

Project Memorandum

Los Angeles Pierce College Parking Lot 5 Stormwater Project

TO: John H. Holloway
Project Manager
Best, Best, and Krieger, LLP

FROM: Stephanie Khoury
Environmental Scientist

DATE: April 2, 2026

SUBJECT: Applicable California Environmental Quality Act (CEQA) Exemptions for Los Angeles Pierce College Parking Lot 5 Stormwater Project, in the Neighborhood of Woodland Hills, City of Los Angeles, Los Angeles County, California

Purpose and Intent of the Memorandum

Best, Best, and Krieger (BBK), acting on behalf of the Los Angeles Community College District (LACCD), requested an evaluation of the applicability of State CEQA Guidelines Article 19 (Categorical Exemptions) for the Parking Lot 5 Stormwater Project proposed at Los Angeles Pierce College (LAPC). The California Secretary for Resources has found that the categorically exempt classes of projects do not have a significant effect on the environment, and do not require the preparation of environmental documents (State CEQA Guidelines Section 15300).

The specific applicable exemptions discussed in this memorandum are:

- Categorical Exemption, Class 1, Existing Facilities (State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15301)
- Categorical Exemption, Class 2, Replacement or Reconstruction (State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15302)

This memorandum provides a brief background on the applicability of these CEQA exemptions and confirms and discusses how they apply to the Proposed Project.

