Extera Public Schools Project
Initial Study / Mitigated Negative Declaration

Project No. PRJ2022-004416-(1)
Conditional Use Permit No. RPPL2022013731
Environmental Plan No. RPPL2023005113

Prepared by:

LA COUNTY PLANNING

320 West Temple Street
Los Angeles, California 90012

Prepared with assistance from:

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February 2024

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1 INTRODUCTION

An application for the proposed Extera Public Schools Project (Project) has been submitted to the Cunty of Los Angeles Department of Regional Planning (LA County Planning) for discretionary review. The LA County Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (IS/MND) evaluates potential environmental effects resulting from construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the County's environmental review procedures.

Based on the analysis provided within this IS/MND, the County has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This IS/MND is intended as an informational document, and is ultimately required to be adopted by the decision maker prior to project approval by the County.

1.1 Purpose of an Initial Study

CEQA was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the Lead Agency may adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND).

1.2 Organization of the Initial Study

This Initial Study is organized into four sections as follows:

Section 1. Introduction: This Section provides introductory information on the CEQA process.

Section 2. Environmental Checklist Form: This Section provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Project, including project characteristics, related project information and a list of requested discretionary actions.

Section 4. Evaluation of Environmental Impacts: This Section contains the completed CEQA Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA Process

In compliance with the State CEQA Guidelines, the County as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the County has prepared an IS/MND to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the proposed Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein.

If this IS/MND and the Project are approved by the County, then within five days of the action, the County will file a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

Environmental Checklist Form (Initial Study)
County of Los Angeles, Department of Regional Planning

Project title: "Extera Public Schools" / Project No. PRJ2022-004416-(1) / Conditional Use Permit No. RPPL2022013731 / Environmental Plan No. RPPL2023005113

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Christina Nguyen, Planner, Metro Development Services, 213-262-1325, cnguyen@planning.lacounty.gov

Project sponsor's name and address: Extera Public Schools, 3626 E. Fifth Street, Los Angeles, CA 90063

Project location: 1059 S. Gage Avenue, Los Angeles, CA 90023
APN: 5239-012-028 and 5239-012-009 *USGS Quad*: Los Angeles

Gross Acreage: 1.17

General plan designation: Medium Density Residential (MD)

Community/Area wide Plan designation: East Los Angeles Community Plan

Zoning: R-3

Description of project:

Existing Uses
The Site is currently improved with two buildings totaling approximately 25,302 square feet of building area and a surface parking lot: 1-story, 6,993 square-foot building (Building 1) and 2-story, 18,309 square-foot building (Building 2). The Site is currently used as a church (currently Oasis of Mercy Church).

Proposed Uses
The Project consists of a transitional kindergarten (TK) to 8th grade charter school serving 525 students with 28 employees (teachers and staff), which will include 22 classrooms, offices, outdoor eating areas and play areas, and a multi-purpose room. The Project proposes to: (i) renovate Building 1, including the removal of an existing 509 square-foot covered courtyard and add a new 2,265 square-foot outdoor lunch patio; (ii) demolish and rebuild a new Building 2 in a different location of the Site; and (iii) provide 38 vehicular surface parking spaces and 90 bicycle spaces (88 short-term and two long-term). The renovated Building 1 will provide a total of 8,749 square feet in floor area. The new two-story Building 2 will provide 29,676 square feet of floor area, inclusive of a new 6,276 square-foot concrete deck covering the onsite parking spaces. In total, the Project will provide 38,425 square feet of building floor area or an Floor Area Ration ("FAR") of 0.754:1, which increases the existing floor area by 13,123 square feet.

Use Permitted
Pursuant to LACC Section 22.18.030, a school use is permitted in the R-3 zone, subject to approval and issuance of a conditional use permit ("CUP") under LACC Section 22.158.050. Thus, the Applicant requests a CUP to permit the construction, operation, and maintenance of a school use on the Site.

Parking
Projects located within a half-mile of a major transit stop or high-quality transit corridor ("HQTC") are generally eligible for the automobile parking reduction by AB 2097, which prohibits local jurisdictions from imposing or enforcing

minimum parking requirements for new development projects, including additions and changes of use. This includes residential, commercial, and industrial projects, but does not include hotels, motels, bed and breakfast inns, or other transient lodging.

While LACC Section 22.112.070 would require the Project to provide 54 vehicular parking spaces, under AB 2097, the Project is not required to meet a minimum parking requirement because it is located within a half-mile of a HQTC. Specifically, the Site is within 1,000 feet of eastbound and westbound transit stops along the Whittier Boulevard corridor. The Whittier Boulevard corridor is served by Metro Local Line 18 (Metro 18). Metro 18 provides eastbound and westbound service from the Wilshire & Western transit stop in the Koreatown area of the City of Los Angeles to the Montebello Metrolink Station in the City of Montebello. Metro 18's current service frequency meets the SCAG threshold for 15 minutes or less in each direction, and therefore, Whittier Boulevard currently qualifies as a HQTC. The Project will voluntarily provide 38 vehicular parking spaces.

Vehicular Access

Vehicular ingress to the Project's drop-off/pickup area and on-site parking will be provided through one-way access from South Gage Avenue to South Eastman Avenue for egress. There will be clear posted signage of the one-way traffic through the Site. Additionally, staff and parents/caregivers will be provided with information regarding Site access prior to the start of the school year. Therefore, motorists destined to the Site will be aware of the one-way flow of traffic. The proposed on-site drop-off/pick-up area lane is approximately 26 feet in width, which is sufficient to accommodate one lane of queued vehicles, plus a bypass lane to allow vehicles to bypass the queue should there be delay related to the passenger loading/unloading of one or more of the queued vehicles as discussed Vehicle Queuing Analysis (LLG, January 3, 2024) included in **Appendix J-2** of this MND.

This configuration will provide efficient and safe ingress and egress from the Property while maintaining less vehicular conflict points to both South Gage Avenue and South Eastman Avenue.

Design and Architecture

The proposed architecture is modern contemporary with bright colors and design elements celebrating Mexican cultural heritage. The modern Mexican architecture of the buildings include vibrant colors, bold shapes, playful lines and angles which embody a playful spirit matching the Project's use. The construction materials includes stucco, terra cotta Spanish and Mexican tile which will serve as accent details. Treatments incorporate a blend of contemporary and traditional architectural forms and details, which include a flat façade, hip style roof, plaster walls, and articulated facades such as inset windows and doors, offset/projected wall features and recessed entryways. Proposed building colors incorporate a neutral earth-tone palette with bright accents and a smooth stucco finish.

The buildings would be set back from the southern side of the Site by five feet, the rear setback by 15 feet, and a front yard setback of 15 feet required by LACC Section 22.110.090. Walls will be constructed along the northern and southern perimeters of the Site adjacent to the neighboring lots. Noise attenuating landscaping will be installed along the perimeter of the Site. A landscape plan has been submitted showing landscape areas on the perimeter of the Site and in the interior open spaces areas and within the front yard setback. Project lighting would consist of security lighting and wall lights on the building perimeters, using LED fixtures. All lighting would be designed to avoid light spillage to the neighboring properties.

Construction and Phasing

Construction activities would include demolition of the existing structures, fine grading; utility and infrastructure installation; building construction; roadway pavement; and architectural coatings. Grading is expected to result in 971 cubic yards of export (including 15 percent swell factor for topsoil). Overall, grading would balance onsite.

Construction activities are anticipated to last 12 months, with demolition, grading, and infrastructure development lasting 3) months and home construction lasting 9 months. Construction activities would be coordinated with all adjacent property owners.

Project construction would occur within the hours allowed by Los Angeles County Code Title 12, Environmental Protection, Section 12.08.440, which states that construction shall occur only between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, with no construction allowed on Sundays and holidays.

General Plan and Zoning

The Project is consistent with the existing County General Plan land use and zoning designations and no changes are proposed. The Project is subject to the Los Angeles County General Plan – East Los Angeles Community Plan. The school use is generally consistent with the General Plan land use designation of Medium Density Residential and is authorized with approval of a CUP. The General Plan sets forth policies regarding land use, urban form, open space, economic development, public services and more for the unincorporated areas of Los Angeles County. In line with the guiding principles of the General Plan, the Project supports the principle and goal to ensure community services and infrastructures are sufficient to accommodate growth and provide the foundation for a strong and diverse economy.

Discretionary Approvals and Permits

Pursuant to Los Angeles County Code (the "Code" or "LACC") the Applicant hereby requests the following entitlement to permit the proposed Project:

- Pursuant to LACC Section 22.18.030, a Conditional Use Permit to permit a school use on the Site, subject to LACC Section 22.158.050.

Surrounding land uses and setting:

The Project site is located within a developed, residential area within unincorporated Los Angeles County as described below:

North: Directly adjacent to the north of the Project Site are single-family homes (1044 Eastman Avenue and 1049 Gage Avenue), designated as Medium Density Residential (MD in the General Plan and zoned R-3.

West: Directly across Eastman Avenue are multi-family buildings (1047-1059 Eastman Avenue), designated as Medium Density Residential (MD in the General Plan and zoned R-3.

South: Directly adjacent to the south of the Project Site are single-family homes and multi-family buildings (1058 Eastman Avenue and 1067 Gage Avenue), designated as Medium Density Residential (MD in the General Plan and zoned R-3.

East: Directly across Gage Avenue are multi-family buildings (1052-1066 Gage Avenue), designated as Medium Density Residential (MD in the General Plan and zoned R-3.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to the requirements of Assembly Bill 52, the County sent informational letters about the proposed project and requests for consultation to each tribe on the County's list of tribes requesting consultation. A formal notification of the proposed project was sent to the following Native American tribes and groups:

- Gabrieleño Band of Mission Indians-Kizh Nation.

- The Local Government Tribal Consultation List Request was sent to the Native American Heritage Commission on September 25, 2023. A response dated November 15, 2023 was received via email and included in Appendix C-3 of this MND and stated the following, "A search of the SFL (Sacred Lands File) was completed for the project with negative results."

- A request for the Project Review/Quick Check was submitted to the South Central Coastal Information Center (California State University, Fullerton-Department of Anthropology) on September 25, 2023. The results of the Project Review/Quick Check was received on November 15, 2023, and included in Appendix C-1 of this MND.

During the notification period, the Gabrieleño Band of Mission Indians-Kizh Nation responded and requested consultation with the County. The tribe identified potential tribal cultural resources and provided recommended mitigation measures that are included within this Initial Study. Consultation with the tribe concluded on November 20, 2023.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency	*Approval Required*
Department of Public Works – Building and Safety	Building, grading, and demolition permits

Major projects in the area:

Project/Case No.	*Description and Status*
None	N/A

Reviewing Agencies:

Responsible Agencies

- ☐ None
- Regional Water Quality Control Board:
  - ☒ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ LAFCO

Special Reviewing Agencies

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area
- ☐

Regional Significance

- ☒ None
- ☒ SCAG Criteria
- ☐ Air Quality
- ☒ Water Resources
- ☐ Santa Monica Mtns. Area
- ☐

Trustee Agencies

- ☐ None
- ☒ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

County Reviewing Agencies

- ☒ DPW
- ☒ Fire Department - Land Development Unit
- ☒ Sanitation District
- ☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☒ Sheriff Department
- ☒ Parks and Recreation
- ☐ Subdivision Committee

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture/Forestry	☐ Hazards/Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Services
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

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

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

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

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

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

Seth Wulkan — 2/22/24
Signature (Prepared by) — Date

Christina Nguyen — 2/21/2024
Signature (Approved by) — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

7) The explanation of each issue should identify: The significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

3 PROJECT DESCRIPTION

This section is based on the following item, which is included as **Appendix A** to this ND:

A Plans, Franco Architects, November 17, 2023

3.1 Project Summary

The Project consists of a transitional kindergarten (TK) to 8th grade charter school serving 525 students with 28 employees (teachers and staff), which would include 22 classrooms, offices, outdoor eating areas and play areas, and a multi-purpose room. The Site is approximately 50,994 square feet (1.17 acres), which currently includes Building 1 (south portion of the Site) and Building 2 (north portion of the Site), which total 25,302 square feet. The Project proposes to (i) renovate Building 1, including the removal of an existing 509 square-foot covered courtyard and add a new 2,265 square-foot outdoor lunch patio, (ii) demolish and rebuild a new Building 2 in a different location of the Site, and (iii) provide 38 vehicular surface parking spaces and 90 bicycle spaces (88 short-term and two long-term). The renovated Building 1 will provide a total of 8,749 square feet in floor area. The new two-story Building 2 will provide 29,676 square feet of floor area, inclusive of a new 6,276 square-foot concrete deck covering the onsite parking spaces. In total, the Project will provide 38,425 square feet of building floor area or an Floor Area Ratio ("FAR") of 0.754:1, which increases the existing floor area by 13,123 square feet. **Table 3-1**, below, provides a comparison of the existing and proposed uses.

Table 3-1
Comparison of Existing and Proposed Project

	Existing	Project			Change
		Demo	New	Proposed	
Building 1 (south)	6,993 sf	- 509 sf	+ 2,265 sf	8,749 sf	+ 1,756 sf
Building 2 (north)	18,309 sf	- 18,309 sf	+ 29,676 sf	29,676 sf	+ 11,367 sf
Total	**25,302 sf**	**- 18,818 sf**	**+ 31,941 sf**	**38,425 sf**	**+ 13,123 sf**
Plans, Franco Architects, November 17, 2023.					

3.2 Environmental Setting

3.2.1 Project Location

The Project Site is located at 1059 South Gage Avenue, spanning between Gage Avenue and Eastman Avenue, in the unincorporated community of East Los Angeles of the County of Los Angeles (County), in zip code 90023.

The Site is 3.5 miles east of Downtown Los Angeles and 17 miles east of the Pacific Ocean.

See **Figure 3-1, Regional Map**, for the location of the Project within the context of the City.

See **Figure 3-2, Aerial Map**, for an aerial view of the Site and the immediate surrounding area.

Legend

Project Site

Source: Google Maps 2022.

Figure 3-1
Regional Location Map

Legend

Project Site

Existing Buildings Onsite

Source: Google Maps 2022.

Figure 3-2
Aerial Map

3.2.2 Surrounding Land Uses

The Site's vicinity is urbanized with a mixture of housing, commercial, and medical uses nearby. As described below, housing is located adjacent to the Site. Commercial uses are located along Whittier Boulevard, 915 feet north of the Site. Medical uses are located at the Los Angeles Community Hospital (4081 Olympic Boulevard), 400 feet south of the Site, across the I-5 Freeway, and the East Los Angeles Doctors Hospital (4060 Whittier Boulevard), 600 feet north of the Site. The existing adjacent surrounding uses include:

North: Directly adjacent to the north of the Project Site are single-family homes (1044 Eastman Avenue and 1049 Gage Avenue), designated as Medium Density Residential (MD in the General Plan and zoned R-3.

West: Directly across Eastman Avenue are multi-family buildings (1047-1059 Eastman Avenue), designated as Medium Density Residential (MD) in the General Plan and zoned R-3.

South: Directly adjacent to the south of the Project Site are single-family homes and multi-family buildings (1058 Eastman Avenue and 1067 Gage Avenue), designated as MD in the General Plan and zoned R-3.

East: Directly across Gage Avenue are multi-family buildings (1052-1066 Gage Avenue), designated as MD in the General Plan and zoned R-3.

3.2.3 Regional and Local Access

Regional access is provided by:

- Santa Ana Freeway (I-5), 150 feet south of the Site
- Long Beach Freeway (I-710), 3,450 feet east of the Site
- Pomona Freeway (SR-60), 3,750 feet north of the Site

Local access is provided by:

- Gage Avenue, adjacent to the east
- Eastman Avenue, adjacent to the west
- Dennison Street, 100 feet south of the Site
- Verona Street, 450 feet north of the Site
- Whittier Boulevard, 915 feet north of the Site

3.2.4 Pedestrian Facilities

There are sidewalks along the entire east boundary on Gage Avenue and west boundary on Eastman Avenue of the Project Site. Crosswalks are provided at the nearest signalized intersections:

- Whittier Boulevard / Gage Avenue, 955 feet north of the Site
- Whittier Boulevard / Eastman Avenue, 915 feet north of the Site

3.2.5 Bicycle Facilities

The following bicycle facilities are nearby:[1]

- Rowan Avenue (north of Whittier Boulevard), 1,000 feet northwest the Site is a Bike Boulevard[2]
- Downey Road, 1,500 feet east of the Site, is a Bike Route[3]

3.2.6 Public Transit

Los Angeles County Metropolitan Transportation Authority (Metro)[4] and Los Angeles County Department of Public Works (LADPW)[5] operate public transit in the area, as shown in **Table 3-2, Public Transit**.

Table 3-2
Public Transit

Line	Type	Direction	Stop	Distance to Site	Frequency of Service
Metro					
18	Bus	East-west on Whittier	Eastman	915 feet north	6 minutes
665	Bus	North-south on Indiana	Whittier	2,150 feet northwest	50 minutes
E	Train	North-south on Indiana	3rd	4,850 feet northwest	10 minutes
LA County Public Works El Sol Shuttle					
UP/SP	Bus	East-west on Whittier	Eastman	915 feet north	60 minutes
Metro 18 schedule (June 25, 2023): https://www.metro.net/riding/schedules/?line=18-13168 Metro 665 schedule (June 25, 2023): https://www.metro.net/riding/schedules/?line=665-13168 Metro E schedule (June 16, 2023): https://www.metro.net/riding/schedules/?line=804 LADPW El Sol Union Pacific / El Sol (Oct. 2019): https://pw.lacounty.gov/transit/ELASW_upsp.aspx					

1 Los Angeles County Bicycle Map: https://pw.lacounty.gov/tpp/bike/map.cfm. Bike Boulevard - on-street bike route, enhanced with traffic calming features which prioritize bicycle travel. Bike Route - on-street shared travel lane, shared space with other vehicular traffic.

2 On-street bike route, enhanced with traffic calming features which prioritize bicycle travel.

3 On-street shared travel lane, shared space with other vehicular traffic.

4 Metro System Map: https://www.metro.net/riding/guide/system-maps/, accessed September 10, 2023.

5 LA County Public Works: https://pw.lacounty.gov/transit/ELASW_upsp.aspx, accessed September 10, 2023.

The Site is within a High-Quality Transit Area (HQTA),[6] which are areas within one-half mile of a high-quality transit corridor. A high-quality transit corridor is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.[7]

3.2.7 Planning and Zoning

Table 3-3, Project Site, lists the Site's APNs, zoning, and General Plan land use designation as[8] R-3 (Limited Multiple Residence) and Medium Density Residential designation. The Project Site has the following zoning classifications:

Table 3-3
Project Site

Address	APN	Size (sf)	Zone	Land Use
1059 S. Gage Avenue	5239-012-028	50,994	R-3	Medium Density Residential
1048 S. Eastman Avenue	5239-012-009			
https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=7700eea9d54d46b18efb615f86cba25c				

3.3 Existing Conditions

The Site is currently improved with two buildings totaling approximately 25,302 square feet of building area and a surface parking lot:

- One-story, 6,993 square-foot building on the south portion of the Site (Building 1)
- Two-story, 18,309 square-foot building on the north portion of the Site (Building 2)

The Site is currently used as a church (currently Oasis of Mercy Church).The Church is used for various religious services and ceremonies, including religious education, religious services and ceremonies, overnight/weekend retreats, gospel concerts, Mass celebrations, vigils, twice yearly carnivals, and other special events. These activities are held throughout the week and weekend. Pre-Covid, between 185 and 750 people attended events, classes, and meetings at the church per day. In addition to church events and activities, there are an average of 54 leased and donated events per year, including baptisms, weddings, and events for other religious entities. Between 20-500 people attended each of these events.

