.1.2 **Studies**

SCCIC information notes that 22 cultural resources studies have been conducted within a 1-mile radius of the project site. Two of the studies (LA-5739 and LA-7158) included at least a portion of the project site. The first (LA-5739) was a cultural resources records search and paleontological overview of the Las Virgenes Municipal Water District's (LVMWD's) Recycled Water Feasibility Study (McKenna 2001). It encompassed several miles of proposed pipeline right-of-way and included the siting of a water tank site (T-4) on a ridge west of and overlooking Camp Kilpatrick; this is the only element of the LVMWD project that included a portion of the current study area. The second study (LA-7158) consisted of a Phase I cultural and paleontological resources survey of the identical study area defined in LA-5739 (McKenna

2002). No cultural resources were noted in the area of the water tank (T-4) that remains in the location previously identified.

Please refer to Appendix A for a bibliographic listing of the 22 studies.

6.2 PALEONTOLOGICAL RESOURCES RECORDS SEARCH

A paleontological resources records search for the proposed project was requested from the Natural History Museum of Los Angeles County (LACM). A response was received on August 3, 2012, from Samuel McLeod, Vertebrate Paleontologist (see Appendix B). McLeod's response indicates that no fossil localities are recorded on the project site, but there are nearby localities in similar sedimentary units that occur in the project site.

The elevated terrain around the periphery of the project site has exposures of the Tertiary age Conejo Volcanics that are devoid of fossils. Most of the project site itself has surficial deposits of terrestrial Quaternary Alluvium, derived as fan or fluvial deposits. These deposits typically do not contain significant vertebrate deposits in the uppermost layers. Older Quaternary alluvium may underlie the younger alluvial material and could contain fossils.

McLeod recommends that any deeper excavations that penetrate into older Quaternary alluvial deposits in the central portion of the project site should be monitored by a qualified paleontologist.

6.3 NATIVE AMERICAN SACRED LANDS FILE REVIEW

The NAHC Search of the Sacred Lands File on July 13, 2012, did not identify the presence of Native American cultural resources on the project site. In addition, the NAHC provided a list of Native American groups and individuals that may have knowledge of the religious and/or cultural significance of resources that may be in and near the project site. The NAHC listed the following groups and individuals:

- Beverly Salazar Folkes, Chumash, Tataviam, Fernandeno;
- Julie Lynn Tumamait-Stensile, Chairwoman, Barbareño/Ventureño Band of Mission Indians;
- Patrick Tumamait, Chumash;
- Mark Steven Vigil, Chief, San Luis Obispo County Chumash Council;
- Qun-Tan Shup, Owl Clan;
- Randy Guzman-Folkes, Chumash, Fernandeno, et al.;
- Tony Cordero, Chairwoman, Coastal Band of the Chumash Nation;
- Richard Angulo, Chumash;
- Carol Pulido, Chumash;
- Melissa M. Parra-Hernandez, Chumash;
- Frank Arrendondo, Chumash;
- Freddie Romero, Cultural Preservation Consultant, Santa Ynez Tribal Elders Council;
- Aylisha Diane Marie Garcia Napoleone;
- Kathleen Pappo, Barbareño/Ventureño Band of Mission Indians; and

- Raudel Joe Banuelos, Jr., Barbareño/Ventureño Band of Mission Indians

Each of these groups and individuals were mailed an informational letter on July 13, 2012, describing the project and requesting any information regarding resources that may exist on or near the project site.

On July 17, Freddie Romero, Cultural Preservation Consultant for the Santa Ynez Tribal Elders Council, replied by telephone. His call was returned on July 31, 2012. He stated that the project is outside the tribe's area of interest and defers to tribes that include the project site in their areas of interest.

No additional responses have been received to date. All Native American correspondence can be viewed in Appendix C.

6.4 FIELD SURVEY

On June 12, 2012 BonTerra Consulting's Patrick Maxon visited the site to complete the archaeological survey. After meeting with County staff, submitting security paperwork, and signing in to the camp roster, architectural historian Pam Daly and Mr. Maxon walked the camp grounds. Because of the built nature of the camp, there was no real possibility of the presence of prehistoric archaeological sites and any potential historic archaeology would be presently buried.

After the walking the grounds of the camp, Mr. Maxon surveyed the elevated areas along the western side of the camp grounds. A large water tank site on the highest point of the study area (approximately 1,925 feet above msl) is surrounded by coastal sage scrub vegetation, the steep knoll sloping down to the east toward the camp. This area around the tank was subjected to the most intensive pedestrian survey. No archaeological resources were noted in this area or anywhere on the project site.

The present-day Camp Kilpatrick complex is comprised of 13 buildings and outdoor facilities. Eight of the permanent buildings and the swimming pool structure were constructed on the site between 1961 and 1974. The Laundry/Storage building was constructed on the site after 1974, and the 2 portable buildings do not appear to be over 30 years old. The baseball field and the basketball courts are not being considered as historic resources as they have been continually upgraded, repaved, and repaired since 1962.

7.0 CEQA IMPACT ANALYSIS

This impact analysis is provided to assist in the preparation of an environmental document for the proposed project and provides discussion regarding each significance criterion for cultural resources.

7.1 SIGNIFICANCE CRITERIA

Appendix G of the State CEQA Guidelines contains the Initial Study Environmental Checklist Form, which includes questions relating to cultural resources. The issues presented in the Initial Study Checklist have been used as significance criteria. Accordingly, a project may result in a significant environmental impact if it:

- *Would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.*

- *Would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.*
- *Would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*
- *Would disturb any human remains, including those interred outside of formal cemeteries.*

7.2 PROJECT IMPACT ANALYSIS

Would the project cause a substantial adverse change in the significance of a historical resource?

According to Daly (2012), the Camp Kilpatrick complex does not qualify as a significant historic resource under NRHP or CRHR criteria relating to association with significant historical events that exemplify broad patterns of history. The Camp Kilpatrick facility was one of many constructed in Los Angeles County to address the growing need for additional facilities and the rapidly growing juvenile offender population. Archival research does not reveal that the property was the site of any significant historic event. There is no evidence that Camp Kilpatrick is eligible for listing under CEQA Criterion A/1.

The complex does not qualify as a significant resource under NRHP or CRHR criteria relating to Camp Kilpatrick's direct association with persons of historic importance. While the Camp Kilpatrick Mustang football team has achieved commendable athletic and life-lesson goals, those accomplishments cannot be physically conveyed by the built-environment resources. Camp Kilpatrick has not reached the level of significance to be determined eligible for listing under CEQA Criterion B/2 (Daly 2012).

Under NRHP or CRHR criteria relating to the distinctive characteristics of a type, period, region, or method of construction, the Camp Kilpatrick complex is not significant as it does not embody a high artistic design, nor does it appear to have been designed by an architect of merit. Built in the 1960s using a utilitarian design and inexpensive materials, these types of concrete masonry buildings were widely found throughout Southern California individually and in groups. The Camp Kilpatrick complex is not eligible for listing under Criterion C/3. Individual buildings in the Camp Kilpatrick complex have not been found eligible for listing under CEQA Criterion C/3 (Daly 2012).

According to the grading plan of the site for the Santa Monica Boys Probation Camp prepared by the County in 1960, there was one wood-frame building and a foundation pad that remained from an earlier occupation of the land. These early structures were demolished and removed from the site prior to the construction of the camp. The Camp Kilpatrick site has not yielded, nor does it appear to have the potential to yield, information important to the history of the local area, California, or the nation pursuant to CEQA Criterion D/4 (Daly 2012).

In summation, the Camp Kilpatrick complex is not eligible for listing in the NRHP or the CRHR as a significant historic resource; therefore, no impacts to known historical resources would occur as a result of the project. No mitigation is required.

Would the project cause a substantial adverse change in the significance of an archaeological resource?

No archaeological resources were noted on the project site as a result of the records search, Native American consultation, or field survey. The built nature of the project site suggests that the presence of buried prehistoric archaeological resources is unlikely, but still possible. There is also a possibility that historic archaeological deposits related to Camp Kilpatrick and/or earlier

developments at the site remain buried in the area. With implementation of Mitigation Measure (MM) 1, impacts to archaeological resources would be less than significant.

Would the project disturb or encounter any significant paleontological remains?

Much of the project site has surficial deposits of terrestrial Quaternary Alluvium, derived as fan or fluvial deposits. These deposits typically do not contain significant vertebrate deposits in the uppermost layers. Older Quaternary alluvium may underlie the younger alluvial material and could contain fossils; therefore, McLeod recommends that any deeper excavations that penetrate into older Quaternary alluvial deposits in the central portion of the project site should be monitored by a qualified paleontologist. With implementation of MM 2, impacts to paleontological resources would be less than significant.

Would the project disturb any human remains, including those interred outside of formal cemeteries?

There is no indication as a result of this study that human remains are present within the project site. The records search and field survey indicate that no evidence of human remains are located on or near the site. Project-related earth disturbance, however, has the potential to unearth previously undiscovered remains, resulting in a potentially significant impact. MM 3 would reduce impacts to a less than significant level.

7.3 MITIGATION MEASURES

MM 1 Should archaeological resources be found during ground-disturbing activities for the Project, a qualified Archaeologist shall be retained to first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” pursuant to Section 21083.2(g) of the *California Public Resources Code* (PRC) or a “historical resource” pursuant to Section 15064.5(a) of the CEQA Guidelines. If the archaeological resource is determined to be a “unique archaeological resource” or a “historical resource”, the Archaeologist shall formulate a mitigation plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed sections. Potential mitigation could include planning construction to avoid the resource; protection and preservation in place; and/or data recovery excavation of a representative sample of the site’s constituents.

If the Archaeologist determines that the archaeological resource is not a “unique archaeological resource” or “historical resource”, s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County of Los Angeles and to the CHRIS at the SCCIC.

Compliance with MM 1 would ensure that impacts to archaeological resources would be less than significant.

MM 2 Prior to the commencement of ground-disturbing activities in native soils, a qualified Paleontologist shall be retained to monitor excavations into the older Quaternary alluvium that lies below the younger Quaternary alluvium exposed at the surface. The schedule and extent of monitoring activities shall be established by the Supervising Paleontologist in coordination with Contractor and County staff at the Project’s pre-grade meeting, and as grading activities commence. Because it is often

difficult to distinguish between older and younger Quaternary alluvium on sight, for the purposes of this mitigation measure, a qualified Paleontologist shall be retained to monitor excavations into native soils 5 feet below ground surface or deeper (i.e., grading and excavation for footings and utility trenches). It shall be the responsibility of the Supervising Paleontologist to demonstrate, to the satisfaction of the County, the appropriate level of monitoring necessary based on the on-site soils and final grading plans, when available. All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If a fossil discovery occurs during grading operations when a Paleontological Monitor is not present, grading shall be diverted around the area until the Monitor can survey the area. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to the County of Los Angeles or other appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.

Compliance with MM 1 would ensure that impacts to archaeological resources would be less than significant.

MM 3 If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (*California Public Resources Code* §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the *California Health and Safety Code*. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. 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 (*California Health and Safety Code* §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (*California Public Resources Code* §5097.98).

Compliance with MM 3 would ensure that impacts to human remains would be less than significant.

8.0 CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this cultural resources report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

DATE: August 2012

SIGNED:



Patrick Maxon., RPA
Director, Cultural Resources

9.0 REFERENCES

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 1965 The Quantitative Approach to the Relations between Population and Settlement Size. *University of California Archaeological Survey Reports* 64: 1-97. Berkeley.
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 1978b Eastern Coastal Chumash. *Handbook of North American Indians: California, Vol. 8* (Robert F. Heizer, editor), pp.509–519. Smithsonian Institution, Washington D.C.
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- 2002 Results of a Phase I Cultural Resources Investigation and Paleontological Overview for the Proposed Las Virgenes Municipal Water District Recycled Water Feasibility Study, Los Angeles and Ventura Counties, California. On file, South Central Coastal Information Center, California State University, Fullerton.
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1955 A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology*, 11: 214–230.
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1966 Cultural Tradition and Ecological Adaptation on the Southern California Coast. In Archaic Prehistory in the Western United States, *Eastern New Mexico University Contributions in Anthropology* 1(3):1–14.

1968 Cultural Traditions and Ecological Adaptation on the Southern California Coast. In Archaic Prehistory in the Western United States. *Eastern New Mexico Contributions in Anthropology* 1(3): 1–14.
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1996 A Phase I Archaeological Study: Bikeway Gap Closure Project, Cities of Calabasas, Agoura Hills, Westlake Village and Unincorporated Los Angeles County, California. On file, South Central Coastal Information Center, California State University, Fullerton.

APPENDIX A
CULTURAL RESOURCES RECORDS SEARCH (SCCIC)

SCCIC Bibliography: Camp Kilpatrick

LA-00081

Author(s): Rosen, Martin D.

Year: 1975

Title: Evaluation of the Archaeological Resources for the Areawide Facilities Plan for the Las Virgenes Municipal District, (malibu Coast, Western Santa Monica Mountains, Southern Simi Hills), Los Angeles and Ventura Counties.

Affiliation: University of California, Los Angeles Archaeological Survey

Resources: 19-000018, 19-000019, 19-000028, 19-000029, 19-000031, 19-000032, 19-000093, 19-000129, 19-000133, 19-000187, 19-000189, 19-000190, 19-000195, 19-000215, 19-000246, 19-000265, 19-000268, 19-000269, 19-000314, 19-000331, 19-000352, 19-000450, 19-000517, 19-000707, 56-000008, 56-000012, 56-000123, 56-000176, 56-000177, 56-000180, 56-000181, 56-000267, 56-000270

Quads: CALABASAS, CANOGA PARK, MALIBU BEACH, NEWBURY PARK, OAT MOUNTAIN, POINT DUME, SANTA SUSANA, THOUSAND OAKS, TOPANGA, TRIUNFO PASS

Pages:

Notes: Same as VN1457.

LA-01453

Author(s): Foster, John M.

Year: 1985

Title: Archaeological Investigation: Selmer Property in the Santa Monica Mountains, Los Angeles County

Affiliation: Greenwood and Associates

Resources:

Quads: POINT DUME

Pages:

Notes:

LA-01579

Author(s): Brown, Robert S.

Year: 1986

Title: Archaeological Survey of a 622 Acre Property in the Trancas Canyon Area of the Santa Monica Mountains Tentative Tract 44398

Affiliation: Archaeological Associates, Ltd.

Resources: 19-000527, 19-000528, 19-000864, 19-000865

Quads: POINT DUME

Pages:

Notes:

LA-01951

Author(s): McKenna, Jeanette A.

Year: 1990

Title: Historical and Archaeological Investigations of the Phlyn Properties Tract 47425 in the Santa Monica Mountains of Los Angeles County, Palmdale, California

Affiliation: McKenna et al.

Resources:

Quads: POINT DUME

Pages:

Notes:

SCCIC Bibliography: Camp Kilpatrick

LA-02097

Author(s): Bleitz, Dana E. and Roy A. Salls

Year: 1990

Title: Report of Archaeological Reconnaissance Survey of Zuma Project Point Dume Quad Malibu, Caalifornia

Affiliation: Northridge Center for Public Archaeology, CSUN

Resources:

Quads: POINT DUME

Pages:

Notes:

LA-02444

Author(s): Ross, E. T.

Year: 1981

Title: Pictographs in Southern California: Malibu

Affiliation: ASA Journal

Resources: 19-000717

Quads: POINT DUME

Pages:

Notes:

LA-02616

Author(s): Dunbar, Helen

Year: 1988

Title: National Register of Historic Places Registration Form Saddle Rock Ranch Pictograph Site CA-LAN-717; Cave of the Four Horsemen

Affiliation: National Park Service

Resources: 19-000717

Quads: POINT DUME

Pages:

Notes:

LA-03100

Author(s): King, Chester

Year: 1994

Title: Affect to Archaeological Sites of a Proposed Trail Segment Between Kanan Road and the Suma Crest Fire Road, Los Angeles County, California

Affiliation: Topanga Anthropological Consultants

Resources: 19-002177

Quads: POINT DUME

Pages:

Notes:

SCCIC Bibliography: Camp Kilpatrick

LA-03293

Author(s): Rosen, Martin D. and C. William Clewlow

Year: 1975

Title: (Duplicate of LA81 and Ven32) Evaluation of the Archaeological Resources for the Areawide Facilities Plan for the Las Virgenes Municipal Water District (malibu Coast, Western Santa Monica Mountains, Southern Simi Hills), Los Angeles and Ventura Counties

Affiliation: University of California, Los Angeles Archaeological Survey

Resources:

Quads: CALABASAS, CANOGA PARK, MALIBU BEACH, NEWBURY PARK, OAT MOUNTAIN, POINT DUME, SANTA SUSANA, THOUSAND OAKS, TOPANGA

Pages:

Notes:

LA-03453

Author(s): Singer, Clay A.

Year: 1994

Title: Archaeological Evaluation of Two Trail Routes in the Santa Monica Mountains National Recreation Area, Los Angeles and Ventura Counties, California

Affiliation: C.A. Singer & Associates, Inc.

Resources: 19-002177, 56-000083

Quads: NEWBURY PARK, POINT DUME

Pages:

Notes: Same as VN1408.

LA-03530

Author(s): King, Chester, Leonard, Aiello, P., and Hasten Barbey

Year: 1966

Title: Ucas-200 the Santa Monica Mountains Project Los Angeles and Ventura Counties

Affiliation: UCAS

Resources: 19-000050, 19-000051, 19-000078, 19-000218, 19-000310, 19-000717, 56-000057, 56-000068, 56-000083, 56-000118, 56-000119, 56-000120, 56-000121, 56-000122, 56-000123, 56-000124, 56-000125

Quads: BEVERLY HILLS, BURBANK, CALABASAS, CAMARILLO, CANOGA PARK, HOLLYWOOD, MALIBU BEACH, NEWBURY PARK, POINT DUME, POINT MUGU, THOUSAND OAKS, TOPANGA, TRIUNFO PASS, VAN NUYS

Pages:

Notes: Included in the unmappables notebook for all listed quads and mapped pointing to all listed sites.

LA-03568

Author(s): Singer, Clay A.

Year: 1997

Title: Report on an Archaeological Survey of the Backbone Trail Connection Newton Canyon / Zuma Ridge Section in Los Angeles County, California

Affiliation: C.A. Singer & Associates, Inc.

Resources:

Quads: POINT DUME

Pages:

Notes:

SCCIC Bibliography: Camp Kilpatrick

LA-03587

Author(s): King, Chester

Year: 1994

Title: Prehistoric Native American Cultural Sites in the Santa Monica Mountains

Affiliation: Topanga Anthropological Consultants

Resources: 19-000002, 19-000007, 19-000043, 19-000052, 19-000059, 19-000060, 19-000069, 19-000070, 19-000071, 19-000072, 19-000073, 19-000074, 19-000080, 19-000111, 19-000114, 19-000186, 19-000193, 19-000194, 19-000207, 19-000227, 19-000229, 19-000242, 19-000243, 19-000264, 19-000267, 19-000324, 19-000373, 19-000384, 19-000413, 19-000466, 19-000629, 19-000669, 19-000690, 19-000776, 19-000807, 19-001117, 19-001248, 19-001326, 19-001327, 19-001341, 19-001352, 19-002153, 19-002154, 19-002157, 19-002158, 19-002159, 19-002160, 19-002161, 19-002162, 19-002163, 19-002164, 19-002165, 19-002167, 19-002168, 19-002200, 19-002201, 19-002202, 56-000001, 56-000003, 56-000010, 56-000024, 56-000039, 56-000044, 56-000045, 56-000065, 56-000070, 56-000071, 56-000089, 56-000095, 56-000096, 56-000100, 56-000110, 56-000115, 56-000123, 56-000124, 56-000145, 56-000146, 56-000174, 56-000179, 56-000195, 56-000204, 56-000221, 56-000222, 56-000261, 56-000271, 56-000294, 56-000341, 56-000342, 56-000535, 56-000536, 56-000538, 56-000606, 56-000639, 56-000640, 56-000705, 56-000706, 56-000707, 56-000721, 56-000737, 56-000853, 56-000865, 56-000869, 56-000870, 56-000871, 56-000872, 56-000873, 56-000874, 56-000875, 56-000876, 56-000877, 56-000878, 56-000879, 56-000880, 56-000881, 56-000882, 56-000883, 56-000884, 56-000885, 56-000886, 56-001020, 56-001154, 56-001156, 56-001157

Quads: BEVERLY HILLS, BURBANK, CALABASAS, CAMARILLO, CANOGA PARK, HOLLYWOOD, MALIBU BEACH, NEWBURY PARK, POINT DUME, POINT MUGU, THOUSAND OAKS, TOPANGA, TRIUNFO PASS, VAN NUYS

Pages: 254

Notes: Same as VN1462. Space did not permit the entry of all sites referenced within this report. Please see report for full listing of sites and isolates.

LA-05673

Author(s): King, Chester

Year: 1994

Title: Affect to Archaeological Sites of a Proposed Trail Segment Between Kanan Road and the Zuma Crest Fire Road, Los Angeles County, California

Affiliation: TAC

Resources: 19-002117

Quads: POINT DUME

Pages:

Notes:

LA-05739

Author(s): McKenna, Jeanette A.

Year: 2001

Title: Previous Archaeological Investigations and Paleontological Overview for the Proposed Las Virgenes Municipal Water District Recycled Water Feasibility Study, Los Angeles and Ventura Counties, California

Affiliation: McKenna et al.

Resources: 19-000527, 19-000528, 19-000864, 19-000865, 56-000008, 56-000854, 56-000855, 56-001235

Quads: POINT DUME, THOUSAND OAKS

Pages:

Notes:

SCCIC Bibliography: Camp Kilpatrick

LA-07158

Author(s): McKenna, Jeanette A.

Year: 2002

Title: Results of a Phase I Cultural Resources Investigation and Paleontological Overview for the Proposed Las Virgenes Municipal Water District Recycled Water Feasibility Study, Los Angeles and Ventura Counties, California

Affiliation: McKenna et al.

Resources: 19-000527, 19-000578, 19-000717, 19-000864, 19-000865, 19-001871, 19-002156, 56-000008, 56-000012, 56-000854, 56-000855, 56-001235

Quads: POINT DUME, THOUSAND OAKS

Pages:

Notes: See VN2250

LA-08359

Author(s): Tang, Bai "Tom" and Casey Tibbet

Year: 2003

Title: Rowell Adobe House and Garage, 45007 North Elm Avenue, Lancaster, Ca 93534-2409

Affiliation: CRM Tech

Resources: 19-186683

Quads: LANCASTER WEST

Pages:

Notes: Note: Eligible for California Register of Historical Resources

LA-08570

Author(s): Wlodarski, Robert J.

Year: 2006

Title: A Phase 1 Archaeological Study for Proposed Improvements to the Malibu Country Club Golf Course and Property Encompassing Approximately 627 Acres of Land Within the Coastal Zone of Los Angeles County, California

Affiliation: Historical, Environmental, Archaeological, Research, Team

Resources: 19-000527, 19-000528

Quads: POINT DUME

Pages:

Notes:

LA-09532

Author(s): Bonner, Wayne H.

Year: 2008

Title: Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate NL0233-01 (Calamigos Ranch), 205 Vera Canyon Road, Malibu, Los Angeles County, California.

Affiliation: Michael Brandman Associates

Resources: 19-000015, 19-000018, 19-000717

Quads: POINT DUME

Pages: 13

Notes:

SCCIC Bibliography: Camp Kilpatrick

LA-10637

Author(s): Knight, Albert

Year: 1999

Title: ROCK ART of the SANTA MONICA MOUNTAINS and the SIMI HILLS

Affiliation: none

Resources: 19-000045, 19-000048, 19-000049, 19-000078, 19-000089, 19-000188, 19-000209, 19-000340, 19-000341, 19-000354, 19-000357, 19-000403, 19-000448, 19-000449, 19-000640, 19-000717, 19-000743, 19-000748, 19-001540, 56-000008, 56-000035, 56-000037, 56-000057, 56-000119, 56-000149, 56-000163, 56-000165, 56-000195, 56-000203, 56-000242, 56-000314, 56-000612, 56-000613, 56-000630, 56-000632, 56-000732, 56-001072

Quads: CALABASAS, MALIBU BEACH, NEWBURY PARK, OAT MOUNTAIN, POINT DUME, SANTA SUSANA, THOUSAND OAKS, TOPANGA, TRIUNFO PASS

Pages: 113

Notes:

LA-10650

Author(s): Schmidt, James

Year: 2010

Title: SCE Santa Monica Mountains National Recreational Area (SMMNRA) Road Grading Archaeological Monitoring Program, Los Angeles County, Trancas and Solstice Canyons, Point Dume Quadrangle

Affiliation: Compass Rose Archaeological, Inc.

Resources: 19-100041, 19-100124, 19-100125, 19-100126

Quads: POINT DUME

Pages: 3

Notes:

LA-10651

Author(s): Schmidt, James

Year: 2010

Title: Archaeological Letter Report, Latigo-Portrero 66kV Tower Access Road Grading Project, Santa Monica Mountains Area, Los Angeles County, California

Affiliation: Compass Rose Archaeological, Inc.

Resources: 19-000527, 19-000528, 19-000864, 19-000865

Quads: POINT DUME

Pages: 4

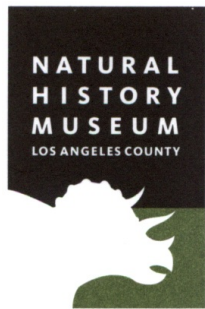
Notes:

APPENDIX B

PALEONTOLOGICAL RESOURCES RECORDS SEARCH (LACM)

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org



Vertebrate Paleontology Section
Telephone: (213) 763-3325
Fax: (213) 746-7431
e-mail: smcleod@nhm.org

3 August 2012

BonTerra Consulting
2 Executive Circle, Suite 175
Irvine, CA 92614

Attn: Patrick O. Maxon, Director, Cultural Resources

re: Paleontological Resources for the proposed Camp Kilpatrick Project, near Malibu, Los Angeles County, project area

Dear Patrick:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Camp Kilpatrick Project, near Malibu, Los Angeles County, project area as outlined on the portion of the Point Dume USGS topographic quadrangle map that you sent to me via e-mail on 6 July 2012. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have localities nearby from the sedimentary deposits similar to those that occur in the proposed project area.