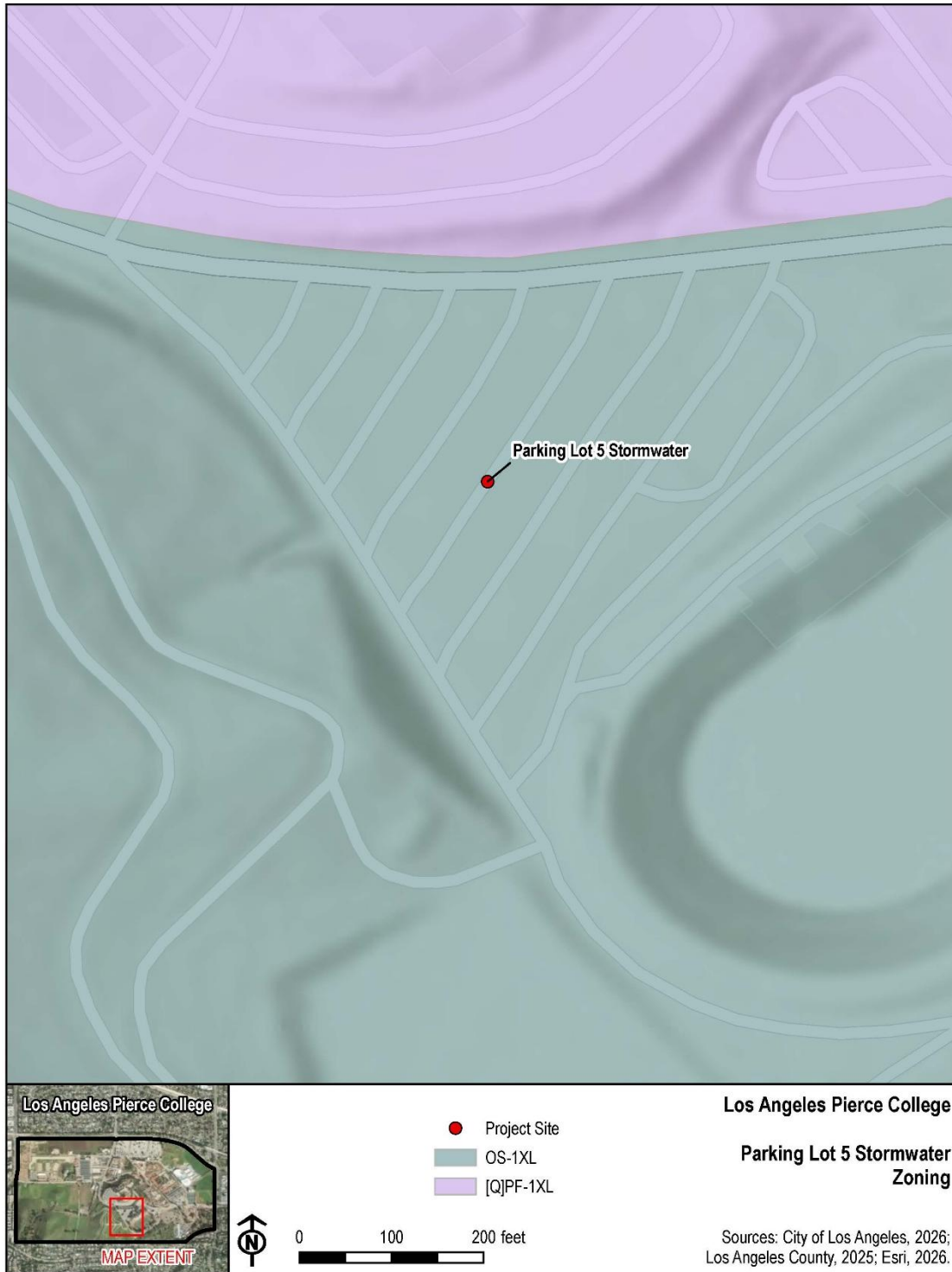
Environmental Setting

Existing LAPC Setting. The Proposed Project is located within the LAPC campus, an 82-acre community college campus located at 6201 Winnetka Avenue, Woodland Hills, CA 91371. As is characteristic of developed educational uses, minimal vegetation is present on much of the eastern half of the LAPC campus outside of established landscape features. However, the western half of the LAPC campus consists of agrarian uses serving the LAPC agricultural operations program, and thus largely contains grazing fields and fenced animal pens. US Route 101 and State Route 27 (Topanga Canyon Boulevard) are the primary transportation corridors closest to the Project site, and are located approximately 0.7 and 1.0 miles from the LAPC campus, respectively. According to the State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB, 2026) and Department of Toxic Substances Control (DTSC) Envirostor (DTSC, 2026) website, the LAPC campus does not contain an open or active hazardous waste site pursuant to Section 65962.5 of the Government Code.

As shown in Figure 1, the LAPC campus carries dual zoning and general plan land use designations of Qualified Public Facilities Height District 1 Extra Low ([Q]PF-1XL) and Open Space Height District 1 Extra Low (OS-1XL) according to the City of Los Angeles Zone Information and Map Access System (ZIMAS) (City of Los Angeles, 2026a). The [Q]PF-1XL District allows such uses as public libraries, public health facilities, educational facilities, fire and police stations, and post offices, as well as government buildings and supportive housing projects with proper zoning authority approval. The OS-1XL District allows such uses as public recreation spaces, nature reserves, community gardens, farmers markets, cemeteries, local civic facilities, public safety facilities, and minor utilities, as well as amphitheatres, stadiums, entertainment venues, and commercial uses with proper zoning authority approval (City of Los Angeles, 2026b). The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan identifies the agricultural land and open space on the LAPC campus as an environmentally sensitive educational resource, the preservation of which is considered an important goal of the plan (City of Los Angeles, 1999).

Figure 1 also shows surrounding zoning designations, including Low (RS-1) and Very Low (RA-1) Density Residential, which allow for single-family residential dwellings and, in Very Low Density areas, limited agricultural uses; Qualified Restricted Density Multiple Dwelling Residential ([Q]RD2-1), which allows for multi-family development such as duplexes or small apartments; Qualified High Density Residential ([Q]R4-2D), which allows for apartments and other multi-family housing; and Qualified Commercial ([Q]C4-2D), which allows for commercial and mixed-use residential uses (City of Los Angeles, 2026a, 2026b). Additionally, parcels along the western border of the LAPC campus occur in the College Subdistrict of the Warner Center Specific Plan ([WC]COLLEGE-SN), which allows for educational, commercial, and mixed-use development (City of Los Angeles, 2013a).

Figure 1. Zoning Designations



Source: City of Los Angeles, 2026a.

Proposed Project Description

Project Overview. The Proposed Project would repave Parking Lot 5 and a portion of Brahma Drive, install stormwater biofiltration systems and planters, spray and sub-surface drip irrigation (SSDI) systems, minor electrical systems, lighting, and stormwater infrastructure in Parking Lot 5 (Figure 2). The pavement in Parking Lot 5 is currently in poor condition, consisting of uneven cracked surfaces throughout the site.

Proposed Site Improvements. Elements to be demolished at Parking Lot 5 include the existing 24-inch storm drain, asphalt pavement across the 3.9-acre site, curbs and other concrete fixtures, light poles and associated foundations, and electrical infrastructure associated with existing lighting. Construction would not require the demolition of any existing buildings.

Following the demolition phase, the Project site would be graded so that stormwater would flow toward one of four biofiltration end caps to be constructed at the north end of the site. A biofiltration end cap is a component installed at the end of the biofiltration system that passively filters runoff through soil and plant media to remove pollutants. End caps would not contain electrical components. Next, electrical infrastructure including underground pull boxes (small ground enclosure used to house electrical cables), new light poles to replace demolished light poles, and conduits for a future fiber optic cable would be installed; the existing pay kiosk would be relocated; the site would be fully repaved except for the proposed biofiltration planters and a number of additional ornamental planters; and individual parking stripes would be painted.

Site irrigation improvements would include biofiltration systems and spray and SSDI systems. Biofiltration irrigation uses gravity and a variety of plant species and soils to naturally filter and convey stormwater toward biofiltration planters and end caps. Spray and SSDI irrigation use standard sprinkler systems and drip lines that reach directly to the roots of plants, respectively. Biofiltration planters would consist of multiple layers beginning with one foot of construction aggregate, followed by two feet of bioretention soil media, and capped by a three-inch layer of mulch. This multilayered conveyance structure would be surrounded on either side by six inches of concrete, with curb inlets to allow stormwater to flow from the parking lot to the biofiltration planters. The biofiltration planters would be installed in each landscape median to convey stormwater flows to biofiltration end caps. Biofiltration planters would be approximately 5.25 feet wide and would culminate three to six inches below ground surface. The biofiltration planters would collect, treat, and temporarily store stormwater runoff from impervious surfaces to filter pollutants before water percolates into the ground. They would generally be located between each row of parking spaces.