There is ornamental vegetation and one tree (Howea palm) on the Project Site. There are two street trees (Ficus Microcarpa Nitida and Cupaniopsis Anacardioides) on Gage Avenue.[9]

6 SCAG, HQTA 2016 based on the 2020-2045 RTP/SCS: https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954, accessed September 10, 2023.

7 SCAG, Connect SoCal, Active Transportation Technical Report, page 26: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_active-transportation.pdf?1606001530, accessed September 10, 2023.

8 Los Angeles County Zoning: https://planning.lacounty.gov/luz/summary/category/residential_zones

9 Landscape Plan, Carter Romanek, November 2, 2023, included in **Appendix A** of this IS/MND.

3.4 Description Of Project

3.4.1 Project Overview

The Project consists of a transitional kindergarten (TK) to 8th grade charter school serving a maximum enrollment of 525 students, which would include 22 classrooms, offices, outdoor eating areas and play areas, and a multi-purpose room. The Project proposes to:

(i) renovate Building 1, including the removal of an existing 509 square-foot covered courtyard and add a new 2,265 square-foot outdoor lunch patio canopy;

(ii) demolish and rebuild Building 2 in a different location of the Site; and

(iii) provide 38 vehicular surface parking spaces and 90 bicycle spaces (88 short-term and 2 long-term).

The new two-story Building 2 would provide 23,400 square feet of classroom area and a new 6,276 square-foot concrete deck covering the onsite parking spaces, for a total of 29,676 square feet of new building. The renovated Building 1 would provide a total of 8,749 square feet in floor area. The Project would result in a net increase of 13,123 square feet for a total floor area[10] at the Site of 38,425 square feet.

The proposed school use would consolidate three existing school locations to this Site:

- Breed Street campus (2226 E. 3rd Street, 2.1 miles northwest of the Site), with 110 students
- Lorena Street campus (1015 S. Lorena Street, 0.9 miles west of the Site), with 109 students
- Eastman campus (4112 E. Olympic Boulevard, 1,300 feet south of the Site), with 108 students

The total number of students would not result in a net increase. Thus, the 327 students that currently attend these three school locations would instead attend the proposed school location.

In addition, students from 2nd Street Campus (1942 E. 2nd Street, 2.45 miles northwest of the Site) can also enroll at the proposed school location, though that will be on an optional basis (although it is unpredictable how many students will exercise this option).

Special events include typical-school related events, such as:

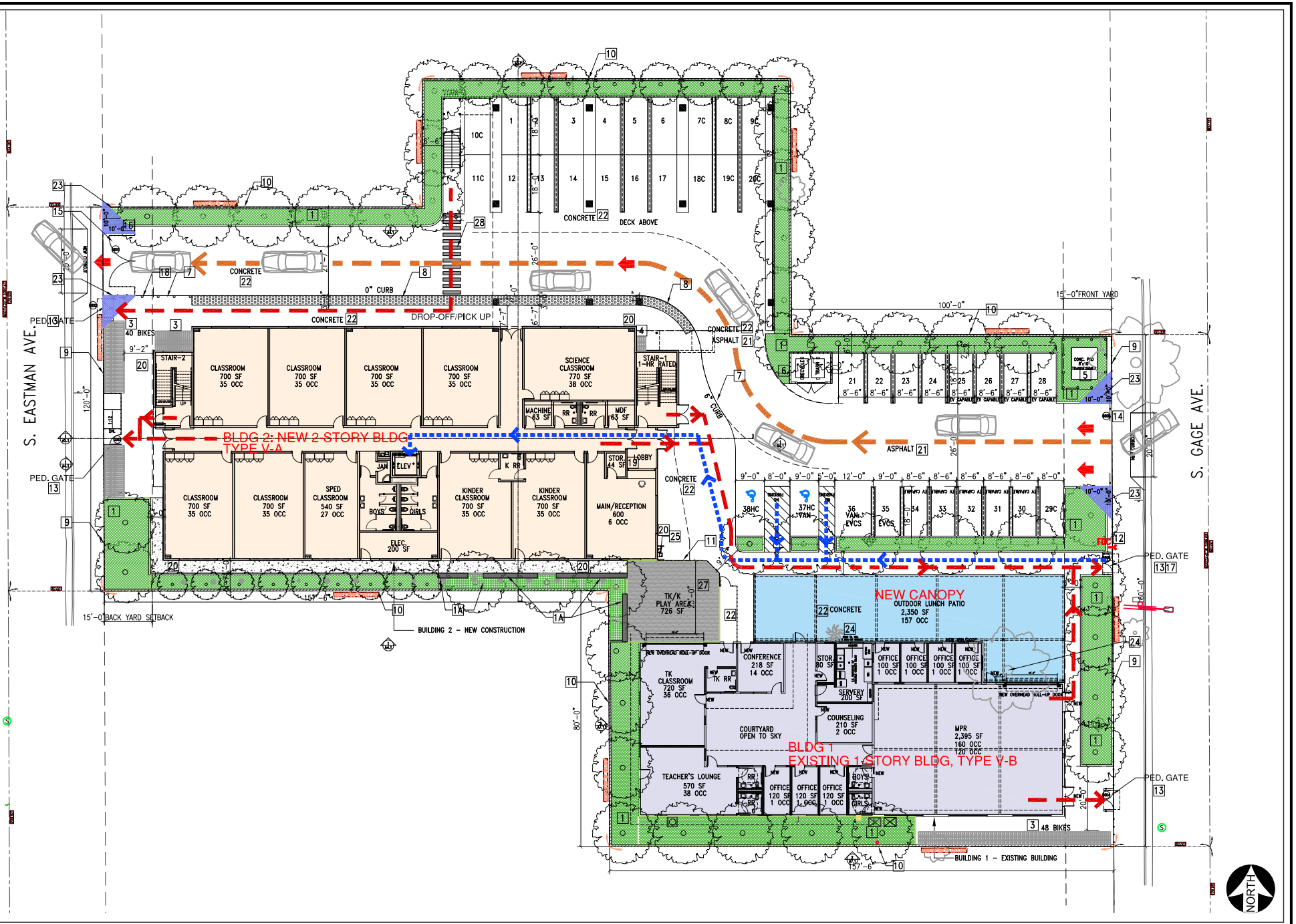
- Community and PTA meetings and events (monthly, during the day)
- Teacher professional development meetings (monthly, during the day)

[10] Los Angeles County Code: Division 1 - INTRODUCTORY PROVISIONS | Code of Ordinances | Los Angeles County, CA | Municode Library. LACC Sec. 22.04.050.E – Rules for Measurement. Gross Floor Area includes the total building area, measured from the exterior of the building walls, of all floors of a building expressed in square feet. Gross Floor Area shall exclude designated parking areas and unenclosed exterior decks.

- Welcome Back Families and Students in August (once per year, during the day)
- Back to School Night in September/October (once per year, during the evening)
- Heritage Month celebrations (monthly, during the day)
- Academic competition/Spelling Bee in October (during the evening)
- Winter Showcase in December (once per year, during the evening)
- Open House/Science Fair in April (once per year, during the day)
- Talent Show in June (once per year, during the day)
- 5th grade and 8th grade promotions in June (once per year, during the day)

See **Appendix A** of this MND for floor plans, elevations, sections, and renderings.

See **Figure 3-3, Site Plan**, for the ground level of the Project.



Source: Franco Architects Inc., 2022.

Figure 3-3
Site Plan

3.4.2 Floor Area

See **Table 3-4** for the floor area and FAR. The Project proposes a total floor area of 38,425 square feet (0.754:1 FAR), an increase of 13,123 square feet from the existing 25,302 square feet of uses.

Building 1 (Existing Building) would remain. The existing 6,993 square foot building would have a 509 square foot covered courtyard removed and a new 2,265 square foot canopy added. The total would be 8,749 square feet, a net increase of 1,756 square feet compared to the existing 6,993 square-foot building that will be renovated.

Building 2 (New Building) would include 23,400 square feet classroom area and 6,276 square feet deck, for a total of 29,676 square feet, an increase of 11,367 square feet compared to the existing 18,309 square-foot building that will be removed.

Table 3-4
Floor Area

Lot Area	Existing		Provided		Change	
	FAR	Floor Area	FAR	Floor Area	FAR	Floor Area
50,994 sf	0.50:1	25,302 sf	0.754:1	38,425 sf	+ 0.254	+ 13,123 sf
Plans, Franco Architects, November 17, 2023.						

3.4.3 Design and Architecture

The proposed architecture is modern contemporary with bright colors and design elements celebrating Mexican cultural heritage. The modern Mexican architecture of the buildings would include vibrant colors, bold shapes, playful lines and angles which embody a playful spirit matching the Project's use. The construction materials would include stucco, glass windows, terra cotta Spanish and Mexican tile which would serve as accent details. Treatments incorporate a blend of contemporary and traditional architectural forms and details, which would include a flat façade, hip style roof, plaster walls, and articulated facades such as inset windows and doors, offset/projected wall features and recessed entryways. Proposed building colors incorporate a neutral earth-tone palette with bright accents and a smooth stucco finish.

The Site is a large street-to-street lot that is approximately 50,994 square feet (1.17 acres), which allows for two separate buildings, space for play areas and a safe and efficient pick-up/drop-off area making it an ideal location for a school. The Project is designed to include the number of classrooms and offices to meet the capacity demand while also accommodating a multi-purpose room and multiple outdoor areas.

The main entrance of the building is at the east elevation, facing Gage Avenue. The playfulness brought out by the angled canopies and roof lines, the openness induced by large glass areas in the façade, Spanish tile detail at the main entrance, as well as the strategic location of the school signs all serve the purpose of creating a focal point to draw people in, once they arrive on campus.

North elevation is the long elevation facing the campus. Patterns of windows, sunshades, various of shapes and colors all contribute to a rhythmic fabric that defines the image of spirited and disciplined educational facility. Many shapes and colors follow a dynamic pattern, not a uniform rule. Visually they are in harmony, but still unique in every bay.

On the west elevation, a pattern of slim windows to minimize the heat gain in the afternoon, with vertical color blocks to accentuate the pattern fills the need to mitigate lower-angled sun in the afternoon to avoid heat gain, and to create an interesting façade, looking from Eastman Avenue. The vertical patterns are carried around onto the south elevation, to give the southwest corner the same dynamic design.

The south elevation would have Project buildings (the existing Building 2 to remain and the new Building 1) nearest to adjacent neighboring residences. To be sensitive to the neighbor's privacy, there are 4 foot high windows on the 2nd floor, with windowsills being 6 feet above the floor. There are large windows to give natural light to those classrooms and to take advantage of the south facing daylighting opportunities.

The existing one-story administration and multi-purpose room building with simpler color design and lower massing are all consistent with a lower profile building compared to the new classroom building. It incorporates the three theme colors into the elevations, to echo the new building's vibrant style, but avoid visually compete with the new building.

3.4.4 Setbacks

The buildings would be set back from the southern side of the Site by five feet, the rear setback by 15 feet, and a front yard setback of 15 feet required by LACC Section 22.110.090. Walls would be constructed along the northern and southern perimeters of the Site adjacent to the neighboring lots. Noise attenuating landscaping would be installed along the perimeter of the Site.

3.4.5 Lighting

Project lighting would consist of security lighting and wall lights on the building perimeters, using LED fixtures. All lighting would be designed to avoid light spillage to the neighboring properties.

3.4.6 Landscaping

A landscape plan has been submitted showing landscape areas on the perimeter of the Site and in the interior open spaces areas and within the front yard setback.

The existing onsite tree (Howea palm) would be removed. The two street trees (Ficus Microcarpa Nitida and Cupaniopsis Anacardioides) on Gage Avenue would be preserved. The Project would plant 32 additional trees.[11]

LACC Section 22.126.030.A.1.b, for projects that are non-residential or mixed-use, a minimum of three trees shall be planted for every 10,000 square feet of developed lot area. With a 50,994

[11] Landscape Plan, Carter Romanek, November 2, 2023, included in **Appendix A** of this IS/MND.

square-foot Site, the Project would require 16 trees. The Project would plant 32 trees to join the two existing trees to be preserved, for a total of 34 trees.

The Project would include 8,699 square feet of landscaping on the Site. With a Site area of 50,994 square feet, landscaping would cover approximately 17% of the Site.[12]

3.4.7 Access and Circulation

There is one existing curb cut on Gage Avenue and one on Eastman Avenue that provides access to the existing surface parking lot. These curb cuts would be closed with the Project and replaced with landscaping and a pedestrian gate.

The school would not offer any bus service.

Vehicular ingress to the Project's drop-off/pickup area and on-site parking will be provided through one-way access from South Gage Avenue to South Eastman Avenue for egress. There will be clear posted signage of the one-way traffic through the Site. Additionally, staff and parents/caregivers will be provided with information regarding Site access prior to the start of the school year. Therefore, motorists destined to the Site will be aware of the one-way flow of traffic. The proposed on-site drop-off/pick-up area lane is approximately 26 feet in width, which is sufficient to accommodate one lane of queued vehicles, plus a bypass lane to allow vehicles to bypass the queue should there be delay related to the passenger loading/unloading of one or more of the queued vehicles as discussed Vehicle Queuing Analysis (LLG, January 3, 2024) included in **Appendix J-2** of this MND.

The start and dismissal times of the Project's middle school and elementary school components would be staggered by a minimum of 20 minutes, thereby dispersing the arrival of traffic over a longer period of time.

Onsite traffic monitors will also assist with indicating turning restrictions to motorists.

For student drop-off and pick-up operations, motorists would be instructed to make a right-turn into the Site's drop-off/pick-up area, travel within the proposed onsite drop-off/pick-up lane, complete the student drop-off or pick-up, and then exit from the proposed driveway along the east side of Eastman Avenue via a right-turn movement.

This configuration will provide efficient and safe ingress and egress from the Property while maintaining less vehicular conflict points to both South Gage Avenue and South Eastman Avenue.

Pedestrian access would be provided from Gage Avenue and from Eastman Avenue.

3.4.8 Vehicle Parking

Projects located within a half-mile of a major transit stop or high-quality transit corridor ("HQTC") are generally eligible for the automobile parking reduction by AB 2097, which prohibits local

[12] Plans, Franco Architects, November 17, 2023, included in **Appendix A** of this IS/MND.

jurisdictions from imposing or enforcing minimum parking requirements for new development projects, including additions and changes of use. This includes residential, commercial, and industrial projects, but does not include hotels, motels, bed and breakfast inns, or other transient lodging.

While LACC Section 22.112.070 would require the Project to provide 54 vehicular parking spaces, under AB 2097, the Project is not required to meet a minimum parking requirement because it is located within a half-mile of a HQTC. Specifically, the Site is within 1,000 feet of eastbound and westbound transit stops along the Whittier Boulevard corridor. The Whittier Boulevard corridor is served by Metro Local Line 18 (Metro 18). Metro 18 provides eastbound and westbound service from the Wilshire & Western transit stop in the Koreatown area of the City of Los Angeles to the Montebello Metrolink Station in the City of Montebello. Metro 18's current service frequency meets the SCAG threshold for 15 minutes or less in each direction, and therefore, Whittier Boulevard currently qualifies as a HQTC.

The Project will voluntarily provide 38 vehicular parking spaces. Staff would occupy the large majority of spaces, with a few designated non-exclusive spaces for visitors and other members of the public.

Table 3-5, Electric Vehicle Parking, provides the amount of required and provided electric vehicle parking. The Project would provide 9 electric vehicle supply equipment (EVSE) spaces and 2 electric vehicle charging stations (EVCS).

Table 3-5
Electric Vehicle Parking

Parking Provided	Required		Provided	
	EVSE	EVCS	EVSE	EVCS
38	9	2	9	2
EVSE - electric vehicle supply equipment (space) EVCS – electric vehicle charging stations Plans, Franco Architects, November 17, 2023.				

3.4.9 Bicycle Parking

Notwithstanding AB 2097, the Project is required to provide 8=8 bicycle parking spaces, pursuant to LACC Section 22.112.100, which requires four bicycle parking spaces for every one classroom, with a minimum of 4 spaces and 1 long-term space for every 10 classrooms. As shown in **Table 3-6, Bicycle Parking Spaces**, the Project would provide 90 bicycle parking spaces (88 short-term and 2 long-term).

Table 3-6
Bicycle Parking

Quantity	Short-Term Spaces			Long-Term Spaces		
	Rate	Required	Provided	Rate	Required	Provided
22 classrooms	4 / classroom	88	88	1/10 classrooms	2	2
LACC Section 22.112.100. Plans, Franco Architects, November 17, 2023.						

3.4.10 Site Security

Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design; lighting of building entryways and areas. The security program would include a monitored security alarm system, a closed campus during operating hours; controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems; and security lighting.

The vehicle access points would be secured with a new motorized slide gate on Gage Avenue and a swing gate on Eastman Avenue. During drop off and pickup times, the vehicular gates will be monitored by school personnel.

3.4.11 Wall and Fence

The pedestrian and vehicle access points to the Site would be secured with a gate at both Eastman Avenue and Gage Avenue.

A cement block wall would surround the adjoining property lines and a fence would surround the Eastman Avenue and Gage Avenue frontages.

3.5 Sustainability Features

The Project would comply with the applicable Los Angeles County Building Code (LACBC, 2023 version effective January 1, 2023)[13] and the applicable California Green Building Standards Code (CalGreen, 2022 version effective January 1, 2023).[14] The applicability is determined when the Project is submitted and accepted by plan check.

All building systems would meet applicable Title 24 Energy Standards. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate possible stormwater retention on-site.

The Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project would provide EV spaces as required by the LACC.

The Project would be all-electric, with no natural gas in the building.

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13 Los Angeles County Department of Public Works, Building Codes: https://dpw.lacounty.gov/building-and-safety/general, accessed on September 10, 2023.

14 California Building Codes: https://www.dgs.ca.gov/BSC/Codes, accessed on September 10, 2023.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle trips and vehicle miles traveled for students, employees, and visitors. In addition, the consolidation of three existing Extera school locations to the proposed Project Site would concentrate approximately 327 students at one location, which could also contribute to a reduction in trips across multiple sites.

3.5.1 Solar Ready Roof

The 2022 Building Energy Efficiency Standards took effect on January 1, 2023. Nonresidential buildings with three habitable stories or fewer, other than healthcare facilities, shall comply with the requirements of Section 110.10(b) through 110.10(d).