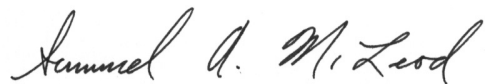
The elevated terrain around the periphery of the proposed project area has exposures of the Tertiary age Conejo Volcanics that, of course, will be devoid of fossils. Most of the proposed project area, however, has surficial deposits of terrestrial Quaternary Alluvium, as fan or fluvial deposits within the drainage. These deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers, but may be underlain by older Quaternary deposits that may well contain fossil vertebrate remains. Our closest vertebrate fossil locality in similar Quaternary deposits is LACM 3213, just east of due north of the proposed project area near the intersection of the Ventura Freeway (Highway 101) and South Westlake Boulevard, that produced a fossil specimen of ground sloth, *Paramylodon*. Our next closest vertebrate fossil locality in similar sediments is LACM 7660, further to the north-northwest of the proposed

project area between the Ventura Freeway (Highway 101) and East Thousand Oaks Boulevard east of Highway 23, that produced an uncommon fossil specimen of American mastodon, *Mammut americanum*.

Excavations in the volcanic bedrock exposed in the elevated terrain on the margins of the proposed project area will not encounter any fossils. Shallow excavations in the Quaternary deposits in the lower lying central portion of the proposed project area are unlikely to encounter significant fossil vertebrate remains either. Deeper excavations in the latter area, however, may well uncover significant vertebrate fossils. Any substantial excavations in the sedimentary deposits in the central portion of the proposed project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

A handwritten signature in cursive script that reads "Samuel A. McLeod".

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice

APPENDIX C
NATIVE AMERICAN CONSULTATION (NAHC)



TRANSMITTAL

DATE: July 11, 2012

TO: Mr. Dave Singleton
Program Analyst
Native American Heritage Comm.
915 Capitol Mall, Rm. 364
Sacramento, CA 95814

FAX NUMBER: (916) 657-5390
TEL NUMBER: (916) 653-6251
PROJECT: Camp Kilpatrick Camp Replacement Project
FROM: Patrick Maxon, RPA

[X] Fax / Pages__ [] E-Mail [] Fed Ex / Overnite Express [] Delivery / Courier

REGARDING: Sacred Lands File Search and Contact List Request

Dear Mr. Singleton:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains near the intersection of Encinal Canyon Road and Mulholland Highway, near Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines).

At your earliest convenience, please conduct a search of the Sacred Lands File for the proposed project, which is located within Section 11 (Township 1 South; Range 19 West) of the USGS Point Dume, CA 7.5 Minute Quadrangle. Refer to attached exhibit.

The proposed Project is to raze several of the existing building on the Camp Kilpatrick facility and replace them with new structures.

Please fax the results to me at (714) 444-9599, or e-mail to p.maxon@bonterraconsulting.com, referencing your letter to the "Camp Kilpatrick Camp Replacement Project".

If you have any questions or require any additional information, please do not hesitate to contact me at (714) 444-9199 or via email.

Sincerely,

BONTERRA CONSULTING

Patrick Maxon, RPA
Director, Cultural Resources

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



July 13, 2012

Mr. Patrick Maxon, RPA, Director – Cultural Resources

BonTerra Consulting

2 Executive Circle, Suite 175
Irvine, CA 92614

Sent by FAX to: 714-444-9599

No. of Pages: 5

Re: Sacred Lands File Search and Native American Contacts list for the proposed
“Campo Kilpatrick Camp Replacement Project;” located in the Santa Monica
Mountains near Malibu; Los Angeles County, California

Dear Mr. Maxon:

The Native American Heritage Commission (NAHC) conducted a Sacred Lands File searches of the 'area of potential effect,' (APE) based on the USGS coordinates provided and **Native American cultural resources were not identified** within one-half mile of the project area of potential effect (e.g. APE): you specified. Also, please note; the NAHC Sacred Lands Inventory is not exhaustive and does not preclude the discovery of cultural resources during any project groundbreaking activity.

California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction.

In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites

The California Environmental Quality Act (CEQA – CA Public Resources Code §§ 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. CA Government Code §65040.12(e) defines "environmental justice" provisions and is applicable to the environmental review processes.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Local Native Americans may have knowledge of the religious and cultural significance of the historic properties of the proposed project for the area (e.g. APE). Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). We urge consultation with those tribes and interested Native Americans on the list that the NAHC has provided in order to see if your proposed project might impact Native American cultural resources. Lead agencies should consider avoidance as defined in §15370 of the CEQA Guidelines when significant cultural resources as defined by the CEQA Guidelines §15064.5 (b)(c)(f) may be affected by a proposed project. If so, Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "substantial," and Section 2183.2 which requires documentation, data recovery of cultural resources.

The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Partnering with local tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C 4321-43351) and Section 106 4(f), Section 110 and (k) of the federal NHPA (16 U.S.C. 470 *et seq*), Section 4(f) of the Department of Transportation Act of 1966 (23 CFR 774); 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The NAHC remains concerned about the limitations and methods employed for NHPA Section 106 Consultation.

Also, California Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery', another important reason to have Native American Monitors on board with the project.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. An excellent way to reinforce the relationship between a project and local tribes is to employ Native American Monitors in all phases of proposed projects including the planning phases.

Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision

on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibility threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton

Attachment: Native American Contact List

Native American Contacts
Los Angeles County
July 13, 2012

Beverly Salazar Folkes
 1931 Shadybrook Drive
 Thousand Oaks, CA 91362
 folkes@msn.com
 805 492-7255
 (805) 558-1154 - cell

Chumash
 Tataviam
 Fernandeño

Owl Clan
 Qun-tan Shup
 48825 Sapaque Road
 Bradley, CA 93426
 mupaka@gmail.com
 (805) 472-9536 phone/fax
 (805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennslie, Chairwoman
 365 North Poli Ave
 Ojai, CA 93023
 jtumamait@sbcglobal.net
 (805) 646-6214

Chumash

Randy Guzman - Folkes
 6471 Cornell Circle
 Moorpark, CA 93021
 ndnRandy@yahoo.com
 (805) 905-1675 - cell

Chumash
 Fernandeño
 Tataviam
 Shoshone Paiute
 Yaqui

Patrick Tumamait
 992 El Camino Corto
 Ojai, CA 93023
 (805) 640-0481
 (805) 216-1253 Cell

Chumash

Coastal Band of the Chumash Nation
Toni Cordero, Chairwoman
 P.O. Box 4464
 Santa Barbara CA 93140
 cordero44@charter.net
 805-964-3447

Chumash

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
 1030 Ritchie Road
 Grover Beach CA 93433
 (805) 481-2461
 (805) 474-4729 - Fax

Chumash

Richard Angulo
 P.O. Box 935
 Salome, AZ 85348

Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed Camp Replacement Project; located at Camp Kitpatrick in the Santa Monica Mountains near Malibu; Los Angeles County, California for which a Sacred Lands File search and Native American Contacts list were requested.

Native American Contacts

Los Angeles County

July 13, 2012

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Aylisha Diane Marie Garcia Napoleone
33054 Decker School Road Chumash
Malibu , CA 90265

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
(805) 248-8463 cell

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales Verdes CA 90275
310-831-5295

Frank Arredondo
PO Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
805-987-5314

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Consint
P.O. Box 365 Chumash
Santa Ynez , CA 93460
freddyromero1959@yahoo.
805-688-7997, Ext 37

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed Camp Replacement Project; located at Camp Kilpatrick in the Santa Monica Mountains near Malibu; Los Angeles County, California for which a Sacred Lands File search and Native American Contacts list were requested.

July 13, 2012

Mr. Richard Angulo
P.O. Box 935
Salome, Arizona 85348

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Angulo:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

Location

The project site is located approximately 2,800 feet west of the intersection of Encinal Canyon Road and Mulholland Highway, and can be seen within Section 11 (Township 1 South; Range 19 West) of the USGS Point Dume, CA 7.5 Minute Quadrangle. Refer to attached exhibit.

Project

The County of Los Angeles Department of Public Works is proposing to replace the existing Camp Kilpatrick Detention Center with newly designed facilities intended to create a more supportive and treatment-oriented environment. Established in 1962, Camp Kilpatrick is located in unincorporated Los Angeles County at 427 South Encinal Canyon Road, Malibu, California. Camp Kilpatrick is located immediately to the north of Camp Miller which is also a County of Los Angeles juvenile detention center. No improvements are proposed at Camp Miller, which would remain operational during construction of the replacement project at Camp Kilpatrick.

The physical design of the replacement camp is centered on the evidence based treatment programs that rehabilitates juveniles. Specifically, replacing the large dormitory with four small cottages is intended to enhance rehabilitation therapy and programs. The physical design of the replacement camp is intended to maximize collaboration with partnering agencies, including the Department of Mental Health, Juvenile Court Health Services, Los Angeles County Office of Education, and Community and Religious Based Organizations.

Currently, Camp Kilpatrick has a rated bed capacity of 125 minors and consists of 14 structures with a total of approximately 48,682 square feet. The proposed project will replace the existing camp with a similar building square footage and capacity. No increase in juvenile capacity will be accommodated. The proposed project will support green building and will be designed for a minimum rating of LEED Silver Certification.



Mr. Richard Angulo
July 13, 2012
Page 2

NAHC Notification

A Sacred Lands File Search conducted by the Native American Heritage Commission (NAHC) did not identify the presence of Native American cultural resources on the project site. The NAHC also provided BonTerra Consulting with a list of Native American individuals/organizations that may have knowledge of cultural resources in the project area. Your name and contact information was included on the list and serves as the basis for this letter.

Records Search

An archaeological/historic records search was conducted at the South Central Costal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the project site. No cultural resources have been recorded on the project site. A survey of the project site was completed after the records search to identify any exposed cultural resources. None were noted; however, the Saddle Rock Ranch Pictograph site (Cave of the Four Horsemen), approximately 2,200 feet to the east of the project site, was listed in the National Register of Historic Places in 1982 and determined eligible to be designated a National Historic Landmark in 1990.

Your participation in this local planning process is important. If you have any additional knowledge of Native American Sacred Lands or other cultural resources on or near the study area, or any comment on the project, please contact me at your earliest convenience at (714) 444-9199 or via email at pmaxon@bonterraconsulting.com, with a subject line referencing the "Camp Kilpatrick Camp Replacement Project".

Sincerely,

BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Frank Arredondo
P.O. Box 161
Santa Barbara, California 93102

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Arredondo:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

Location

The project site is located approximately 2,800 feet west of the intersection of Encinal Canyon Road and Mulholland Highway, and can be seen within Section 11 (Township 1 South; Range 19 West) of the USGS Point Dume, CA 7.5 Minute Quadrangle. Refer to attached exhibit.

Project

The County of Los Angeles Department of Public Works is proposing to replace the existing Camp Kilpatrick Detention Center with newly designed facilities intended to create a more supportive and treatment-oriented environment. Established in 1962, Camp Kilpatrick is located in unincorporated Los Angeles County at 427 South Encinal Canyon Road, Malibu, California. Camp Kilpatrick is located immediately to the north of Camp Miller which is also a County of Los Angeles juvenile detention center. No improvements are proposed at Camp Miller, which would remain operational during construction of the replacement project at Camp Kilpatrick.

The physical design of the replacement camp is centered on the evidence based treatment programs that rehabilitates juveniles. Specifically, replacing the large dormitory with four small cottages is intended to enhance rehabilitation therapy and programs. The physical design of the replacement camp is intended to maximize collaboration with partnering agencies, including the Department of Mental Health, Juvenile Court Health Services, Los Angeles County Office of Education, and Community and Religious Based Organizations.

Currently, Camp Kilpatrick has a rated bed capacity of 125 minors and consists of 14 structures with a total of approximately 48,682 square feet. The proposed project will replace the existing camp with a similar building square footage and capacity. No increase in juvenile capacity will be accommodated. The proposed project will support green building and will be designed for a minimum rating of LEED Silver Certification.



Mr. Frank Arredondo
July 13, 2012
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Records Search

An archaeological/historic records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the project site. No cultural resources have been recorded on the project site. A survey of the project site was completed after the records search to identify any exposed cultural resources. None were noted; however, the Saddle Rock Ranch Pictograph site (Cave of the Four Horsemen), approximately 2,200 feet to the east of the project site, was listed in the National Register of Historic Places in 1982 and determined eligible to be designated a National Historic Landmark in 1990.

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Sincerely,

BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Raudel Joe Banuelos, Jr.
Barbareno/Ventureno Band of Mission Indians
331 Mira Flores Court
Camarillo, California 93012

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Banuelos, Jr.:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

Location

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Project

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Mr. Raudel Joe Banuelos, Jr.
July 13, 2012
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Sincerely,

BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Toni Cordero, Chairwoman
Coastal Band of the Chumash Nation
P.O. Box 4464
Santa Barbara, California 93140

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Cordero:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Ms. Toni Cordero
July 13, 2012
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Sincerely,

BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Randy Guzman-Folkes
6471 Cornell Circle
Moorpark, California 93021

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Guzman-Folkes:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Mr. Randy Guzman-Folkes
July 13, 2012
Page 2

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Sincerely,

BONTERRA CONSULTING


Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Diane Napoleone
Diane Napoleone and Associates
33054 Decker School Road
Malibu, California 90265

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Napoleone:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Ms. Diane Napoleone
July 13, 2012
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Your participation in this local planning process is important. If you have any additional knowledge of Native American Sacred Lands or other cultural resources on or near the study area, or any comment on the project, please contact me at your earliest convenience at (714) 444-9199 or via email at pmaxon@bonterraconsulting.com, with a subject line referencing the "Camp Kilpatrick Camp Replacement Project".

Sincerely,

BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Kathleen Pappo
Barbareno/Ventureno Band of Mission Indians
2762 Vista Mesa Drive
Rancho Pales Verdes, California 90275

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Pappo:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

Location

The project site is located approximately 2,800 feet west of the intersection of Encinal Canyon Road and Mulholland Highway, and can be seen within Section 11 (Township 1 South; Range 19 West) of the USGS Point Dume, CA 7.5 Minute Quadrangle. Refer to attached exhibit.

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Ms. Kathleen Pappo
July 13, 2012
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BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Melissa M. Para-Hernandez
119 North Balsam Street
Oxnard, California 93030

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Para-Hernandez:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Ms. Melissa M. Para-Hernandez
July 13, 2012
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BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Carol A. Pulido
165 Mountain View Street
Oak View, California 93022

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Pulido:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Ms. Carol A. Pulido
July 13, 2012
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BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Freddie Romero
Santa Ynez Tribal Elders Council
P.O. Box 365
Santa Ynez, California 93460

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Romero:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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Mr. Freddie Romero
July 13, 2012
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BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, California 91362

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Salazar Folkes:

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Ms. Beverly Salazar Folkes
July 13, 2012
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Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Qun-tan Shup
Owl Clan
48825 Sapaque Road
Bradley, California 93426

Subject: Camp Kilpatrick Camp Replacement Project

Dear Mr. Shup:

BonTerra Consulting has been retained to complete a cultural resources study for the proposed Camp Kilpatrick Camp Replacement Project located in the Santa Monica Mountains in Malibu, Los Angeles County, California. This project does not require a General or Specific Plan amendment or adoption; therefore, the project is not subject to the statutory requirements of Senate Bill 18 (Tribal Consultation Guidelines). However, as part of the background cultural resources research being conducted, this letter is to inform you of the proposed project and to request any relevant information you may have regarding cultural resources on or near the project site.

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July 13, 2012
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BONTERRA CONSULTING


Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Ms. Julie Lynn Tumamait-Stennslie, Chairwoman
Barbareno/Ventureno Band of Mission Indians
365 North Poli Ave.
Ojai, California 93023

Subject: Camp Kilpatrick Camp Replacement Project

Dear Ms. Tumamait-Stennslie:

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Ms. Julie Lynn Tumamait-Stenslie
July 13, 2012
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Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Mr. Patrick Tumamait
992 El Camino Corto
Ojai, California 93023

Subject: Camp Kilpatrick Camp Replacement Project

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BONTERRA CONSULTING



Patrick O. Maxon, RPA
Director, Cultural Resources

July 13, 2012

Chief Mark Steven Vigil
San Luis Obispo County Chumash Council
1030 Ritchie Road
Grover Beach, California 93433

Subject: Camp Kilpatrick Camp Replacement Project

Dear Chief Vigil:

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Currently, Camp Kilpatrick has a rated bed capacity of 125 minors and consists of 14 structures with a total of approximately 48,682 square feet. The proposed project will replace the existing camp with a similar building square footage and capacity. No increase in juvenile capacity will be accommodated. The proposed project will support green building and will be designed for a minimum rating of LEED Silver Certification.



Chief Mark Steven Vigil
July 13, 2012
Page 2

NAHC Notification

A Sacred Lands File Search conducted by the Native American Heritage Commission (NAHC) did not identify the presence of Native American cultural resources on the project site. The NAHC also provided BonTerra Consulting with a list of Native American individuals/organizations that may have knowledge of cultural resources in the project area. Your name and contact information was included on the list and serves as the basis for this letter.

Records Search

An archaeological/historic records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the project site. No cultural resources have been recorded on the project site. A survey of the project site was completed after the records search to identify any exposed cultural resources. None were noted; however, the Saddle Rock Ranch Pictograph site (Cave of the Four Horsemen), approximately 2,200 feet to the east of the project site, was listed in the National Register of Historic Places in 1982 and determined eligible to be designated a National Historic Landmark in 1990.

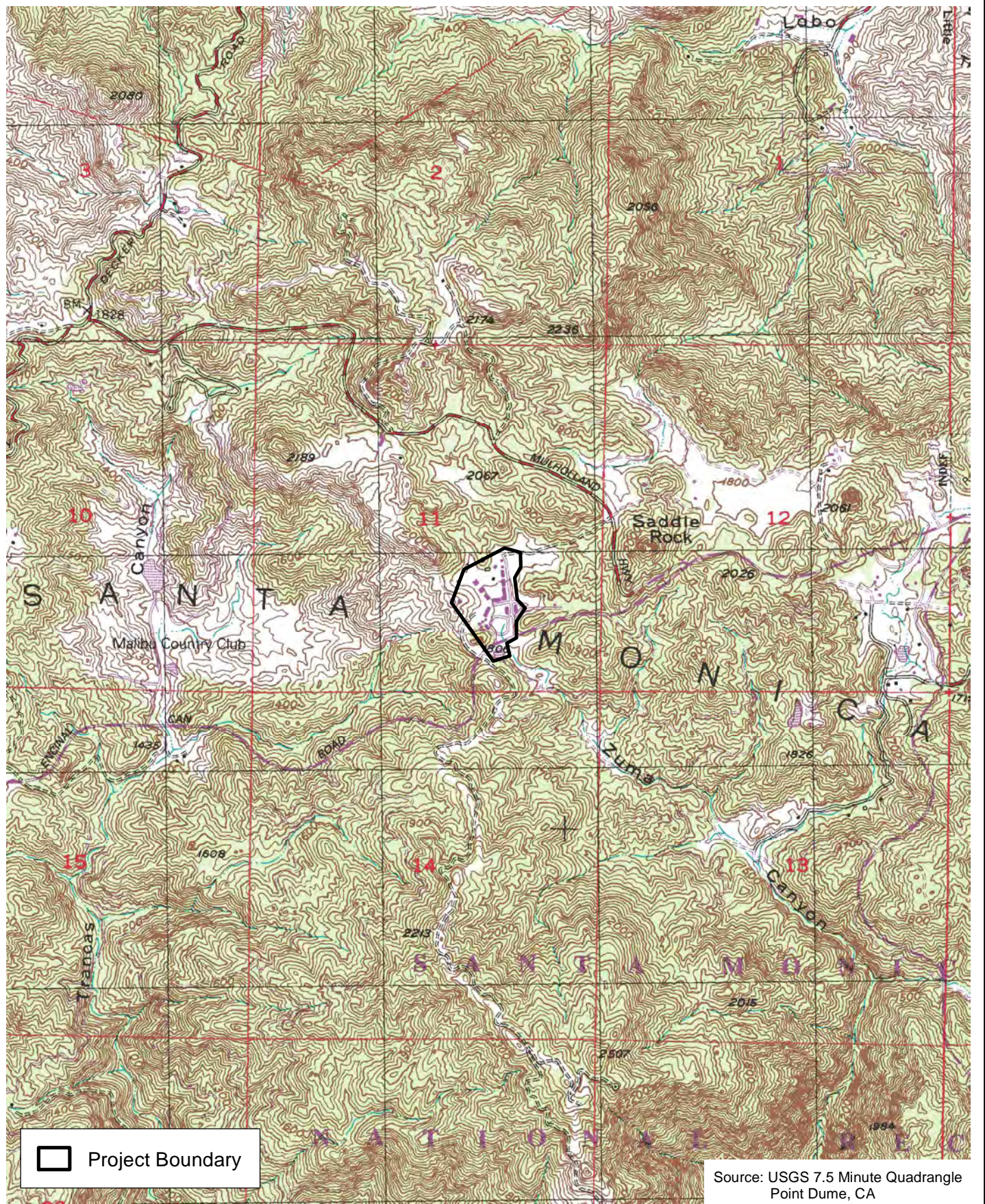
Your participation in this local planning process is important. If you have any additional knowledge of Native American Sacred Lands or other cultural resources on or near the study area, or any comment on the project, please contact me at your earliest convenience at (714) 444-9199 or via email at pmaxon@bonterraconsulting.com, with a subject line referencing the "Camp Kilpatrick Camp Replacement Project".

Sincerely,

BONTERRA CONSULTING

A handwritten signature in blue ink that reads "Patrick O. Maxon". The signature is fluid and cursive, with the first name being the most prominent.

Patrick O. Maxon, RPA
Director, Cultural Resources



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Local Vicinity

Camp Kilpatrick

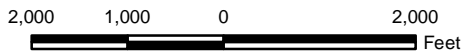


Exhibit 2



APPENDIX D
SITE PHOTOGRAPHS



Camp Driveway East Side: Looking north.



Slope east of Camp: Looking east.

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Site Photographs

Camp Kilpatrick Replacement Project

Appendix D-1

Bonterra
CONSULTING

(Rev 08/17/12 JAZ) Projects\CoLADPWJ184\Graphics\Cultural\AppD_SP1.pdf



Camp overview from Water Tank: Looking east.



Overview east of Camp from Water Tank: Looking east.

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Site Photographs

Camp Kilpatrick Replacement Project

Appendix D-2

Bonterra
CONSULTING

(Rev 08/17/12 JAZ) Projects\CoLADPWJ184\Graphics\Cultural\AppD_SP2.pdf

APPENDIX E
HISTORIC RESOURCES REPORT (DALY 2012)

HISTORIC RESOURCES ASSESSMENT REPORT

Of

**Camp Kilpatrick Juvenile Detention Facility
427 Encinal Canyon Road, Malibu, Los Angeles County, CA**

**Project Owner: Los Angeles County Department of Public Works
900 South Freemont Avenue
Alhambra, CA 91803**

Prepared for:
BonTerra Consulting
2 Executive Circle, Suite 175
Irvine, CA 92614

Prepared by
Pamela Daly, M.S.H.P.
Daly & Associates
4486 University Avenue
Riverside, CA 92501



July 2012

EXECUTIVE SUMMARY

The County of Los Angeles Department of Public Works (County) has provided for this investigation the original blueprints and drawings of Camp Kilpatrick when it was first identified as the Junior Camp of the Santa Monica Boys Probation Camp. These records, combined with articles from the Los Angeles Times archives, support the determination of this evaluation that the Santa Monica Boys Probation Camp buildings that comprise today's Camp Kilpatrick complex were designed and constructed for the straightforward utilitarian purpose of housing and educating youthful offenders.

Under National Register of Historic Places (National Register) or California Register of Historical Resources (California Register) criteria relating to the buildings of Camp Kilpatrick's association with historical events that have made a significant contribution to the broad patterns of regional, state or American history, the complex does not appear to qualify as a significant historic resource. The Camp Kilpatrick facility was one of many constructed in Los Angeles County to address the growing need for additional juvenile facilities in the early 1960s. Archival research does not reveal that the property was the site of any significant historic event. There is no evidence that Camp Kilpatrick is eligible for listing under Criterion A/1.

Under National Register or California Register criteria relating to Camp Kilpatrick's direct association with persons of historic importance, the complex does not appear to qualify as a significant resource. While Camp Kilpatrick's Mustang football team has achieved commendable athletic and life-lesson goals, those accomplishments cannot be physically conveyed by the built-environment resources. Camp Kilpatrick has not reached the level of significance to be determined eligible for listing under Criterion B/2.

Under National Register or California Register criteria relating to the distinctive characteristics of a type, period, region, or method of construction, the Camp Kilpatrick complex is not significant as it does not embody a high artistic design, nor does it appear to have been designed by an architect of merit. Built in 1961 using a utilitarian design and inexpensive materials, these types of concrete masonry buildings that comprise the Camp Kilpatrick complex were widely found throughout Southern California individually and in groups. The Camp Kilpatrick complex is not eligible for listing under Criterion C/3.

According to the grading and excavation plan of the site for the Santa Monica Boys Probation Camp prepared by the County in 1960, there was one wood-frame building and a foundation pad that remained from an earlier occupation of the land. These early structures were demolished and removed from the site prior to the construction of the camp. Camp Kilpatrick site has not yielded, nor does it appear to have the potential to yield, information important to the history of the local area, California or the nation pursuant to Criterion D/4.

In summation, the Camp Kilpatrick complex is not eligible for listing in the National Register or the California Register as a significant historic resource.

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3. A portion of the U.S. Geographic Society topographic map of Triunfo Pass, 1943

Photographs

1. Aerial view of the buildings of Camp Kilpatrick Juvenile Detention Complex that are slated for removal.
2. Aerial view of future site of Camp Kilpatrick, in 1959. Structures associated with the old Filbert Ranch or CCC camp are circled.
3. Aerial view of Camp Kilpatrick, 2012.
4. 40-Bed Dormitory 1A. View looking southwest.
5. 40-Bed Dormitory 1A. View looking northwest.
6. 40-Bed Dormitory 1B. View looking southwest.
7. Gymnasium. View looking southwest.
8. Shared Kitchen and Mess Hall. View looking west.
9. Classroom building and attached Principal's Office (at far end). View looking south.
10. West elevation of Administration Building. View looking east.
11. Counselor offices in Administration Building, added in 1963. View looking southeast.
12. Administration Building. The original Administration building is the left wing, the right wing was added in 1973. View from main driveway, looking northwest.

13. Administration Building entrance. The Administration wing to the right was constructed in 1973. View from main driveway, looking west.
14. 20-Boy Dormitory used for Health Center and special needs. View looking southeast.
15. Maintenance Building and Garage. View from main driveway, looking west.
16. Laundry and Storage Building, constructed after 1980. View from main driveway, looking northwest.
17. In-ground swimming pool. View looking west.
18. Foundation pad of demolished "comfort station" located to the east of the swimming pool. View looking northwest.