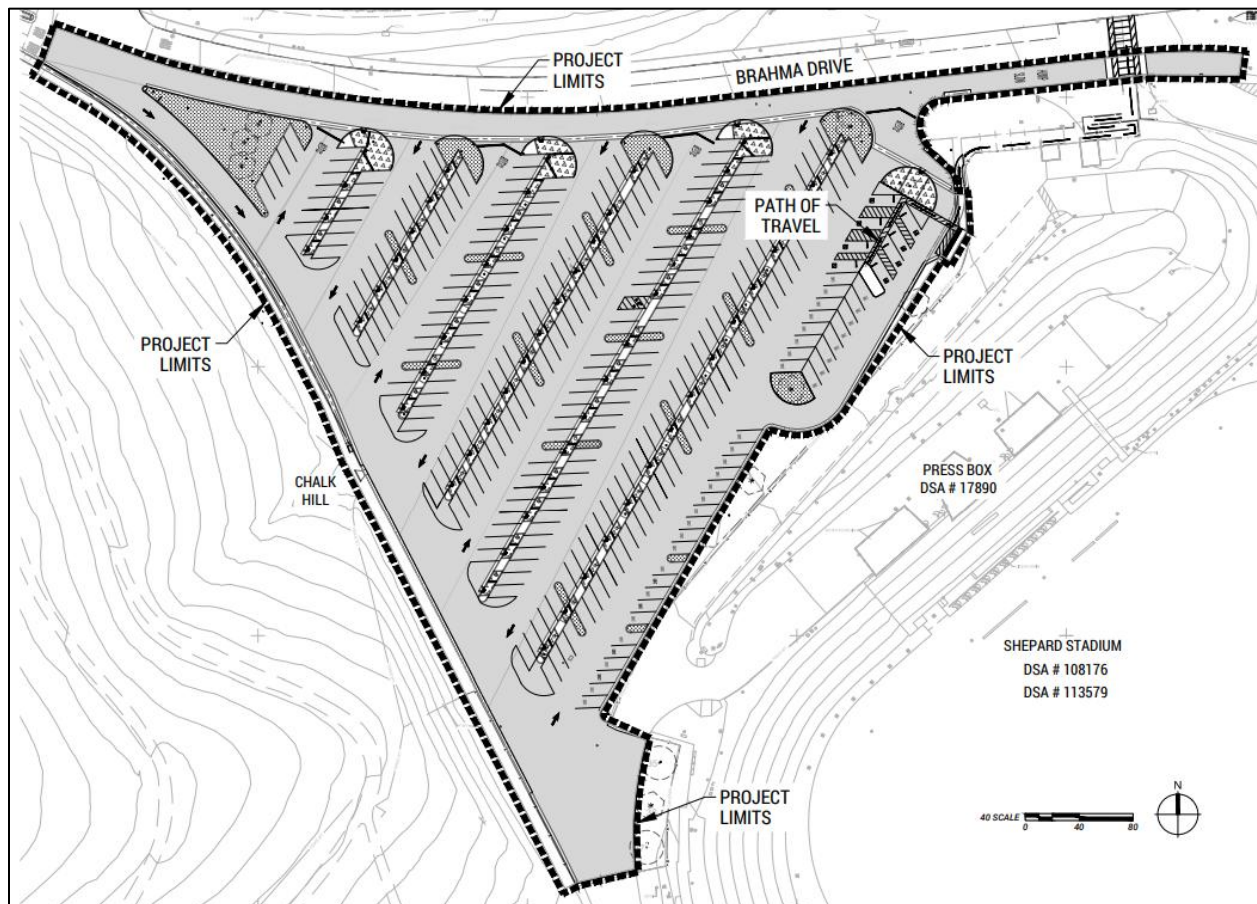
A project-specific Stormwater Pollution Prevention Plan (SWPPP) would be implemented during construction to prevent polluted runoff, including measures such as avoiding inclement weather, hydroseeding (applying a mixture of mulch, seed, and water to exposed soils to prevent erosion by water and wind), installing gravel bag berms on sloped areas, sweeping and vacuuming surfaces before final paving, placing sediment filters over storm drains, stabilizing site entrances and exits, and following general safe use and storage of water, fuel, and construction materials. Following grading, paving, and biofiltration system installation, irrigation systems consisting of a mix of standard pop-up spray and subsurface bubbler models would be installed throughout the lot, and approximately 30 ornamental trees would be planted across the site. Approximately 10 existing trees would be retained on the Parking Lot 5 site, and shrubs, vines, and other ground covering plants would be planted in both ornamental and biofiltration planters. The Project site can be adequately served by existing utilities, as no major electrical, gas, or water demand would increase, and therefore no additional utility infrastructure would be needed.

Proposed Facility Operations. The new proposed biofiltration system would collect and treat stormwater in Parking Lot 5, feeding it into SSDI irrigation systems across the site, which would require ongoing

monthly maintenance such as regular inspections, flushing of drip lines, and use of flow meters and pressure gauges to ensure proper functionality. Project operations would remain unchanged, with the site continuing to offer parking for visitors.