The solar zone shall be located on the roof or overhang of the building or on the roof or overhang of another structure located within 250 feet of the building or on covered parking installed with the building project, and shall have a total area no less than 15 percent of the total roof area of the building excluding any skylight area. The solar zone requirement is applicable to the entire building, including mixed occupancy.

The roof area on Building 2 is approximately 11,100 square feet. The Project is required to provide 15 percent of its roof area, or approximately 1,665 square feet, for solar zone area. The Project would provide 1,670 square feet of solar area.

3.6 Anticipated Construction Schedule

The estimated construction schedule is shown in **Table 3-7, Construction Schedule**. The summary of the construction process are:

- The demolition includes removal of 509 square feet of covered courtyard at Building 1, 18,309 square feet of Building 2 floor area[15], and 26,000 square feet of asphalt/concrete parking lot hauled 25 miles to landfill in 10-cubic yard capacity trucks.

- The site preparation includes grubbing and removal of trees, plants, landscaping, weeds.

- The maximum depth of excavation would be 5 feet and grading includes fine grading, with approximately 971 cubic yards of soil (including 15 percent swell factor for topsoil)[16] hauled 25 miles to landfill in 10-cubic yard capacity trucks.

- The trenching includes connections for utilities, including gas, water, electricity, and telecommunications.

- The construction includes footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and

15 For a conservative worse case approach, the air quality modeling assumed demolition of the full 25,302 square feet of existing buildings and the asphalt area noted above.

16 Conceptual Grading Plan, Tritech Engineering Association, November 4, 2022.

carpentry, elevator installations, low voltage systems, trash management.

- The paving includes flatwork, including paving of driveways and walkways.

- The architectural coatings include application of interior and exterior coatings and sealants.

Table 3-7
Anticipated Construction Schedule

Phase	Schedule	Duration
Demolition	November 1, 2024 – November 30, 2024	1 month
Site Preparation	December 1, 2024 – December 4, 2024	1 week
Grading	December 5, 2024 – December 16, 2024	2 weeks
Trenching	December 18, 2024 – March 16, 2025	3 months
Construction	December 18, 2024 – November 30, 2025	10 months
Paving	September 15, 2025 – September 29, 2025	2 weeks
Architectural Coatings	August 1, 2025 – November 30, 2025	4 months

Demolition involves removing buildings or structures.
Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.
Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.
Building Construction involves the construction of the foundation, structures, and buildings.)
Trenching is associated with underground utilities, including gas, water, electricity, telecommunications.
Paving involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.
Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

The analysis assumes that construction would start in 2024. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.
Estimates provided by the Applicant, November 2022, modified in September 2023, and CalEEMod sheets, September 2023.

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the County and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. These streets are part of different approved haul routes. The haul route would be approximately 25 miles one-way and could include the following:

- Full trucks: Exit Site on Gage Avenue to Dennison Street to Downey Road to Olympic Boulevard to I-710 Freeway North to SR-60 East to I-605 (San Gabriel River Freeway) to Arrow Highway to destination at 1245 Arrowhead Highway, Irwindale, 91706.

- Empty trucks would travel in the reverse to the Site and exit I-710 at Whittier/Olympic to Whittier Boulevard to Downey Road to Dennison Street to Gage Avenue to the Site.

3.7 Discretionary Requests

Pursuant to Los Angeles County Code (the Code or LACC) the Applicant hereby requests the following entitlement to permit the Project:[17]

- Pursuant to LACC Section 22.18.030, a Conditional Use Permit to permit a school use on the Site, subject to LACC Section 22.158.050.

As required by various sections of the LACC, the Applicant would request the necessary administrative approvals and permits for Project construction actions, including but not limited to the following: demolition, excavation, shoring, grading, foundation, building, haul route, street tree removal, and tenant improvements, as applicable.

3.8 Related Projects

There are no current construction projects or reasonably foreseeable related projects within 1,000 feet of the Project Site, which is located in a developed residential area near the Santa Ana Freeway. Any potential related projects would likely be located on Whittier Boulevard, nearly 900 feet north of the Project Site or south of the Santa Ana Freeway in commercially-zoned arterials.

17 Supplemental To Los Angeles County Conditional Use Permit Application. September 2023.

4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Less than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. A scenic vista can be impacted in two (2) ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether the proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.[1] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the County; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels.

As discussed in the Conservation and Natural Resources Element (2015, Chapter 9) of the County's General Plan, the San Gabriel Mountains, Verdugo Hills, Santa Susana Mountains, Simi Hills, Santa Monica Mountains and Puente Hills play a major role in physically defining the topographically and aesthetically diverse communities in the project area. These landforms not only create dramatic backdrops against developed communities, but also provide extensive environmental and public benefits to residents.[2] However, while the existing General Plan

1 Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

2 Los Angeles County General Plan, Chapter 9,Conservation and Natural Resources Element, page 160: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf

recognizes the importance of scenic resources in the project area, there are no specific views or corridors that are identified for conservation purposes. The hills and mountains identified above are not visible from the Project Site due to intervening buildings and trees.

The Project Site is located within an urbanized residential area of unincorporated Los Angeles County. The Project Site includes 1.17 acres currently zoned R-3. The school use is generally consistent with the General Plan land use designation of Medium Density Residential and is authorized with approval of a CUP. The General Plan sets forth policies regarding land use, urban form, open space, economic development, public services and more for the unincorporated areas of Los Angeles County. In line with the guiding principles of the General Plan, the Project supports the principle and goal to ensure community services and infrastructures are sufficient to accommodate growth and provide the foundation for a strong and diverse economy.

Therefore, the Project would not result in a substantial adverse effect on a scenic vista. Impacts to scenic vistas would be less than significant.

b)	**Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?**	☐	☐	☐	☒

No Impact. The Project Site is located within a fully developed urban area and is not located in the vicinity of a County regional riding or hiking trail.[3] The Project would not result in impacts related to regional riding or hiking trails and scenic views. Therefore, no impacts to regional riding or hiking trails and scenic views would occur.

c)	**Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**	☐	☐	☐	☒

No Impact. The Project is not located within view of a state scenic highway, as there are no designated scenic highways within the vicinity. The closest officially designated state scenic highway is:[4]

- State Route 2, Angeles Crest Highway, from 3 miles north of I-210 in La Canada to the San Bernardino County Line. This is 14 miles north of the Site.

The Project would not result in impacts to trees, rock outcroppings, or historic buildings within a state scenic highway. Therefore, no impacts to scenic resources within a state scenic highway would occur.

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3 Los Angeles County General Plan, Figure 10.1, Regional Trail System: https://planning.lacounty.gov/assets/upl/project/gp_2035_2018-FIG_10-1_regional_trail_system.pdf

4 Caltrans State Scenic Highways Map: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed November 4, 2022.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced rom publicly accessible vantage point)	☐	☐	☒	☐

Less than Significant Impact. The Project Site is located within an urbanized area and is surrounded by roadways and residential uses. The existing character of the Site and surrounding area is neither unique nor of special aesthetic value or quality. The proposed school development would replace and relocate an existing church building and convert another church building into school buildings.

The Project Site is located within an urbanized residential area of unincorporated Los Angeles County. The Project Site includes 1.17 acres currently zoned R-3. The school use is generally consistent with the General Plan land use designation of Medium Density Residential and is authorized with approval of a CUP. The General Plan sets forth policies regarding land use, urban form, open space, economic development, public services and more for the unincorporated areas of Los Angeles County. In line with the guiding principles of the General Plan, the Project supports the principle and goal to ensure community services and infrastructures are sufficient to accommodate growth and provide the foundation for a strong and diverse economy.

In addition, the project would be consistent with the General Plan Conservation and Natural Resources Element goals and policies related to scenic quality, as shown in **Table 4.1-1**.

Table 4.1-1
Conservation and Natural Resources Elements Consistency

Goal or Policy	Project Consistency
Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.	**Consistent.** The school use is generally consistent with the General Plan land use designation of Medium Density Residential and is authorized with approval of a CUP. Therefore, the Project is consistent with land use regulations governing density in order to mitigate development impacts.
Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.	**Consistent.** The Project Site is located in an urban area in unincorporated LA County. The Project Site is not located on a ridgeline; therefore, implementation of the Project would not impact ridgelines.
Policy C/NR 13.3: Reduce light trespass, light pollution and other threats to scenic resources.	**Consistent.** The Project would comply with the County Green Building Code, as adopted in the Los Angeles County Code Title 31. As such, the Project would comply with regulations regarding exterior lighting in order to reduce light pollution from the Project. The Project is not

	located in a Rural Outdoor Lighting District per Title 22, Chapter 22, Section 80, and therefore, would not be required to implement further dark skies measures.
Policy C/NR 13.4: Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.	**Consistent.** There is currently no natural terrain or vegetation on the Project Site as it is developed with ornamental landscaping and trees. The Project would incorporate the use of California native and drought tolerant plants in landscaping in order to improve site conditions in relation to the natural vegetation found throughout the County.
Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain	**Consistent.** The Project Site is relatively flat. Therefore, there are no significant terrain features and project grading will be compatible with the existing terrain.
Policy C/NR 13.6: Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.	**Consistent.** The Project Site is not located along any scenic routes, corridors, waterways, or in other scenic areas.
Policy C/NR 13.7: Encourage the incorporation of roadside rest stops, vista points, and interpretive displays into projects in scenic areas.	**Consistent.** The Project Site is located in a highly urbanized area in unincorporated LA County. The project's frontages do not feature any significant scenic vistas as the Project Site is developed with a church the surrounding areas are developed with residential uses. Therefore, the Project would not need to encourage the incorporation of roadside rest stops, vista points, and interpretive displays into development as it is not in a scenic area.
Policy C/NR 13.8: Manage development in HMAs (Hillside Management Areas) to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.	**Consistent.** The Project Site is located in an urban area in unincorporated LA County. The Project Site is not located in a hillside management area; therefore, the project would not need to comply with standards or requirements set for hillside management areas.
https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf	

In addition, as part of the entitlement process, the County conducts a review of all building and site plans. The purpose of this review is to ensure that the design of a proposed development is consistent with all applicable requirements, standards, and regulations set forth by the County Code, as well as other relevant local, State, and federal regulations.

The Site has a land use designation of MD, or Medium Density Residential, and a zoning designation of R-3, or limited density multiple residence. Pursuant to LACC Section 22.18.030, a school use is permitted in the R-3 zone, subject to approval and issuance of a conditional use permit ("CUP") under LACC Section 22.158.050. Thus, the Applicant requests a CUP to permit the construction, operation, and maintenance of a school use on the Site. The Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or diminish the value of neighboring properties. The Project would not conflict with applicable zoning and other regulations governing scenic quality. As the Project Applicant would develop the Site with school buildings, which is consistent with the land uses adjacent to the Site, the Project would be visually compatible with the surrounding residential uses.

Therefore, the Project would not degrade the visual character of the project site and surrounding area. Impacts to visual character would be less than significant.

e)	**Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?**	☐	☐	☒	☐

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site.

Spill light occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Sensitive uses (e.g., residential uses) surrounding the project site could be impacted by the light from development within the boundaries of the Project Site if light spill occurs.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of off-site locations but results in a visible source of light viewable from a distance. Glare could also occur from building materials of the new structures, including glass and other reflective materials.

The Project Site is currently developed with two church buildings. The Project would introduce additional sources of light from new building security lighting, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from the Project. However, the Project would only slightly increase lighting and glare compared to the existing condition and new landscaping would be provided throughout the Project Site that would limit impacts from new sources of light and glare. Landscaping, including trees, would limit spill of light to adjacent properties. As a standard condition of project approval, the Project would be required to comply with lighting standards detailed in the County's Code, which would require project lighting to be shielded, diffused or indirect to avoid glare to both on and offsite residents, pedestrians, and motorists.

Therefore, the Project would not create new substantial sources of shadows, light, or glare. Impacts associated with new lighting would be less than significant.

Cumulative Impacts

There are no current construction projects or reasonably foreseeable related projects within 1,000 feet of the Project Site, which is located in a mature residential area near the Santa Ana Freeway. Any potential related projects would likely be located on Whittier Boulevard, nearly 900 feet north of the Project Site or south of the Santa Ana Freeway in commercially-zoned arterials.

The geographic context for the analysis of cumulative impacts related to visual character of the surrounding area and its aesthetic image would include related projects located within view of the Project Site. Related projects located in such a position that they would not be visible from the Project Site or to which the Project would not be visible would not normally have a potential to combine with the Project to create a cumulative aesthetics impact.

No potential related projects would not be visible from the Project Site area, due to distance and intervening structures. No scenic vistas are available from the Project Site area and as such, development of related projects in the vicinity of the Project Site would not result in any cumulative impacts related to scenic vistas. The degree to which each of the related project sites contain scenic resources that could be affected by the related projects would be considered on a case-by-case basis.

The Project Site does not contain any scenic resources that are shared by or common to any of the related project sites. Related projects within the Project Site area would be required to undergo review and approval by the County to ensure compliance with applicable design guidelines, which would ensure continuity of these projects with the County's visual character/quality standards.

Further, development of the Project in combination with the related projects could result in an intensification of land uses in an already urbanized area of the area, which currently maintains an elevated level of ambient light and glare, typical of a densely developed area. As such, the Project and related projects could contribute to increased ambient light levels within the surrounding area. However, the Project Site area is highly urbanized, and the presence of additional nighttime illumination resulting from the Proposed and related projects would not represent a significant, adverse alteration to the existing nighttime visual environment. Additionally, the potential increase in nighttime light resulting from the Project would not be bright enough to substantially affect nearby sensitive uses. For these reasons, cumulative aesthetics impacts would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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 Department 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

No Impact. The Project Site is currently developed with church buildings and located in an urbanized area of unincorporated Los Angeles County that is predominantly developed with educational, commercial, and residential uses. The Project Site has a zoning designation of R-3. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[5] The Site is not designated as Prime, Unique, or Farmland of Statewide Importance. Therefore, no impacts would occur.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	☐	☐	☐	☒

No Impact. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[6] The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land

5 State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018, Map, website: https://maps.conservation.ca.gov/DLRP/CIFF/ and https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx, accessed September 14, 2023.

6 State of California Department of Conservation, Williamson Act Program, website: https://www.conservation.ca.gov/dlrp/wa, accessed September 14, 2023.

under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

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))?	☐	☐	☐	☒

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. Therefore, no impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact. The Project Site is completely surrounded by urban uses and infrastructure and is not forest land. Therefore, no impact would occur.

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?	☐	☐	☐	☒

No Impact. A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the County that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. Therefore, no impact would occur.

Cumulative Impacts

Neither the Project Site nor any of the possible related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

4.3 AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

This section is based on the following item, which is included as **Appendix B** to this MND:

B Air Quality Technical Report and Modeling, DKA Planning, September 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site is located in the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources.

For purposes of analyzing consistency with the AQMP, if a proposed project would result in growth that is substantially greater than what was anticipated, then the project would conflict with the AQMP per Consistency Criterion No. 1.

On the other hand, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation per Consistency Criterion No. 2.

Furthermore, SCAB is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The Project Site is zoned as an R-3 parcel, a classification that conditionally allows schools such as that proposed by the Project. As such, the Connect SoCal or RTP/SCS' assumptions about growth in the County accommodate the projected jobs on the Project Site. As a result, the Project would be consistent with the growth assumptions in the County's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the RTP/SCS and 2022 AQMP.

SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region's air quality attainment plan to address the "extreme" ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NOx emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in SCAG's 2020-2045 RTP/SCS.

The County's General Plan Air Quality Element identifies eight policies with specific strategies for advancing the County's clean air goals. As shown in **Table 4.3-1**, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

The Project would support AQMP objectives to promote infill/redevelopment and balance jobs and housing for Los Angeles County, and would not conflict with implementation of the AQMP. As a result, the Project would comply with Consistency Criterion No. 1 listed above.

As detailed below in Impact 3b and 3c, operation of the Project would not exceed the thresholds of significance. Therefore, the Project would result in an impact related to Consistency Criterion No. 2 of the AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

Table 4.3-1
Project Consistency with County of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.	**Consistent.** The Project Site is located in a residential neighborhood, with health care and school facilities nearby. As such, there are no major toxic hot spots or point sources that would adversely impact human health.
Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.	**Consistent.** The Project would comply with SCAQMD Rule 1113, which limits the VOC content of architectural coatings.

Table 4.3-1
Project Consistency with County of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.	**Consistent.** The construction activities that involve earthmoving (i.e., demolition, site preparation, grading) would be regulated by SCAQMD Rule 403, which controls fugitive dust emissions through best practices measures that address on-site and off-site particulate emissions and entrainment of inhalable particulates.
Policy AQ 1.4: Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.	**Not Applicable.** This policy calls for the County to work with SCAQMD to publicize smog alert days, wildfire events, and to help track facilities that emit toxic air contaminants through the entitlement process. Nevertheless, the Project would not interfere with the implementation of this policy.
Policy AQ 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.	**Consistent.** While the Project Site is 150 feet north of the Santa Ana Freeway, the project's design has sited the outdoor lunch patio and play area north of the existing Building 1, where particulate matter from the freeway would be shielded in large part by the presence of this structure. In addition, all classrooms would comply with the California Energy Commission's requirements to protect indoor air quality. This would include mechanical ventilation that includes MERV-13 filters to reduce indoor exposure of students to inhalable particulates.
Policy AQ 2.2: Participate in, and effectively coordinate the development and implementation of community and regional air quality programs.	**Not Applicable.** This policy calls for the County to work with SCAQMD to develop education and outreach programs to advance clean air objectives. Nevertheless, the Project would not interfere with the implementation of this policy.
Policy AQ 2.3: Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.	**Consistent.** The Project would replace a site that is largely a paved parking lot with minimal ground cover and trees with a landscaped facility. This would include trees and shrubs that line the project boundaries, as well as groundcover and permeable surfaces in the play area.
Policy AQ 2.4: Coordinate with different agencies to minimize fugitive dust from different sources, activities, and uses.	**Consistent.** The Project's construction activities that involve earthmoving (i.e., demolition, site preparation, grading) would be regulated by SCAQMD Rule 403, which controls fugitive dust emissions through best practices measures that address on-site and off-site particulate emissions and entrainment of inhalable particulates. During operation of the school, paved parking lots and common areas would reduce fugitive dust emissions and entrainment of particulates in cars that enter and leave the Project Site.
Source: DKA Planning, 2022.	

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?	☐	☐	☒	☐

Less Than Significant Impact. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as discussed in the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

SCAB is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the Project, could cumulatively contribute to these pollutant violations. Evaluation of cumulative air quality impacts of the Project has been completed pursuant to SCAQMD's cumulative air quality impact methodology, SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM10, and PM2.5) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

SCAQMD published its Final Localized Significance Threshold Methodology in July 2008, recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors from emissions of CO, NO_X, PM10, and PM2.5. The methodologies from the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook are used in evaluating project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in **Table 4.3-2**.