Appendix A

Selected drawings of the buildings at Camp Kilpatrick (Santa Monica Boy Probation Camp), 1960

Appendix B

Camp Kilpatrick California Department of Parks and Recreation Inventory Site Forms (DPR523 series forms)

I. INTRODUCTION

A. PROJECT DESCRIPTION

The County of Los Angeles Department of Public Works is proposing to replace the existing Camp Kilpatrick Juvenile Detention Center with newly designed facilities intended to create a more supportive and treatment-oriented environment. Established in 1962, Camp Kilpatrick is located in an unincorporated area of Los Angeles County with the mailing address of 427 South Encinal Canyon Road, Malibu, California. Camp Kilpatrick is located immediately to the north of Camp Fred Miller which is also a County of Los Angeles juvenile detention center. No improvements are proposed at Camp Miller, which would remain operational during construction of the replacement project at Camp Kilpatrick.

The physical design of the replacement camp is centered on the evidence based treatment programs that rehabilitate juveniles. Specifically, replacing the large dormitories with small cottages is intended to enhance rehabilitation therapy and programs. The physical design of the replacement camp is intended to maximize collaboration with partnering agencies, including the Department of Mental Health, Juvenile Court Health Services, Los Angeles County Office of Education, and Community and Religious Based Organizations.

Currently, Camp Kilpatrick has a rated bed capacity of 125 minors and consists of 13 structures totaling approximately 48,682 square feet and outdoor facilities (e.g., swimming pool, sports court). The proposed project will replace the existing camp with a similar building square footage and capacity. No increase in juvenile capacity will be accommodated. The proposed project will support green building and will be designed for a minimum rating of LEED Silver Certification.

For the purposes of this Scope of Work, it is assumed that the project will require demolition of all structures within the fenceline for Camp Kilpatrick, with the exception of the swimming pool area. It is also assumed that impacts to the baseball field, located to the east of Zuma Ridge Fire Road may also occur. The two camps share a wastewater treatment facility that is located to the south of Encinal Canyon Road. Potential improvements to the piping system that connects to the wastewater treatment facility are anticipated, but no other improvements to the facility or operations are anticipated.

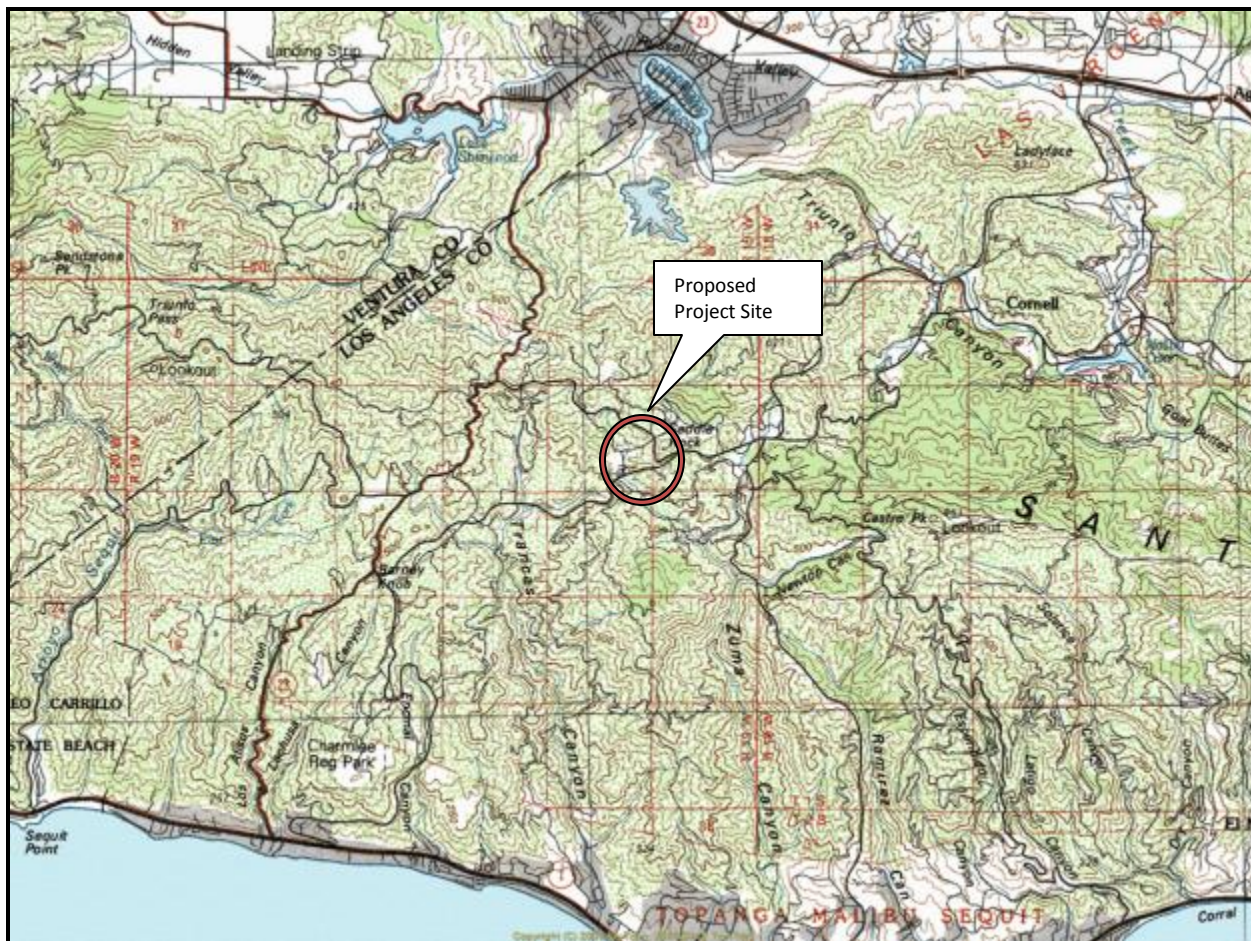


Figure 1: Regional Project Location
(U.S.G.S. Los Angeles Map, 1:100,000)

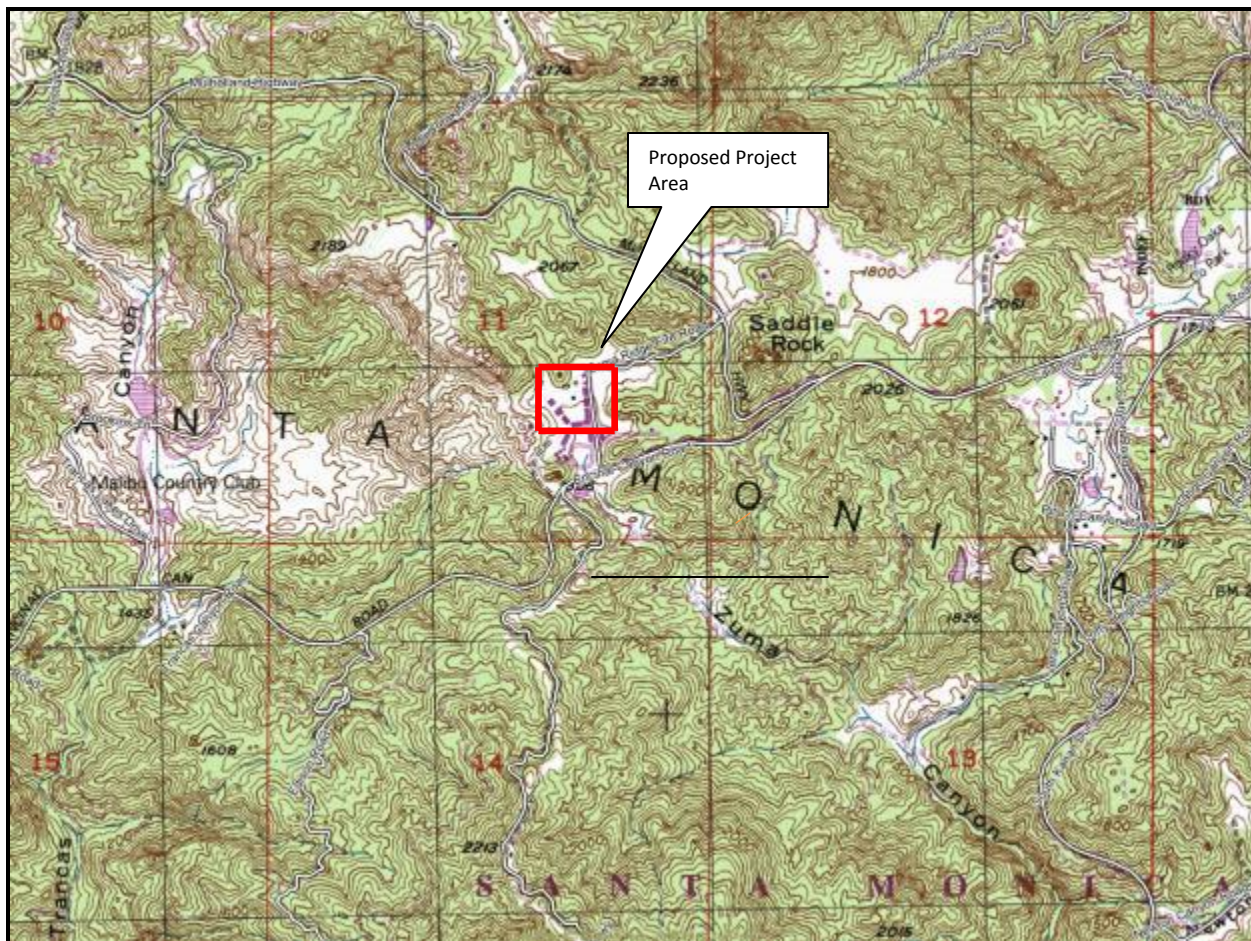


Figure 2: Location of Camp Kilpatrick and the proposed project.
(U.S.G.S. Point Dume Quad, 1:24,000)

B. BACKGROUND INFORMATION

Camp Kilpatrick has not been previously surveyed for the investigation and documentation of cultural resources. The buildings and structures of Camp Kilpatrick have not been previously surveyed by a qualified architectural historian, nor has the Camp Kilpatrick complex or individual buildings been evaluated for eligibility for listing in the National Register or California Register.



Photograph 1: Aerial view of the buildings and outdoor facilities of Camp Kilpatrick Juvenile Detention Complex being evaluated within the proposed project area.. The Camp Miller complex is located to the south of Camp Kilpatrick, and is outside of the area of potential effect. (Source: Google Earth, 2012)

C. METHODOLOGY

The historic resource assessment and evaluation for this report was conducted by Pamela Daly, M.S.H.P., Senior Architectural Historian. In order to identify and evaluate the buildings, structures, and features that are associated with the Camp Kilpatrick complex, a multi-step methodology was utilized. An inspection of the existing structures and associated features, combined with a review of accessible archival sources regarding Camp Kilpatrick, were performed to document existing conditions and assist in assessing and evaluating the property for significance. Photographs were taken of buildings and structures, including photographs of architectural details or other points of interest, during the on-site survey. The photographs will be used to prepare the California Office of Historic Preservation Historical Resources Inventory Form (DPR Form series) to document the current built-environment of Camp Kilpatrick.

The National Register and the California Register criteria were employed to evaluate the significance of the property. In addition, the following tasks were performed for the study:

- The National Register and the California Historical Resources Inventory were searched.
- Site-specific research was conducted utilizing maps, city directories, newspaper articles, historical photographs, and other published sources.
- Blueprints, drawings, and other building records related to Camp Kilpatrick were provided by the County.
- Ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs were reviewed and analyzed.

II. REGULATORY FRAMEWORK

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act of 1966 as amended (NHPA), and the California Register of Historical Resources (CRHR), are the primary federal and state laws and regulations governing the evaluation and significance of historic resources of national, state, regional, and local importance. A description of these relevant laws and regulations are presented below.

In analyzing the historic significance of the subject property, criteria for designation under federal, and State landmark programs were considered. Additionally, the Office of Historic Preservation (OHP) survey methodology was used to survey and rate the relative significance of the property.

A. FEDERAL LEVEL

1. National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register was established by the NHPA as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”¹ The National Register recognizes properties that are significant at the national, state and local levels.

To be eligible for listing in the National Register, the quality of significance in American history, architecture, archaeology, engineering, or culture must be in a district, site, building, structure, or object that possesses integrity of location, design, setting, materials, workmanship, feeling and association, and:²

- A. is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. is associated with the lives of persons significant in our past; or

¹ Code of Federal Regulations (CFR), 36 § 60.2.

² Guidelines for Completing National Register Forms, National Register Bulletin 16, U.S. Department of the Interior, National Park Service, September 30, 1986 (“National Register Bulletin 16”). This bulletin contains technical information on comprehensive planning, survey of cultural resources, and registration in the National Register of Historic Places.

- C. embodies the distinctive characteristics of a type, period, or method of construction or that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. yields, or may be likely to yield, information important to prehistory or history.

A property eligible for listing in the National Register must meet one or more of the four criteria (A-D) defined above. Also, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for National Register listing.

In addition to meeting the criteria of significance, a property must have integrity. “Integrity is the ability of a property to convey its significance.”³ According to *National Register Bulletin 15*, within the concept of integrity, the National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property should possess at least one, if not most, of these seven aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance.⁴ The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. The following is excerpted from *National Register Bulletin 15*, which provides guidance on the interpretation and application of these factors.

- Location is the place where the historic property was constructed or the place where the historic event occurred.⁵
- Design is the combination of elements that create the form, plan, space, structure, and style of the property.⁶
- Setting is the physical environment of a historic property.⁷
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.⁸

³ National Register Bulletin 15, page 44.

⁴ Ibid.

⁵ “The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of historic property, complemented by its setting is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.” Ibid.

⁶ “A property’s design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.” Ibid.

⁷ National Register Bulletin 15, page 45.

⁸ “The choice and combination of materials reveals the preferences of those who created the property and indicated the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area’s sense of time and place.” Ibid.

- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.⁹
- Feeling is property's expression of the aesthetic or historic sense of a particular period of time.¹⁰
- Association is the direct link between an important historic event or person and a historic property.¹¹

In assessing a property's integrity, the National Register criteria recognize that properties change over time; therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must, however, retain the essential physical features that enable it to convey its historic identity.¹²

For properties that are considered significant under National Register criteria A and B, *National Register Bulletin 15* states that a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).¹³

In assessing the integrity of properties that are considered significant under National Register criterion C, *National Register Bulletin 15* provides that a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.¹⁴

The primary effects of listing in the National Register on private property owners of historic buildings is the availability of financial and tax incentives.¹⁵ In addition, for projects that receive federal funding, the Section 106 clearance process must be completed. State and local laws and regulations may apply to properties listed in the National Register. For example,

⁹ "Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques." Ibid.

¹⁰ "It results from the presence of physical features that, taken together, convey the property's historic character." Ibid.

¹¹ "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to the observer. Like feeling, associations require the presence of physical features that convey a property's historic character...Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." Ibid.

¹² National Register Bulletin 15, page 46.

¹³ Ibid.

¹⁴ "A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of features that once characterized its style." Ibid.

¹⁵ See 36 CFR 60.2(b) (c).

demolition or inappropriate alteration of National Register eligible or listed properties may be subject to the California Environmental Quality Act (CEQA).

B. STATE LEVEL

The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the state's jurisdictions.

1. California Register of Historical Resources

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the CRHR is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."¹⁶ The criteria for eligibility for the California Register are based upon National Register criteria.¹⁷ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.¹⁸

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places;
- California Registered Historical Landmarks from No. 770 onward;
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.¹⁹

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;

¹⁶ California Public Resources Code § 5024.1(a).

¹⁷ California Public Resources Code § 5024.1(b).

¹⁸ California Public Resources Code § 5024.1(d).

¹⁹ California Public Resources Code § 5024.1(d).

- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.²⁰

To be eligible for listing in the California Register, a historic resource must be significant at the local, state, or national level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.²¹

Integrity under the California Register is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that a historic resource may not retain sufficient integrity to meet criteria for listing in the National Register, but it may still be eligible for listing in the California Register.²²

2. California Office of Historical Preservation Survey Methodology

The evaluation instructions and classification system prescribed by the California Office of Historic Preservation in its Instructions for Recording Historical Resources provide a three-digit evaluation rating code for use in classifying potential historic resources. The first digit indicates one of the following general evaluation categories for use in conducting cultural resources surveys:

²⁰ California Public Resources Code § 5024.1(e).

²¹ California Code of Regulations, California Register of Historical Resources (Title 14, Chapter 11.5), Section 4852(c).

²² Ibid.

1. Listed on the National Register or the California Register;
2. Determined eligible for listing in the National Register or the California Register;
3. Appears eligible for the National Register or the California Register through survey evaluation;
4. Appears eligible for the National Register or the California Register through other evaluation;
5. Recognized as Historically Significant by Local Government;
6. Not eligible for any Listing or Designation; and
7. Not evaluated for the National Register or California Register or needs re-evaluation.

The second digit of the evaluation status code is a letter code indicating whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number that is used to further specify significance and refine the relationship of the property to the National Register and/or California Register. Under this evaluation system, categories 1 through 4 pertain to various levels of National Register eligibility. The California Register, however, may include surveyed resources with evaluation rating codes through level 5. In addition, properties found ineligible for listing in the National Register, California Register, or for designation under a local ordinance are given an evaluation status code of 6.

III. EVALUATION

A. HISTORIC CONTEXT

1. Santa Monica Mountains

The current project is located within Section 11, Township 1 South, Range 19 West, San Bernardino Base Meridian. This area of western Los Angeles County was used for grazing during the Mexican Rancho period, from the 1700s and into the 1900s. The proposed project area is located between three relatively large Spanish/Mexican Period ranchos; the Rancho Las Virgenes and Rancho El Conejo to the north, and Ranch Topanga Malibu Sequit to the south. Camp Kilpatrick and Camp Miller are located outside of the recognized boundaries of the historic ranchos of this region, on land that was opened by the U.S. Government for homesteading beginning in the late 1800s.

The unincorporated community of Cornell was established in the Santa Monica Mountains in the late 1800s, with a United States Post Office opening there in 1884.²³ (The building that currently houses the Old Place Restaurant, across from the Peter Strauss Ranch, was the location of the Cornell Post Office.) Numerous individuals had filed land patent applications in this area when sections were opened for general public sale in 1901.²⁴ An early patent for 160 acres west of Cornell was filed in 1901 for a homestead claim in the eastern half of Section 11 by Frances H. Culter of Santa Monica, California.²⁵ To the immediate east of the Cutler patent, Cecelia E. Haney became the recorded legal owner of the 160 acres of land located in Sections 11 and 12, in 1916. After a patent had been “proved up” the owners could sell the land as they pleased. Camp Kilpatrick and Camp Miller are located on land that spreads between the two early homestead patents.

The U.S.G.S. Dume Point Quadrangle map dating from 1929/1932 shows a homestead in our project area labeled as the “Filbert Ranch”. An article from the Los Angeles Times in June of 1933 states that Los Angeles County had established a Civilian Conservation Corps (CCC) camp for fire control in Malibu on the Filbert Ranch.²⁶ The Triunfo Pass U.S.G.S. map from 1943 also shows a permanent building situated in the approximate location of the current project area, but it is labeled as the “Fillbrick Ranch”. (Figure 3)

A building, water tank, and foundation associated with the Filbert Ranch, or the CCC camp, appear on a historic aerial photograph dating from 1959. (Photograph 2) The old

²³ Old Place Restaurant, Cornell/Agoura, California. <http://oldplacecornell.com/history>

²⁴ Bureau of Land Management, Grand Land Office (GLO) records. <http://www.glorerecords.blm.gov/>

²⁵ Bureau of Land Management, Grand Land Office (GLO) records. <http://www.glorerecords.blm.gov/>

²⁶ *Los Angeles Times*. “Forest Groups Due Here Today”, June 3, 1933.

building foundations and a small wood frame building are noted on the grading plans for the site of the new Santa Monica Boys Probation Camp in 1960. These early structures were completely removed from the site of the new probation camp before construction.

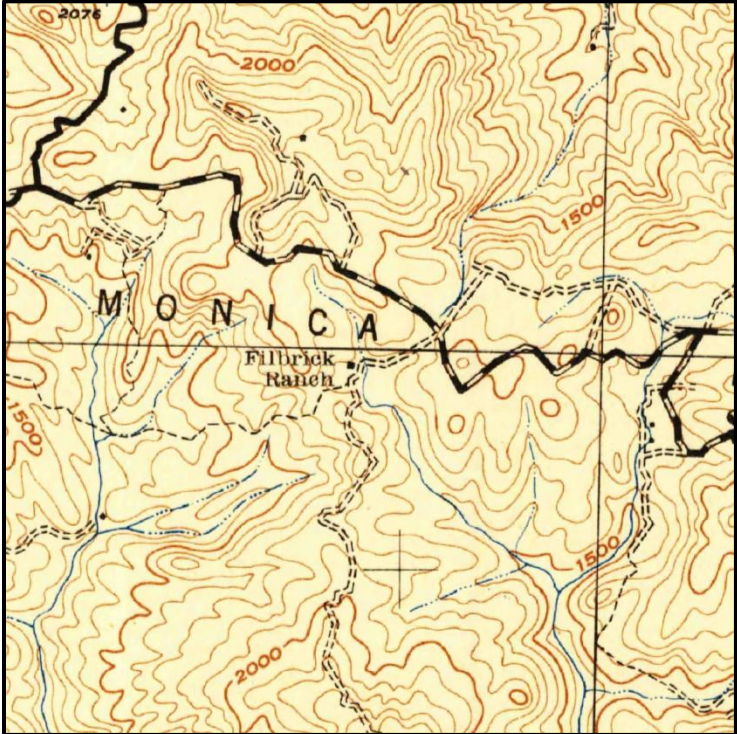
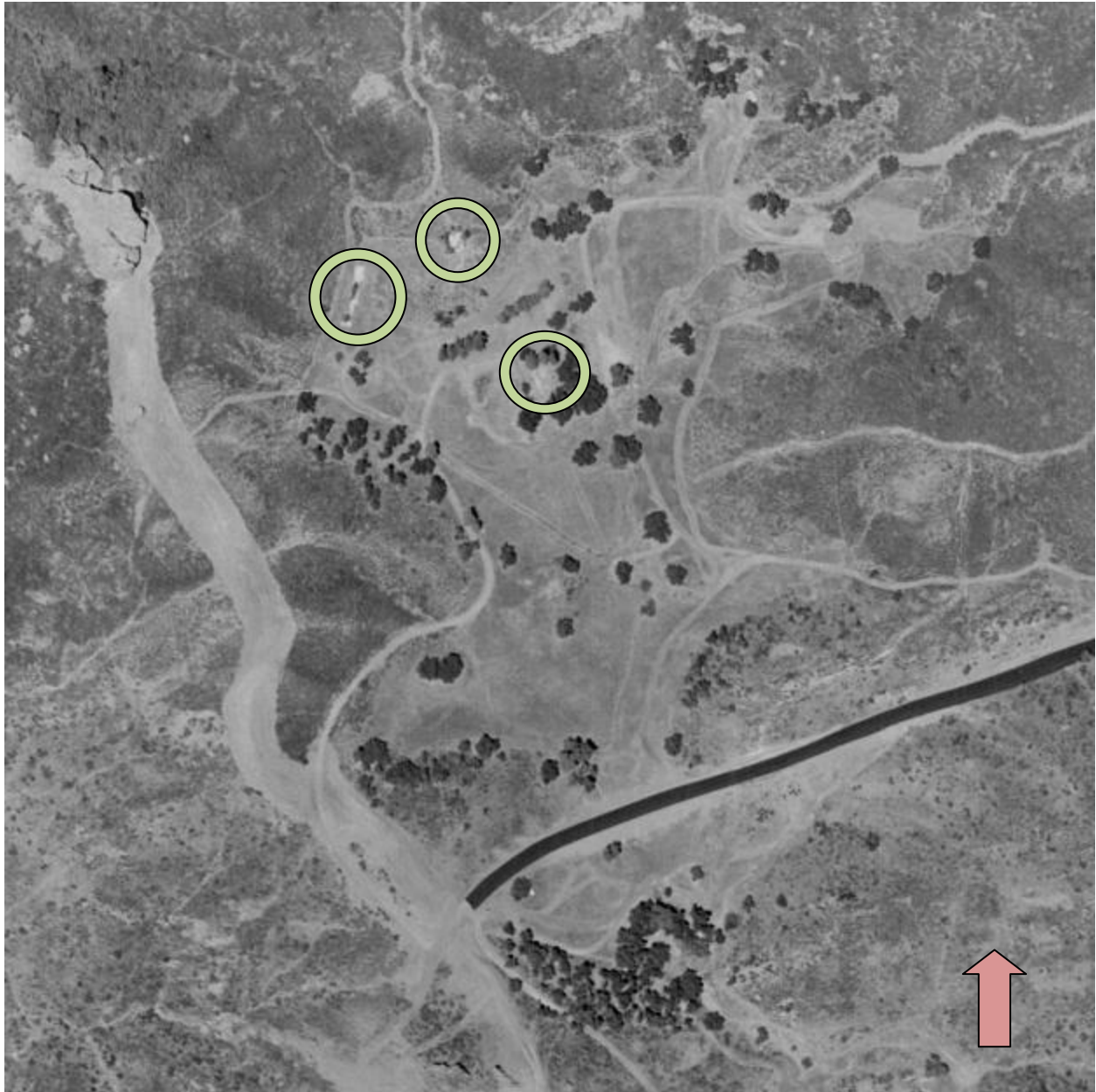


Figure 3: A portion of the U.S. Geographic Society topographic map of Triunfo Pass, 1943. Scale 1:62,500.



Photograph 2: Aerial view of future site of Camp Kilpatrick, in 1959. Structures associated with the old Filbert Ranch, or CCC camp, are circled. (HistoricAerials.com)

2. Camp Kilpatrick

Los Angeles County established the first juvenile probation department camps during the Great Depression of the 1930s. Not only were families that lived in Southern California in dire straits during the difficult economic times, but families from the drought ravaged mid-Western states poured into California seeking work and shelter. Families disbanded, and groups of young men turned towards criminal behavior to survive. Those boys that were not guilty of serious crimes were assigned by the courts to serve in the fire camps that spread across Los Angeles County, from the Santa Monica Mountains to the San Gabriel Mountains.