All workers conducting operational maintenance on the site would be trained on proper material delivery and storage practices. If fertilizers or pesticides are applied to the landscape areas, recommended doses and usage instructions would be followed to avoid excess materials being carried offsite by runoff.

Figure 2. Proposed Site Layout

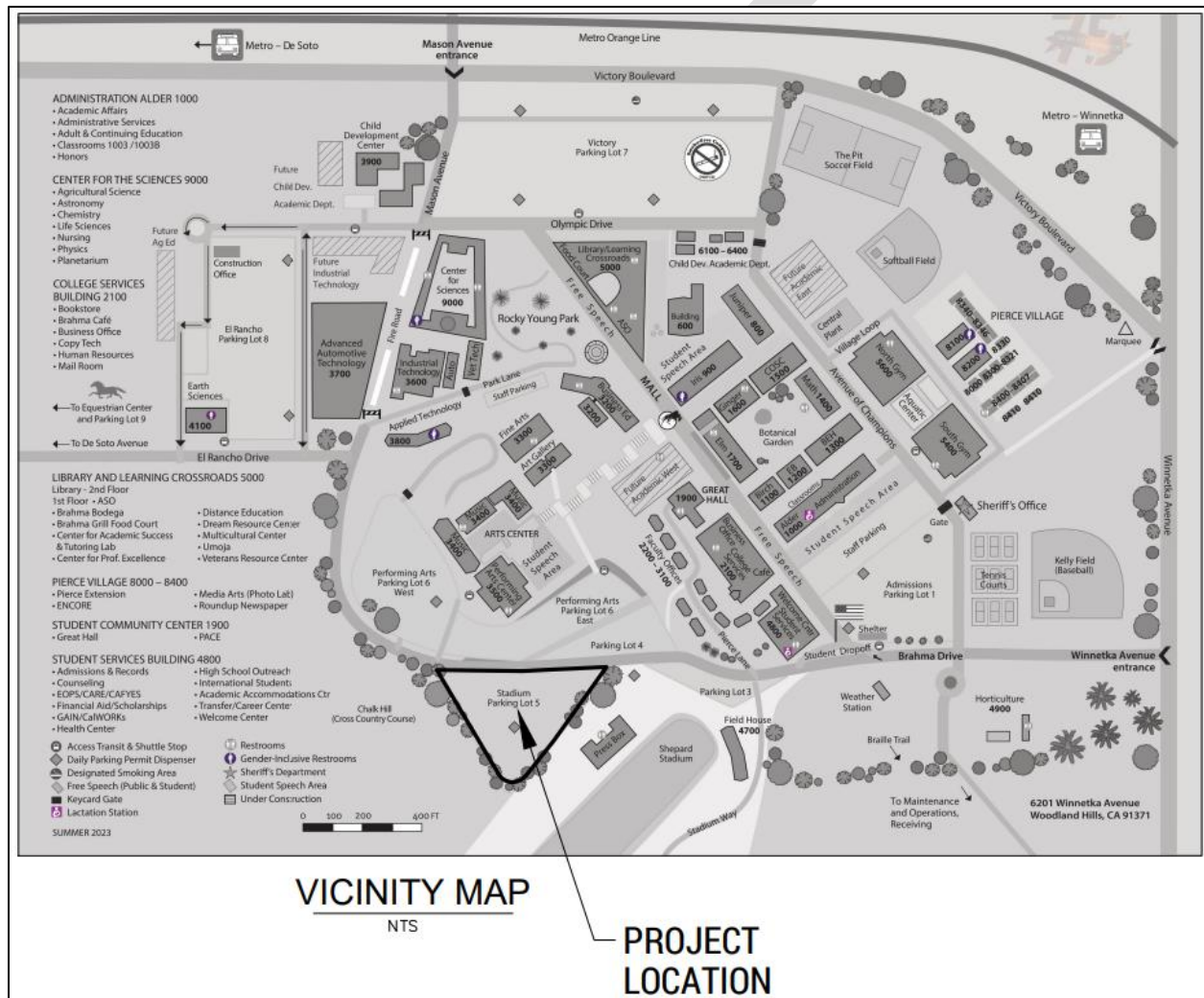


Project Location. As shown in Figure 3, the Project site consists of LAPC Parking Lot 5 in the southern portion of the LAPC campus. The Project site is bordered by Brahma Drive and the LAPC Performing Arts Center to the north, Shepard Stadium to the east, and the Chalk Hill running trails to the south and west. The Project site is located within the portion of the LAPC campus that is zoned OS-1XL, as shown in Figure 1, and is surrounded by educational and recreational uses, as well as low-density residential development approximately 0.1 mile to the south.

Project Construction. Project construction would take approximately 31 months and is estimated to begin in August 2026 and be completed by the end of April 2029. Construction would occur Monday through Friday from 7:00 a.m. to 5:00 p.m. Staging and employee parking is anticipated to occur along Brahma Drive to the north of the Project site. No ground disturbance, equipment staging, placement of soil spoils would occur in the open space used for trail running adjacent to Parking Lot 5.