Table 4.3-2
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions	
	Regional	Localized /a/	Regional	Localized /a/
Volatile Organic Compounds (VOC)	75	--	55	--
Nitrogen Oxides (NO_X)	100	74	55	74
Carbon Monoxide (CO)	550	680	550	680
Sulfur Oxides (SO_X)	150	--	150	--
Respirable Particulates (PM_{10})	150	5	150	2
Fine Particulates ($PM_{2.5}$)	55	3	55	1

/a/ Localized significance thresholds assumed a 1-acre and 25-meter (82-foot) receptor distance in the Central LA source receptor area. The SCAQMD has not developed LST values for VOC or SO_X. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008).

Source: SCAQMD, South Coast AQMD Air Quality Significance Thresholds, 2019.

Construction

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.18 model and a projected construction schedule of approximately twelve months. The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity creates air quality impacts through the use of heavy-duty construction equipment on site and through haul truck trips and vehicle trips generated by construction workers traveling to and from the Project Site. NO_X emissions would primarily result from the use of construction equipment and truck trips.

Fugitive dust emissions would peak during grading activities, where approximately 971 cubic yards of soil (including 15 percent swell factor for topsoil) would be exported from the Project Site for foundation work, footings, and utilities. All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent.

During the building finishing phase, the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As shown in **Table 4.3-3**, construction of the Project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that would not exceed the SCAQMD's regional thresholds. This is a conservative analysis, as it assumes that the entirety of structures on the Project Site would be demolished. However, the existing 6,993 square-foot structure (Building 1) would be retained (except for the removal of an existing 509 square-foot covered courtyard) while the interior is demolished and remodeled, demolition emissions is conservative. Similarly, the analysis conservatively overstates building construction emissions by assuming the erection of a new 8,749 square-foot building, which includes a covered courtyard and canopy. As the existing building would be retained, the emissions analysis is conservative of the building construction phase. Nevertheless, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table 4.3-3
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2024	1.7	18.9	18.0	<0.1	3.9	2.1
2025	5.0	10.6	12.7	<0.1	0.7	0.4
Maximum Regional Total	5.0	18.9	18.0	<0.1	3.9	2.1
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Maximum Localized Total	4.8	15.9	15.4	<0.1	3.5	2.0
Localized Threshold	N/A	74	680	N/A	5	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)
Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.18 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[7] 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 based on the most recent background ambient air quality monitoring data (2018-2020) for the Project area.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central Los Angeles SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences that flank the Project Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in **Table 4.3-3**, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. BACMs are fugitive dust control actions that are listed in Table 1 of SCAQMD Rule 403 and include stabilizing backfill material, maintaining soil stability, using water, sweeping, and vacuuming debris and piles.[8] This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local

7 South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

8 SCAQMD Rule 403, Table 1: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4

streets. Therefore, construction impacts on localized air quality are considered less than significant.

Although not required since there was no construction impact identified, the Project would voluntarily commit to the use off-road construction equipment with engines over 25 horsepower (hp) that comply with Tier 4 Final emissions standards and are registered in the CARB off-road registration inventory.

Voluntary Condition of Approval (COA)

AIR-COA-1 The Project would voluntarily commit to the use of off-road construction equipment with engines over 25 horsepower (hp) that comply with Tier 4 Final emissions standards and are registered in the CARB off-road registration inventory.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include consumer products such as cleaners, architectural coatings for routine maintenance, and landscaping equipment. Energy sources include electricity and natural gas use for space heating and water heating. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 827 net vehicle trips to the local roadway network on a weekday at the start of operations in late 2025.[9]

As shown in **Table 4.3-4**, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

In addition to regular daytime school activities, there would be a number of intermittent special events that would be held throughout the school year that would generate additional emissions. These could occur both during the day (e.g., parent celebrations, holiday parades, orientations) and the evening (e.g., Back to School Night, spelling bee). While these events would generate more emissions than those summarized in **Table 4.3-4**, they would incrementally add emissions from parents traveling to and from these events and would not approach regional or localized thresholds of significance. Moreover, because these events would only occur during the academic school year, these emissions would occur outside the summer season, when conditions are more conducive to smog formation.

Table 4.3-4
Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.2	<0.1	1.7	<0.1	<0.1	<0.1

9 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, January 3, 2024.

Energy Sources	<0.1	0.2	0.2	<0.1	<0.1	<0.1
Mobile Sources	2.8	1.1	10.9	<0.1	1.5	0.4
Regional Total	4.0	1.3	12.8	<0.1	1.5	0.4
Existing Total	-1.6	-1.0	-8.6	-<0.1	-1.4	-0.4
Net Regional Total	2.4	0.3	4.2	<0.1	0.1	<0.1
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	0.4	-0.1	0.6	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	74	680	N/A	2	1
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**
LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles SRA Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.18 model runs (included in the Technical Appendix). Totals reflect the summer season maximum and may not add up due to rounding.						

c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

Less Than Significant Impact. There are several sensitive receptors within 0.25 miles of the Project Site that could be exposed to air pollution from construction and operation of the Project, including, but are not limited to, the following representative sampling (see **Figure 4.13-1**):

- Residences, 1075 Gage Avenue; five feet south of the Project Site.
- Residences, 1049 Gage Avenue; five feet north and east of the Project Site.
- Residences, Eastman Avenue (east side); five feet north and south of the Project Site.
- Residences, Gage Avenue (east side); 70 feet east of the Project Site.
- Residences, 1142 Eastman Avenue; 320 feet south of the Project Site.
- LA Community Hospital, 400 feet southwest of the Project Site.
- Eastman Avenue Elementary School, 740 feet south of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in **Table 4.3-2**, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values

were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in **Table 4.3-3**, during construction of the Project, maximum daily localized unmitigated emissions of NOx, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately twelve months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

The Project Site would be redeveloped with an elementary and middle school, a land use that is not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome

plating facilities, dry cleaners, and gasoline dispensing facilities).[10] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[11] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include diesel PM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[12]

Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot.

10 California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

11 South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

12 South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[13] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[14] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational impacts on local sensitive receptors would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

No Impact. The Project would not result in activities that create objectionable odors. The Project is a school campus that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with the elementary and middle schools. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

While the Project would generate short- and long-term emissions during the construction and operations phases, respectively, the presence of any other development projects could produce cumulative impacts. The U.S. EPA finds that in the context of roadway pollutants, "…concentrations generally decrease to background levels within 500-600 feet."[15] CARB also finds that air pollution levels can be significantly higher within 500 feet of freeways or other major sources.[16]

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13 California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. www.http://oehha.ca.gov/public_info/facts/dieselfacts.html

14 South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

15 U.S. EPA. Near Roadway Air Pollution and Health: Frequently Asked Questions. August 2014.

16 South Coast Air Quality Management District. Guidance Document: Air Quality Issues Regarding Land Use.

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2022 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2020-2045 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population growth resulting from the Project would be consistent with the growth projections of the AQMP. Any related project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if required due to any significant emissions impacts. In addition, each related project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project's contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

Construction

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[17] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As summarized in **Table 4.3-3**, the Project would not exceed the SCAQMD's mass emissions thresholds and would not contribute to any potential cumulative impact. If any related project was projected to exceed LST thresholds (after mitigation), it could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at any related project would generally involve diesel particulate emissions associated with heavy equipment operations during

[17] White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities, which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative toxic emission impacts during construction would be less than significant.

Operation

As discussed above, the Project’s operational air quality emissions and cumulative impacts would be less than significant. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. As operational emissions would not exceed any of the SCAQMD’s regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by Project operations would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any likely related projects (which are largely residential, retail/commercial in nature), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB’s Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, any related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs the CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions.

As such, cumulative TAC emissions during long-term operations would be less than significant. Therefore, the Project would not result in any substantial sources of TACs that have been identified by the CARB’s Land Use Guidelines, and thus, would not contribute to a cumulative impact.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site is located in an urbanized and developed area of the County and is developed with two church buildings with largely impermeable surfaces, and a surface parking. The Project Site has been subject to substantial disturbance associated with the original construction of the buildings and ongoing regular maintenance of the landscaping and nearby surrounding areas are entirely developed. No native oak trees have also been identified on the Project Site. The Project Site is not located or adjacent to a designated Significant Ecological Area as mapped by the County. As such, the Project Site does not exhibit potential to support endangered, rare, or threatened plant species.

The Project Site is disturbed, relative to the presence of natural habitats, and surrounding areas are entirely developed; therefore, the Site does not provide suitable habitat for endangered, rare, or threatened animal species. Some examples of these disturbances that deter animals include complete absence of native habitats or vegetation, substantial vehicular traffic, artificial lighting, routine vegetation maintenance, domesticated and feral dogs and cats, and pest management.

There is ornamental vegetation and one tree (Howea palm) on the Project Site, which would be removed. There are two street trees (Ficus Microcarpa Nitida and Cupaniopsis Anacardioides) on Gage Avenue, which would remain.[18] These trees could potentially provide nesting sites for migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur.

Compliance with these existing regulations would ensure that that Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species

[18] Landscape Plan, Carter Romanek, November 2, 2023, included in **Appendix A** of this IS/MND.

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. Therefore, Project impacts related to nesting birds would be less than significant.

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 CDFW or USFWS?	☐	☐	☐	☒

No Impact. The Project Site is located in an urbanized and developed area of the County and is developed with two church buildings and surface parking. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[19] Due to the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body, and the lack of trees on the Site, the Project Site is not a habitat for native resident or migratory species or contain native nurseries. Thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities. Therefore, no impacts related to this issue would occur as a result of the Project.

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?	☐	☐	☐	☒

No Impact. The Project Site is located in an urbanized and developed area of the County and is developed with two church buildings and surface parking. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is the Los Angeles River channel, which classified as a Riverine and located approximately 1.25 miles south of the Project Site.[20] Thus, implementation of the Project would not result in any adverse effect on wetlands. Therefore, no impacts related to this issue would occur as a result of the Project.

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?	☐	☐	☐	☒

19 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed September 14, 2023.

20 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed September 14, 2023.

No Impact. The Project Site is located in an urbanized and developed area of the County and is developed with two church buildings and surface parking. The Site is not part of a significant wildlife corridor or regional habitant linkage area.[21] Additionally, there are no waterways located in the vicinity of the Project Site that are used by migratory fish, and there are no wildlife nursery sites in the area.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish and Game Code Section 4150, California Code of Regulations (CCR), Section 251.1).

The Project would be required to comply with all regulatory requirements, to reduce potential impacts to migratory bird and bat species that could potentially nest in trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, no impact would occur.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?	☐	☐	☐	☒

No Impact. The trees existing on the Project Site and surrounding street trees are not native. No oak woodlands or other unique native trees exist within the Project Site. There is ornamental vegetation and one tree (Howea palm) on the Project Site. There are two street trees (Ficus Microcarpa Nitida and Cupaniopsis Anacardioides) on Gage Avenue.[22]

The California Natural Diversity Database (CNDDB) identifies the following special-status community terrestrial habitats as occurring within the Los Angeles quadrangle[23]: California

21 Los Angeles County General Plan, Figure 9.2, Regional Habitat Linkages: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf

22 Landscape Plan, Carter Romanek, November 2, 2023, included in **Appendix A** of this IS/MND.

23 US Geological Survey, Topographic Maps, Los Angeles, 2022: https://apps.nationalmap.gov/viewer/

Walnut Woodland and Southern Sycamore Alder Riparian Woodland.[24] No oak woodlands or unique native trees are present on the Project Site. Therefore, no impact would occur.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?	☐	☐	☐	☒

No Impact. Chapter 22.174 of the County's Code regulates oak tree permits. As discussed in the County Code, the intent of an Oak Tree Permit is to maintain and enhance the general health, safety, and welfare of oak trees, which assist in counteracting air pollution, minimizing soil erosion, and other related environmental damage. The Oak Tree Permit is also intended to preserve and enhance property by conserving and adding to the distinctive and unique aesthetic character of many areas of the County in which oak trees are indigenous. The stated objective of the Oak Tree Permit is to preserve and maintain healthy oak trees in the development process.

There is ornamental vegetation and one tree (Howea palm) on the Project Site. There are two street trees (Ficus Microcarpa Nitida and Cupaniopsis Anacardioides) on Gage Avenue.[25] No protected oak trees are on the Site or within 50 feet of the property boundaries. Therefore, the Project would not impact the County's oak tree ordinance.

Overall, the Project would include the removal of ornamental trees and shrubs within the Project Site. However, none of the existing trees and shrubs on site have been determined to be significant biological resources. Furthermore, the Project Site is not located in a Wildflower Reserve Area, Significant Ecological Area, Specific Plan, Community Standards District, or Coastal Resource Area.[26] Implementation of the Project would not conflict with any local policies or ordinances protecting biological resources (e.g., a tree preservation policy or ordinance). Therefore, no impacts would occur.

24 California Department of Fish and Wildlife, BIOS Map: https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data#43018410-cnddb-quickview-tool

25 Landscape Plan, Carter Romanek, November 2, 2023, included in **Appendix A** of this IS/MND.

26 Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2019-FIG_9-3_significant_ecological_areas.pdf

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?	☐	☐	☐	☒

No Impact. The Project Site and immediately surrounding areas are not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan.[27] As such, implementation of the Project would have no potential to conflict with a conservation plan. Therefore, the Project would not conflict with any conservation plan, no impact would occur.

Cumulative Impacts

Any nearby related projects would be located in highly urban areas and likely do not contain significant biological resources, such as special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

[27] Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2019-FIG_9-3_significant_ecological_areas.pdf

4.5 CULTURAL RESOURCES

This section is based on the following items, which are included as **Appendix C** to this MND:

C-1 Archaeology Response, South Central Coastal Information Center, November 15, 2023

C-2 Paleontological Response, Natural History Museum, October 1, 2023

C-3 Sacred Lands File Search, Native American Heritage Commission, November 15, 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒

No Significant. According to the State CEQA Guidelines, a historical resource is defined as something that meets one or more of the following criteria:

1) Listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR);

2) Listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);

3) Identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or

4) Determined to be a historical resource by the project's Lead Agency.

PRC Section 5024.1 directs evaluation of historical resources to determine their eligibility for listing on the CRHR. The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing on the National Register of Historic Places (NRHP), enumerated above, and require similar protection to what National Historic Preservation Act (NHPA) Section 106 mandates for historic properties. According to PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it meets at least one of the following criteria: 1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; 2) Associated with the lives of persons important to local, California or national history; 3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or 4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The Project Site is located in an urbanized and developed area of the County and is developed with two church buildings and surface parking. According to the Los Angeles County General Plan, there are no historic resources on the Site.[28] According to the Los Angeles Conservancy there are no potential historic resources on the Site.[29]

The existing structures do not meet the definition of a historical resource and are not determined to be a significant historical resource; therefore, impact is less than significant. No historic resources are known to exist on the Site. Therefore, no impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐

Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. State CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

A records search was conducted for the Project area by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project Site (see **Appendix C-1** of this MND). The records search includes a review of all recorded archeological sites within a 0.5-mile radius of the Project Site as well as a review of cultural resource reports on file. The California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Historic Resources Inventory, and City of Los Angeles Historic-Cultural Monuments (HCM) listings were also reviewed for the Project Site. The records search indicates that there are no historic resources located on-site.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading up to a depth of 5 feet. As such, there is a possibility for unknown archaeological resources to be encountered within the underlying alluvium during grading and excavation activities associated with development of the Project.

If archaeological resources are discovered during excavation, grading, or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in

[28] Los Angeles County General Plan, Figure 9.9, Historic Resource Sites Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-9_historic_resources.pdf

[29] Los Angeles Conservancy, Historic Places: https://www.laconservancy.org/explore-la/historic-places

accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2 as described in **Mitigation Measure MM-CUL-1**.

Mitigation Measure

MM-CUL-1 Archaeological Resources Monitor

- If archaeological resources are encountered during construction and the Tribal Monitor (required in MM-TCR-1) has determined that the find is not Native American in origin, all ground disturbance activities within 25 feet of the find shall stop until a qualified archaeologist can evaluate the significance of the find.

- Upon receiving notification of the find, the Applicant shall retain a qualified archaeologist to evaluate the significance of the find. Thereafter, the qualified archaeologist or a trained archeological monitor, under the supervision of the qualified archaeologist, shall monitor all remaining ground disturbance activities along with the Tribal Monitor (required in MM-TCR-1). A qualified archaeologist is defined as an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

- If the find is determined significant, the qualified archaeologist shall recommend appropriate measures, subject to County approval, to mitigate potential impacts to cultural resources to less than significant. Such measures may include, but are not limited to, avoidance, preservation in place and data recovery.

- Where preservation in place is not feasible, treatment may include archaeological data recovery. The qualified archaeologist shall record all recovered archaeological resources on the appropriate California Department of Parks and Recreation Site Forms to be filed with the California Historical Resources Information System–South Central Coastal Information Center (SCCIC). Recovered resources that are determined to be significant shall be curated at an appropriate facility that will ensure their long-term preservation and will allow access to interested scholars. If no institution accepts the archaeological resource(s), they shall be offered to a local school or historical society in the area for educational purposes. Within 90 days after monitoring has ended, the qualified archaeologist shall prepare and submit a final monitoring report documenting all encountered archaeological resources, the significance of the resources, and the treatment of the resources to the County and SCCIC.

- Personnel of the Project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in

accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Therefore, impacts would be less than significant with mitigation incorporated.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site and surrounding area are flat and are currently developed. No unique geologic features are located on or near the Project Site.

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

A Project-specific paleontological records search for the Project Site was conducted by the Natural History Museum of Los Angeles County on October 1, 2023, which is included as **Appendix C-2** of this MND. As outlined therein, there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site either at the surface or at depth.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. As such, there is a possibility for unknown paleontological resources to be encountered within the underlying alluvium during grading and excavation activities associated with development of the Project.

Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Site.

In addition, if paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Site. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any

paleontological resources or sites, or unique geologic features shall be treated in accordance with state law. Therefore, impacts would be less than significant.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site does not contain a cemetery, and no known formal cemeteries are located within the immediate vicinity of the Project Site.

A Project-specific Sacred Lands File Search (SLF) for the Project Site was conducted by the Native American Heritage Commission on November 15, 2023, which is included as **Appendix C-3** of this MND. The result of SLF check was negative.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot.

Nevertheless, should human remains be unearthed during grading and excavation activities associated with project development, the construction contractor would be required by California law to comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. There is no record of human remains on the project site.

In the event that human remains are encountered on the project site, the project applicant would be required to halt all development activities and comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 and contact the Los Angeles County Coroner. If it is determined that the human remains are of Native American descent, the Native American Heritage Commission should be contacted, who will in turn contact the likely descendants. They will be informed of the encounter and in consultation with the property owner,

a decision will be made on how to proceed. Only after this decision and all necessary actions occur can development activities recommence.

Through mandatory compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to disturbing human remains, including remains of Native American ancestry, would be less than significant.