The boys would spend their days clearing brush, and creating fire roads and breaks in the dense chaparral covered hillsides.²⁷

In 1961, the Los Angeles County Board of Supervisors approved plans for the creation of the Santa Monica Boys Probation Camp in the Cornell area of Los Angeles County.²⁸ The plans were drawn by the Department of County Engineer, Architectural Division, and included the construction of eleven structures that would form the establishment of two separate camps for junior boys aged 13 to 16, and senior boys aged 16 to 18. The new camps would alleviate overcrowding at the main Juvenile Hall. By combining the camps, the County could expect considerable savings by having the adjacent camps share a common school, mess hall and kitchen buildings.²⁹ Herbert Goldsworthy's construction company, located in Santa Monica, won the project with the low bid of \$1,140,000.³⁰ The K.E.C. Company of Artesia was awarded a contract of \$78,393 to construct the sewage treatment and waste water reclamation plant to serve both camps.³¹

The Junior Camp of the Santa Monica Boys Probation Camp would be named for Vernon Kilpatrick, a powerful California Assemblyman who represented Lynwood for 24 years and during his years in the Assembly from 1938 to 1964, served on the Committees on Social Welfare, and Crime and Corrections.³² Camp Kilpatrick was constructed in 1961-1962 as an extension of the County's Probation Department that primarily served the northern San Fernando Valley area. The structures that comprised Camp Kilpatrick in 1962 were the two 40-bed dormitories, one 20-bed dormitory, a gymnasium, administration building, garage/maintenance building, one un-attached comfort station, basketball courts, running track, and the co-shared kitchen, mess hall, school, and principal's office. Almost immediately after opening Camp Kilpatrick, the administration building was enlarged with additional counseling rooms, and offices for probation staff. The Senior Camp became what is now called Camp Fred Miller.

By 1966, there were thirteen juvenile camps operated by the County Probation Department, with more than half of those regarded as San Fernando Valley facilities.³³ Camp Kilpatrick was originally planned to be a minimum security facility for junior boys. In February 1971, with the destruction of the Valley Juvenile Hall in Sylmar by an earthquake, senior boys from a secure facility were relocated to Camp Kilpatrick. Probation Department officials considered turning Camp Kilpatrick into a "full-security institution" with a 14-foot-high wall

²⁷ *Los Angeles Times*. "Hard Guys Live at Last Chance Camp", June 13, 1976.

²⁸ *Los Angeles Times*. "Boys Probation Unit Authorized", February 1, 1961.

²⁹ *Los Angeles Times*. "Boys Probation Camp Construction to Start", March 26, 1961.

³⁰ *Los Angeles Times*. "Probation Camp Set for Santa Monica", March 13, 1961.

³¹ *Los Angeles Times*. "Contract Let for Mountain Sewage Plant", January 28, 1962.

³² *Los Angeles Times*. "Obituary: Vernon Kilpatrick", February 11, 1984.

³³ *Los Angeles Times*. "Probation Leader Hails Aid for Poor", March 6, 1966.

built around the facility to contain the older boys similar to Camp Karl Holton in Little Tujunga Canyon, which had been destroyed in the earthquake.³⁴ The plan to construct the security wall at Camp Kilpatrick to stop runaways was cancelled in early 1972, when the County supervisors received bids far above their in-house estimates.³⁵ In 1973, a swimming pool was added to the complex, and the existing administration building was enlarged again with the construction of a large new wing.

Since 1975, with the development of an innovative rehabilitation program designed by specialists from the departments of social welfare and education at University of California Los Angeles (UCLA), Camp Kilpatrick has been providing intensive intervention in a residential treatment setting.³⁶ Upon commitment by the court, a minor receives health, educational and family assessments that allow treatment tailored to meet their individual needs. The goal of the program is to reunify the minor with their family, to reintegrate the minor into the community, and to assist the minor in achieving a productive crime free life.

Camp Kilpatrick currently provides structured work experience, vocational training, education, specialized tutoring, athletic activities and various types of social enrichment. The camp provides enhanced components tailored to its population and purpose. These community-building programs include the Amer-I-Can Program, the Literacy Project, Operation Read, the Honors Drama Ensemble, Gangs for Peace, Bridge to Employment, Young Men as Fathers (L.A. Dads), and many others. Camp Kilpatrick is a member of the California Interscholastic Federation (CIF), and competes with private and public high school athletic leagues in football, basketball, soccer and baseball.

In addition to training components offered in all camps, fire camp minors receive 80 hours training in wild land fire suppression. After successful completion of this training, minors are assigned to 14-man crews, which work under the direct supervision of Fire Department personnel (Fire Fighter Specialists). Crews work two to five days per week on a variety of projects, continuing a history of County fire prevention service of over eighty years.

³⁴ *Los Angeles Times*. "Wall to Be Raised at Boy's Probation Camp", August 5, 1971.

³⁵ *Los Angeles Times*. "Camp Wall Project Canceled by Board", March 30, 1972.

³⁶ *Los Angeles Times*. "Pilot Rehabilitation Plan Set Up at Juvenile Camp", July 24, 1975.

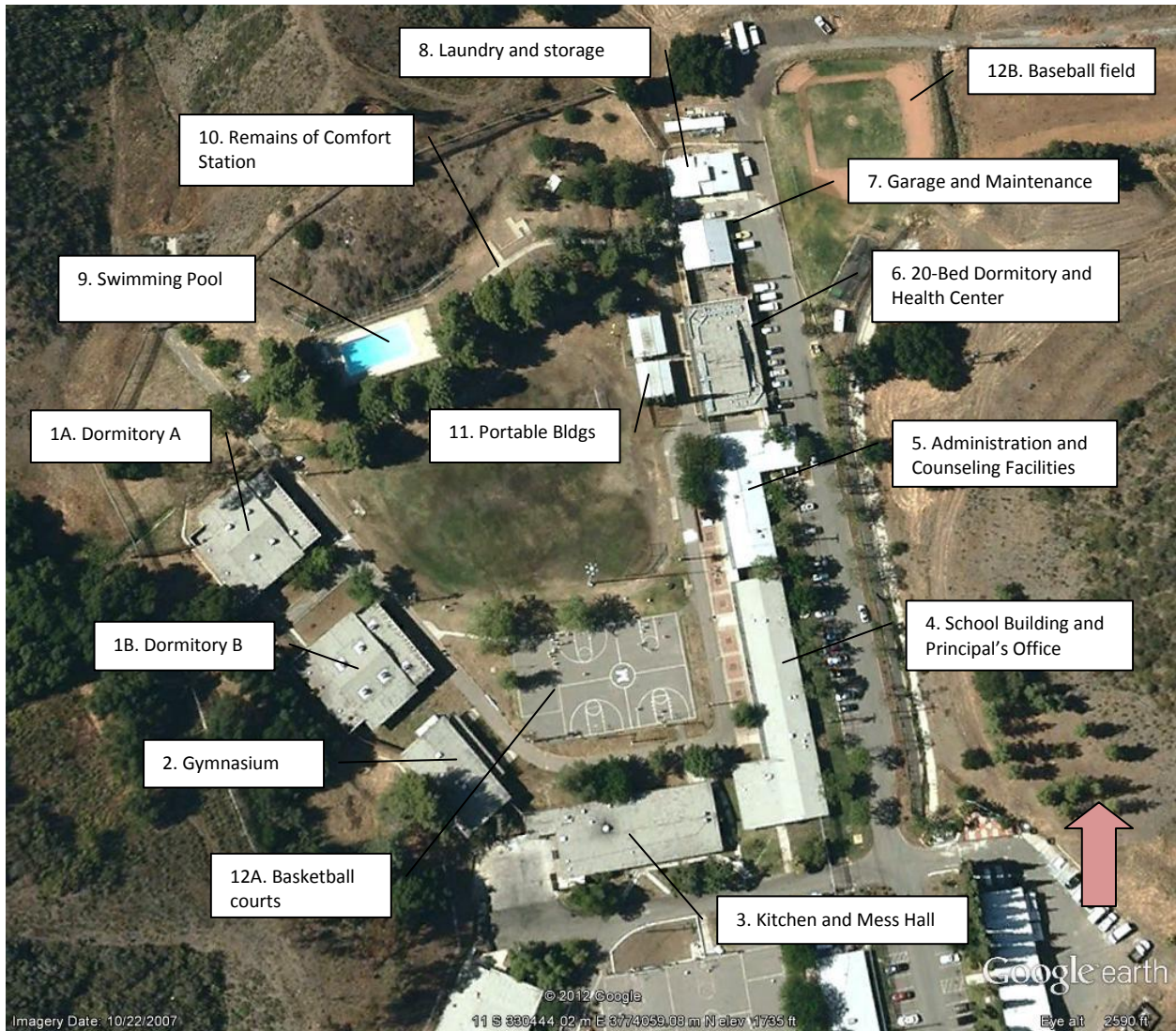
B. HISTORIC RESOURCES IDENTIFIED

A site visit and pedestrian-level inspection of the Camp Kilpatrick complex was performed by Pamela Daly on June 12, 2012. The present-day complex is comprised of 14 buildings and outdoor facilities. Eight of the permanent buildings and the swimming pool structure were constructed on the site between 1961 and 1974. The Laundry/Storage building was constructed on the site after 1974, and the two portable buildings do not appear to be over 30 years old. The baseball field and the basketball courts are not being considered as historic resources as they have been continually upgraded, repaved, and repaired since 1962.

The buildings and structures of Camp Kilpatrick are set in a “U”-shaped plan around an athletic field and basketball courts. The “arms” of the complex plan face north and northwest, with the swimming pool located between the “arms” towards the northern border of the complex. (Photograph 3)

The buildings were constructed in simple, utilitarian designs. As specified by the County Architect, the contractor used inexpensive building materials, primarily walls of concrete masonry block, slab concrete foundations, and metal-frame casement windows to keep down the building costs. Concrete block was the preferred building material as there was a high probability that the facility would eventually be in the path of one of the seasonal wildfires that plague the Santa Monica Mountains. The buildings on the complex are described as follows:

1. Dormitory A and B are identically designed 40-bed dormitories with one large single sleeping hall, bathroom facilities, and dayrooms. (Photographs 4, 5, and 6) The rectangular-massed, one-story buildings measure approximately 76 feet wide by 81 feet long, with a footprint of 5,728 square feet. A single low-pitched gable roof covers the sleeping hall, while the dayrooms that face the playing fields are flat-roofed. Across the front (east) elevation, six large window units allow abundant light into the dayrooms. Two large window units on each of the north and south elevations allow natural light into the large sleeping halls. For security, or to avoid wayward athletic equipment, false parapet walls have been constructed along the east and west edges of the roof.
2. Gymnasium: the tall, one-story, single use building measures approximately 81 feet long by 41 feet wide, with an exterior wall height of 16 feet 8 inches. (Photograph 7) The building is covered in one large, low pitched gable roof set on a north/south axis, and has a footprint of 3,321 square feet. A porch spans the front (east) elevation, and a false parapet security wall runs along the edge of the porch roof.



Photograph 3: Aerial view of Camp Kilpatrick, 2012.

3. Kitchen and Mess Hall: this is a long, one-story building that measures 100 feet long by 40 feet wide, and has a footprint of approximately 4,000 square feet. (Photograph 8) The mess hall was constructed to hold up to 200 diners from both Camp Miller and Camp Kilpatrick simultaneously, and the kitchen is large enough to prepare 200 meals at a sitting. The one-story building is covered by a low-pitched gable roof that runs on an east/west axis. Multiple casement window units span the north and south elevations.
4. School and Principal's Office: The original site plans show the Principal's office building was to be unattached from the School Building. At some point in time, the two buildings were attached to form an "L" plan building. (Photograph 9) The School Building measures approximately 192 feet long by 32 feet wide, for a footprint of 6,144 square feet. The Principal's office building measures approximately 44 feet long by 32 feet wide for an additional 1,408 square feet. The School building has a low-pitched gable roof and is set on a north/south axis. Multiple window units are placed along the

east and west elevations of the School building, and the north elevation of the Principal's office building.

5. The Administration building contains the probation offices, counseling rooms, visitor lounge, and control room. The original Administration building was a rectangular-massed, one-story building that measured 72 feet long by 33 feet wide. It has a low-pitched gable roof and is aligned on a north/south axis. The control room extends 12 feet from the west elevation of the main block, and spans a length of 21 feet with large window units along the full wall. Altogether, the original Administration building had a footprint of approximately 2,544 square feet. (Photograph 10) Shortly after the construction of the building, an addition was made to the south elevation of the main block in 1963. The addition created 896 square feet for more office and counseling space. (Photograph 11) After the Sylmar earthquake of 1972, a new wing was added to the main block that contained 1,764 square feet. The new wing is covered in a low-pitched gable roof and the wing is set perpendicular to the main block on an east/west axis. (Photographs 12 and 13)
6. Dormitory and Health Center: Original drawings refer to this one-story building as a 20-bed dormitory. The building was designed to house individual dorm rooms and the nurse's/health center facilities, for those boys with special needs. The small dorm rooms were designed to face a central open space that was illuminated with light from clerestory windows built into the gable ends of the roof of the building. The low-pitched roof is set on an east/west axis. The building measures approximately 95 feet long by 51 feet wide with a footprint of 4,845 square feet. (Photograph 14)
7. Garage and Maintenance building: this one-story building, approximately 14 feet tall at the gable peak, is comprised of two 20 foot by 20 foot general purpose rooms, and an open-end garage, all covered within a low-pitched gable roof set on a north/south axis. The garage roof overhang is supported at the corners by simple metal posts. (Photograph 15)
8. Laundry/Storage building: Historic aerial photographs reveal that this building was constructed after 1980, and it has not reached an age to be evaluated as a historic resource. (Photograph 16)
9. Swimming Pool: the in-ground swimming pool that measures 60 feet long by 30 feet wide was installed in 1973 by the lowest bidder to the County contract. Unfortunately, the option of going with the low bid was immediately evident, for in less than 4 months the pool was recorded as losing 6 inches of water every 24 hours.³⁷ This issue was eventually rectified and the pool remains in the northern area of the Camp Kilpatrick complex. It is not planned for demolition. (Photograph 17)

³⁷ *Los Angeles Times*. "Hayes Assails Probation Department on Camps, Mentally Ill Youths", August 8, 1974.

10. Comfort Station: this was a combination bathroom and changing room located to the east of where the swimming pool is situated. It has been previously removed and only the foundation pad remains. (Photograph 18)
11. Portable Buildings: the two portable buildings are used as classrooms. The portable classroom buildings are not set on permanent foundations, and are considered to be “temporary” structures designed to be removed from a site upon short notice. The portable buildings at Camp Kilpatrick do not appear to be over 45 years old, and have not reached an age to be evaluated as historic resources.
12. Outdoor athletic activity areas – basketball courts and baseball field: Two basketball courts are painted onto one large asphalt-paved area that measures approximately 142 feet long by 86 feet wide. The basketball courts are located at the southern end of the “U” plan. A single baseball diamond is located in a graded dirt field at the northern end of the Camp Kilpatrick campus. Both the basketball court and baseball playing areas have been continually repaired and upgraded over the years. They are not eligible to be considered as historic resources due to the continual upgrades.



Photograph 4: 40-Bed Dormitory 1A. View looking southwest.



Photograph 5: 40-Bed Dormitory 1A. View looking northwest.



Photograph 6: 40-Bed Dormitory 1B. View looking southwest.



Photograph 7: Gymnasium. View looking southwest.



Photograph 8: Shared Kitchen and Mess Hall. View looking west.



Photograph 9: Classroom building and attached Principal's Office (at far end). View looking south.



Photograph 10: West elevation of Administration Building. View looking east.



Photograph 11: Counselor offices in Administration Building, added in 1963. View looking southeast.



Photograph 12: Administration Building. The original Administration building is the left wing, the right wing was added in 1973. View from main driveway, looking northwest.



Photograph 13: Administration Building entrance. The Administration wing to the right was constructed in 1973. View from main driveway, looking west.



Photograph 14: 20-Boy Dormitory used for Health Center and special needs. View looking southeast.



Photograph 15: Maintenance Building and Garage. View from main driveway, looking west.



**Photograph 16: Laundry and Storage Building, constructed after 1980.
View from main driveway, looking northwest.**



Photograph 17: In-ground swimming pool. View looking west.



**Photograph 18: Foundation pad of demolished "comfort station" located to the east of the swimming pool.
View looking northwest.**

C. SIGNIFICANCE

The County has provided for this investigation the original blueprints and drawings of Camp Kilpatrick when it was first identified as the Junior Camp of the Santa Monica Boys Probation Camp. The County also provided access to the drawings of alterations to existing buildings when the Camp was later known as Camp Vernon Kilpatrick. These detailed property records were reviewed to ascertain the name of the project architects (if any) and the changes to the original buildings since their construction. These records, combined with articles from the Los Angeles Times archives, support the determination of this evaluation that the Santa Monica Boys Probation Camp buildings that comprise today's Camp Kilpatrick complex were designed and constructed for the straightforward utilitarian purpose of housing and educating youthful offenders.

Under National Register or California Register criteria relating to the buildings of Camp Kilpatrick's association with significant historical events that exemplifying broad patterns of our history, the complex does not appear to qualify as a significant historic resource. The Camp Kilpatrick Camp facility was one of many constructed in Los Angeles County to address the growing need for additional facilities and the rapidly growing juvenile offender population. Archival research does not reveal that the property was the site of any significant historic event. There is no evidence that Camp Kilpatrick is eligible for listing under Criterion A/1.

Under National Register or California Register criteria relating to Camp Kilpatrick's direct association with persons of historic importance, the complex does not appear to qualify as a significant resource. While the Camp Kilpatrick Mustang football team has achieved commendable athletic and life-lesson goals, those accomplishments cannot be physically conveyed by the built-environment resources. Camp Kilpatrick has not reached the level of significance to be determined eligible for listing under Criterion B/2.

Under National Register or California Register criteria relating to the distinctive characteristics of a type, period, region, or method of construction, the Camp Kilpatrick complex is not significant as it does not embody a high artistic design, nor does it appear to have been designed by an architect of merit. Built in the 1960s using a utilitarian design and inexpensive materials, these types of concrete masonry buildings were widely found throughout Southern California individually, and in groups. The Camp Kilpatrick complex is not eligible for listing under Criterion C/3. Individual buildings in the Camp Kilpatrick complex have not been found eligible for listing under Criterion C/3.

According to the grading plan of the site for the Santa Monica Boys Probation Camp prepared by the County in 1960, there was one wood-frame building and a foundation pad that remained from an earlier occupation of the land. These early structures were demolished and removed from the site prior to the construction of the camp. The Camp Kilpatrick site has not yielded, nor does it appear to have the potential to yield, information important to the history of the local area, California or the nation pursuant to Criterion D/4.

In summation, the Camp Kilpatrick complex is not eligible for listing in the National Register or the California Register as a significant historic resource.

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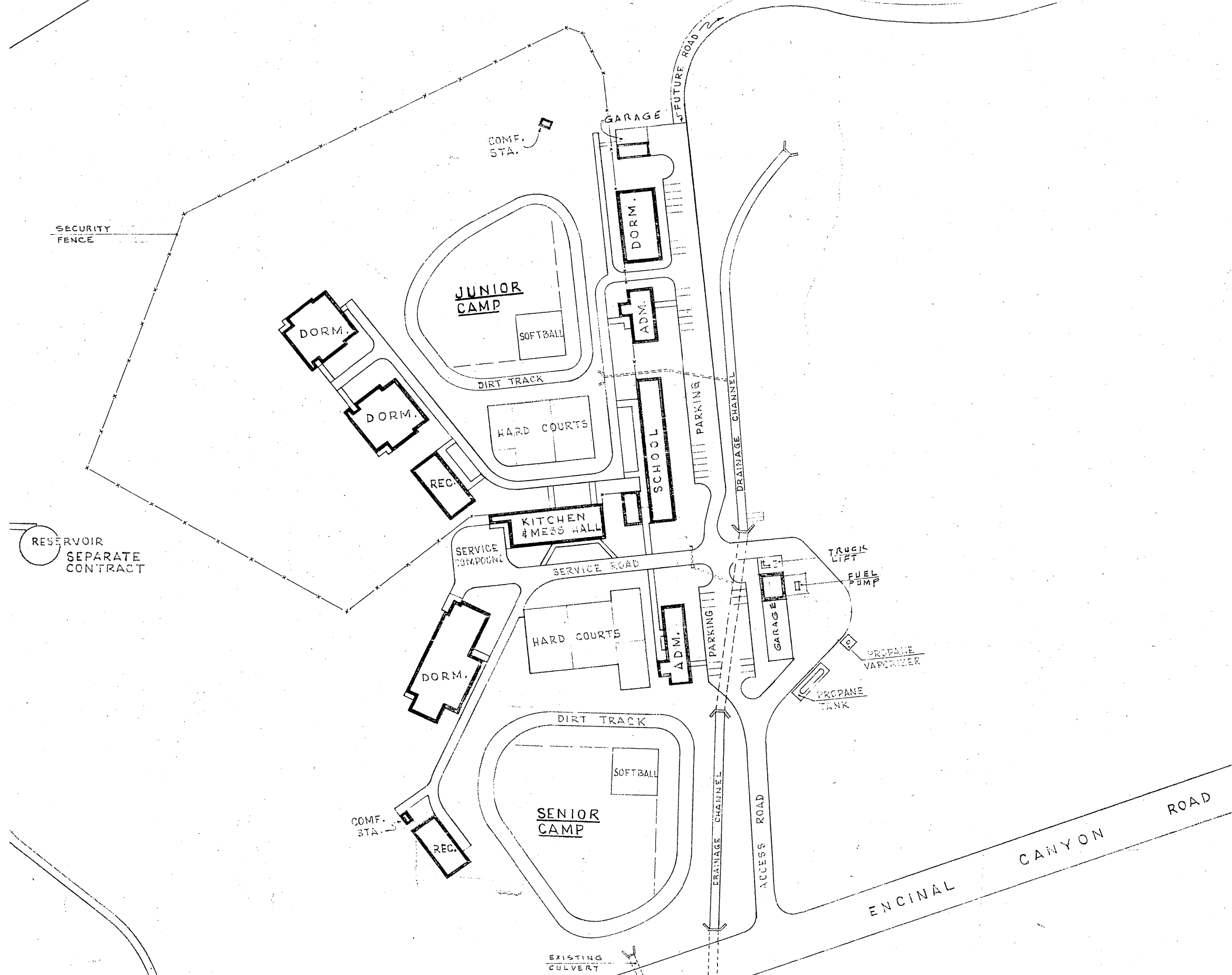
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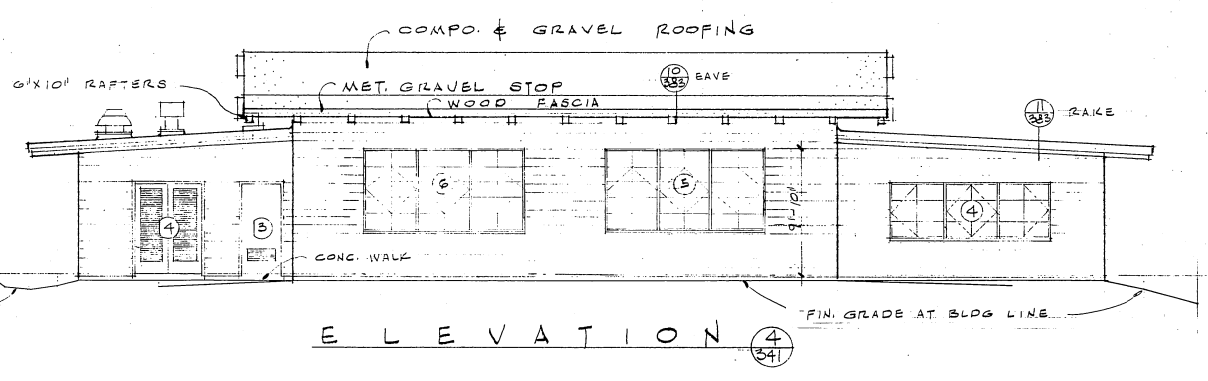
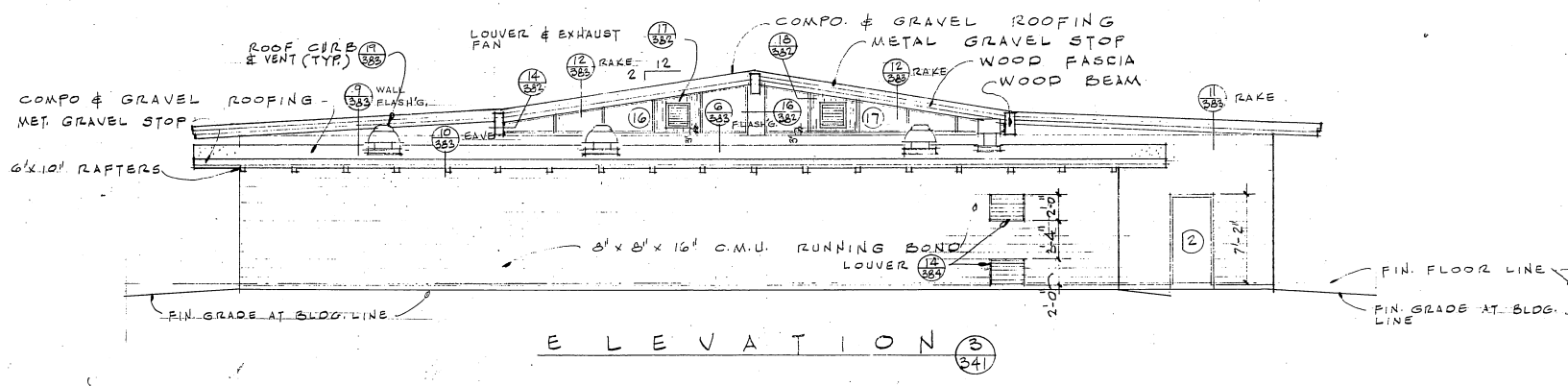
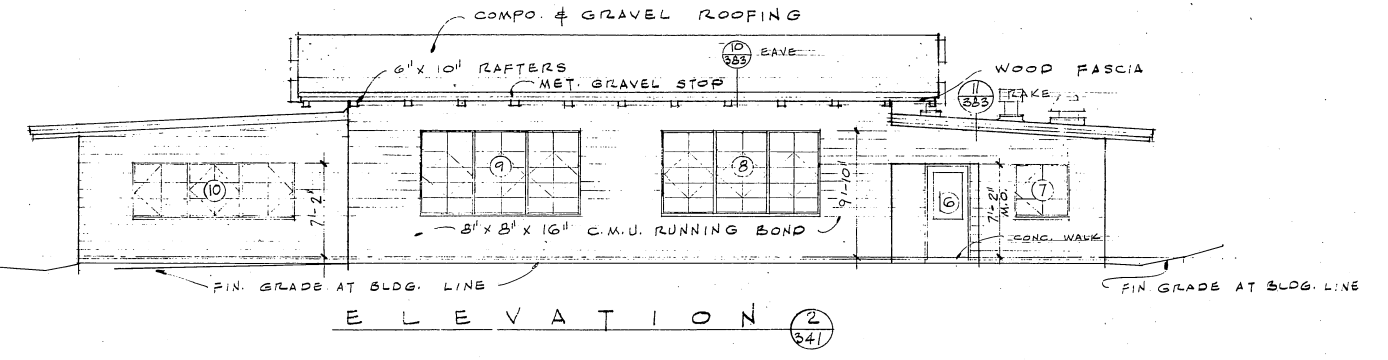
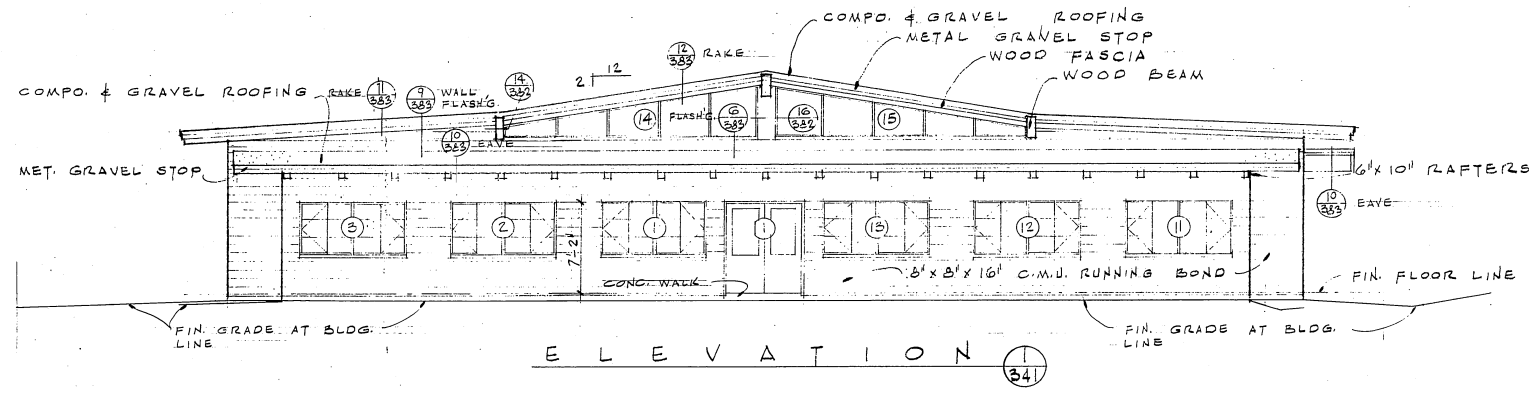
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United States Geographic Service. Point Dume Quad Map, 1929/1932. Scale 1:24,000.