All workers would be trained on the proper material delivery and storage practices. If construction materials are to be stored on site, storage areas would be located away from vehicular traffic to the extent feasible. Construction personnel would avoid the exposure of applied materials such as paint to rainfall and runoff unless sufficient time has been allowed for them to dry. Paint would be mixed indoors or in a containment area and would not be cleaned or rinsed into a street, gutter, storm drain, or watercourse. All paint thinners, residue, and related waste that cannot be recycled would be disposed of as hazardous waste. Application of erodible landscape materials would be temporarily halted within two days before a forecasted rain event. If fertilizers or pesticides are applied to the landscape areas, recommended doses and usage instructions would be followed to avoid excess materials being carried offsite by runoff.

Figure 3. Project Site Location



Project Approvals. Following approval of the Proposed Project, LACCD would proceed with filing the necessary Notice of Exemption (NOE) with the County Clerk and State Clearinghouse at the California Governor's Office of Land Use and Climate Innovation. Additionally, the Proposed Project would comply with all applicable Building Codes and General Plan standards.

Analysis

The following provides the categorical exemptions applicable to project activities.

State CEQA Guidelines Section 15301, “Existing Facilities,” states:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:

(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;...

(h) Maintenance of existing landscaping, native growth, and water supply reservoirs (excluding the use of pesticides, as defined in Section 12753, Division 7, Chapter 2, Food and Agricultural Code).

Justification: The Proposed Project would consist of minor alterations to the existing parking lot, landscaping, and stormwater infrastructure within Parking Lot 5. The existing parking lot would be regraded and repaved with new asphalt, as its current condition has deteriorated with major cracks and uneven surfaces, and the proposed stormwater biofiltration planters are considered minor alterations to the existing parking lot and landscape medians. The Proposed Project would not expand parking capacity or increase the number of students at LAPC.

State CEQA Guidelines Section 15302, “Replacement or Reconstruction,” states:

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:

(c) replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

Justification: The Proposed Project would essentially reconstruct the existing parking lot by resurfacing and repaving Parking Lot 5 and adding additional permeable areas within existing and new landscape medians to the parking lot to facilitate stormwater capture and improve water quality. New stormwater biofiltration planters and water-efficient irrigation systems would be installed. New plants would be drought-tolerant and require minimal water. The Proposed Project would not expand the capacity of LAPC, as improvements would be limited to the existing footprint of Parking Lot 5.

If the project is categorically exempt, then the lead agency must consider whether the categorical exemption is negated by an “exception” to the categorical exemption. These exceptions apply under the following circumstances described in State CEQA Guidelines Section 15300.2 (a)-(f):

(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.

Justification: The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan identifies the agricultural land and open space on the LAPC campus as an environmentally sensitive educational resource, the preservation of which is considered an important goal of the plan (City of Los Angeles, 1999). Although the Project is located adjacent to agricultural land/open space, all project activities would be limited to the existing parking lot limits and would not change the use of this adjacent land or physically impact this resource. The Proposed Project would not impact a designated

environmental resource of hazardous or critical concern as detailed in the full discussion under *Further Analysis*, below. Therefore, this exception does not apply to the Proposed Project.

- (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.*

Justification: Several projects have been identified that would occur at the same time as the Proposed Project: the Rocky Young Park Improvements Project, the Sewer Line Replacement Project, the Campus Mall Renovation Project, and the Athletic Fields Project. However, these projects would all be campus projects such that coordination between them to reduce any potential cumulative impacts would be implemented. These projects are all minor campus improvements occurring in different locations throughout LAPC and are different types of projects involving different activities such as landscaping and hardscape improvements, sewer replacement, and athletic field renovations. Different construction methods, durations, and disturbance areas across campus would occur such that individual construction-related impacts would be temporary, intermittent, and localized, and would not combine to result in a cumulatively considerable effect. There would be no cumulatively considerable impacts and therefore this exception does not apply to the Proposed Project.

- (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.*

Justification: The Proposed Project is located in a developed area and involves the installation of stormwater capture infrastructure and paving improvements at LAPC. Project construction is anticipated to be short-term, as improvements would include repaving a parking lot, installation of stormwater biofiltration systems, irrigation systems, replacement lighting, and new landscaping. Nothing regarding the Proposed Project's size, location, nature, or scope would be considered "unusual circumstances." Therefore, this exception does not apply to the Proposed Project.

- (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 outcropping, 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.*

Justification: The nearest eligible state scenic highway is the segment of US Route 101 west of its intersection with State Route 27, located approximately 1.7 mile southwest of the Project site (Caltrans, 2026). The Proposed Project would be located at an existing school, and Project activities would not be visible from US Route 101. Therefore, this exception does not apply to the Proposed Project.

- (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.*

Justification: The Proposed Project would be located within the existing LAPC campus. A search of the entire LAPC campus was conducted on Envirostor and GeoTracker, and the campus and Project site were not identified as a hazardous waste site by the California Department of Toxic Substances Control, nor would they be located near a hazardous waste generator (DTSC, 2026; SWRCB, 2026). This exception does not apply to the Proposed Project.