Cumulative Impacts

It is possible that some of the related projects could result in significant impacts on historical resources. However, as discussed above, the Project would not result in impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources, paleontological resources, and human remains are site-specific and are assessed on a site-by-site basis. All development in the County (including the Project and any related project) that involves ground-disturbing activities is required to comply with existing state regulations related to discovery of resources and human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	☐	☐	☒	☐

Less Than Significant.

Construction

The Project would have energy impacts related to short-term construction impacts, but these impacts would be relatively minor in nature due to the limited construction period, only 12 months.

Construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction.

Electricity would be used during construction to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure would be consumed during Project construction activities. This electricity would be supplied to the Project Site by the Southern California Edison (SCE) and would be obtained from the existing electrical lines that connect to the Project Site overhead and underground along Gage Avenue.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Construction equipment fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2019 was 23.68 miles per gallon (mpg) for gasoline and 9.43 mpg for diesel.[30] In 2018, California

30 CARB, https://arb.ca.gov/emfac/emissions-inventory.

consumed a total of 3.4 billion barrels of gasoline for transportation, which is equivalent to a total annual consumption of 143 billion gallons by the transportation sector.[31]

Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[32]

In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

Electricity Demand

As shown in **Table 4.6-1**, the Project estimates a net increase of approximately 10,200 kWh/year of electricity would be used per year at the Project Site (refer to **Table VI-1**). This is due to the greatly reduced electricity usage rates assumed for the existing church uses as compared to

31 EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, November 2022. One barrel of oil has 42 gallons of oil.

32 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

school uses.[33] Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing SCE lines adjacent to the Site.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the SCE and what exists currently at the Project Site for the existing uses. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also be in compliance with the County's Building Code. Electrical service would be provided in accordance with the SCE Electrical Service Requirements.[34] For the reasons discussed here, the Project's operational impacts related to electricity would be less than significant.

Table 4.6-1
Estimated Project Electricity Demand

Land Use	Total (kw-h/yr)[1]
Existing Uses (to be removed)	
Church	(242,715)
Proposed Uses	
School	252,915
Net Total	**10,200**

du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year
[1] Calculated via CalEEMod. Refer to Appendix B to this MND.
Note: SCE does not provide or comment on generation rates to provide an estimate of demand.

Natural Gas Demand

As shown in **Table 4.6-2**, the Project would consume a net decrease of approximately 406,709 kBTU per year or 465,068 cubic feet of natural gas per year.[35] Th e decrease is due to the greatly reduced natural gas usage rates assumed for existing church uses as compared to school uses.[36] Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas). Natural gas distribution lines in the vicinity of the Project Site.

Table 4.6-2
Estimated Project Natural Gas Demand

Land Use	Total (kBTU/yr)[1]
Existing Uses (to be removed)	
Church	(1,082,975)
Proposed Uses	
School	806,152
Net Total	**-276,823**

33 CalEEMod, User Guide, Appendix D Default Data Tables, Table 8.1 (Energy Use by Climate Zone and Land Use Type).

34 SCE, Electrical Service Requirements: https://www.sce.com/regulatory/distribution-manuals/electrical-service-requirements.

35 One kBTU = 0.98 cubic foot.

36 CalEEMod, User Guide, Appendix D Default Data Tables, Table 8.1 (Energy Use by Climate Zone and Land Use Type).

Table 4.6-2
Estimated Project Natural Gas Demand

Land Use	Total (kBTU/yr)[1]
du = dwelling unit sf =square feet kBTU = 1,000 British Thermal Units yr = year	
[1] Calculated via CalEEMod. Refer to Appendix B to this MND.	
Note: SCG does not provide or comment on generation rates to provide an estimate of demand.	

Natural gas service is provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The availability of natural gas is based on current conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2,735 million cf per day in 2025 (the Project's buildout year).[37] The Project would account for a fraction of a percent of the forecasted 2025 consumption in SoCalGas's planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the County's Green Building Code to reduce energy usage.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts.

Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the County's Building Code, which requires building energy efficiency measures. Therefore, the Project's operational impacts related to natural gas supply would be less than significant.

Transportation Energy Demand

The Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs.

[37] 2022 California Gas Report, Table 28: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf

Bus routes are within reasonable walking distance (less than one-half mile) of the Project Site, including Metro bus lines 18, 665, and LA County's El Sol shuttle.

As such, the Project Site would provide access for students, employees, and visitors of the Project Site. These transit services, in addition to long-term bicycle parking spaces and short-term bicycle parking spaces, would provide alternatives to driving individual vehicles both to the Project Site from the surrounding areas as well as for employees and patrons at the Project Site to travel to surrounding areas. The change in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand.

The National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations, such as Corporate Average Fuel Economy (CAFE) Standards and the Advanced Clean Cars Program, to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption.

CalEEMod estimated the Project would generate 2,038 vehicle miles traveled per day. Assuming 23.68 mpg, this would demand 86 gallons per day of gasoline. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Criterion 2: *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

Electricity

As shown in **Table 4.6-1**, the Project would consume a net decrease of approximately 48,747 kWh/year of electricity. Since the Project is located in an area already served by existing electricity infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new lines or infrastructure facilities would be constructed or expanded as a result of the Project. However, the Project would require Project-specific infrastructure improvements to connect to the existing infrastructure serving the Project Site area. As future projected electricity supplies from SCE are adequate to serve the Project, impacts on local and regional electricity supplies would be less than significant.

Natural Gas

As shown in **Table 4.6-2**, the Project would consume a net decrease of approximately 474,558 kBTU per year or 465,068 cubic feet of natural gas per year. Since the Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive

infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Project. However, the Project would require Project-specific infrastructure improvements to connect to the existing infrastructure serving the Project Site area. As future projected natural gas supplies from SoCalGas are adequate to serve the Project, impacts on local and regional natural gas supplies would be less than significant.

Criterion 3: *The effects of the project on peak and base period demands for electricity and other forms of energy.*

As discussed above, the Project's net reduction in demand for electricity and natural gas supply would be well within the available regional supplies of SCE and SoCalGas, respectively. The Project's energy demand and consumption would be relatively negligible compared to available supplies. The electricity and natural gas supplies would be sufficient to serve the Project's peak energy consumptions, and impacts would be less than significant.

Criterion 4: *The degree to which the project complies with existing energy standards.*

The Project would be required to comply with Title 24 requirements, CalGreen requirements, and the County's Building Code. Overall, the Project would be required to comply with the mandatory provisions of the Los Angeles County Title 31 Green Building Standards Code and all other applicable requirements to achieve the objective of improving public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices. Title 31 which is based on the California Green Building Standards Code (CALGreen), for residential construction. Title 31 addresses green building, energy efficiency, water efficiency and conservation, low-impact development, and landscape design.

The Project would be reviewed by the County Department of Public Works to ensure that the building construction techniques, building materials, and landscape design are consistent with the principles of sustainability and green design in the Los Angeles County Green Buildings Standard Code. Thus, the Project would comply with energy standards, and impacts would be less than significant.

Criterion 5: *The effects of the project on energy resources.*

Electricity

In accordance with Senate Bill 350 (SB 350) (Clean Energy and Pollution Reduction Act), which establishes clean energy, clean air, and GHG emissions reduction goals, SCE is required to procure eligible renewable energy resources of 50 percent by 2030. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead. The Project would adhere to the required building code standards, such as Title 24 standards and the County's Green Building Code, to ensure energy efficiency within the Project building. Compliance with

energy standards is expected to result in more efficient use of electricity in future years. As such, the Project would not impact electricity resources, and impacts would be less than significant.

Natural Gas

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. As stated in the 2022 California Gas Report, SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf; of that, 112.5 billion cf is allocated to residential, small industrial, and commercial customers. Compliance with energy standards are expected to result in more efficient use of natural gas in future years. Therefore, the Project would not impact natural gas resources, and impacts would be less than significant.

Criterion 6: *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

Approximately 523,779 thousand barrels of crude oil (were supplied to California refineries in 2021.[38] Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves.

Additionally, the Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs.

Bus routes are within reasonable walking distance (less than one-half mile) of the Project Site, including Metro bus lines 18, 665 and LA County's El Sol shuttle.

As such, the Project Site would provide access for students, employees, and visitors of the Project Site. These transit services, in addition to long-term bicycle parking spaces and short-term bicycle parking spaces, would provide alternatives to driving individual vehicles both to the Project Site from the surrounding areas and the Project Site to travel to surrounding areas. The changes in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies, and impacts on energy resources would be less than significant.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Additionally, the Project would not conflict with or obstruct a state or

38 California Energy Commission, Oil Supply Sources to California Refineries, https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries, accessed November 10, 2022.

local plan for renewable energy efficiency. Therefore, impacts related to energy would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

No Impact. Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen building code, and the County's Green Building Code. As these conservation policies are mandatory, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

The Green Building Standards Code requirements which must be complied with include Green Building, Low-Impact Development, and Drought Tolerant Landscaping.

The Green Building Standards Code, Title 31, states that the purpose of the County's Green Building Standards Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices.

As such, the Project would be designed to meet all applicable State building energy efficiency standards as well as to meet the County's energy efficiency standards. Development of the Site would not result in obstruction of opportunities for use of renewable energy due to the addition of PV panels on each home.

For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur.

Cumulative Impacts

Electricity

The Project, in conjunction with any related projects, could result in a net increased demand for electricity supplies. SCE can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. SCE will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the County's Green Building Code. Compliance will further reduce cumulative energy demands. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

The Project, in conjunction with the related projects, could result in a net increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, all of the related projects are located in a transit-rich area of the County and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

4.7 GEOLOGY AND SOILS

This section is based on the following item, which is included as **Appendix D** to this MND:

D Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause 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.	☐	☐	☐	☒

No Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

The Site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low.[39] Therefore, no impact would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Less Than Significant Impact. The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal

39 Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022, page 6.

property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the California Building Code (CBC). The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including County Code Title 26, which regulates all building and construction projects within the County and implements a minimum standard for or building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. Structures built in the County are required to be built in compliance with the CBC, which incorporates the International Building Code (IBC). Compliance with current California Building Code requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

The Site is not within an earthquake fault zone or seismic hazards zone.[40] The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Engineering Investigation. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?	☐	☐	☐	☒

No Impact. Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Regulations include design criteria provided in the Geotechnical Site Investigation including the Uniform Building Code Section 1804.5 (Liquefaction Potential and Soil Strength Loss).

The Site is not within a liquefaction zone.[41] The Seismic Hazards Maps of the State of California does not classify the site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial

40 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed November 10, 2022.

41 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed November 10, 2022.

earthquake. Based on the dense nature of the underlying soils, the lack of groundwater to 50 feet, and the depth to historic highest groundwater level, the potential for liquefaction occurring at the site is considered to be remote.[42] Therefore, no impact would occur.

iv) Landslides?	☐	☐	☐	☒

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow.

The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site. The Site is not within a landslide zone.[43] The probability of seismically-induced landslides occurring on the site is considered to be low due to the general lack of elevation difference slope geometry across or adjacent to the Site.[44] Therefore, no impacts would occur.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site is currently completely developed with approximately 98 percent impervious surfaces[45] (buildings and surface parking paving) and does not contain any topsoil. During the Project's construction phase, activities such as grading and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities.

The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.).

42 Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022, page 7.

43 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed November 10, 2022.

44 Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022, page 8.

45 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

The SWPPP would be subject to review and approval by the County for compliance with the County's Low Impact Development (LID) Manuel (County Code Section 12.84.440). [46] Additionally, all Project construction activities would comply with the County's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

Additionally, during the Project's operational phase, most of the Project Site would be developed with 89 percent impervious surfaces[47] (compared to existing conditions of 98 percent), and all stormwater flows would be directed to storm drainage features including drains on Eastman Avenue and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

c) Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

Less Than Significant Impact. As discussed previously, liquefaction potential at the Project Site is considered low. Seismically-induced settlement or compaction of dry or moist, cohesionless soils can also be a secondary effect of earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Some seismically-induced settlement of the proposed structures should be expected as a result of strong ground shaking. However, due to the relatively dense and uniform nature of the soils at the Project Site, excessive differential settlements are not anticipated. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Site vicinity.

The Project Applicant would be required by the County, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the County Building Code and recommendations included in the Final Geotechnical Reports, impacts related to geologic and soil instability would be less than significant.

46 Los Angeles County, Low Impact Development: https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm

47 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

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?	☐	☐	☒	☐

Less Than Significant Impact. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Grading would occur to create building pads that are in compliance with the applicable requirements related to expansive soil of the California Building Code and the County Building Code.

The onsite geologic materials are in the very low to moderate expansion range.[48] Prior to approval of construction, an engineering level design geotechnical report is required to be prepared and submitted to the County that details the project designs that have been included to address soil conditions pursuant to the CBC requirements, that are included in the County Code Chapter in Title 26. Compliance with the CBC, through design level geotechnical specifications that would be reviewed and approved by the County Engineer, would ensure that potential impacts related to expansive soils would be less than significant.

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 waste water?	☐	☐	☐	☒

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project would connect to the County's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impact would occur.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	☐	☐	☐	☒

No Impact. The Project Site is not located within any Hillside Management Area as specified in Los Angeles County Code, Title 22, Chapter 22.104.[49] The Project Site is relatively flat. As such,

48 Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022, page 10.

49 Los Angeles County General Plan, Figure 9.8, Hillside Management Areas and Ridgeline Management Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_9-8_hillside_management_areas.pdf

the Project would not conflict with the Hillside Management Area Ordinance. Therefore, no impact would occur.

Cumulative Impacts

Geotechnical impacts related to future development involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each related site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, Project cumulative geotechnical impacts would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

This section is based on the following item, which is included as **Appendix E** to this MND:

E Greenhouse Gas Technical Report and Modeling, DKA Planning, September 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Less Than Significant Impact.

CEQA Guidelines Section 15064.4(a) assist lead agencies in determining the significance of the impacts of GHG emissions, giving them discretion to determine whether to assess impacts quantitatively or qualitatively. It calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The County, SCAQMD, Office of Planning and Research (OPR), California Air Resources Board (CARB), California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.[50] This evaluation is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment.

The analysis also calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations requirements adopted to implement plans for reducing

50 CEQA Guidelines, Section 14 CCR 15064.4.

or mitigating GHG emissions. However, the significance of the Project's GHG emissions is not based on the amount of emissions from the Project.

Project Emissions

In support of the consistency analysis below that describes the Project's compliance with, or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, the County's General Plan 2035 Air Quality Element, quantitative calculations are provided below.

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing church and parking lot, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerants: These are substances used in equipment for air conditioning and refrigeration. Most refrigerants are HFCs or blends of them, which can have high GWP values.

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

Project construction is anticipated to be completed in 2025 with occupancy in late 2025 and early 2026. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in the Technical Appendix. The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

As shown in **Table 4.8-1**, construction of the Project is estimated to generate a total of 151 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the

Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[51] This results in annual Project construction emissions of 5 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in the Technical Appendix (**Appendix E** to this MND).

Table 4.8-1
Combined Construction-Related Emissions

Year	$MTCO_2e$[a]
2024	78
2025	73
Total	**151**
Amortized Over 30 Years	**5**

Metric tons of carbon dioxide equivalent = MTCO2e
a CO_2e was calculated using CalEEMod version 2022.1.1.18. Detailed results are provided in the Technical Appendix.
Source: DKA Planning, 2023.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in **Table 4.8-2**, the Project would result in one $MTCO_2e$ per year from area sources.

Table 4.8-2
Annual GHG Emissions Summary (Buildout)[a]

Year	$MTCO_2$[a]
Area[b]	1
Energy[c] (electricity and natural gas)	83
Mobile	205
Solid Waste[d]	30
Water/Wastewater[e]	3
Refrigerants	<1
Construction	5
Total Emissions	**327**

Metric tons of carbon dioxide equivalent = MTCO2e
a CO2e was calculated using CalEEMod and the results are provided in the Technical Appendix.
b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.

51 SCAQMD Governing Board Agenda Item 31, December 5, 2008.

Source: DKA Planning, 2023.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for SCE were selected in CalEEMod. The carbon intensity (pounds per megawatt an hour (lbs/MWh)) for electricity generation was calculated for the Project buildout year based on SCE projections. A straight-line interpolation was performed to estimate the SCE carbon intensity factor for the Project buildout year. SCE's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

The 2019 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water hating, lighting, and insulation for attics and walls.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey

(RASS) studies.[52] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in **Table 4.8-2**, Project GHG emissions from electricity and natural gas usage would result in a total of 83 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with students, residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the number of students for both schools were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 11th Edition*.

The Project represents an infill development within an urbanized area that would concentrate new schools within an HQTA.[53] The Project is geared toward local families and children and would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques.[54] Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance students travel for school and provides a foundation for the implementation of other strategies, such as enhanced transit services.

- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The Project would introduce new uses on the Project Site, including new schools that support local residents. The changes in land uses on the Project Site would reduce vehicle trips and VMT by encouraging students and families to walk and use non-

52 California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

53 The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

54 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.

automotive forms of transportation (i.e., public transit, biking), which would result in corresponding reductions in transportation-related emissions.

- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is located in the dense Whittier Boulevard corridor and is accessible by public transportation. Access to multiple destinations would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions as a result of the Project.

- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The Project would be located near Metro bus route Line 18. The Project would also provide bicycle parking spaces to encourage children to cycle to school.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in **Table 4.8-2**, the Project GHG emissions from mobile sources would result in a total of 205 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in **Table 4.8-2**, the Project scenario is expected to result in a total of 30 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.[55]

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[56] GHG emissions are then calculated based on the amount of electricity consumed

55 AB 341 (2012) increased the Statewide waste diversion goal from 50 to 75 percent from baseline rates established by CalRecycle by 2020 and beyond. Further, SB 1383 (2016) requires jurisdictions to reduce 75 percent of organic waste disposal in landfills by 2030.

56 The intensity factor reflects the average pounds of CO2e per megawatt generated by a utility company.

multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for SCE were selected in CalEEMod.

SCE's programs includes programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2019 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the 2016 standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its Landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035.

As shown in **Table 4.8-2**, Project GHG emissions from water/wastewater usage would result in a total of 3 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in **Table 4.8-2**, the Project scenario is expected to result in less than one $MTCO_2e$ per year from use of refrigerants that used HFCs and have high GWP values.

Combined Construction and Operational Emissions

As shown in **Table 4.8-2**, when taking into consideration implementation of project design features, including the requirements set forth in the County's regulations and codes and the full implementation of current state mandates, the GHG emissions for the Project would equal 327 $MTCO_2e$ annually (as amortized over 30 years) during construction.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, one approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a Project Without Reduction Features comparison. The analysis in this section includes potential emissions under a Project Without Reduction Features scenario and from the Project at build-out based on actions and mandates in force in 2024.

As shown in **Table 4.8-3**, the emissions for the Project and its associated CARB 2024 Project Without Reduction Features scenario are estimated to be 327 and 474 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 31.0 percent from CARB's 2024 Project Without Reduction Features scenario.