APPENDIX A – Selected Drawings

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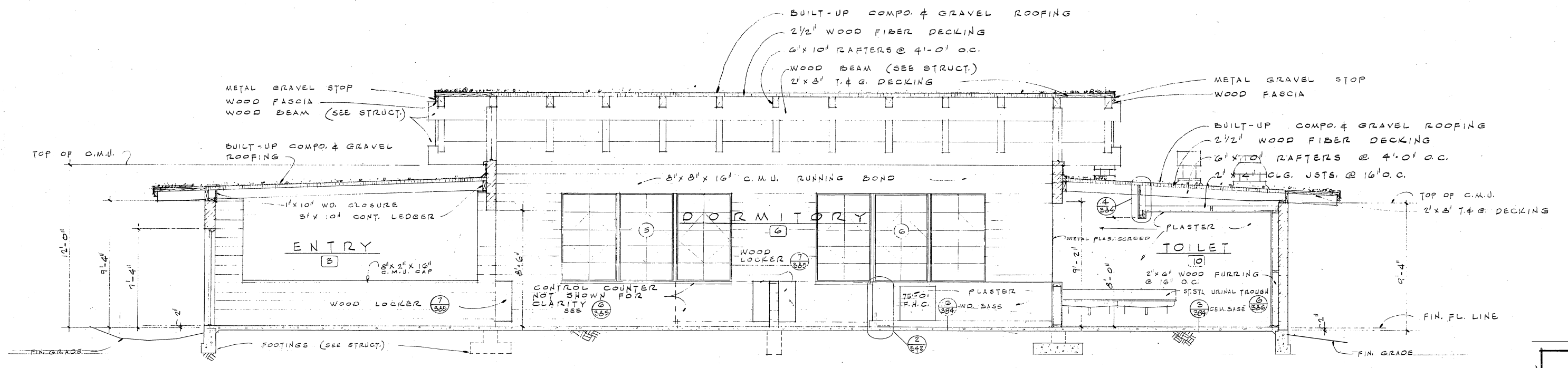




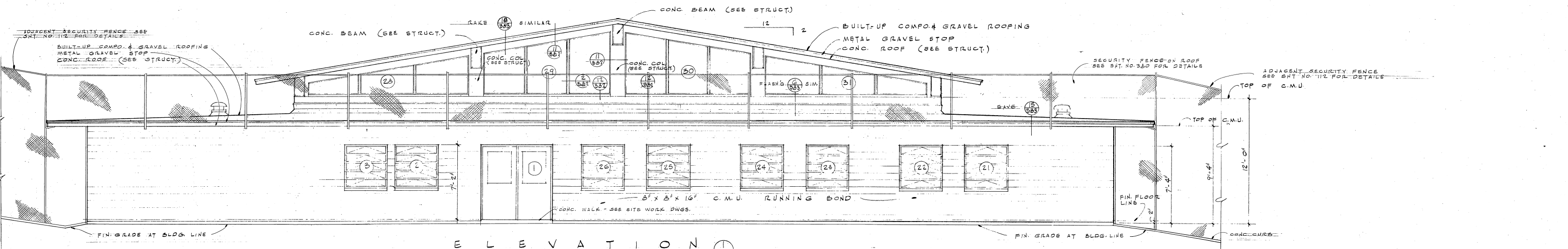
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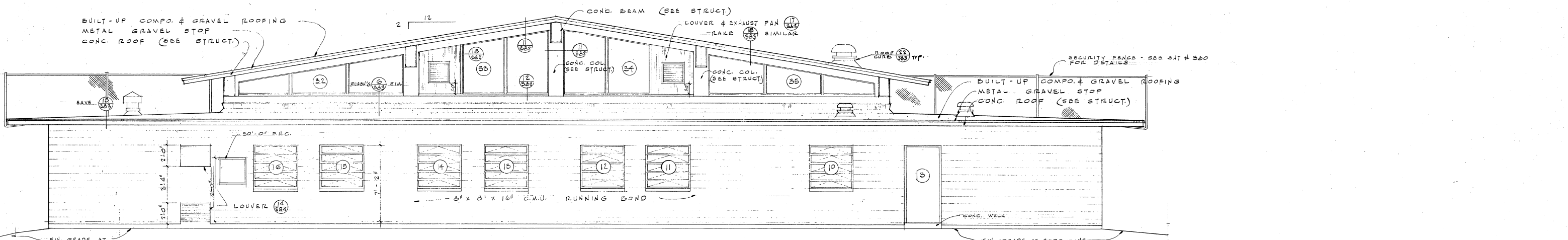
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 2. SEE GRADING AND REMOVAL PLAN FOR EXISTING GRADES



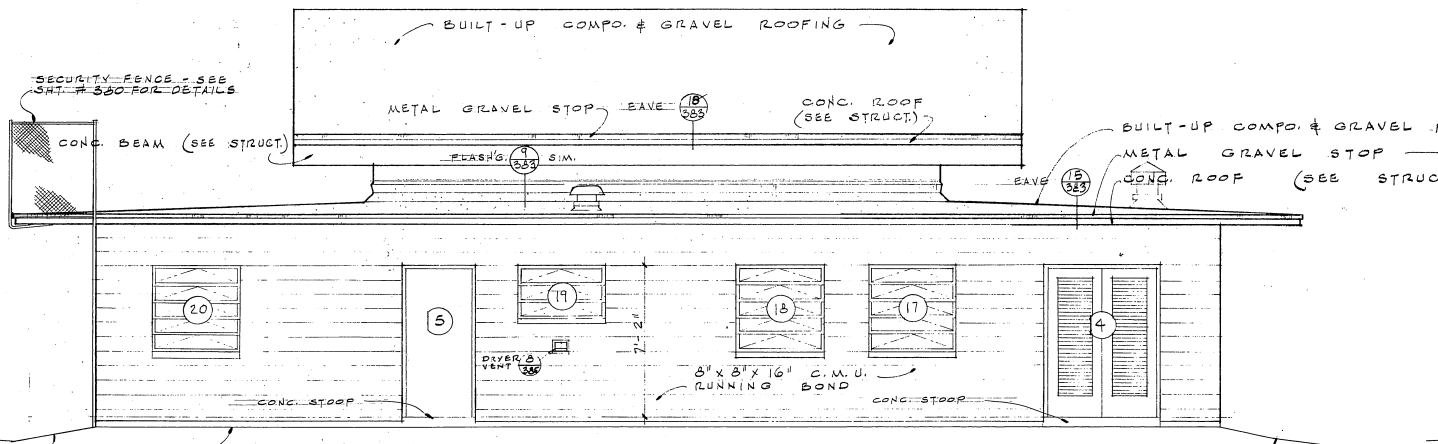
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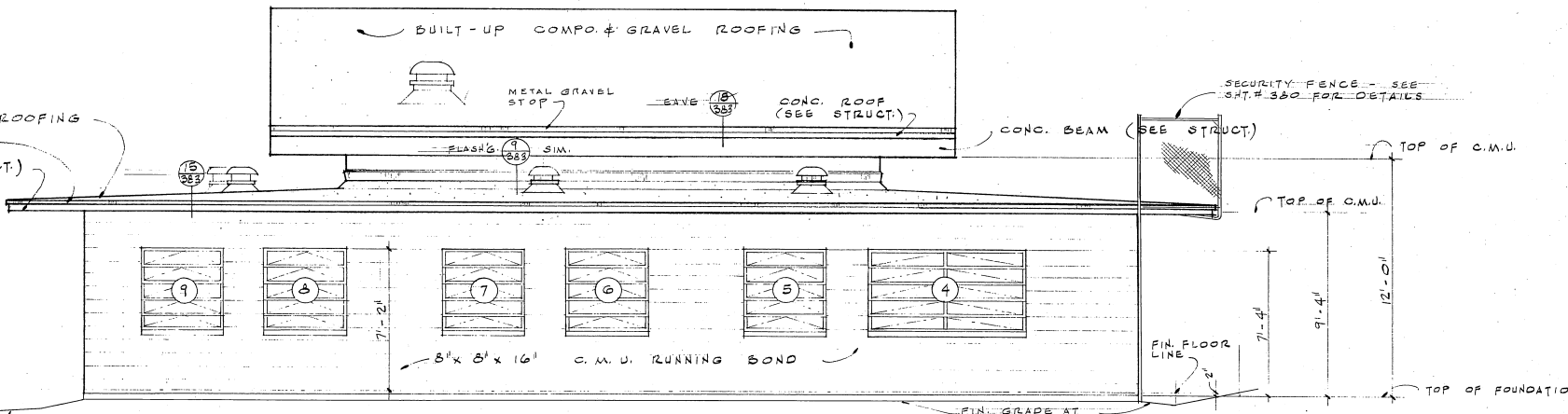
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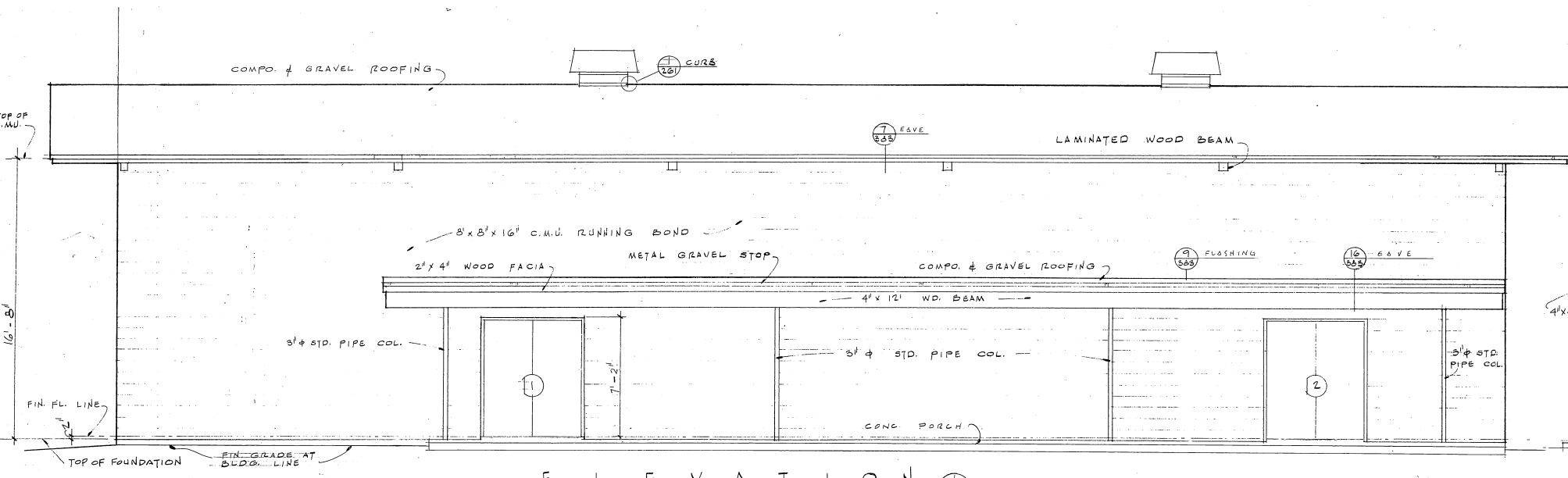


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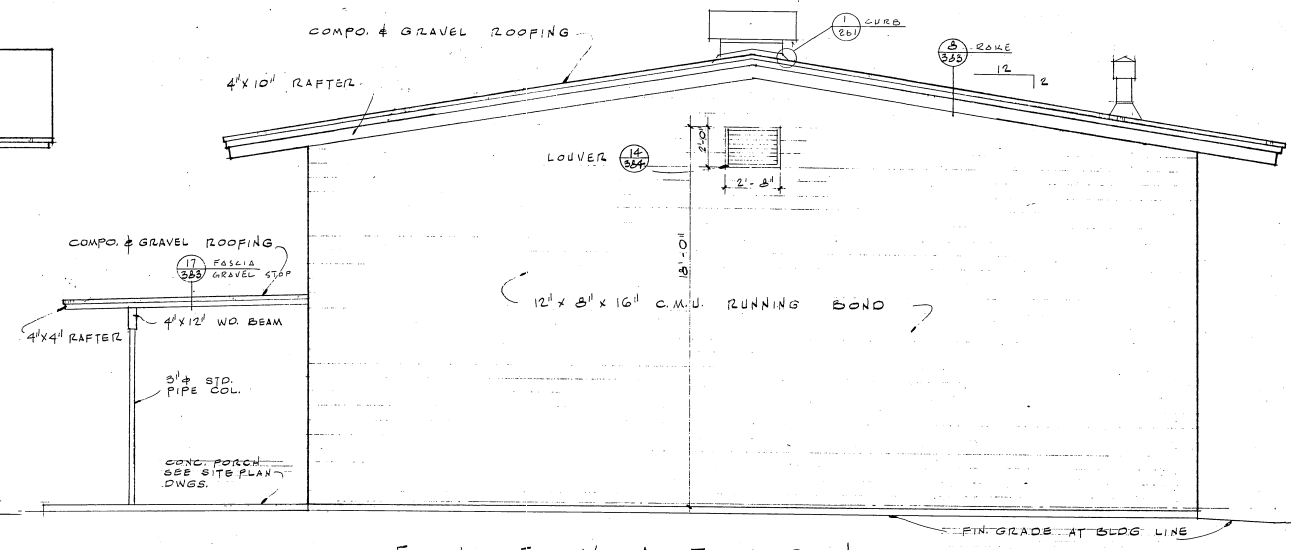
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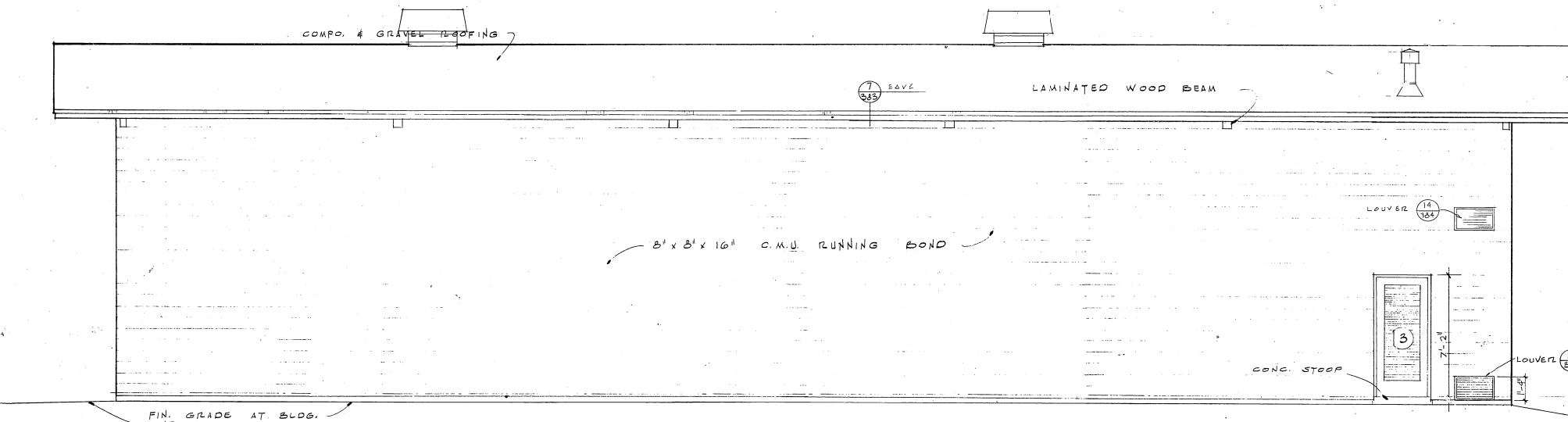
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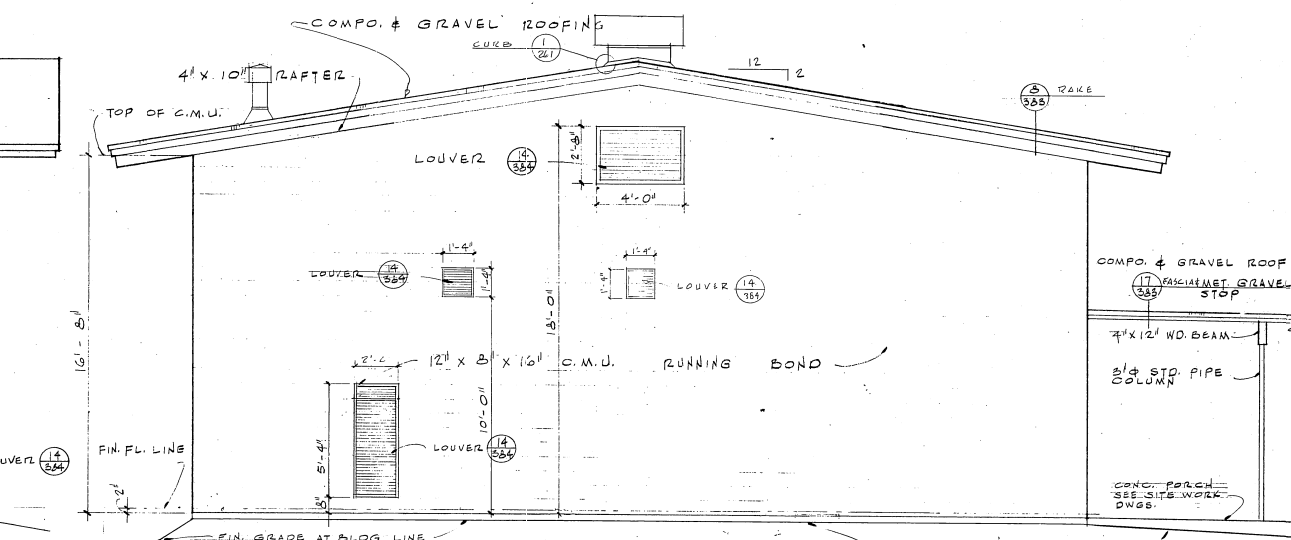
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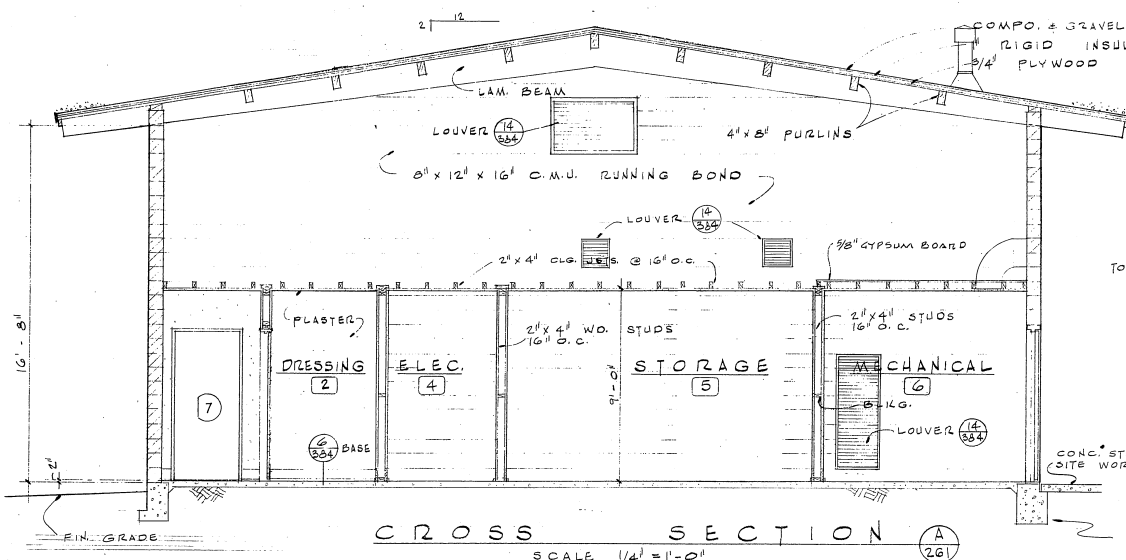


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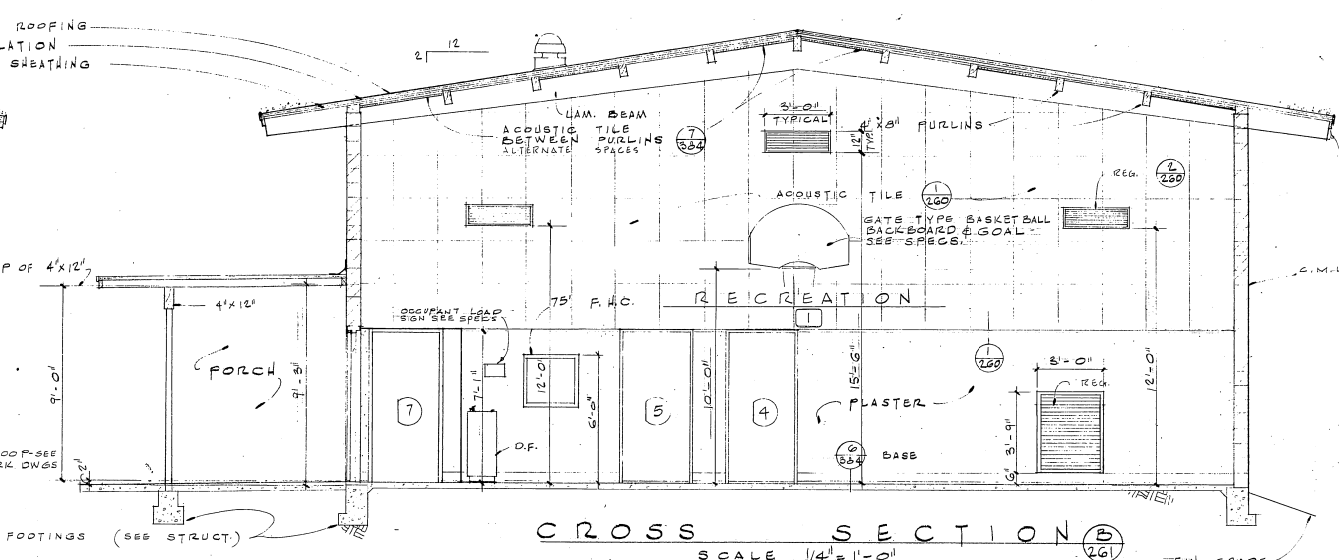


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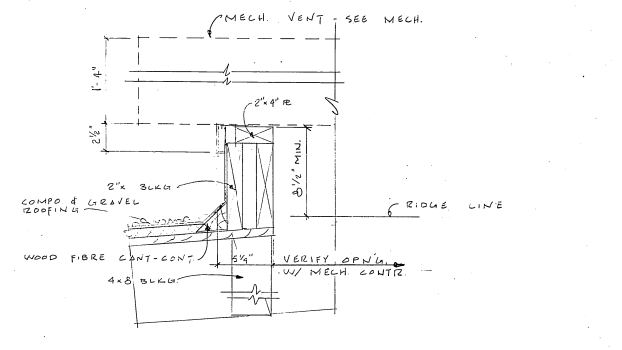
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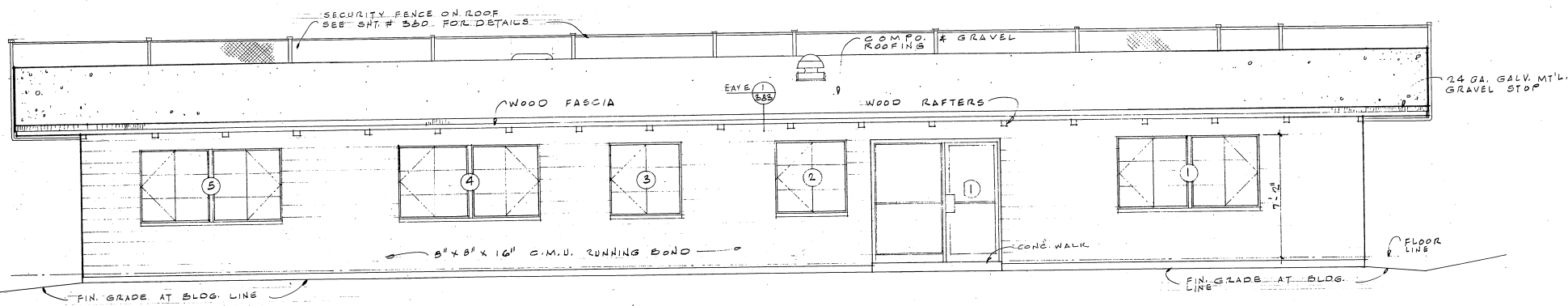