- (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.*

Justification: No historical resources would be affected by the Proposed Project. The Proposed Project would upgrade an existing parking lot by repairing existing pavement currently in poor condition, installing stormwater biofiltration infrastructure to improve water quality, and installing SSDI systems to facilitate water conservation and reduce water consumption. Construction activities associated with the Proposed Project would not occur within proximity to an identified historical resource, as none have been identified on the LAPC campus according to the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan's General Plan Land Use Map (City of Los Angeles, 2013b). Additionally, no buildings would be demolished or altered as a result of the Project. Therefore, this exception does not apply to the Proposed Project.

Further Analysis

Because the Proposed Project has been designed to avoid potential adverse effects and use construction best management practices (BMPs), a categorical exemption would apply to the Proposed Project and the exceptions denoted in State CEQA Guidelines Section 15300.2 (a)-(f) as described above and supplemented below would not apply.

The Proposed Project would add new stormwater biofiltration systems and SSDI systems to LAPC Parking Lot 5, which are consistent with eligible Class 1 and Class 2 categorical exemptions listed in State CEQA Guidelines Sections 15301 and 15302. The Proposed Project would not impact adjacent land uses or sensitive natural resources. Although the existing agricultural land on the LAPC campus is identified in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan as an environmentally sensitive educational resource, Project activities would not extend beyond the limits of the Parking Lot 5 site and would not preclude agricultural educational activities. Project construction would also be subject to existing laws; BMPs would be implemented to avoid impacts to nesting birds.

Burrowing owls (*Athene cunicularia*) have been documented utilizing agricultural areas south of Brahma Drive and west of the Proposed Project. These observations represent wintering or migrating individuals, consistent with regional owl movement patterns. No suitable breeding or wintering habitat occurs within the Project footprint. The Proposed Project would not result in direct impacts to burrowing owls or occupied burrows. To reduce any potential indirect impacts, construction noise would be limited in accordance with City of Los Angeles Municipal Code (City of Los Angeles, 2026c), and lighting would be installed in accordance with Title 24 lighting requirements. Construction activities would be confined to the work limit area as illustrated in Figure 2, and dust control measures would be implemented in accordance with South Coast Air Quality Management District (SCAQMD) Rule 403. To reduce predator attraction, refuse and food waste would be disposed of in designated waste collection areas and containers, and the work area would be kept clean throughout construction per the Project SWPPP.

Project construction activities would avoid impacts related to fugitive dust in compliance with SCAQMD regulations such as Rule 403 (Fugitive Dust). Project construction would be short-term, lasting approximately 31 months. Work areas would be fenced to ensure the safety of students and provide security for the work area. Construction would not occur during evenings and weekends, thereby minimizing noise impacts to adjacent residential land uses. Given the short-term and temporary nature of construction activities and the limited scope of work required to improve the 3.9-acre parking lot site, the Proposed Project would not involve "unusual circumstances." The Proposed Project is in a developed urban area surrounded by residential and institutional uses. There are no designated state scenic highways or known hazardous waste sites near the Project site (Caltrans, 2026; DTSC, 2026; SWRCB, 2026).

There are no known historical resources in proximity to the Project site. The Proposed Project would not involve any construction activities or alteration of land outside of the Project site. The Proposed Project would not cause a substantial adverse change in the significance of a historical resource.

LACCD would follow state law and utilize the following BMPs when implementing the Proposed Project. These BMPs would address any unanticipated cultural resource discoveries, avoid impacts to nesting birds and burrowing owls, minimize fugitive dust, and prevent any discharge or runoff of sediment or construction-related materials from the site.

- Fugitive Dust Control.** As required by SCAQMD Rule 403 (Fugitive Dust), LACCD would implement the best available dust control measures during active operations capable of generating fugitive dust. BMPs outlined in Rule 403 that may be utilized during construction, as applicable, are provided below in Table 1.

Table 1. SCAQMD Rule 403 Best Available Control Measures

Source Category	Control Measure	Guidance
Backfilling	<ul style="list-style-type: none"> Stabilize backfill material when not actively handling Stabilize backfill material during handling Stabilize soil at completion of activity 	<ul style="list-style-type: none"> Mix backfill soil with water prior to moving Dedicate water truck or high-capacity hose to backfilling equipment Empty loader bucket slowly so that no dust plumes are generated Minimize drop height from loader bucket
Clearing and grubbing	<ul style="list-style-type: none"> Maintain stability of soil through pre-watering of site prior to clearing and grubbing Stabilize soil during and immediately after clearing and grubbing activities 	<ul style="list-style-type: none"> Maintain live perennial vegetation where possible Apply water in sufficient quantity to prevent generation of dust plumes
Clearing forms	<ul style="list-style-type: none"> Use sweeping and water spray to clear forms Use vacuum system to clear forms 	<ul style="list-style-type: none"> Use of high-pressure air to clear forms may cause exceedance of Rule requirements
Crushing	<ul style="list-style-type: none"> Stabilize surface soils prior to operation of support equipment Stabilize material after crushing 	<ul style="list-style-type: none"> Follow permit conditions for crushing equipment Pre-water material prior to loading into crusher Monitor crusher emissions opacity Apply water to crushed material to prevent dust plumes
Cut and fill	<ul style="list-style-type: none"> Pre-water soils prior to cut and fill activities Stabilize soil during and after cut and fill activities 	<ul style="list-style-type: none"> For large sites, pre-water with sprinklers or water trucks and allow time for penetration Use water trucks/pulls to water soils to depth of cut prior to subsequent cuts