Table 4.8-3
Estimated Reduction of Project-Related GHG Emissions

Scenario and Source	Project Without Reduction Features *	As Proposed	Reduction from Project Without Reduction Features	Change from Project Without Reduction Features
Area Sources	1	1	-	0%
Energy Sources	143	83	-60	-42%
Mobile Sources	292	205	-87	-30%
Waste Sources	30	30	-	0%
Water Sources	3	3	-	0%
Refrigerants	<1	<1	-	0%
Construction	5	5	-	0%
Total Emissions	**474**	**327**	**-147**	**-31.0%**

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.
* Project Without Reduction Features scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).
Source: DKA Planning, 2023.

The analysis in this section uses the 2022 Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution to climate change. The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a Project Without Reduction Features approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its Project Without Reduction Features comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's focus on attracting local students and families in an existing urban setting provide opportunities to reduce transportation-related emissions.

Post-2030 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to

80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[57] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the Project would be consistent with the Actions and Strategies set forth in the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS.

Conclusion

Given the Project's consistency with state, SCAG, and County GHG emissions reduction goals and objectives, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

57 Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Consistency with Applicable Plans and Policies

The discussion below describes how the Project complies with or exceeds the performance-based standards in the 2022 *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS, each of which identifies GHG-reducing measures that directly and indirectly apply to the Project. This analysis also evaluates the Project's consistency with the County's General Plan 2035 Air Quality Element. This analysis also evaluates the Project's consistency with the County's 2045 Climate Action Plan, which is not effective yet. This is intended to be informational and for disclosure purposes. As shown here, the Project would be consistent with the applicable GHG reduction plans and policies.

Statewide: Climate Change Scoping Plan

Table 4.8-4 evaluates the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2022 Climate Change Scoping Plan Update*. When compared to SB 32, the Proposed Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2022 Scoping Plan. **Table 4.8-4** confirms that the Proposed Project is consistent with the Scoping Plan's focus on increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the following analysis, the Project would be consistent with the State's Climate Change Scoping Plan's objective of reducing 2030 GHG emissions in accord with SB 32. As such, impacts related to consistency with the Scoping Plan would be less than significant impact.

Table 4.8-4
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHG	**No Conflict.** The Project represents an infill development within an urbanized area that would concentrate new elementary and middle schools within an HQTA and reduce per capita VMT and GHG emissions. The Project would be consistent with SB 375 and its VMT reduction goals, as well as the GHG and transportation goals of the 2020-2045 RTP/SCS.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of Light Duty Vehicle sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. In November 2022, the Advanced Clean Cars II regulations took effect, setting ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly stringent emission standards (LEV program) to ensure automakers phase out sales of internal combustion engine vehicles.	**No Conflict.** Emissions from vehicle engines from the Project would be regulated by State regulations governing technology and cleaner emissions.
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report)	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. CARB's Advanced Clean Truck Regulation accelerates the transition	**No Conflict.** While the Project would not generate substantial medium- and heavy-duty truck traffic, it would not impede the advancement of cleaner trucks over time.

		of zero-emission medium- and heavy-duty vehicles from 2024 to 2035. CARB also adopted the Innovative Clean Transit measure in 2018 that requires all public transit agencies to transition to zero emission fleets.	
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	CARB focuses on reducing emissions from ground support equipment and airport transit vehicles. It is also working with national and international entities to tighten aircraft emission standards. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** While the Project would not directly impact aviation industry, it would not impede the advancement of a cleaner aviation industry over time.
Ocean-going Vessels (OGVs)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** While the Project would not directly impact trade or OGVs, it would not impede the advancement of a cleaner on- or off-shore sources over time.
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory. In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs,	**No Conflict.** While the Project would not directly impact trade or port operations, it would not impede the advancement of a cleaner on-shore sources over time.

		transport refrigeration units, and clean trucks.	
Freight and Passenger rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** While the Project would not directly impact freight or passenger rail, it would not impede the advancement of a cleaner locomotives over time. The Project's land uses would not include freight transportation or warehousing that would be subject to the California Sustainable Freight Action Plan. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** While the Project would not directly impact oil extraction, it would help reduce demand for petroleum products from energy, area, and mobile sources.
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** While the Project would not directly impact oil extraction, it would help reduce demand for petroleum products that require refining.
Electricity Generation	Sector GHG target of 38 $MMTCO_2e$ in 2030 and 30 $MMTCO_2e$ in 2035. Retail sales load coverage 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not directly impact the sources of electricity generation.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would incorporate appliances that are consistent with Title 24 and Green Building requirements and consistent

	million heat pumps installed statewide by 2030.		with the reduction of residential energy use.
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would comply with Title 24 and Green Building requirements during construction and any future retrofit or appliance replacement requirements.
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** While the Project is not a commercial development, it would not interfere with any future requirements to retrofit commercial appliances.
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not directly impact the sources of energy for food production.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not directly impact the sources of energy for construction equipment.
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not directly impact the sources of energy for boilers.
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality.	**No Conflict.** The Project would not directly impact the sources of energy for stone, clay, glass, and cement facilities.

		AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not directly impact the sources of energy for industrial facilities.
Combined Heat and Power	Facilities retire by 2040.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not affect facilities that produced heat and power.
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not affect directly agricultural sources of energy.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In November 2022, the Advanced Clean Cars II regulations took effect, setting low emission standards for transportation.	**No Conflict.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS targets a 20% reduction in CI from a 2010 baseline by 2030. GHG emissions generated by Project-related vehicular travel would benefit from the Advanced Clean Cars Program.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping	SB 350: The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring	**No Conflict.** The Project would comply with this this action/strategy being located within the Southern California Gas (SCG) service area and would

	up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030. Required measures include increasing RPS to 50 percent of retail sales by 2030, establishing annual targets for statewide energy efficiency that achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. SB 100: The California Renewables Portfolio Standard Program (2018) requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It requires local publicly owned electric utilities to procure a minimum quantity of electricity from renewable energy resources of 44 percent of retail sales by December 31, 2024 and 60 percent by December 31, 2030.	comply with CalGreen and Title 24 energy efficiency standards. Southern California Edison (SCE) must generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As SCE would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. As required under SB 350, doubling of the energy efficiency savings from retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as	SB 1383 (2016) requires CARB to set 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels. The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.	**No Conflict.** This program applies to State regulators looking to reduce methane emissions from landfill and dairy facilities and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce such pollutants.

	infrastructure components retire in line with reduced fossil gas demand		
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 605 (2014) directed CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy.	**No Conflict.** This program applies to State regulators looking to reduce high GWP refrigerants and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce such pollutants.
Natural and Working Lands	Conserve 30% of the state's NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions. SB 1386: NWL are an important strategy in meeting GHG reduction goals.	**No Conflict.** This program applies to State regulators governing Natural and Working Lands and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan, EO N-82-20, SB 27, or SB 1386.
Forests and Shrublands	At least 2.3 million acres treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	Restore health and resilience to overstocked forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization. EO B-52-18: CARB to increase the opportunity for using prescribed fire.	**No Conflict.** This program applies to State regulators governing forest and shrubland management and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of EO B-52-18, AB 1504, or the Forest Carbon Plan.

		AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.	
Grasslands	At least 2.3 million acres treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.		**No Conflict.** This program applies to State regulators of grasslands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce fuels in grasslands surrounding communities.
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/ conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands.	**No Conflict.** This program applies to State regulators overseeing croplands and is not directly related to development of the Project. However, the Project would not interfere or impede SB 859 and efforts to increase organic agriculture and conserve croplands.
Developed Lands	Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban tree canopy 10% by 2035.	**No Conflict.** This program applies to State regulators addressing urban forestry and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of AB 2251 and efforts to increase the urban canopy.
Wetlands	Restore 60,000 acres of Delta wetlands		**No Conflict.** This program applies to State regulators restoring Delta wetlands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to restore wetland ecologies.

Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.		**No Conflict.** This program applies to State regulators slowing the conversion of sparsely vegetated lanes and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to slow urban conversion of such lands.
Cap-and-Trade Program	Implement the post-2020 Cap-and-Trade Program with declining annual caps.	AB 398 was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.	**Not Applicable.** This applies to the market-based program to reduce GHG emissions over time and is not applicable to a development project.
Source: DKA Planning, 2023 based on California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Scoping Plan Scenario.			

Regional: 2020-2045 RTP/SCS

As discussed earlier, the 2020-2045 RTP/SCS is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions 8 percent by 2020 and by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance.

Generally, projects are considered consistent with the provisions and policies of applicable County and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS (as well as its previous iteration) involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT.

Table 4.8-5 provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS.

Table 4.8-5
Consistency with the 2020 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of region's total household growth occurring within HQTAs.	**Not Applicable.** The Project does not include residential uses. Nevertheless, it would not reduce housing stock in the County and would not inhibit the County's efforts to add to the supply and diversity of housing in metropolitan Los Angeles County.
Increase percent of the region's total employment growth occurring within HQTAs.	**Consistent.** The Project is an infill development that would create more school- and service-related jobs, consistent with the 2020 RTP/SCS policies and would focus on job growth on Whittier Boulevard and an HQTA.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**Consistent.** The Project is an infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	**Consistent.** The Project is an infill development that would reduce daily VMT per capita. Local elementary and middle schools are geared toward neighborhood children that involve short trips that can be made with bicycling and walking. This would reduce potential driving distances for some parents as well. This includes access to Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site.
Decrease average daily distance traveled for work and non-work trips (in miles)	**Consistent.** The Project is an infill development that would reduce trip distances for students and parents. Local elementary and middle schools are geared toward neighborhood children that involve short trips that can be made with bicycling and walking. This would reduce potential driving distances for some parents as well. This includes access to Metro local bus Line 18 which operates

Objectives	Consistency Analysis[a]
	east-west service on Whittier Boulevard approximately 880 feet north of the Project Site.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**Consistent.** The would substantially increase all trips that are less than three miles in length. Local elementary and middle schools are geared toward neighborhood children that involve short trips that can be made with bicycling and walking. This would reduce potential driving distances for some parents as well. This includes access to Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site.
Increase share of short trip lengths for commute purposes.	**Consistent.** The Project is an infill development that could reduce trip lengths for faculty and other staff. Local elementary and middle schools are geared toward neighborhood children that involve short trips but often attract local teachers and staff that would have shorter commute trips than working at more remote schools.
Decrease average minutes of delay experienced per capita due to traffic congestion.	**Consistent.** The Project is an infill development in the dense Whittier Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit and active transportation mode share.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. When combined with bus and shuttle service on Whittier Boulevard, this would reduce car trips on local roads that could reduce congestion and help improve travel speeds on this arterial.
Decrease excess travel time for heavy-duty trucks result from the difference between reference speed and actual speed.	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. This would reduce potential car trips on Whittier Boulevard and local roads that could reduce truck congestion and help improve travel speeds on this arterial.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. As such, trips to school would not exceed 45 minutes in duration. Moreover, school bell times would ensure that most vehicle traffic in the afternoon occur soon after the student dismissal time at 3:15 P.M.
Increase percentage of trips that use transit (work and all trips)	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. Students living further away from school could use Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site.

Objectives	Consistency Analysis[a]
Decrease average travel time to work (all modes)	**Consistent.** The Project is an infill development that could reduce trip lengths for faculty and other staff. Local elementary and middle schools are geared toward neighborhood children that involve short trips but often attract local teachers and staff that would have shorter commute trips than working at more remote schools.
Increase percentage of trips using either walking or biking (by trip type)	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking.
Reduce per capita GHG emissions (from 2005 levels)	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. Students living further away from school could use Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	**Consistent.** The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. Students living further away from school could use Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site.

Local: County of Los Angeles General Plan 2035 Air Quality Element

While Goal AQ 3 of the Air Quality Element calls for the County to implement plans and programs to address the impacts of climate change, the Project would be consistent with the spirit of this goal. The Project would be geared toward local middle neighborhood children that would involve short trips that can be made with bicycling and walking. Students living further away from school could use Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site. As such, the Project would accommodate population growth while minimizing GHG emissions from mobile sources associated with transporting children to and from school.

Local: County of Los Angeles 2045 Climate Action Plan (draft)

The following is intended to be informational and for disclosure purposes.

The Revised Draft 2045 Los Angeles County Climate Action Plan (2045 CAP) is LA County's path toward meeting the goals of the Paris Agreement and striving towards carbon neutrality for unincorporated areas of the County. The Revised Draft 2045 CAP builds on previous climate action work from the Unincorporated Los Angeles County Community Climate Action Plan 2020, adopted in October 2015 as a subcomponent of the Air Quality Element of the Los Angeles County

General Plan 2035. The Revised Draft 2045 CAP identifies strategies, measures, and actions to mitigate emissions from community activities, which may include some municipal operations.[58]

To reduce emissions across all sectors, the 2045 CAP establishes three GHG emissions reduction targets and one long-term aspirational goal:

- Target: By 2030, reduce GHG emissions by 40 percent below 2015 levels.
- Target: By 2035, reduce GHG emissions by 50 percent below 2015 levels.
- Target: By 2045, reduce GHG emissions by 83 percent below 2015 levels.
- Aspirational Goal: By 2045, achieve carbon neutrality in unincorporated Los Angeles County.

The 2045 CAP includes 10 strategies, 25 measures, and almost 90 actions that shall be implemented by the County to achieve its proportional share of state GHG emissions reductions for the target year 2030.

To demonstrate consistency with the 2045 CAP, all projects that do not screen out of the 2045 CAP consistency review process must implement either (1) all feasible applicable checklist measures or (2) for infeasible checklist measures, alternative project emissions reduction measures. The project review checklist will be used in one two ways: (1) For projects consistent with the 2045 CAP, to demonstrate CAP consistency that allows for a streamlined project-specific CEQA GHG analysis; or (2) for projects required or electing to prepare project-specific CEQA GHG analyses, to demonstrate that all feasible applicable checklist measures or alternative project emissions reduction measures have nevertheless been implemented, either as project features or as GHG mitigation measures. Projects that do not implement all feasible applicable checklist measures or alternative project emissions reduction measures may have significant GHG impacts because they could conflict with an applicable GHG reduction plan per CEQA Guidelines Appendix G, Section VII.

The Project is an infill development that could reduce trip lengths for faculty and other staff. Local elementary and middle schools are geared toward neighborhood children that involve short trips but often attract local teachers and staff that would have shorter commute trips than working at more remote schools. The Project is an elementary and middle school geared toward neighborhood children that involve short trips that can be made with bicycling and walking. Students living further away from school could use Metro local bus Line 18 which operates east-west service on Whittier Boulevard approximately 880 feet north of the Project Site. This would reduce dependency on automobiles and reduce GHG emissions from mobile sources.

To demonstrate conformance with the 2045 CAP, a project must demonstrate consistency with the General Plan 2035 and meet the 2045 CAP Consistency Screening Criteria.

58 Los Angeles County 2045 Climate Action Plan (draft): https://planning.lacounty.gov/long-range-planning/climate-action-plan/documents/

Step 1 is to demonstrate consistency with the Los Angeles County General Plan 2035. As discussed in **Table 4.11-1** (Land Use Planning section) of this MND, the Project is consistent with the General Plan.

Step 2 is to determine whether the project screens out of using the 2045 CAP Checklist.

Does the project achieve zero GHG emissions compared to the existing on-site development at the project site? As shown in **Table 4.8-2** (Greenhouse Gas section) of this MND, when taking into consideration implementation of project design features, including the requirements set forth in the County's regulations and codes and the full implementation of current state mandates, the GHG emissions for the Project would equal 327 $MTCO_2e$ annually (as amortized over 30 years) during construction. Thus, the project does not achieve zero GHG emissions compared to the existing on-site development at the project site. If not, proceed to step 3.

Step 3 is to demonstrate consistency with the 2045 CAP GHG Emissions Reduction Measures and Actions.

The Project would provide 1,670 square feet of solar area to support on-site renewable energy systems, and the Project could participate in Southern California Edison at the Green Rate level (i.e. 100% carbon-free electricity) until SCE provides 100% carbon-free electricity by default.

Based on the Project's proximity to public transit and satisfying the related screening criteria provided in the County's Transportation Impact Analysis Guidelines, the Project meets the transportation screening criteria.

The project would comply with any CALGreen Code requirement, County ordinance, building code, or condition of approval that requires a certain amount of electric vehicle (EV) charging infrastructure (EVCSs) and readiness. The Project would provide 9 electric vehicle supply equipment (EVSE) spaces and 2 electric vehicle charging stations (EVCS).

The County's goal is to achieve a job density of 300 jobs per acre. The Project is a school project serving 525 students with 28 employees (teachers and staff) on 1.17 acres but a majority of the population would be school children. This is not the nonresidential-type of development that the County's goal was made for.

The Project includes reduced parking requirement per AB 2097. While LACC Section 22.112.070 would require the Project to provide 54 vehicular parking spaces, under AB 2097, the Project is not required to meet a minimum parking requirement because it is located within a half-mile of a HQTC.

The Project would comply with all County and State water use efficiency and water conservation requirements.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2020-2045 RTP/SCS, the County's General Plan 2035 Air Quality Element, and the County's 2045 Climate Action Plan (draft). Consistency with the above plans, policies, regulations, and GHG emissions reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Cumulative Impacts

As explained above, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis, because climate change is a global problem, and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change.

The analysis shows that the Project is consistent with CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The analysis also shows that the Project would be consistent with the 2020-2045 RTP/SCS, which would serve to reduce regional GHG emissions from the land use and transportation sectors by 2020 and 2035.

In addition, the Project would comply with the General Plan 2035 Air Quality Element, which identifies the need for countywide plans and programs that reduce GHG. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following item, which is included as **Appendix F** to this MND:

F Phase I Environmental Site Assessment, Hazard Management Consulting, October 4, 2022

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	☐	☐	☒	☐

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Hazardous materials are generally defined as any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or future hazard to human health and safety or to the environment, if released into the workplace or the environment (Health and Safety Code §25501(o)). The California Department of Toxic Substances (DTSC) is responsible for classifying hazardous materials in the state of California. Hazardous materials are commonly stored and used by a variety of businesses and are commonly encountered during construction activities.

Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban infill project such as a school. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a school. This typical urban use does not involve the routine use of hazardous materials**.** For example, the proposed use would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project cleaning and maintenance program could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with urban land uses. The Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable regulations regarding implementation of hazardous waste reduction efforts on-site. The applicable regulatory requirements further ensure that the minimal number of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, impacts would be less than significant.

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?	☐	☒	☐	☐

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Historic Uses

The Site and Site vicinity are located in an area of historic residential development. The Site was developed with single-family residences from at least 1923 until approximately 1928. From 1928 until 1952, the Site was observed as being undeveloped vacant land. The Site was developed with the existing buildings in 1953 and has operated as various churches until the present. The

Site vicinity has been developed with single-family residences and apartment buildings. There were no Recognized Environmental Conditions (RECs) found from the historic use of the Site.

Existing Uses

There were no hazardous materials observed in Building 2 (north building) with the exception of household cleaning products.