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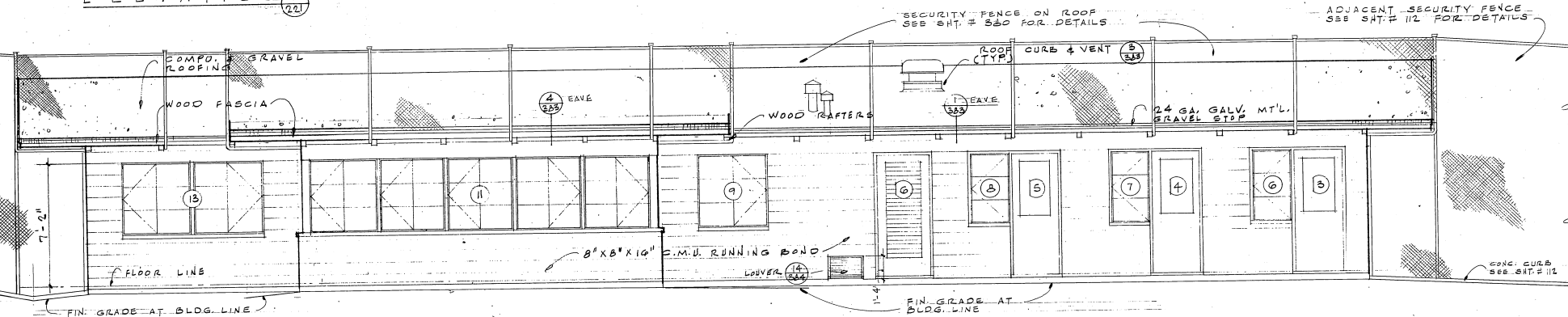


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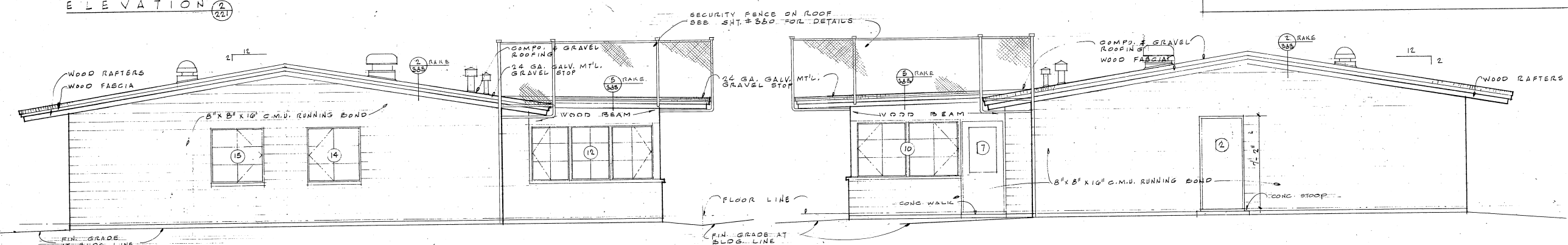
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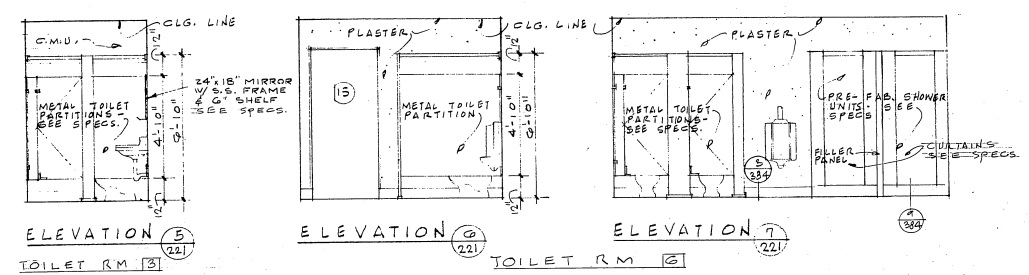
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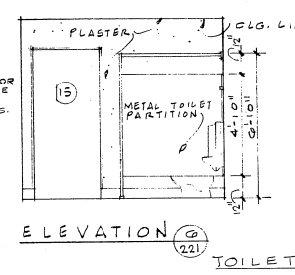
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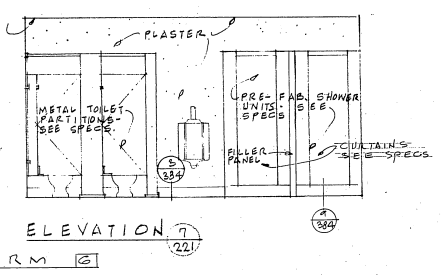
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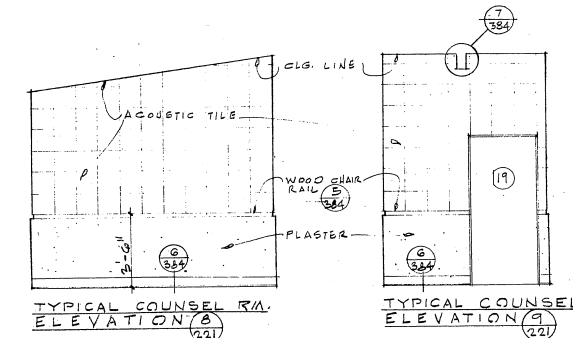
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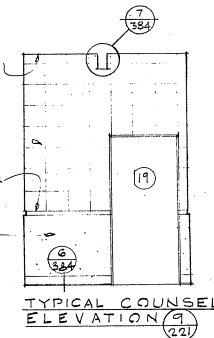
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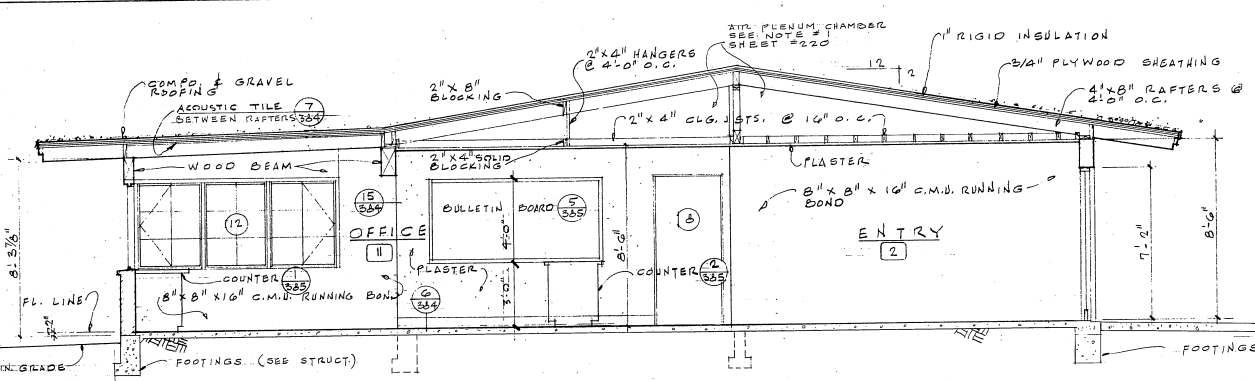


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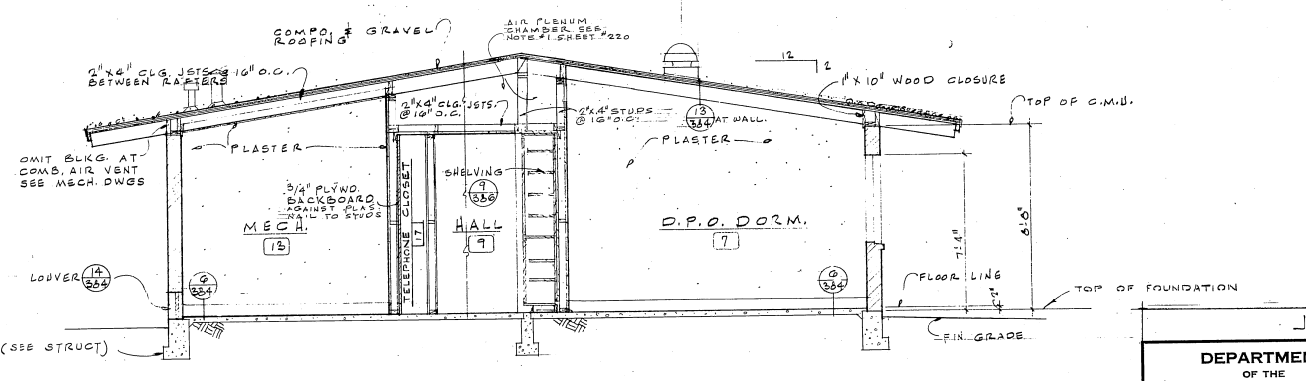


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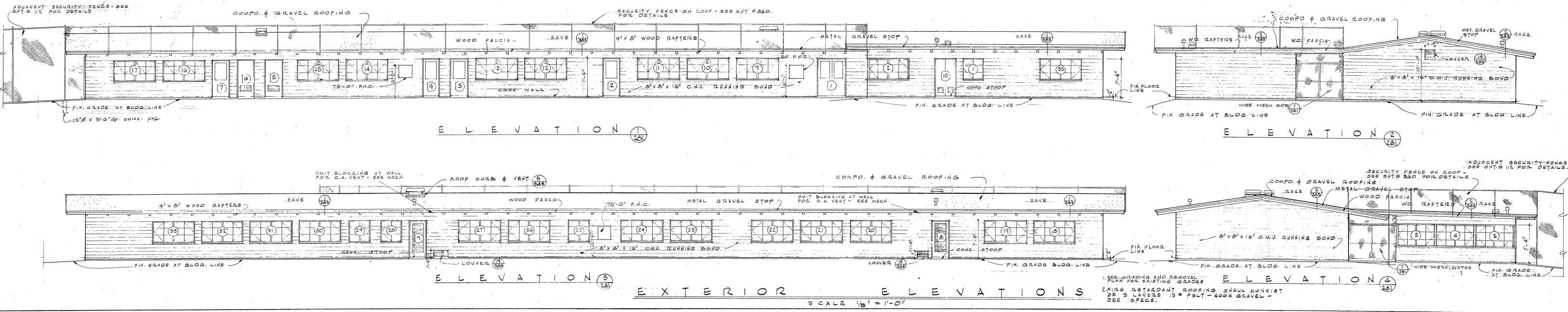


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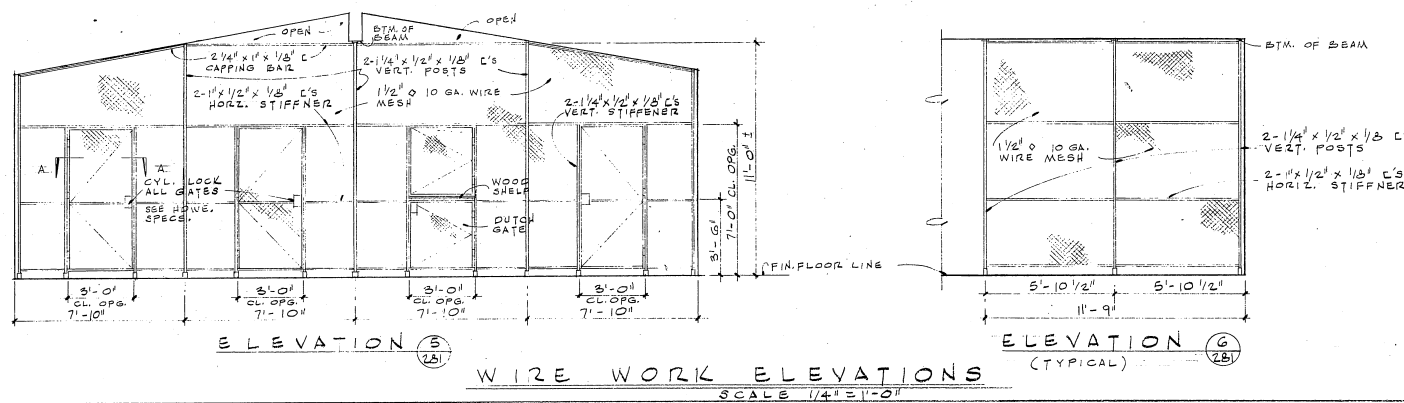


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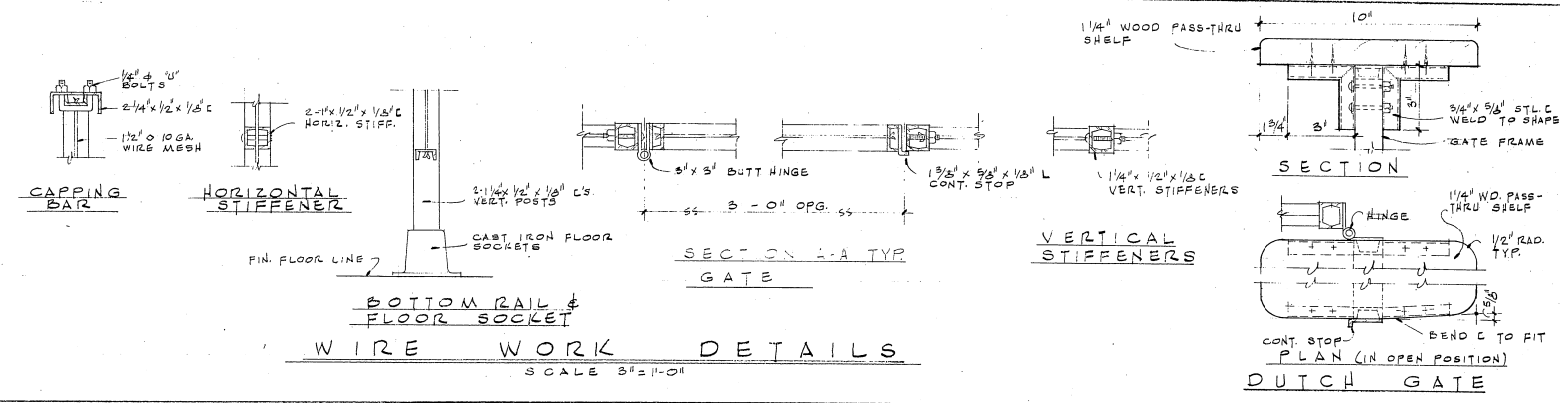
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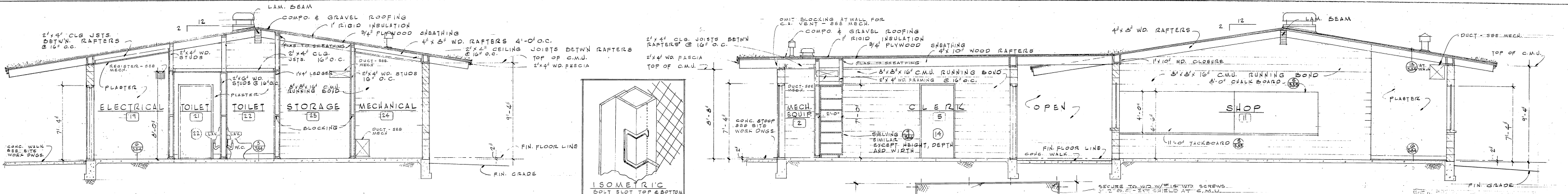
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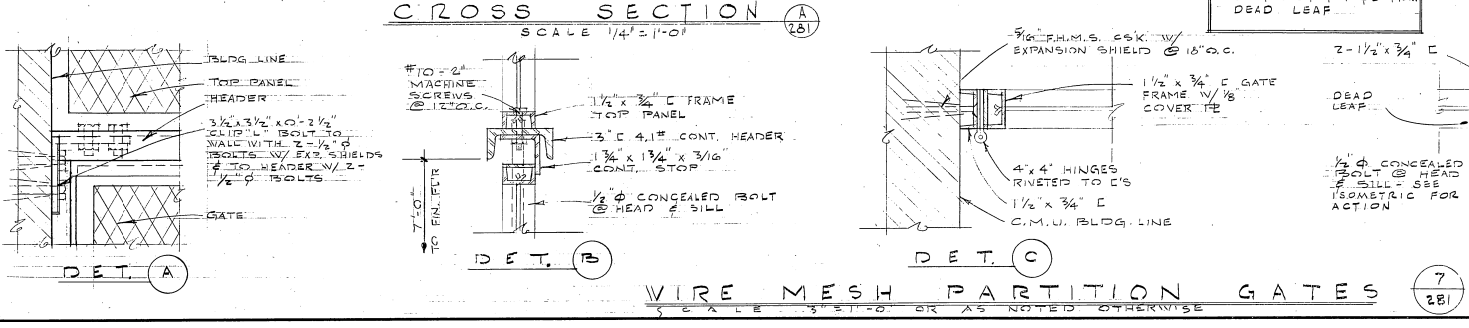


WIRE WORK DETAILS
SCALE 3/8" = 1'-0"



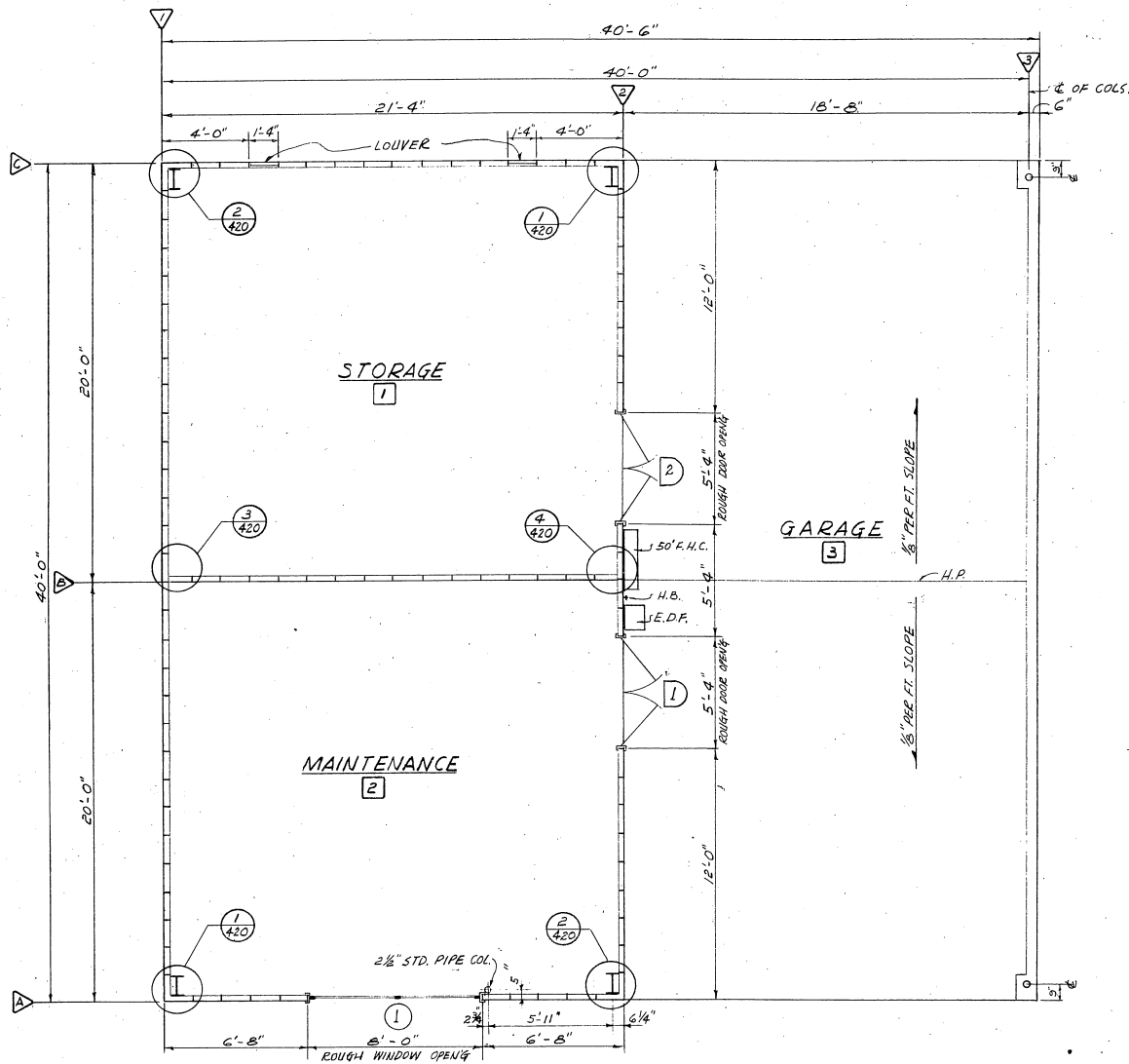
CROSS SECTION A
SCALE 1/4" = 1'-0"

CROSS SECTION B
SCALE 1/4" = 1'-0"



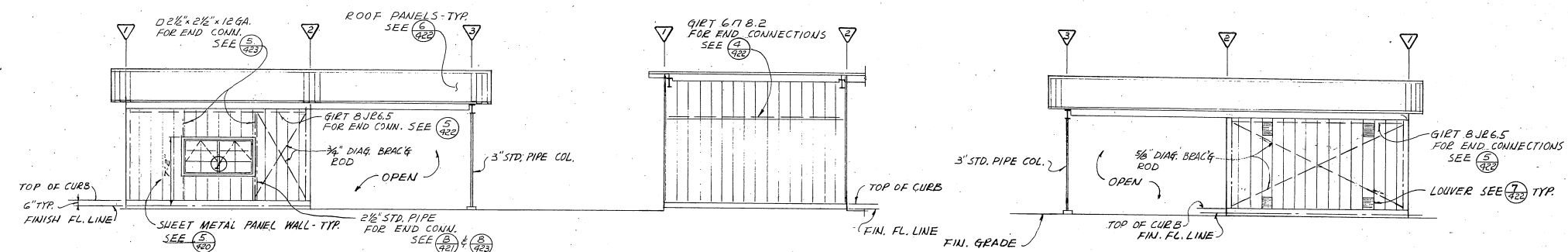
WIRE MESH PARTITION GATES
SCALE 3/8" = 1'-0" OR AS NOTED OTHERWISE

DEPARTMENT OF THE COUNTY ENGINEER ARCHITECTURAL DIVISION COUNTY OF LOS ANGELES		DATE OCT. 1960	SPEC. NO. 2157 OF 1960
APPROVED: _____		JOB CAPTAIN J. A. _____	WORK ORDER 9605.82
DRAWN BY J. A. _____		CHECKED BY _____	CAPITAL PROJECT 9605
CHIEF ARCHITECT		AS BUILT CORRECTIONS	SHEET NO. 281 OF SHEETS
SCHOOL ELEVATIONS & SECTIONS			
SANTA MONICA BOYS PROBATION CAMP			
433 S. ENGINAL CANYON ROAD CORNELL, CALIFORNIA			



FLOOR PLAN
SCALE: 1/8" = 1'-0"

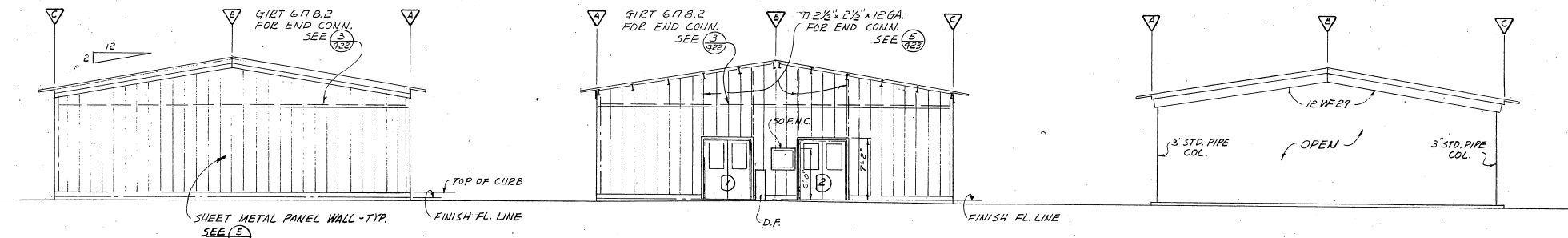
NOTE: SPRAY ON TYPE INSULATION TO BE APPLIED TO UNDER SIDE OF ROOF PANELS OF RM. 1 & 2 ONLY. SEE SPECS.