Demolition mechanical/manual	<ul style="list-style-type: none"> ■ Stabilize wind erodible surfaces to reduce dust ■ Stabilize surface soil where support equipment and vehicles will operate ■ Stabilize loose soil and demolition debris ■ Comply with AQMD Rule 1403 	<ul style="list-style-type: none"> ■ Apply water in sufficient quantities to prevent the generation of visible dust plumes
Disturbed soil	<ul style="list-style-type: none"> ■ Stabilize disturbed soil throughout the construction site ■ Stabilize disturbed soil between structures 	<ul style="list-style-type: none"> ■ Limit vehicular traffic and disturbances on soils where possible ■ If interior block walls are planned, install as early as possible ■ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
Earth-moving activities	<ul style="list-style-type: none"> ■ Pre-apply water to depth of proposed cuts ■ Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction ■ Stabilize soils once earth-moving activities are complete 	<ul style="list-style-type: none"> ■ Grade each project phase separately, timed to coincide with construction phase ■ Upwind fencing can prevent material movement on site ■ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
Importing/exporting of bulk materials	<ul style="list-style-type: none"> ■ Stabilize materials while loading to reduce fugitive dust emissions ■ Maintain at least six inches of freeboard on haul vehicles ■ Stabilize material while transporting and unloading to reduce fugitive dust emissions ■ Comply with Vehicle Code Section 23114 	<ul style="list-style-type: none"> ■ Use tarps or other suitable enclosures on haul trucks ■ Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage ■ Comply with track-out prevention/mitigation requirements ■ Provide water while loading and unloading to reduce visible dust plumes
Landscaping	<ul style="list-style-type: none"> ■ Stabilize soils, materials, and slopes 	<ul style="list-style-type: none"> ■ Apply water to materials to stabilize ■ Maintain materials in a crusted condition ■ Maintain effective cover over materials ■ Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes ■ Hydroseed prior to rain season
Screening	<ul style="list-style-type: none"> ■ Pre-water material prior to screening ■ Limit fugitive dust emissions to opacity and plume length standards ■ Stabilize material immediately after screening 	<ul style="list-style-type: none"> ■ Dedicate water truck or high-capacity hose to screening operation ■ Drop material through the screen slowly and minimize drop height ■ Install wind barrier with a porosity of no more than 50% upwind of screen to the height of the drop point
Staging areas	<ul style="list-style-type: none"> ■ Stabilize staging areas during use and at project completion 	<ul style="list-style-type: none"> ■ Limit size of staging area ■ Limit vehicle speeds to 15 miles per hour ■ Limit number and size of staging area entrances/exits
Stockpiles/Bulk Material Handling	<ul style="list-style-type: none"> ■ Stabilize stockpiled materials ■ Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational 	<ul style="list-style-type: none"> ■ Add or remove material from the downwind portion of the storage pile ■ Maintain storage piles to avoid steep sides or faces

	water irrigation system that is capable of complete stockpile coverage	
Traffic areas for construction activities	<ul style="list-style-type: none"> ■ Stabilize all off-road traffic and parking areas ■ Stabilize all haul routes ■ Direct construction traffic over established haul route 	<ul style="list-style-type: none"> ■ Apply gravel/paving to all haul routes as soon as possible to all future roadway areas ■ Barriers can be used to ensure vehicles are only used on established parking areas/haul route
Truck Loading	<ul style="list-style-type: none"> ■ Pre-water material prior to loading ■ Ensure that freeboard exceeds six inches (CVC 23114) 	<ul style="list-style-type: none"> ■ Empty loader bucket such that no visible dust plumes are created ■ Ensure that the loader bucket is close to the truck to minimize drop height while loading

Source: SCAQMD, 2005.

- **Worker Environmental Awareness Program (WEAP).** As part of standard construction practices, a Worker Environmental Awareness Program (WEAP) shall be provided to construction personnel prior to the start of ground-disturbing activities. The WEAP shall consist of a brief environmental awareness training incorporated into the construction contractor’s pre-construction meetings. Training shall include an overview of the cultural sensitivity of the Project site and the surrounding area; examples of cultural resources that could potentially be identified during earthmoving activities; and standard procedures to follow in the event that unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. Representative photographs of objects considered cultural resources with the potential to occur during construction will be presented in the WEAP training.
- **Inadvertent Discovery of Cultural Resources.** As part of standard construction procedures, if a previously unidentified cultural resource is discovered during construction activities, work in the immediate vicinity of the discovery (generally within 50 feet of the find) shall be temporarily paused until a Secretary of the Interior-qualified archaeologist assesses the nature of the resource, consistent with California Public Resources Code Section 5097.98, State CEQA Guidelines Section 15064.5, and the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61). If the archaeologist determines that the finds warrant further consideration, the archaeologist shall consult with the appropriate responsible public agency regarding recommended plans for treatment of the find(s), which may include documentation, avoidance, or other treatment measures consistent with applicable laws and regulations. Construction activities may resume in the area following completion of the evaluation and implementation of any applicable procedures.
- **Inadvertent Discovery of Human Remains.** In the event that human remains, or potential human remains are discovered, construction activities shall be immediately halted. Compliance with California Health and Safety Code Section 7050.5 and Public Resource Code section 5097 is required by law. Under California Health and Safety Code Section 8100, six or more human burials at a single location constitute a cemetery, and willful disturbance of human remains is a felony under Section 7052.
- **Nesting Bird Avoidance and Protection.** As required by the Migratory Bird Treaty Act and California Fish and Game Code, LACCD will implement the following best management practices during construction to avoid impacts to protected nesting birds. A qualified biologist shall conduct pre-construction nesting bird surveys within all suitable habitat in the Project Area and within a 300-foot buffer for passerines and a 500-foot buffer for raptors. Surveys shall be completed within