Hazardous materials observed in Building 1 (south building) include storage of approximately 8 5-gallon propane tanks and household cleaning products.

Surrounding Uses

The Site is located in an area that has historically had residential and commercial activity and numerous facilities have experienced releases though none were close enough or in the correct orientation to be considered a direct threat or REC to the Site with the exception of the elevated concentrations of lead found in surface soils at the Site as a result of the release of lead into the air from the former Exide Technologies Facility. The Exide Technologies Facility is located nearby (3901 Bandini Boulevard, 1.15 miles southwest) and operated as a battery recycling and production facility. As part of their operations, lead was released into the air and has been found to have deposited onto surface soil in the downwind area. Arcadis and EFI Global conducted soil x-ray fluorescence (XRF) scanning and sampling to evaluate lead concentrations in soil on behalf of the DTSC. The sampling event occurred on April 6, 2017, which consisted of 20 soil XRF scan samples and 20 soil samples for laboratory analysis. There were no detections of lead in any of the soil XRF scan samples. Lead was detected in all soil samples at concentrations ranging from 12.9 mg/kg to 352 mg/kg. Nine of the soil samples detected lead above the residential lead screening level of 80 mg/kg. These samples are located along the north property line adjacent to Building 2 and the southeast property line fronting Building 1 along Gage Avenue.[59]

The presence of lead in soil at concentrations above the residential screening level would be considered an REC. However, given the limited quantity of soil known to contain elevated concentrations of lead, the soil impacts can be effectively managed with a Soil Management Plan (SMP) to guide the overall grading activities. (See **Mitigation Measure MM-HAZ-1**, below.) See also, Phase I Environmental Site Assessment, Hazard Management Consulting, October 4, 2022, page 7 of the PDF.)

Mitigation Measure

MM-HAZ-1 Soil Management Plan

During future development of the Site, a Soil Management Plan (SMP) shall be developed for the proposed construction activities. The SMP shall describe the management of impacted soils which may be encountered during Site

59 Phase I Environmental Site Assessment, Hazard Management Consulting, October 4, 2022, page 1,645 of the PDF.

development, and outline health and safety procedures to minimize risk to onsite workers and personnel.

In addition, the SMP shall describe the procedures for export of inert soil for offsite reuse.

It is anticipated that data collected during additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse.

The SMP shall be developed by a qualified environmental consultant, consistent with SCAQMD Rule 1166 (Site Specific and Various Locations Soil Mitigation Plan) for the site and implemented during site grading and excavation.

The SMP shall be reviewed by the Los Angeles County Fire Department Site Mitigation Unit of the Health Hazardous Materials Division (LACFD SMU) as follows:

First, a draft version of a complete SMP prepared by a qualified environmental consultant shall be submitted to the LACFD SMU. Additional comments may be provided by the LACFD SMU, and the determination that comments are warranted.

All such comments, to the extent warranted, shall be incorporated into the final draft SMP. The SMP shall then be implemented during the soil disturbance and site grading phases of Project construction.

The objective of the SMP is to establish policy and requirements for the management and disposal of soils generated during excavation and redevelopment, and other activities that may disturb potentially contaminated soil.

Implementation of the **Mitigation Measure MM-HAZ-1** requiring an SMP would ensure that impacts during construction are less than significant.

Asbestos-Containing Materials and Lead-Based Paint

The use of asbestos-containing materials (a known carcinogen) and lead paint (a known toxin) was common in building construction prior to 1978 (the use of asbestos-containing materials in concrete products was common through the 1950s). Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the federal Environmental Protection Agency (EPA). Federal asbestos requirements are found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M, and are enforced in the project area by the SCAQMD.

The Site was developed with the existing buildings in 1953. Given the age of the buildings on Site, asbestos containing materials and lead-based paints are likely to be present in building materials.

SCAQMD Rule 1403 requires notification of the SCAQMD prior to commencing any demolition or renovation activities that involve asbestos containing materials. Rule 1403 also sets forth specific

procedures for the removal of asbestos and requires that an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with asbestos-containing materials. With compliance with AQMD Rule 1403, potential impacts related to the disposal of asbestos-containing materials would be less than significant.

In addition, per Los Angeles County Department of Public Works, Building and Safety, an asbestos survey is required for applicants to receive a demolition permit.

If lead-based paint materials are found to be present, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

Oil and Gas Wells

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on or near the Site.[60]

Operational Health Hazards

The Project shall be maintained in a neat, attractive, and safe condition at all times. On-site activities will be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins will be maintained with a lid in working condition; such lid will be kept closed at all times. Trash and garbage collection bins will be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers will be emptied a minimum of once per week. Trash and garbage bin collection areas will be maintained free from trash, litter, garbage, and debris. Operational impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	☐	☐	☒	☐

Less Than Significant Impact. Sensitive land uses are generally considered to be uses such as residential uses, schools, churches, playgrounds, senior citizen centers, hospitals, day-care facilities, or other uses that are more susceptible to hazardous materials. The sensitive uses within one-quarter mile (1,320 feet) of the Project Site include:

60 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#close/, accessed November 10, 2022.

- Residential communities surrounding the Project Site
- Eastman Avenue Elementary School (4112 Olympic Boulevards) is located 800 feet south of the Site, separated by the I-5 Freeway
- Los Angeles Community Hospital (4081 Olympic Boulevard) is located 400 feet south of the Site, past the I-5 Freeway
- East Los Angeles Doctors Hospital (4060 Whittier Boulevard) is located 600 feet north of the Site
- The Site itself is proposed to become a school

As discussed previously, the types of hazardous materials that would be found on the Project Site during the Project's operational phase would be typically associated with school land uses – paints, cleaning supplies, small amounts of petroleum products. The Project would not require routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment.

To the extent there would be any such transport, use, or disposal, compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Additionally, no RECs were identified on the Project Site, except for limited quantity of soil known to contain elevated concentrations of lead which will be resolved with **a** regulatory compliant Soil Management Plan. Any potential ACMs and/or mold found would be remediated in accordance with existing regulations. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, Project impacts related to this issue would be less than significant.

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?	☐	☐	☐	☒

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[61] Based on this, development of the Project would not cause or exacerbate a significant hazard to the public or the environment. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not located within two miles of a public airport. San Gabriel Valley Airport is 9.5 miles northeast of the Site. Los Angeles International Airport is 13 miles southwest. Santa Monica Airport is 15 miles west. Hollywood Burbank Airport is 15.5 miles northwest.

Additionally, the school development would not be of a sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks.

Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site. Therefore, no impacts would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less Than Significant Impact.

Construction

The Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The County's General Plan Safety Element outlines goals and policies aimed at reducing the potential risk of death, injuries, and economic damage resulting from natural and man-made hazards. Additionally, the County's General Plan Safety Element works in conjunction with the Operational Area Emergency Response Plan, which is prepared by County's Chief Executive Office - Office of Emergency Management. The Operational Area Emergency Response Plan strengthens short and long-term emergency response and recovery capability and identifies emergency procedures, as well as emergency management routes in Los Angeles County.

61 Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/, accessed November 10, 2022.

The Project Site is near the I-5 Freeway, which is identified as one of the County's Freeway Disaster Routes.[62] The Project would not affect access to the freeway or the route itself.

The Office of Emergency Management prepares the All-Hazard Mitigation Plan, which provides policy guidance for minimizing threats from natural and man-made hazards in Los Angeles County. The All-Hazard Mitigation Plan includes a compilation of known and projected hazards in Los Angeles County. The All-Hazard Mitigation Plan also includes information on historical disasters in Los Angeles County.

The Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. During short-term construction activities, the Project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the Project Site. Therefore, impacts related to emergency response and evacuation plans associated with construction of the Project would be less than significant.

Operation

The Project does not include any changes to public or private roadways that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events.

During the operational phase of the Project, onsite access would be required to comply with standards established by the County. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to County's fire standards. The Project would provide adequate emergency access to the Site from Gage Avenue and Eastman Avenue. Further, access to and from the Site for emergency vehicles would be reviewed and approved by the County as part of the approval process to ensure the Project is compliant with all applicable codes and ordinances for emergency vehicle access. Therefore, impacts related to interference with an emergency response plan would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires because the project is located:				
i) within a high fire hazard area with inadequate access?	☐	☐	☐	☒

62 Los Angeles County General Plan, Figure 12.6, Disaster Routes Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_12-6_Disaster_Routes.pdf

No Impact. The Project Site is located in an urbanized area of the County and is completely developed. The Project Site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone.[63] Furthermore, The Project Site would include adequate access, as discussed above in response 9(f). Therefore, impacts related to wildland fires would not occur.

ii) within an area with inadequate water and pressure to meet fire flow standards?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site is located within an urban developed area and is not located within an identified wildland fire hazard area and is not an area where residences are intermixed with wildlands. The Project would include onsite water pipes that connect to the existing water line in Gage Avenue and Eastman Avenue. Furthermore, the Project is required to comply with Los Angeles County Code Sections 20.16.050 and 20.16.060, which set water flow requirements for non-residential developments, onsite water lines, and fire hydrants. Therefore, the Project would not expose people or structures to a significant risk involving fires because the Project is located within an area with inadequate water and pressure to meet fire flow standards. Impacts would be less than significant.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	☐	☐	☐	☒

Less Than Significant Impact. The Project Site is not within proximity to land uses that have the potential for a dangerous fire hazard. The area surrounding the Project Site is developed with residential uses and is not in an area with excessive amounts of dry brush that pose significant fire risks. The Project consists of school land uses. This land use would not generate potential impacts related to a dangerous fire hazard. Therefore, impacts related to proximity to potential fire hazard would not occur.

h) Does the proposed use constitute a potentially dangerous fire hazard?	☐	☐	☐	☒

No Impact. The Project would develop school land uses. None of the uses related to the Project would constitute a potentially dangerous fire hazard and impacts would not occur.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the

63 Los Angeles County General Plan, Figure 12.5, Fire Hazard Severity Zones Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-5_Fire_Hazard_Severity_Zones_Policy_Map_Responsibility.pdf

Project Site boundaries. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

This section is based on the following item, which is included as **Appendix G** to this MND:

G Hydrology Report, Tritech Engineering Group, February 8, 2024

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 ground water quality?	☐	☐	☒	☐

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality.

The County of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB). BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[64] The Project is subject to the requirements of the SUSMP, which are enforced through the County's plan approval and permit process.

64 Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. A project must comply with the LID Best Management Practices (LID BMPs), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include site design, source control, and treatment control.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion.

During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

Compliance with the General Construction Activity Stormwater Permit requirements would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) from parked cars and commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists.

In compliance with the NPDES Permit and Los Angeles County Code, development projects are required to prepare a Low Impact Development (LID) report. The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit. Pursuant to County Code Section 12.84.450, the LID report is required to be approved which would ensure it complies with the Los Angeles County RWQCB Municipal Separate Storm Sewer System (MS4) Permit regulations.

The LID Design includes an infiltration trench for the Site with a volume of 3,498 cubic feet, which exceeds the required 3,151.80 cubic feet, or as described in the final approved LID design.[65]

Overall, implementation of the LID report pursuant to the existing regulations would ensure that implementation of the Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

No Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

The Project Site is in the Coastal Plan of Los Angeles – Central Groundwater Basin.[66] Groundwater was not encountered during exploration to 50 feet in depth. The historic high groundwater level was established by review of California Geological Survey Seismic Hazard Evaluation Report 029 Plate 1.2 entitled "Historically Highest Ground Water Contours". Review of this plate indicates that the historically highest groundwater level is on the order of 85 feet below site grade.[67] The nearest surface water in the vicinity is the Los Angeles River channel, which classified as a Riverine and located approximately 1.25 miles south of the Project Site.[68] No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site.

The Project Site is located in an urbanized area of the County. The Project Site is primarily covered with hardscape and is approximately 98 percent impervious.[69] The Project will similarly occupy the entire Project Site with a new building and renovated building but with added landscaping to reduce impervious surfaces to 89 percent.[70] Thus, the Project would decrease the amount of impervious surface that affects groundwater recharge, which would be a net benefit for groundwater recharge opportunity.

65 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

66 Groundwater Basins: https://dwr.maps.arcgis.com/apps/Styler/index.html?appid=740d10eefd6148579321a3abcd065a36

67 Geotechnical Engineering Investigation, Geotechnologies Inc., September 23, 2022, page 3.

68 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed November 10, 2022.

69 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

70 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. Therefore, no impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year floor hazard area or County Capital Floor floodplain; the alternation 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?	☐	☐	☒	☐

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the County. There are no natural watercourses on the Project Site or in the vicinity of the site. The Project Site is completely developed and is considered 98 percent impervious. Current stormwater runoff flows to the local storm drain system. Under the developed-Project condition, the Project Site also would be considered 89 percent impervious.[71]

Since the runoff from the Project Site discharges to public stormdrain system and the post-developed runoff is less than pre-developed runoff, the Project is exempted from hydromodification. The Project is not adversely impacted to the downstream properties.[72]

The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would control the amount of surface water runoff leaving the Project Site during a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour rain event or the 85th percentile, 24-hour rain event as determined from the Los Angeles County 85th percentile precipitation isoheytal map.[73] The Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐

71 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

72 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

73 Los Angeles County LID Manuel: https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm

Less Than Significant Impact. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site.

The Project Site is completely developed and is considered 98 percent impervious. Current stormwater runoff flows to the local storm drain system. Under the developed-Project condition, the Project Site also would be considered 89 percent impervious.[74]

The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Therefore, impacts would related to this issue would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Less Than Significant Impact. The project is covered by the requirements of the County's MS4 Permit to control and minimize potentially polluted runoff. Per the County's LID Ordinance and Stormwater Ordinance, the Project may not result in an excessive amount of runoff which would exceed the capacity of stormwater drainage systems or substantially increase polluted runoff. The County's LID Ordinance and Stormwater Ordinance would require design requirements to promote and improve the County's watersheds and prevent potential polluted runoffs from the Project to drain into natural water bodies.

Prior to issuance of a grading permit, the Project is required to obtain approval from the DPW Land Development Division for a LID/drainage plan, and conduct appropriate infiltration tests in the LID reports to ensure the design of any flood control facilities meet the standards set in the LID Ordinance. Therefore, impacts would be less than significant.

iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year floor hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	☐	☐	☐	☒

74 Hydrology Report, Tritech Engineering Group, February 8, 2024, included as Appendix G to this MND.

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA) flood map 06037C1643F, September 26, 2008.[75] Also, the Project Site is not located near any bodies of water. The Site is not within a County-identified flood hazard zone.[76] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	☐	☐	☐	☒

No Impact. The Project Site is not within a flood hazard zone and would not place structures in a Federal 100-year flood hazard zone or County Capital Flood Severe Flood Hazard Area. Therefore, impacts relating to flood hazards would not occur.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?	☐	☐	☒	☐

Less Than Significant Impact. The Los Angeles County LID ordinance was designed to manage rainfall and stormwater runoff in urban areas through the distribution of small, cost-effective landscape features throughout project sites. Such features include bio-retention/filtration landscape areas, reduced impervious surfaces, and functional landscaping and grading.

Pursuant to Chapter 12.84 of the County's Code (Low-Impact Development Standards), construction, and operation BMPs would be implemented as a standard condition of the Project, which would reduce impacts to water quality during construction and operation, including those impacts associated with soil erosion and siltation. The LID Standards require that new development (1) mimics undeveloped stormwater runoff rates and volumes in any storm event up to and including the Capital Flood (2) prevents pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event, and (3) minimizes hydromodification impacts to natural drainage systems. The Project is subject to Chapter 12.48 of the County's Code.

Development of the Project would be subject to the Los Angeles County's LID and would incorporate BMPs that are consistent with LID. With implementation of LID BMPs, stormwater

75 FEMA, https://msc.fema.gov/portal/search?, accessed November 10, 2022.

76 Los Angeles County General Plan, Figure 12.2a, FEMA Flood Hazard Zones Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-2_flood_zones.pdf

runoff from the Site would decrease compared to existing runoff flow. Therefore, impacts would be less than significant.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	☐	☐	☐	☒

No Impact. Wastewater from the Project Site is conveyed via County sewer infrastructure to the Joint Water Pollution Control Plant which currently provides primary, secondary, and tertiary treatment for a design capacity of 260 million gallons of wastewater per day within a portion of the Los Angeles County Sanitation Districts.[77] No wastewater treatment systems are proposed as part of the Project. The Project would not include an onsite wastewater treatment system. Therefore, no impacts would occur.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

No Impact. Tsunamis are tidal waves generally caused by earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The Project is located approximately 17 miles east of the Pacific Ocean and based on the inland location, not within a tsunami zone.

Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented through regulation of the level of water in storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. There are no major water-retaining structures located immediately upgradient from the Project Site.

The project site is not located within a flood hazard, tsunami hazard, or seiche zone and is not at risk of release of pollutants due to inundation. Therefore, no impacts would occur.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Less Than Significant Impact. Use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit and PPP WQ-1 would serve to ensure that construction activities do not result in a degradation of water quality, and impacts

77 Los Angeles County Sanitation Districts: https://www.app.lacsd.org/facilities/?tab=2&number=1

would be less than significant. Thus, construction associated with the Project would not conflict or obstruct implementation of a water quality control plan.

Also, new development projects are required to implement LID (per the Regional MS4 Permit). The LID specifications and BMPs and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the Project would not conflict with or obstruct implementation of a water quality control plan.

The Project will provide for infiltration through landscaping areas and other LID BMPs that provides for infiltration of stormwater. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant.

Cumulative Impacts

The sites of the Project and the related projects are located in an urbanized area where the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the County is required to comply with the LID Manuel and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community.

The Project conforms to the existing land use patterns of the East Los Angeles community which is residential since a school is a complementary use. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site and is contiguous and bounded by streets. In addition, the Site is not large enough to encompass an established community.

The Project does not propose a new construction of highways, freeways, rails or flood control channel that are generally associated with the physical division of an established community. It will conform to the existing street grid and continues with the existing pattern of residential-related and amenity development and would not create barriers within an existing community or otherwise physically divide an established community. Therefore, no impact would occur.

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

No Impact. The main documents regulating land use for the Project and immediate vicinity are the County's General Plan and Zoning Code. In addition, SCAG's RTP/SCS provides guidance on a regional level. The Project's relationship to these planning documents is described below.

General Plan

The County's General Plan is the principal land use document guiding development within unincorporated Los Angeles County. The General Plan is a comprehensive plan that establishes goals and policies intended to guide growth and development in the County. The Project is subject to the Los Angeles County General Plan – East Los Angeles Community Plan. The school use is

generally consistent with the General Plan land use designation of Medium Density Residential and is authorized with approval of a CUP. The General Plan sets forth policies regarding land use, urban form, open space, economic development, public services and more for the unincorporated areas of Los Angeles County. In line with the guiding principles of the General Plan, the Project supports the principle and goal to ensure community services and infrastructures are sufficient to accommodate growth and provide the foundation for a strong and diverse economy.