WALL A (1-3)
SCALE: 1/8" = 1'-0"

WALL B (1-2)
SCALE: 1/8" = 1'-0"

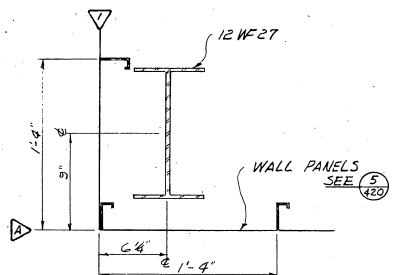
WALL C (3-1)
SCALE: 1/8" = 1'-0"



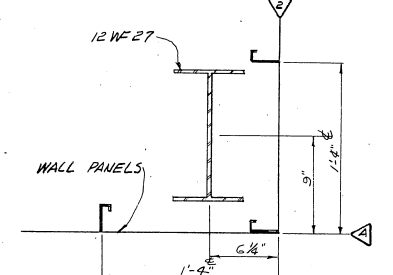
WALL 1 (C-A)
SCALE: 1/8" = 1'-0"

WALL 2 (A-C)
SCALE: 1/8" = 1'-0"

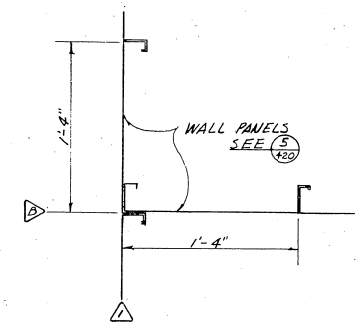
FRAME 3 (A-C)
SCALE: 1/8" = 1'-0"



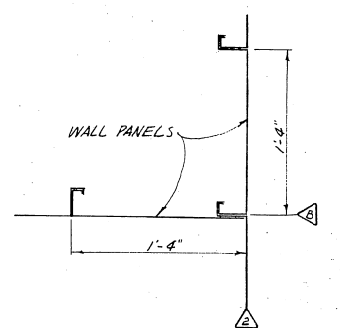
**PLAN AT A₂ SHOWN
PLAN AT C₂ OPP. HAND
DETAIL**
SCALE: 1/2" = 1'-0"



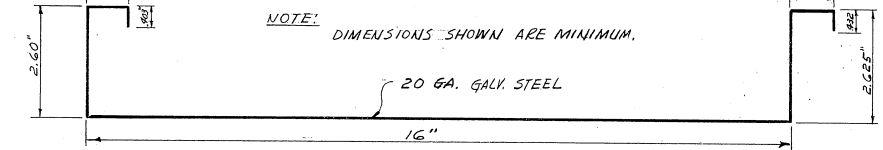
**PLAN AT A₁ SHOWN
PLAN AT C₁ OPP. HAND
DETAIL**
SCALE: 1/2" = 1'-0"



**PLAN AT B₁
DETAIL**
SCALE: 1/2" = 1'-0"



**PLAN AT B₂
DETAIL**
SCALE: 1/2" = 1'-0"

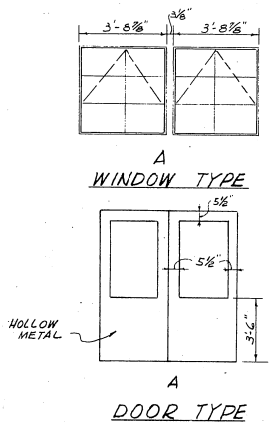


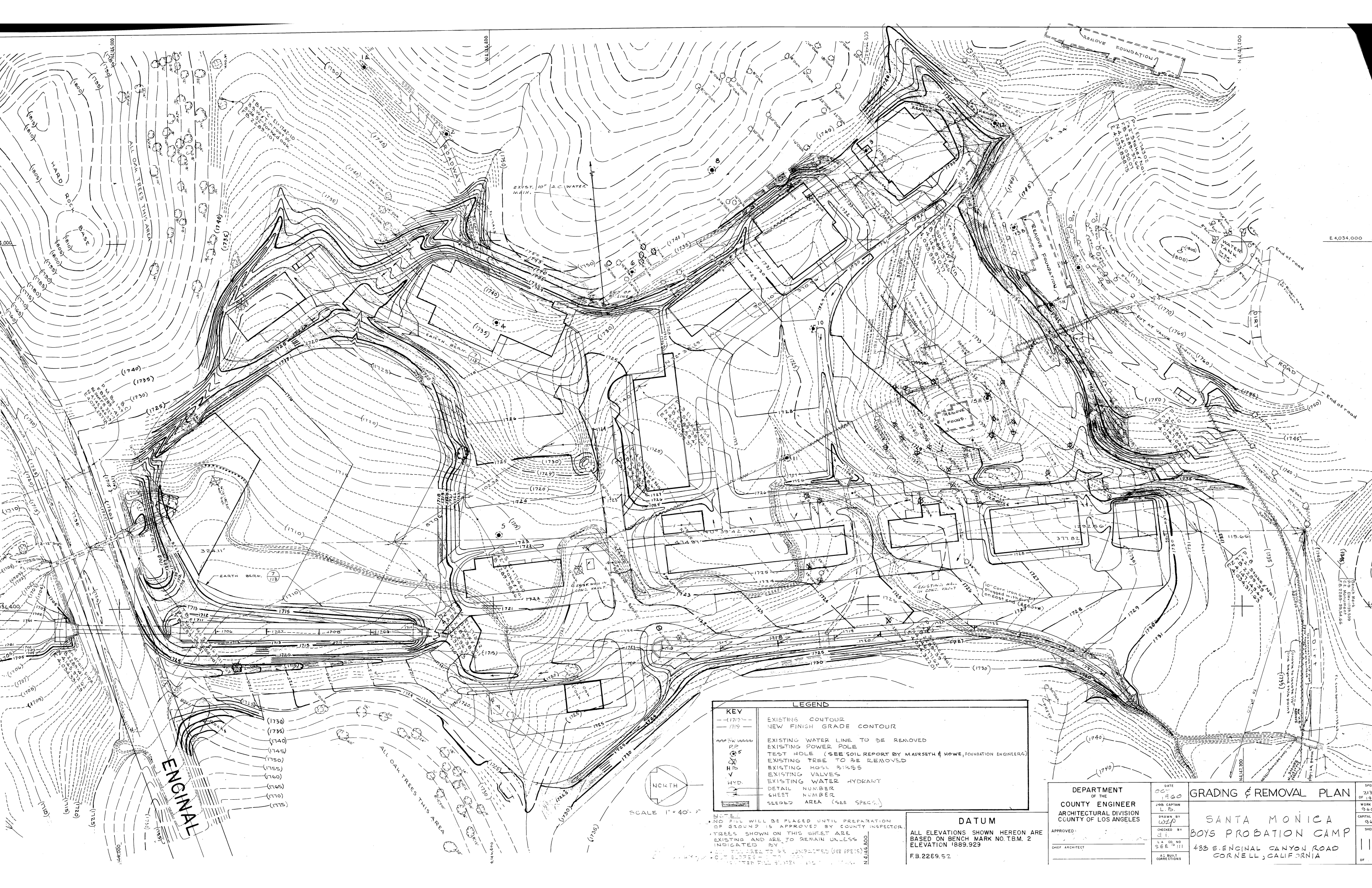
WALL PANEL - DETAIL
SCALE: 1/2" = 1'-0"

DEPARTMENT OF THE COUNTY ENGINEER ARCHITECTURAL DIVISION COUNTY OF LOS ANGELES		DATE: OCT 1960 JOB CAPTAIN: A. ORTEGA DRAWN BY: M. IZUNO CHECKED BY: BALE L.A. CO. NO. 9605 B2 AS BUILT CORRECTIONS	JUNIOR GARAGE FLOOR PLAN, ELEVATIONS & SCHEDULES SANTA MONICA BOYS PROBATION CAMP 433 S. ENCINAL CANYON ROAD CORNELL, CALIFORNIA.	SPEC. NO. 2137 OF 1360 WORK ORDER 9605 B2 CAPITAL PROJECT 9605 SHEET NO. 420
--	--	--	--	--

NUMBER	TYPE	SIZE	SASH		FRAME		GLASS		DETAIL NO.		REMARKS SEE SHEET #423 FOR DETAILS	
			STEEL	HOLLOW METAL	HOLLOW METAL	CLEAR D.B.S.	HEAD	JAMB	MULLION	SILL		
1	A	7'-8 1/2" x 4'-1"	X	X	X				3	4	5	6

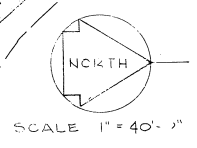
NUMBER	TYPE	SIZE	DOOR		FRAME		GLASS PANEL		DETAIL NO.		REMARKS SEE SHEET #423 FOR DETAILS
			HOLLOW METAL	HOLLOW METAL	THRESHOLD	CLEARANCE WIRE	HEAD	JAMB	SILL		
1	A	PR. 2'-6" x 7'-0" x 1 3/8"	X	X					3	7	
2	"	"	X	X					3	7	





E 4,034.000

KEY		LEGEND	
---	(1775)	---	EXISTING CONTOUR
---	(1719)	---	NEW FINISH GRADE CONTOUR
---	PP	---	EXISTING WATER LINE TO BE REMOVED
---	PP	---	EXISTING POWER POLE
---	PH	---	TEST HOLE (SEE SOIL REPORT BY MAURSETH & HOWE, FOUNDATION ENGINEERS)
---	PH	---	EXISTING TREE TO BE REMOVED
---	PH	---	EXISTING HOSE RIGS
---	V	---	EXISTING VALVES
---	HYD	---	EXISTING WATER HYDRANT
---	1	---	DETAIL NUMBER
---	2	---	SHEET NUMBER
---	3	---	SEEDED AREA (SEE SPECS.)



NOTES:
 NO FILL WILL BE PLACED UNTIL PREPARATION OF GROUND IS APPROVED BY COUNTY INSPECTOR.
 TREES SHOWN ON THIS SHEET ARE EXISTING AND ARE TO REMAIN UNLESS INDICATED BY "X".
 ONLY THE AREA TO BE CONSTRUCTED (SEE SPECS.) IS TO BE FILL.
 ALL ELEVATIONS SHOWN HEREON ARE BASED ON BENCH MARK NO. T.B.M. 2 ELEVATION 1889.925
 FB.2269.52

DATUM
 ALL ELEVATIONS SHOWN HEREON ARE BASED ON BENCH MARK NO. T.B.M. 2 ELEVATION 1889.925
 FB.2269.52

DEPARTMENT OF THE COUNTY ENGINEER ARCHITECTURAL DIVISION COUNTY OF LOS ANGELES	DATE: 02-19-60 JOB CAPTAIN: L.S. DRAWN BY: W.P. CHECKED BY: J.I. L.A. CO. NO. SEE 1111 A.S. BUREAU CORRECTIONS	GRADING & REMOVAL PLAN SANTA MONICA BOYS PROBATION CAMP 433 S. ENCINAL CANYON ROAD CORNELL, CALIFORNIA	SHEET NO. 213 OF 19 WORK 988 CAPITAL 96 SHEET 11 OF
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ENCINAL

ALL OAK TREES THIS AREA

APPENDIX B – DPR Inventory Site Forms

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code

Other Listings

Review Code

Reviewer

Date

*Resource Name or #: Camp Kilpatrick Juvenile Detention Facility

P1. Other Identifier: Santa Monica Boys Probation Camp

***P2. Location:** Not for Publication Unrestricted
and

***a. County:** Los Angeles

***b. USGS 7.5' Quad:** Point Dume

Date: 1995 T 1 S ; R 19 W ; SE ¼ of Sec 11 ; S.B.B.M.

c. Address: 427 Encinal Canyon Road

City: Malibu

Zip: 90265

d. UTM: See Location Map (page 14 of 14) for the boundary coordinates of the proposed project area.

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation: 1722 feet a.s.l.

From its intersection with the Ventura Freeway (CA134), take Exit 34 Kanan Road south for approximately 5 ½ miles until it intersects with Mulholland Highway. Head west on the Mulholland Highway one mile until it intersects with Encinal Canyon Road. Continue on Encinal Canyon Road for approximately 4/10 of a mile. The driveway for Camp Kilpatrick and Camp Miller is on the right (north). Head north on the private driveway past Camp Miller.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The structures that comprised Camp Kilpatrick in 1962 were the two 40-bed dormitories, one 20-bed dormitory, a gymnasium, administration building, garage/maintenance building, one un-attached comfort station, outdoor basketball courts, running track, the kitchen and mess hall shared with Camp Miller, school, and principal's office. Eight of the permanent buildings and the swimming pool structure were constructed on the site between 1961 and 1974. The Laundry/Storage building was constructed on the site after 1974, and the two portable buildings do not appear to be over 30 years old. The baseball field and the basketball courts are not being considered as historic resources as they have been continually upgraded, repaved, and repaired since 1962.

The buildings and structures of Camp Kilpatrick are set in a "U"-shaped plan around an athletic field and basketball courts. The "arms" of the complex plan face north and northwest, with the swimming pool located between the "arms" towards the northern border of the complex. Almost immediately after opening Camp Kilpatrick, the administration building was enlarged with additional counseling rooms, and offices for probation staff. In 1973, a swimming pool was added to the complex, and the existing administration building was enlarged again with the construction of a large new wing. (See continuation sheet for description of resources.)

***P3b. Resource Attributes:** HP39: Other - Juvenile Detention Facility; HP15: Education; HP14: Government buildings

***P4. Resources Present:** Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (See continuation sheets for additional photos)



P5b. Description of Photo:
Dormitory 1A. View looking south.
June 12, 2012.

***P6. Date Constructed/Age and**

Sources: Historic

Prehistoric Both

1961/1962 Los Angeles County
Department of Public Works drawings,
Los Angeles Times articles of
construction.

***P7. Owner and Address:**

Los Angeles County Department of
Public Works

900 South Freemont Avenue

Alhambra, CA 91803

***P8. Recorded by:**

Pamela Daly, M.S.H.P.

Daly & Associates

4486 University Avenue

Riverside, CA 92501

***P9. Date Recorded:** July 28, 2012

***P10. Survey Type:**

Intensive - CEQA

***P11. Report Citation:** Daly, Pamela. *Historic Resource Assessment Report of Camp Kilpatrick Juvenile Detention Facility, 427 Encinal Canyon Road, Malibu, Los Angeles County, CA.* July 2012.

***Attachments:** NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name: Camp Kilpatrick Juvenile Detention Facility

- B1. Historic Name: Santa Monica Boys Probation Camp
- B2. Common Name: Camp Kilpatrick
- B3. Original Use: Juvenile boys probation camp
- B4. Present Use: Juvenile boy's probation camp

*B5. **Architectural Style:** None; utilitarian probation camp facilities

*B6. **Construction History:**

The structures that comprised Camp Kilpatrick in 1962 were the two 40-bed dormitories, one 20-bed dormitory, a gymnasium, administration building, garage/maintenance building, one un-attached comfort station, outdoor basketball courts, running track, the kitchen and mess hall shared with Camp Miller, school, and principal's office. Shortly after the construction of the Administration building, an addition was made to the south elevation of the main block in 1963. The swimming pool was added to the campus in 1973, and the administration building was substantially enlarged again that year also.

*B7. **Moved?** No Yes Unknown **Date:** **Original Location:**

*B8. **Related Features:** Driveways, fences, storm channel, water tanks, mature trees.

B9a. Architect: Los Angeles County, Department of County Engineer, Architectural Division

b. Builder: Herbert Goldsworthy Construction Co., Santa Monica, CA

*B10. **Significance: Theme:** None

Area: None

Period of Significance: None

Property Type: Juvenile Detention Facility

Applicable Criteria: NR/CR

The County has provided for this investigation the original blueprints and drawings of Camp Kilpatrick when it was first identified as the Junior Camp of the Santa Monica Boys Probation Camp. The County also provided access to the drawings of alterations to existing buildings when the Camp was later known as Camp Vernon Kilpatrick. These detailed property records were reviewed to ascertain the name of the project architects (if any) and the changes to the original buildings since their construction. These records, combined with articles from the Los Angeles Times archives, support the determination of this evaluation that the Santa Monica Boys Probation Camp buildings that comprise today's Camp Kilpatrick complex were designed and constructed for the straightforward utilitarian purpose of housing and educating youthful offenders.

Under National Register or California Register criteria relating to the buildings of Camp Kilpatrick's association with significant historical events that exemplifying broad patterns of our history, the complex does not appear to qualify as a significant historic resource. The Camp Kilpatrick Camp facility was one of many constructed in Los Angeles County to address the growing need for additional facilities and the rapidly growing juvenile offender population. Archival research does not reveal that the property was the site of any significant historic event. There is no evidence that Camp Kilpatrick is eligible for listing under Criterion A/1.

Under National Register or California Register criteria relating to Camp Kilpatrick's direct association with persons of historic importance, the complex does not appear to qualify as a significant resource. While the Camp Kilpatrick Mustang football team has achieved commendable athletic and life-lesson goals, those accomplishments cannot be physically conveyed by the built-environment resources. Camp Kilpatrick has not reached the level of significance to be determined eligible for listing under Criterion B/2. (See continuation sheet for additional text.)

B11. Additional Resource Attributes: None

*B12. **References:**

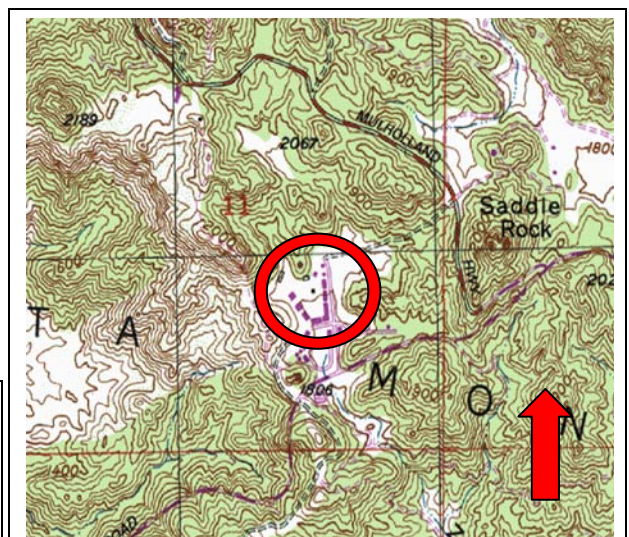
Los Angeles County Department of Public Works architectural drawings for Camp Kilpatrick: Drawers 346, 347, 349, 351, 352, 357.

B13. Remarks:

*B14. **Evaluator:** Pamela Daly, M.S.H.P.

***Date of Evaluation:** July 28, 2012

(This space reserved for official comments.)



CONTINUATION SHEET

Primary #

HRI#

Trinomial

*Resource Name: **Camp Kilpatrick Juvenile Detention Facility**

*Recorded by: Pamela Daly, M.S.H.P.

*Date: July 28, 2012 Continuation Update

P3a. Description of Resources - continued:

The buildings were constructed in simple, utilitarian designs. As specified by the County Architect, the contractor used inexpensive building materials, primarily walls of concrete masonry block, slab concrete foundations, and metal-frame casement windows to keep down the building costs. Concrete block was the preferred building material as there was a high probability that the facility would eventually be in the path of one of the seasonal wildfires that plague the Santa Monica Mountains. The buildings on the complex are described as follows:

1. Dormitory A and B are identically designed 40-bed dormitories with one large single sleeping hall, bathroom facilities, and dayrooms. The rectangular-massed, one-story buildings measure approximately 76 feet wide by 81 feet long, with a footprint of 5,728 square feet. A single low-pitched gable roof covers the sleeping hall, while the dayrooms that face the playing fields are flat-roofed. Across the front (east) elevation, six large window units allow abundant light into the dayrooms. Two large window units on each of the north and south elevations allow natural light into the large sleeping halls. For security, or to avoid wayward athletic equipment, false parapet walls have been constructed along the east and west edges of the roof.
2. Gymnasium: the tall, one-story, single use building measures approximately 81 feet long by 41 feet wide, with an exterior wall height of 16 feet 8 inches. The building is covered in one large, low pitched gable roof set on a north/south axis, and has a footprint of 3,321 square feet. A porch spans the front (east) elevation, and a false parapet security wall runs along the edge of the porch roof.
3. Kitchen and Mess Hall: this is a long, one-story building that measures 100 feet long by 40 feet wide, and has a footprint of approximately 4,000 square feet. The mess hall was constructed to hold up to 200 diners from both Camp Miller and Camp Kilpatrick simultaneously, and the kitchen is large enough to prepare 200 meals at a sitting. The one-story building is covered by a low-pitched gable roof that runs on an east/west axis. Multiple casement window units span the north and south elevations.
4. School and Principal's Office: The original site plans show the Principal's office building was to be unattached from the School Building. At some point in time, the two buildings were attached to form an "L" plan building. The School Building measures approximately 192 feet long by 32 feet wide, for a footprint of 6,144 square feet. The Principal's office building measures approximately 44 feet long by 32 feet wide for an additional 1,408 square feet. The School building has a low-pitched gable roof and is set on a north/south axis. Multiple window units are placed along the east and west elevations of the School building, and the north elevation of the Principal's office building.
5. The Administration building contains the probation offices, counseling rooms, visitor lounge, and control room. The original Administration building was a rectangular-massed, one-story building that measured 72 feet long by 33 feet wide. It has a low-pitched gable roof and is aligned on a north/south axis. The control room extends 12 feet from the west elevation of the main block, and spans a length of 21 feet with large window units along the full wall. Altogether, the original Administration building had a footprint of approximately 2,544 square feet. Shortly after the construction of the building, an addition was made to the south elevation of the main block in 1963. The addition created 896 square feet for more office and counseling space. After the Sylmar earthquake of 1972, a new wing was added to the main block that contained 1,764 square feet. The new wing is covered in a low-pitched gable roof and the wing is set perpendicular to the main block on an east/west axis.
6. Dormitory and Health Center: Original drawings refer to this one-story building as a 20-bed dormitory. The building was designed to house individual dorm rooms and the nurse's/health center facilities, for those boys with special needs. The small dorm rooms were designed to face a central open space that was illuminated with light from clerestory windows built into the gable ends of the roof of the building. The low-pitched roof is set on an east/west axis. The building measures approximately 95 feet long by 51 feet wide with a footprint of 4,845 square feet.
7. Garage and Maintenance building: this one-story building, approximately 14 feet tall at the gable peak, is comprised of two 20 foot by 20 foot general purpose rooms, and an open-end garage, all covered with a low-pitched gable roof set on a north/south axis. The garage roof overhang is supported at the corners by simple metal posts.
8. Laundry/Storage building: Historic aerial photographs reveal that this building was constructed after 1980, and it has not reached an age to be evaluated as a historic resource.
(See continuation sheet for additional text.)

CONTINUATION SHEET

***Recorded by:** Pamela Daly, M.S.H.P.

***Date:** July 28, 2012 Continuation Update

P3a. Description of Resources - continued:

9. Swimming Pool: the in-ground swimming pool that measures 60 feet long by 30 feet wide was installed in 1973 by the lowest bidder to the County contract. Unfortunately, the option of going with the low bid was immediately evident, for in less than 4 months the pool was recorded as losing 6 inches of water every 24 hours. This issue was eventually rectified and the pool remains in the northern area of the Camp Kilpatrick complex. It is not planned for demolition.

10. Comfort Station: this was a combination bathroom and changing room located to the east of where the swimming pool is situated. It has been previously removed and only the foundation pad remains.

11. Portable Buildings: the two portable buildings are used as classrooms. The portable classroom buildings are not set on permanent foundations, and are considered to be "temporary" structures designed to be removed from a site upon short notice. The portable buildings at Camp Kilpatrick do not appear to be over 45 years old, and have not reached an age to be evaluated as historic resources.

12. Outdoor athletic activity areas – basketball courts and baseball field: Two basketball courts are painted onto one large asphalt-paved area that measures approximately 142 feet long by 86 feet wide. The basketball courts are located at the southern end of the "U" plan. A single baseball diamond is located in a graded dirt field at the northern end of the Camp Kilpatrick campus. Both the basketball court and baseball playing areas have been continually repaired and upgraded over the years. They are not eligible to be considered as historic resources due to the continual upgrades.

B10. Statement of Significance – continued:

Under National Register or California Register criteria relating to the distinctive characteristics of a type, period, region, or method of construction, the Camp Kilpatrick complex is not significant as it does not embody a high artistic design, nor does it appear to have been designed by an architect of merit. Built in the 1960s using a utilitarian design and inexpensive materials, these types of concrete masonry buildings were widely found throughout Southern California individually, and in groups. The Camp Kilpatrick complex is not eligible for listing under Criterion C/3. Individual buildings in the Camp Kilpatrick complex have not been found eligible for listing under Criterion C/3.

According to the grading plan of the site for the Santa Monica Boys Probation Camp prepared by the County in 1960, there was one wood-frame building and a foundation pad that remained from an earlier occupation of the land. These early structures were demolished and removed from the site prior to the construction of the camp. The Camp Kilpatrick site has not yielded, nor does it appear to have the potential to yield, information important to the history of the local area, California or the nation pursuant to Criterion D/4.

In summation, the Camp Kilpatrick complex is not eligible for listing in the National Register or the California Register as a significant historic resource.



40-Bed Dormitory 1A. View looking southwest.



40-Bed Dormitory 1A. View looking northwest.



40-Bed Dormitory 1B. View looking southwest.



Gymnasium. View looking southwest.



Shared Kitchen and Mess Hall. View looking west.



Classroom building and attached Principal's Office (at far end). View looking south.



West elevation of Administration Building. View looking east.



Counselor offices in Administration Building, added in 1963. View looking southeast.



Administration Building. The original Administration building is the left wing, the right wing was added in 1973. View from main driveway, looking northwest.



Administration Building entrance. The Administration wing to the right was constructed in 1973. View from main driveway, looking west.



20-Boy Dormitory used for Health Center and special needs. View looking southeast.



Maintenance Building and Garage. View from main driveway, looking west.



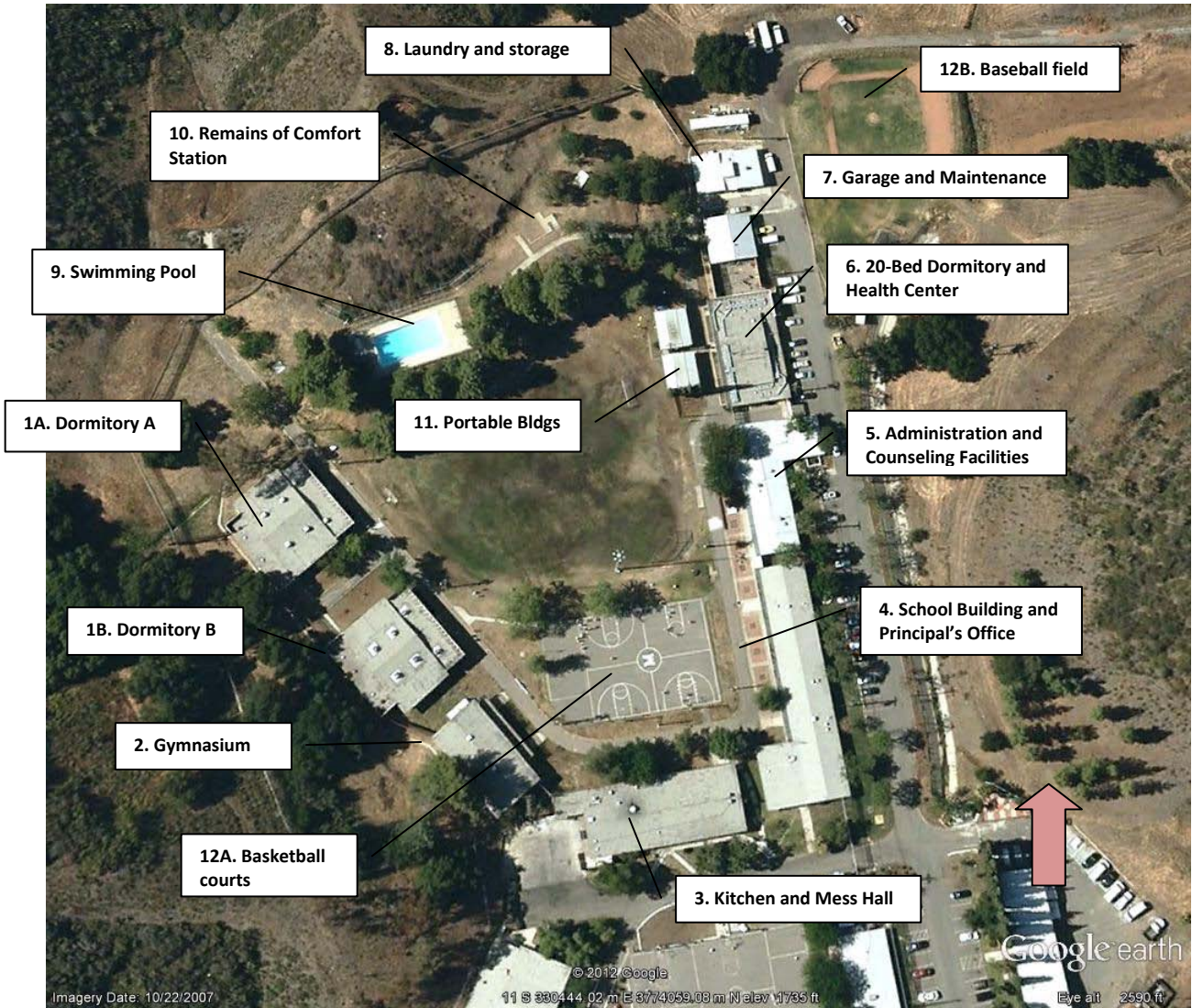
**Laundry and Storage Building, constructed after 1980.
View from main driveway, looking northwest.**



In-ground swimming pool. View looking west.