72 hours prior to the start of construction activities. If active nests (nests containing eggs, nestlings, or fledglings) are detected, the biologist shall establish a no-disturbance buffer to be maintained until the young have fledged and the nest is no longer active. Standard buffers include 100 feet for passerines and 500 feet for raptors or special-status birds, unless the biologist determines—based on species, nest location, site conditions, and proposed activities—that an adjusted buffer would still avoid disturbance. A qualified biologist shall monitor all active nests within or near the established buffers to ensure compliance and to document nesting status until nesting activity has concluded. All Project personnel shall receive environmental awareness training prior to construction, including instruction on applicable wildlife laws, sensitive bird species, avoidance requirements, and procedures for reporting wildlife incidents. The qualified biologist shall have the authority to halt work if nesting birds may be adversely affected and shall determine when work may safely resume.

In addition to the above BMPs, a Project-specific SWPPP would be implemented during construction to prevent polluted runoff on the site. A Qualified Stormwater Practitioner (QSP) would review Project plans prior to construction and recommend effective BMPs to ensure SWPPP compliance. Measures may include, but are not limited to, scheduling project activities to avoid inclement weather, hydroseeding (applying a mixture of mulch, seed, and water to exposed soils to prevent erosion by water and wind), installation of gravel bag berms on sloped areas, sweeping and vacuuming of surfaces before final paving, placement of sediment filters over storm drains, stabilization of site entrances and exits, and general safe use and storage of water, fuel, and construction materials.

Conclusion

LACCD is a public service provider, and LAPC is an educational use. The purpose of the Proposed Project is to upgrade and improve the surface of Parking Lot 5, stormwater capture and irrigation facilities, and landscaping. Therefore, the categorical exemptions described in State CEQA Guidelines Sections 15301 and 15302 would apply to the Proposed Project. These applicable Class 1 and Class 2 categorical exemptions would not be negated by any of the exceptions listed in State CEQA Guidelines Section 15300.2. The LAPC Parking Lot 5 Stormwater Project would not have a significant effect on the environment and is considered exempt from the provisions of CEQA.

We recommend the filing of an NOE based on this analysis within five days of agency approval of the Proposed Project and categorical exemption.

References

- Caltrans (California Department of Transportation). California Scenic Highways Map. https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774#data_s=id%3AdataSource_2-199ba603ee3-layer-4%3A193. Accessed January 26, 2026.
- City of Los Angeles. 1999. Los Angeles City Planning, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. Adopted May 3. https://planning.lacity.gov/odocument/c2a26cca-955f-42ee-8eeb-332f05286c78/Canoga_Park-Winnetka-Woodland_Hills-West_Hills_Community_Plan.pdf. Accessed January 22, 2026.
- _____. 2013a. Los Angeles City Planning, Warner Center 2035 Plan. Adopted October 23. <https://planning.lacity.gov/odocument/3eadcb84-d31e-4666-9811-ad55f4f67d93>. Accessed January 22, 2026.
- _____. 2013b. Los Angeles City Planning, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan – General Plan Land Use Map. <https://planning.lacity.gov/odocument/9f7a06bc-c521-4622-b14e-97217909b658/cpkplanmap.pdf>. Accessed February 17, 2026.
- _____. 2026a. City of Los Angeles Zone Information and Map Access System (ZIMAS). <https://zimas.lacity.org/>. Accessed January 22, 2026.
- _____. 2026b. City of Los Angeles Zoning Code. <https://zoning.lacity.gov/>. Accessed January 22, 2026.
- _____. 2026c. City of Los Angeles Noise Municipal Code (LAMC). LAMC Chapter IV, Article 1, Section 41.40; Chapter XI, Article 2, Sections 112.04 and 112.05. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777. Accessed February 17, 2026.
- DTSC (Department of Toxic Substances Control). 2026. EnviroStor. <https://www.envirostor.dtsc.ca.gov/public/>. Accessed January 19, 2026.
- SCAQMD (South Coast Air Quality Management District). 2005. Rule 403 – Fugitive Dust. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>. Accessed February 17, 2026.
- SWRCB (State Water Resources Control Board). 2026. GeoTracker. <https://geotracker.waterboards.ca.gov/>. Accessed January 19, 2026.