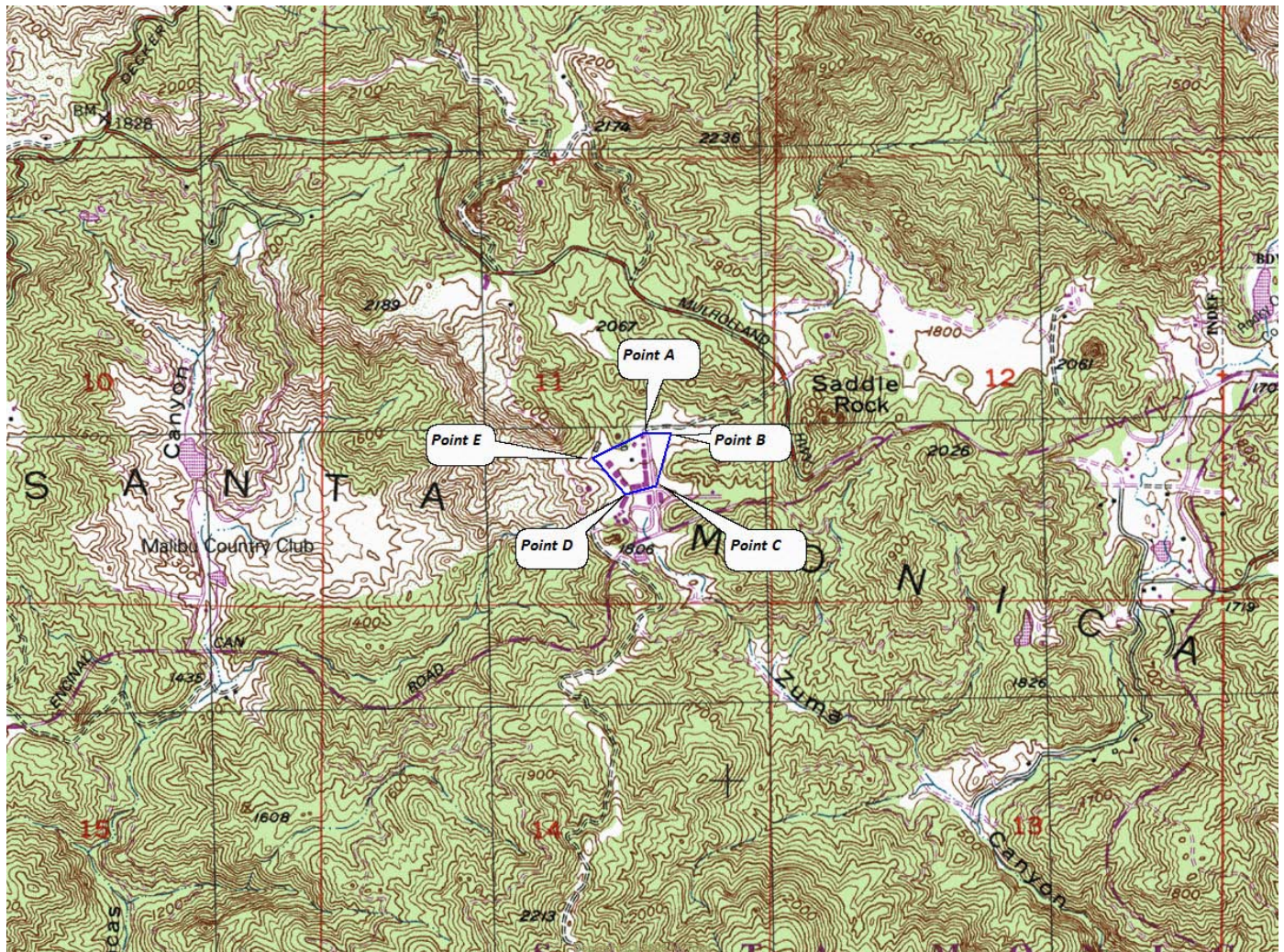


Foundation pad of demolished "comfort station" located to the east of the swimming pool. View looking northwest.



Aerial view of Camp Kilpatrick, 2012.

LOCATION MAP



- Point A: Zone 11; 330492 m/E; 3774175m/N
- Point B: Zone 11; 330588 m/E; 3774174m/N
- Point C: Zone 11; 330531 m/E; 3773983m/N
- Point D: Zone 11; 330420 m/E; 3773954m/N
- Point E: Zone 11; 330304 m/E; 3774091m/N

APPENDIX F
PERSONNEL QUALIFICATIONS

EDUCATION

Master of Arts, Anthropology, California State University, Fullerton, CA, 1994

Bachelor of Arts, Psychology/Sociology, Towson State University, Maryland, MD, 1987

PROFESSIONAL CERTIFICATIONS

Registered Professional Archaeologist (National), 1999 – present

Certified Archaeologist – Riverside County TLMA, 2008 – present

Certified Archaeologist – Orange County Environmental Management Agency, 1998 – present

Cultural Resources Specialist – California Energy Commission, 2004

PROFESSIONAL SUMMARY

Patrick Maxon is a Registered Professional Archaeologist, is certified by the County of Orange Environmental Management Agency and the Riverside County Transportation and Land Management Agency. He has 18 years of experience in all aspects of cultural resources management, including prehistoric and historic archaeology, paleontology, ethnography, and tribal consultation. He has expertise in compliance with the National Environmental Policy Act (NEPA), the California Environmental Quality Act (CEQA), the National Historic Preservation Act (NHPA), the Archaeological Resources Protection Act (ARPA), and the Clean Water Act (CWA), among others. Mr. Maxon has been previously certified by the City of San Diego, and meets the Secretary of Interior's standards for historic preservation programs for archaeology. Mr. Maxon has completed hundreds of cultural resources projects that have involved (1) agency, client, Native American, and subcontractor coordination; (2) treatment plans and research design development; (3) archival research; (4) field reconnaissance; (5) site testing; (6) data recovery excavation; (7) construction monitoring; (8) site recordation; (9) site protection/preservation; (10) mapping/cartography; (11) laboratory analysis; and (12) report production. He has managed a number of projects within the jurisdiction of the U.S. Army Corps of Engineers (USACE), the Bureau of Land Management (BLM), the Bureau of Reclamation, and other federal agencies that require compliance with Section 106 of the NHPA. He has also completed projects throughout Southern California under CEQA for State and local governments and municipalities, including the California Department of Transportation (Caltrans), the Department of General Services (DGS), the California Energy Commission (CEC), the California Department of Water Resources, the Los Angeles County Department of Public Works (LADPW), the Los Angeles Department of Water and Power (LADWP), the Los Angeles Unified School District, and others.

RELEVANT PROJECT EXPERIENCE

Lancaster Solar Farm Initial Study/Mitigated Negative Declaration, Lancaster (CoLACAO).

BonTerra Consulting is currently preparing an Initial Study/Mitigated Negative Declaration (MND) for the proposed Solar Energy Project to be developed on approximately 63 acres of undeveloped County-owned land within the City of Lancaster. The project site is surrounded on the east and west by several County facilities, and the California State Prison-Los Angeles County (CSP-LAC) is located to the south. The County is proposing to develop the project site with a solar facility capable of generating up to 4 megawatts (MW) of electricity under peak solar conditions, and the energy would be made equally available to the adjacent Mira Loma Detention Center and the Challenger Memorial Youth Center.

The cultural resources investigation at the site included a California Historical Resources Information System (CHRIS) records search and literature review for the project at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton. Native American consultation was initiated with the Native American Heritage Commission (NAHC) with a request for a Sacred Lands File Search and contact list, and informational letters were mailed to tribes requesting comment. A paleontological resources records search, completed previously by the Los Angeles County Natural History Museum (LACNHM) was reviewed for information on known paleontological resources in the project site and surrounding area. In addition, a current records review of the museum's vertebrate paleontology records for the project site and vicinity was undertaken and reviewed. A cultural resources survey of the project site was conducted and a Historic Resources Assessment involving a pedestrian survey of the project site and research into the historic development of the site and surrounding area, including individual property information available from archival sources, was also completed. The study concluded that five on-site structures of an extant but defunct wastewater treatment and reclamation system are eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. Avoidance or formal documentation via a Historic American Engineering Report (HAER) to document the history of early sewage treatment and water reclamation systems of the type found in the project area, and the physical properties of the system, was recommended. No other significant cultural resources were identified as a result of the study; however, because of the presence of historic and prehistoric resources in the vicinity, and the possibility of significant resources buried under development at the project site, monitoring of grading was recommended.

Sylmar Ground Return Replacement Return System, City of Los Angeles (MWatson). BonTerra Consulting has been hired by Montgomery Watson Harza to perform an assessment of biological and cultural resources for the Sylmar Ground Replacement Return System Project in Los Angeles. The northern segment extends from north to south within the utility easement corridor that runs between the Sylmar West Converter Station in Sylmar to the Kenter Canyon Terminal Tower near Brentwood. The southern extension, from the Kenter Canyon Terminal Tower to the ocean, is currently being considered under three alternatives. Cultural resources work included a California Historical Resources Information System (CHRIS) records search and literature review for the project at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton. Native American consultation was initiated with the Native American Heritage Commission (NAHC) with a request for a Sacred Lands File Search and contact list, and informational letters were mailed to tribes requesting comment. A paleontological resources records search was completed by the Los Angeles County Natural History Museum (LACNHM) to compile information on known paleontological resources in the project site and surrounding area. Brief, one-day field surveys were conducted for the northern segment and memo reports were produced that identified constraints to the construction work. Cultural resources surveys of the southern extension's three alternatives were subsequently conducted.

Centennial Specific Plan Environmental Impact Report, Cultural Resources Surveys, Los Angeles County. BonTerra Consulting is preparing the environmental documentation for the Centennial Specific Plan EIR that involves a new community consisting of residential, commercial, business park, and cultural and civic/institutional uses and encompassing approximately 11,680 acres. Mr. Maxon is managing the review, evaluation, and mitigation of cultural resources for this proposed project. To consider the current status of the project area's cultural and paleontological resources in the environmental analysis, others initially performed a Phase I cultural resources study of the entire project area. Mr. Maxon surveyed an off-site Caltrans right-of-way south of the project site. This included a records search at the South

Central Coastal Information Center at the California State University, Fullerton; a paleontological records search at the Los Angeles County Museum; and an intensive pedestrian survey to evaluate the project area for the presence of cultural and paleontological resources. Numerous cultural resources sites were discovered on the project site, and some were evaluated for significance. Those that were determined eligible and were in the development area were preserved in place. As the project evolves and expands beyond the Phase I area, additional sites must be evaluated for significance. Some may need to undergo data recovery excavations, while one structure must be recorded and evaluated. Consultations with regulatory agencies, County staff, Native American tribes, the interested public, and Clients must be completed and their comments considered, and the monitoring of disturbances around the known sites will be undertaken when construction activities commence.

Newport Banning Ranch (City of Newport Beach), As project manager of the cultural resources portion of this on going project, Mr. Maxon conducted archaeological, historic, and paleontological investigations for resources potentially impacted by the proposed Newport Banning Ranch development. The investigation consisted of (1) a Phase II test level excavation of eight prehistoric and three historic archaeological sites present on the site; (2) an assessment and evaluation of the built environment resources associated with the West Newport Oil Company development on site; and (3) a paleontological assessment of the project site's potential for the presence of sensitive rock formations and fossil resources. Three archaeological sites were deemed significant as a result of the study and the paleontological significance of the project site was deemed as high. However, no historic resources associated with oil extraction operations were identified. Mr. Maxon oversaw the completion of fieldwork, the preparation of archaeological, historical and paleontological technical reports, and subsequently prepared the cultural resources section of the EIR for the project. Future work will include data recovery excavations and/or site protection/preservation of significant cultural and paleontological resources impacted by the proposed project. Archaeological/Paleontological monitoring will be undertaken during grading of the project site.

Poseidon Desalination Plant, Cultural Resources Services, Huntington Beach and Newport Beach. BonTerra Consulting completed cultural and biological resources Phase I and II studies for the proposed Poseidon Resources Desalination Plant project in the City of Huntington Beach and the associated desalination plant pump station in the City of Newport Beach. The project included a Phase I cultural resources reconnaissance study that consisted of a California Historical Resources Information System (CHRIS) records search and literature review for the project at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton, Native American coordination with the Native American Heritage Commission and local Native American tribes and individuals, a pedestrian survey of both locations, and a cultural resources technical report describing the results of the study and offering management recommendations.

While no archaeological or paleontological resources were discovered, historic structures are present on the property and were evaluated for significance. The proposed desalination plant location in Huntington Beach, currently developed with three defunct fuel oil tanks and their infrastructure, is located within the existing AES Huntington Power Generation Plant facility in Huntington Beach. The second parcel is located in unincorporated County of Orange, immediately adjacent to the City of Newport Beach. It consists of an existing pump station site that will be expanded as part of the current project. Because they are nearly 50 years old, the fuel oil tanks in Huntington Beach were recorded on DPR Series 523 forms and evaluated for eligibility for listing in the California Register of Historical Resources. They were found not eligible. Mitigation for potential project effects included recommendations for the historic

structures present on site and retention of an Archaeologist and/or Paleontologist in the event that cultural resources or fossil resources are discovered during grading.

Atlanta Ave Widening Project HPSR/ASR/XPI (KOMEX). As project manager for the Atlanta Avenue widening project, Mr. Maxon conducted a Phase I cultural resources study to evaluate the potential effects of the project on cultural resources. The initial work included consultation with Caltrans cultural resources specialists regarding the Area of Potential Effects (APE) to cultural resources; a cultural resources literature review; Native American consultation; a field survey of the project area; and submittal to Caltrans of an Archaeological Survey Report (ASR), and a Historic Property Survey Report (HPSR). After further consultation with Caltrans, Mr. Maxon directed the historic evaluation of the Pacific Mobile Home Park south of the site; and completed an Extended Phase I (XPI) study consisting of subsurface archaeological excavation to evaluate the presence of the archaeological site within the APE. An updated ASR, XPI report, DPR 523 site forms, and HPSR was submitted to Caltrans and SHPO for review and comment.

Wintersburg Channel (OrCo). Mr. Maxon performed a Phase I cultural resources study to determine if the proposed widening of the channel would have the potential to impact cultural resources. The study included a literature review at the South Central Coastal Information Center, a paleontological literature review at the Los Angeles County Museum, a pedestrian survey of the Area of Potential Effects, and completion of the CEQA section describing the results of the study. As cultural resources project manager on this contract, Mr. Maxon also consulted with regulators at the US Army Corps of Engineers, Native American tribes and individuals, and with a local archaeologist who has extensive experience working in and around Bolsa Chica. Elements of the defunct Bolsa Chica Gun Club were identified in the wetlands, but it was determined that the channel work would have no impact on them. Recordation of the channel itself and the Slater Bridge to the north was subsequently completed by an architectural historian. Construction monitoring was recommended.

AFFILIATIONS AND COMMITTEES

Pacific Coast Archaeological Society (PCAS)

Society for California Archaeology (SCA)

Society for American Archaeology (SAA)

Association of Environmental Professionals (AEP) (Board of Directors, 2005 to present)

American Cultural Resources Association (ACRA)

PROFESSIONAL EXPERIENCE

BonTerra Consulting, Director, Cultural Resources 2008–present

Chambers Group, Director, Cultural Resources 2006–2008

SWCA, Project Manager/Director, Cultural Resources 2001–2006

RMW Paleo Associates, Staff Archaeologist/Senior Project Manager 1994–2001

Resources

PrimaryString	TrinomialString	ResourceName	Status	OtherIDs	ResType	Age	InfoBase	ResourceCollections	RecordingEvents	Reports	CountyName	Maps
P-19-002156	CA-LAN-002156	Upper Zuma		Resource Name - Upper Zuma; Other - NPS 7	Site	Prehistoric	Survey	No	1993 (C. King, Topanga Anthropological Consultants); 1999 (Chester King, Topanga Anthropological Consultants)	LA-03587, LA-07158, VN-02250	Los Angeles	POINT DUME
P-19-004663	CA-LAN-004663	BBT-15-04		Resource Name - BBT-15-04	Site	Prehistoric	Survey	No	2015 (A. Ringlestein, NPS)	LA-13238	Los Angeles	POINT DUME
P-19-101279		IF-07		Resource Name - IF-07	Other	Prehistoric	Survey	No	2015 (A. Ringlestein, NPS)	LA-13238	Los Angeles	POINT DUME

Reports

ReportNum	Authors	CitYear	CitTitle	CitPublisher	ReportType	Resources	Counties	Maps
LA-01579	Brown, Robert S.	1986	Archaeological Survey of a 622 Acre Property in the Trancas Canyon Area of the Santa Monica Mountains Tentative Tract 44398	Archaeological Associates, Ltd.	Archaeological, Field study	19-000527, 19-000528, 19-000864, 19-000865	Los Angeles	POINT DUME
LA-01951	McKenna, Jeanette A.	1990	Historical and Archaeological Investigations of the Phlyn Properties Tract 47425 in the Santa Monica Mountains of Los Angeles County, Palmdale, California	McKenna et al.	Archaeological, Field study		Los Angeles	POINT DUME
LA-02097	Bleitz, Dana E. and Roy A. Salls	1990	Report of Archaeological Reconnaissance Survey of Zuma Project Point Dume Quad Malibu, California	Northridge Center for Public Archaeology, CSUN	Archaeological, Field study		Los Angeles	POINT DUME
LA-03100	King, Chester	1994	Affect to Archaeological Sites of a Proposed Trail Segment Between Kanan Road and the Suma Crest Fire Road, Los Angeles County, California	Topanga Anthropological Consultants	Archaeological, Field study	19-002177	Los Angeles	POINT DUME
LA-03568	Singer, Clay A.	1997	Report on an Archaeological Survey of the Backbone Trail Connection Newton Canyon / Zuma Ridge Section in Los Angeles County, California	C.A. Singer & Associates, Inc.	Archaeological, Field study		Los Angeles	POINT DUME
LA-05739	McKenna, Jeanette A.	2001	Previous Archaeological Investigations and Paleontological Overview for the Proposed Las Virgenes Municipal Water District Recycled Water Feasibility Study, Los Angeles and Ventura Counties, California	McKenna et al.	Archaeological, Field study	19-000527, 19-000528, 19-000864, 19-000865, 56-000008, 56-000854, 56-000855, 56-001235	Los Angeles	POINT DUME, THOUSAND OAKS
LA-07158	McKenna, Jeanette A.	2002	Results of a Phase I Cultural Resources Investigation and Paleontological Overview for the Proposed Las Virgenes Municipal Water District Recycled Water Feasibility Study, Los Angeles and Ventura Counties, California	McKenna et al.	Archaeological, Field study	19-000527, 19-000578, 19-000717, 19-000864, 19-000865, 19-001871, 19-002156, 56-000008, 56-000012, 56-000854, 56-000855, 56-001235	Los Angeles	POINT DUME, THOUSAND OAKS
LA-07861	Jordan, Stacey C. and Patterson, Joshua D.	2006	Archaeological Survey Report for the Southern California Edison Company Replacement of 30 Deteriorated Poles Private and Public Inholdings, Ventura, Los Angeles, and Santa Barbara Counties, California	Mooney, Jones & Stokes	Archaeological, Field study	19-000729, 19-000730, 19-000731, 19-001266, 56-000141, 56-000550, 56-000562, 56-000901, 56-000902, 56-000980, 56-001110, 56-001124, 56-001125	Los Angeles	CALABASAS, FILLMORE, MALIBU BEACH, MOORPARK, NEWHALL, OJAI, PITAS POINT, POINT DUME, SAN FERNANDO, SANTA PAULA, SANTA PAULA PEAK, SANTA SUSANA, SIMI, THOUSAND OAKS, TRIUNFO PASS, VAL VERDE, VENTURA, YORBA LINDA
LA-08559	King, Chester	2004	Archaeological Survey of a Segment of the Backbone Trail Extending Between Encinal Canyon Road and Mulholland Highway	Topanga Anthropological Consultants	Archaeological, Field study		Los Angeles	POINT DUME
LA-08570	Wodarski, Robert J.	2006	A Phase 1 Archaeological Study for Proposed Improvements to the Malibu Country Club Golf Course and Property Encompassing Approximately 627 Acres of Land Within the Coastal Zone of Los Angeles County, California	Historical, Environmental, Archaeological, Research, Team	Archaeological, Field study	19-000527, 19-000528	Los Angeles	POINT DUME
LA-08607	Wodarski, Robert J.	2005	A Phase 1 Archaeological Study for a Proposed Metal Agricultural Building Located at 32111 Mulholland Highway (APN#2058-016-027) Saddlerock Ranch City of Malibu, County of Los Angeles, California	Historical, Environmental, Archaeological, Research, Team	Archaeological, Field study		Los Angeles	POINT DUME
LA-13238	Brown, Gary M. and Austin Ringelstein	2015	Cultural Resources Inventory along Two New Segments of the Backbone Trail: Etz Meley and Zuma-Trancas, Santa Monica Mountains National Recreation Area, Ventura and Los Angeles Counties, California	NPS	Archaeological, Field study	19-003328, 19-004663, 19-101278, 19-101279	Los Angeles	TRIUNFO PASS

NATIVE AMERICAN HERITAGE COMMISSION

October 15, 2020

Charles Cisneros
Psomas

Via Email to: Charles.cisneros@psomas.com

Re: 2PBW010100 Project, Los Angeles County

Dear Mr. Cisneros:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

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

Sincerely,



Steven Quinn
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

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Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

October 16, 2020

PSOMAS

Attn: Charles Cisneros

re: Paleontological resources for the 2PBW010100 Project

Dear Charles:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the 2PBW010100 project area as outlined on the portion of the Point Dume USGS topographic quadrangle map that you sent to me via e-mail on October 11, 2020. We do not have any fossil localities that lie directly within the proposed project area but do have fossil localities nearby from the same sedimentary deposits that may occur in the proposed project area at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County.

Locality Number	Location	Formation	Taxa	Depth
LACM IP 16924	near intersection of Dry Canyon Rd. and Mulholland Hwy	Conejo Volcanics (sedimentary boulders within volcanic breccias)	Invertebrates	Unknown
LACM IP 16925	Canyon north of Mulholland Hwy. and west of Cold Canyon Rd	Conejo Volcanics (sedimentary boulders within volcanic breccias)	Invertebrates	Unknown
LACM IP 16926	NW corner of intersection of Woodruff Dr. and Piuma Rd	Conejo Volcanics (sedimentary boulders within volcanic breccias)	Invertebrates	Unknown
LACM IP 41429, 40994, 7826, 2554	Along Latigo Canyon Rd., Northwest of Castro Peak, central Santa Monica Mountains	Topanga Formation	Invertebrates	Unknown
LACM 5469, 1051, 5087	Along Old Topanga Canyon Rd.	Topanga Formation	Fish (Chondrichthyes, Osteichthyes); whale (<i>Mysticeti</i>)	Unknown
LACM VP 5455	Encino Reservoir	Topanga Formation	Fish (Chondrichthyes)	Unknown

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the Natural History Museum of Los

Angeles County (“NHMLA”). It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

A handwritten signature in black ink that reads "Alyssa Bell". The signature is written in a cursive, flowing style. The name "Alyssa" is written in a larger, more prominent script than "Bell".

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice

APPENDIX D
NOISE DATA

Construction Generated Noise

Building Type	Office, Hotel, Hospital, School, Public Works	Distance (ft)
Construction Noise at 50 Feet (dBA Leq)		50

Construction Phase	All Applicable Equipment in Use ¹	Minimum Required Equipment in Use ¹	
Ground Clearing/Demolition	84	84	
Excavation	89	79	
Foundation Construction	78	78	
Building Construction	87	75	
Finishing and Site Cleanup	89	75	

Wastewater Treatment Plant		Distance (ft)
Average Construction Noise (dBA Leq)		670

Construction Phase	All Applicable Equipment in Use ¹	Minimum Required Equipment in Use ¹	
Ground Clearing/Demolition	61	61	
Excavation (Site Preparation)	66	56	
Foundation Construction	55	55	
Building Construction	64	52	
Paving	66	52	

Sewer Pipeline		Distance (ft)
Average Construction Noise (dBA Leq)		320

Construction Phase	All Applicable Equipment in Use ¹	Minimum Required Equipment in Use ¹	
Ground Clearing/Demolition	68	68	
Excavation (Site Preparation)	73	63	
Building Construction	71	59	
Paving	73	59	

Source: Bolt, Beranek and Newman, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," prepared for the USEPA, December 31, 1971. Based on analysis for Office Building, Hotel, Hospital, School, and Public Works.

Construction Generated Vibration

Wastewater Treatment Plant		Closest Distance (feet):		670
	Approximate RMS a		Approximate RMS	
	66		73.000	
Equipment	inch/second		inch/second	
Vibratory roller	0.21		0.002	
Large bulldozer	0.089		0.001	
Small bulldozer	0.003		0.000	
Jackhammer	0.035		0.000	
Loaded trucks	0.076		0.001	
	Criteria		0.250	1700
Sewer Pipeline		Closest Distance (feet):		10
	Approximate RMS a		Approximate RMS	
	Velocity at 25 ft,		Velocity Level,	
	inch/second		inch/second	
Equipment				
Vibratory roller	0.21		0.830	
Large bulldozer	0.089		0.352	
Small bulldozer	0.003		0.012	
Jackhammer	0.035		0.138	
Loaded trucks	0.076		0.300	
	Criteria		0.250	
Based on distance to nearest structure				
¹ : Determined based on use of jackhammers or pneumatic hammers that may be used for pavement demolition at a distance of 25 feet				
Notes: RMS velocity calculated from vibration level (VdB) using the reference of one microinch/second.				
Source: Based on methodology from the United States Department of Transportation Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment</i> (2006).				