As shown in **Table 4.11-1**, the Project is in substantial conformance with the applicable land use element goals and policies in the General Plan. For these reasons, the Project substantially conforms with the purpose, intent and provisions of the General Plan, including the Community Plan. The Site is not subject to any specific plan.

Table 4.11-1
Consistency with the County General Plan Land Use Element

Goals and Policies	Consistency Discussion
Goal LU 4: Infill development and redevelopment that strengthens and enhances communities. **Policy LU 4.1:** Encourage infill development in urban and suburban areas on vacant and underutilized and/or brownfield sites. **Policy LU 4.2:** Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.	**Consistent.** The Project meets this goal and policy by revitalizing and optimizing an underutilized property. Currently, the Site is used as a church that is underused and underimproved. The Project will optimize the use and enhance the neighborhood with its thoughtful design features that is cohesive with the existing residential community. Parents, families and caretakers of the students of the Project live in close proximity to the Site which will result in a strengthened community. The Project proposes to renovate Building 2 for the new school-related uses.
Goal LU 5: Vibrant, livable and healthy communities with a mix of land uses, services and amenities. **Policy LU 5.5:** Ensure that all households have access to sufficient supply of quality early care and education and supervised school-age enrichment options for children from birth to age 13.	**Consistent.** The Project meets this goal and policy by expanding opportunities for children in East Los Angeles to receive a high-quality education in close proximity to where they live. This will result in reduced commute times to schools for residents and families in the neighborhood. The Project delivers a new, educational use to serve the surrounding community and is designed to be compatible with the adjacent land uses and community character.
Los Angeles County General Plan: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf	

Zoning Code

Title 22 of the Los Angeles County Codes describes and elaborates on permitted land uses and contains more specific information related to permitted uses and development standards.

School Use CUP

Pursuant to LACC Section 22.18.030, a school use is permitted in the R-3 zone, subject to approval and issuance of a conditional use permit (CUP) under LACC Section 22.158.050. Thus, the Applicant requests a CUP to permit the construction, operation, and maintenance of a school use on the Site. The Project is a TK-8th grade school which are commonly found in residential neighborhoods similar to the neighborhood where the Site is located, throughout the County. The Project is expanding the current square footage at the Site by 12,948 square feet and is renovating what is currently an underutilized church into a renovated and well-designed school that will enhance the current community. Residential neighborhoods are common locations for schools and can be viewed as ideal due to it being a safe environment that is in close proximity to the students' families. The Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or diminish the value of neighboring properties.

Conclusion

The Project would comply with the requirement set forth in Title 22 of the Los Angeles County Code, and the Project would not conflict with the land use plan, policies, or regulations. Impacts would be less than significant.

SCAG 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically, and SCAG has created a 2020-2045 updated RTP/SCS called Connect SoCal. On May 7, 2020, SCAG's Regional Council adopted Connect SoCal for federal transportation conformity purposes only. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

As discussed on **Table 4.11-2**, the Project would be consistent with the applicable goals of the 2020-2045 RTP/SCS.

Table 4.11-2
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Discussion
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable/Consistent.** This goal is directed towards SCAG and the County and does not apply to the Project. However, the Project would develop a new school within an urbanized residential community in, supporting the area's educational needs, and ensuring economic prosperity and global competitiveness of Southern California.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in a highly urbanized area in the County. The Project includes development of a new school within an HQTA and a Living Corridor, as defined by SCAG, and also in close proximity to existing residential uses. During construction, safety measures will be implemented to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project will coordinate with LADPW on construction and best management practices, including but not limited to: install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety. Sidewalks could be closed adjacent to the Project Site and pedestrians will be directed across the streets prior to the Project Site. Sidewalk will be reopened as soon as reasonably feasible taking construction and construction staging into account. For student drop-off and pick-up operations, signs will be posted at the ingress and egress driveways indicating turning restrictions. Traffic monitors will also assist in directing vehicles through the drop-off/pick-up area. Also, the Project's operations would ensure safe travel at and near the Project Site by ensuring safe vehicular and pedestrian access since the Project would be subject to the site plan review requirements of the County and would be required to coordinate with the Department of Public Works and the Los Angeles County Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.

Table 4.11-2
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Discussion
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project includes development of a new school in an urbanized residential community. The Project would include bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near transit opportunities would further reduce dependence on automobile travel, reducing VMT.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project includes development of a new school in an urbanized residential community. The Project would include bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project includes development of a new school in an urbanized residential community. Given the urban nature of the Project Site area, Project employees would be able to walk and bike to/from work. addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project includes development of a new school in an urbanized residential community. Also, the Project includes bicycle parking spaces. The Project Site's proximity to transit and the Project's inclusion of bicycle parking and pedestrian amenities help to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are

Table 4.11-2
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Discussion
indicators and MAP-21/FAST Act regional targets.	responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS, adopted May 2020.	

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas? ☐ ☐ ☐ ☒

No Impact. The Project Site is not located in a Hillside Management Area[78] or Significant Ecological Area.[79] Therefore, no impact would occur.

78 Los Angeles County General Plan, Figure 9.8, Hillside Management Areas and Ridgeline Management Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_9-8_hillside_management_areas.pdf

79 Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2019-FIG_9-3_significant_ecological_areas.pdf

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The County would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	☐	☐	☐	☒

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction.

California's Geological Survey (State Department of Conservation, Division of Mines and Geology) identifies deposits of regionally- significant aggregate resources. These clusters or belts of mineral deposits are designated as Mineral Resources Zones (MRZ-2). MRZ-2 sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.

The Project Site is not located in a Mineral Resources area.[80] Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.[81] Therefore, no impact would occur.

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?	☐	☐	☐	☒

No Impact. A significant impact would occur if a project were located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or

80 Los Angeles County General Plan, Figure 9.6, Mineral Resources: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-6_mineral_resources.pdf

81 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#close/, accessed November 10, 2022.

potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction.

No mineral extraction activities occur on the Site currently, or historically. As such, the proposed project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Additionally, as stated in the response to Question 12(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impact would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

4.13 NOISE

This section is based on the following items, which are included as **Appendix H** to this MND:

H-1 Noise Technical Report and Modeling, DKA Planning, December 2023

H-2 Vibration Technical Report and Modeling, DKA Planning, September 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. 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 County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☒	☐	☐

Less Than Significant Impact With Mitigation Incorporated.

County of Los Angeles General Plan Noise Element

The County of Los Angeles General Plan includes a Noise Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. The noise standards identified in the Noise Element serve as guidelines to evaluate the acceptability of the transportation noise level impacts. These standards are used to assess the long-term traffic noise impacts on land uses. The following is a summary of General Plan policies that are relevant to the Project.

> ***Policy N 1.3:*** *Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).*
>
> ***Policy N 1.4:*** *Enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards and other applicable noise standards.*
>
> ***Policy N 1.5:*** *Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or L_{dn}) noise exposure contours.*

Policy N 1.9: *Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 dBA CNEL and above, when unavoidable impacts are identified.*

Policy N 1.12: *Decisions on land adjacent to transportation facilities, such as the airports, freeways and other major highways, must consider both existing and future noise levels of these transportation facilities to assure the compatibility of proposed uses.*

Based on these guidelines, an exterior noise level of 65 dBA CNEL is generally considered the maximum exterior noise level for noise-sensitive receptors.

County of Los Angeles Code

The County of Los Angeles noise control ordinance restricts unnecessary, excessive, and annoying noise. Examples of violations cited in the Noise Ordinance that would pertain to the Project include:

12.08.390. Exterior Noise Standards. Citations for violations are authorized when:

A. Unless otherwise herein provided, the following exterior noise levels shall apply to all receptor properties within a designated noise zone:

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)
I	Noise Sensitive	Anytime	45
II	Residential	10:00 P.M. to 7:00 A.M.	45
		7:00 A.M. to 10:00 P.M.	50
III	Commercial	10:00 P.M. to 7:00 A.M.	55
		7:00 A.M. to 10:00 P.M.	60
IV	Industrial	Anytime	70
LACC 12.08.390.			

B. Unless otherwise herein provided, no person shall operate or cause to be operated, any source of sound at any location within the unincorporated County, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards:[82]

82 Ambient noise levels were measured at the Project Site on November 1, 2023 from 1:55 P.M.-2:55 P.M. using a Larson Davis Sound Advisor 831C unit. This showed that while ambient noise levels for the area were consistent with exterior standards set by the County, noise levels for Standard 1 were slightly higher than the recommended standard.

Standard No. 1 *shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level from subsection A of this section; or, if the ambient L_{50} exceeds the foregoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.*

Standard No. 2 *shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level from subsection A of this section plus 5 dB; or, if the ambient L_{25} exceeds the foregoing level, then the ambient L_{25} becomes the exterior noise level for Standard No. 2.*

Standard No. 3 *shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable noise level from subsection A of this section plus 10 dB; or, if the ambient $L_{8.3}$ exceeds the foregoing level, then the ambient $L_{8.3}$ becomes exterior noise level for Standard No. 3.*

Standard No. 4 *shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable noise level from subsection A of this section plus 15 dB; or, if the ambient $L_{1.7}$ exceeds the foregoing level, then the ambient $L_{1.7}$ becomes the exterior noise level for Standard No. 4.*

Standard No. 5 *shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level from subsection A of this section plus 20 dB; or, if the ambient L_0 exceeds the foregoing level then the ambient L_0 becomes the exterior noise level for Standard No. 5.*

C. If *the measurement location is on a boundary property between two different zones, the exterior noise level utilized in subsection B of this section to determine the exterior standard shall be the arithmetic mean of the exterior noise levels in subsection A of the subject zones. Except as provided for above in this subsection C, when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level as designated in subsection A shall be the daytime exterior noise level for the subject receptor property.*

Exterior Noise Levels at Project Site (1059 S. Gage Avenue)

Exterior Noise Standards dBA - Industrial										
Duration	Std #1 = L50		Std #2 = L25		Std #3 = L8.3		Std #4 = L1.7		Std #5 = L0	
	30 min/hr	Result	15 min/hr	Result	5 min/hr	Result	1 min/hr	Result	At no time	Result
One hour	50.0	51.3	55.0	53.0	60.0	54.7	65.0	57.9	70.0	69.5
Shaded measurement represents standard dB exceedance for the cumulative period. Measurements taken November 1, 2023 from 1:55 P.M.-2:55 P.M.										

D. The ambient noise histogram shall be measured at the same location along the property line utilized in subsection B of this section, with the alleged intruding noise source inoperative. If for any reason the alleged intruding noise source cannot be turned off, the ambient noise histogram will be estimated by performing a measurement in the same general area of the alleged intruding noise source but at a sufficient distance such that the noise from the alleged intruding noise source is at least 10 dB below the ambient noise histogram in order that only the actual ambient noise histogram be measured. If the difference between the ambient noise histogram and the alleged intruding noise source is 5 to 10 dB, then the level of the ambient noise histogram itself can be reasonably determined by subtracting a one- decibel correction to account for the contribution of the alleged intruding noise source.

E. In the event the intrusive exceeds the exterior noise standards as set forth in subsections B and C of this section at a specific receptor property and the health officer has reason to believe that this violation at said specific receptor property was unanticipated and due to abnormal atmospheric conditions, the health officer shall issue an abatement notice in lieu of a citation. If the specific violation is abated, no citation shall be issued therefor. If, however, the specific violation is not abated, the health officer may issue a citation.

12.08.440 - Construction noise.

A. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

B. Noise Restrictions at Affected Structures. The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in the following schedule:

1. At Residential Structures.

a. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:

	Single-Family Residential	Multi-Family Residential	Semi-Residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 A.M. to 8:00 P.M.	75 dBA	80 dBA	85 dBA
Daily, 8:00 P.M. to 7:00 A.M. and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA
LACC 12.08.440.			

b. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:

	Single-Family Residential	Multi-Family Residential	Semi-Residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 A.M. to 8:00 P.M.	60 dBA	65 dBA	70 dBA
Daily, 8:00 P.M. to 7:00 A.M. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA
LACC 12.08.440.			

2. At Business Structures.

a. Mobile equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment:

Daily, including Sunday and legal holidays, all hours: maximum of 85dBA.

C. All mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order.

D. In case of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

12.08.530 - Residential air conditioning or refrigeration equipment.

Operating or permitting the operation of any air conditioning or refrigeration equipment in such a manner as to exceed any of the following sound levels is prohibited.

Measurement Location	Units Installed Before 1-1-80 (dBA)	Units Installed On or After 1-1-80 (dBA)
Any point on neighboring property line, 5 ft above grade level, no closer than 3 ft from any wall.	60	55
Center of neighboring patio, 5 ft above grade level, no closer than 3 ft from any wall.	55	50
Outside the neighboring living area window nearest the equipment location, not more than 3 ft from the window opening, but at least 3 ft from any other surface.	55	50
LACC 12.08.530.		

Existing Conditions

Noise Sensitive Receptors

The Project Site is located in a residential area within East Los Angeles. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling (see **Figure 4.13-1**):

- Residences (multi- and single-family), 1075 Gage Avenue; five feet south of the Project Site.
- Residences (multi-family), 1049 Gage Avenue; five feet north and east of the Project Site.
- Residences (single-family to the north and multi-family to the south), Eastman Avenue (east side); five feet north and south of the Project Site.
- Residences (multi-family), Gage Avenue (east side); 70 feet east of the Project Site.
- Residences (multi-family), 1142 Eastman Avenue; 320 feet south of the Project Site.
- LA Community Hospital, 400 feet southwest of the Project Site.
- Eastman Avenue Elementary School, 740 feet south of the Project Site.

Existing Ambient Noise Levels

The Project Site is improved with two church-related buildings totaling 25,302 square-feet with a surface parking lot. Operational noise from the Project Site includes six roof-top units providing air conditioning for the two main buildings on-site that occasionally generate minor levels of noise (approximately 81.9 dBA at one foot of distance).[83]

There is also minor noise from the operation of the church's parking lot, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. Intermittent noise from solid waste management and collection activities are of short duration, as are occasional loading of goods, and landscape maintenance using leaf blowers and other equipment.

Existing development also produces noise off-site, as 192 daily vehicle trips travel to and from the Project Site,[84] as traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[85]

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83 County of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.

84 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, August 23, 2023.

85 World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.

In October 2022 (on a Wednesday during morning rush hour non-holiday week with schools in session), DKA Planning took 15 minute short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors.[86] These locations were chosen to assess the ambient noise (in this case from mobile sources) at the nearest sensitive receptors, and at a location south of the I-5 Freeway. As shown in **Table 4.13-1**, noise levels along roadways near the Project Site ranged from 53.6 to 68.1 dBA L_{eq}, which was generally consistent with the traffic volumes on the applicable street(s) and exposure to freeway traffic on the I-5 freeway, despite the presence of ten-foot high soundwalls on both the north- and southbound lanes of the freeway.

Figure 4.13-1 illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-hour CNEL noise levels are generally considered "Normally Acceptable" and "Conditionally Acceptable" for the types of land uses near the Project Site.

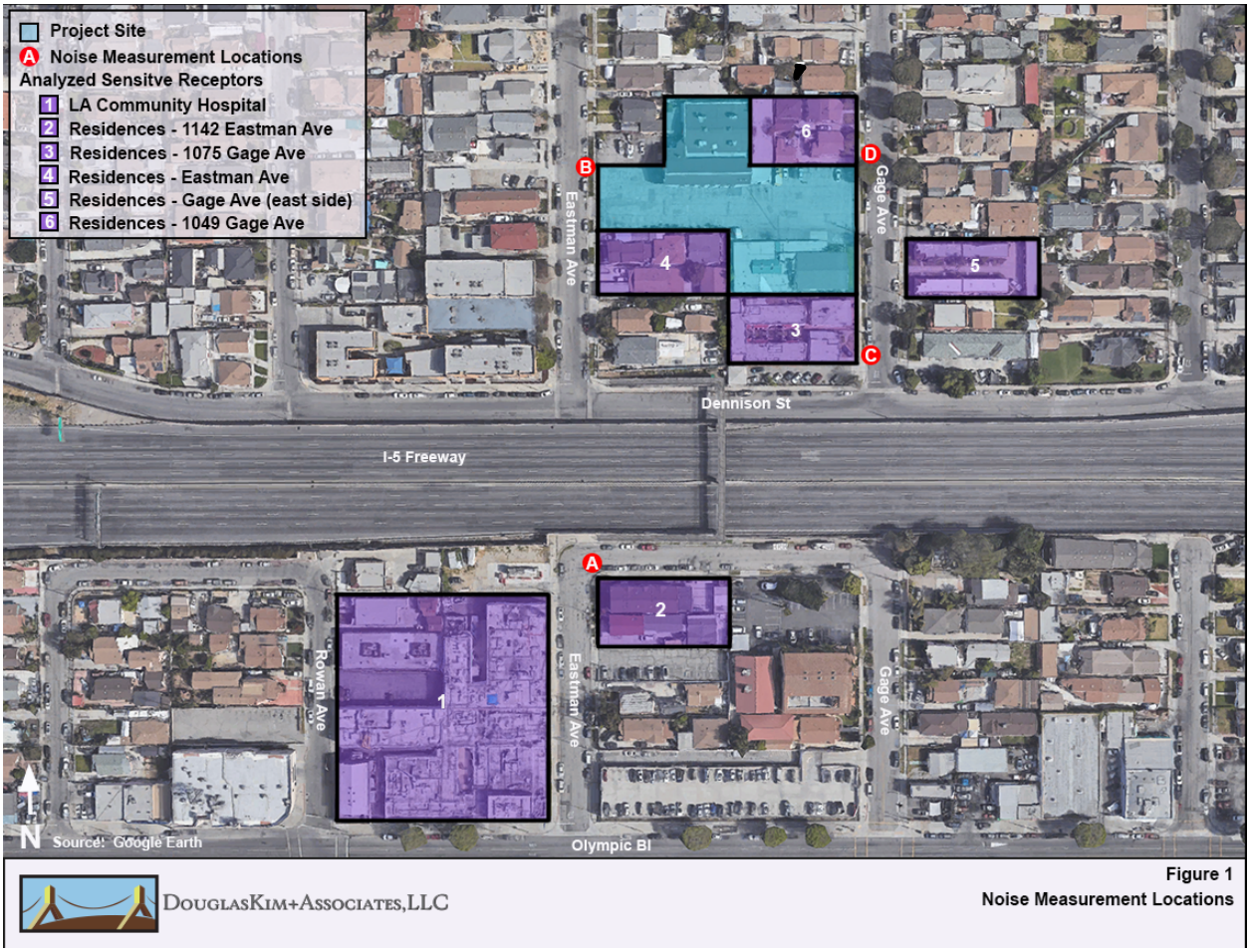
Table 4.13-1
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 1142 Eastman Ave.	Traffic on I-5 Freeway	61.8	59.8	LA Community Hospital; Residences-1142 Eastman Ave.	Normally Acceptable
B. 1044 Eastman Ave.	Traffic on Eastman Ave.	57.5	55.5	Residences-Eastman Ave.	Normally Acceptable
C. 1075 Gage Ave.	Traffic on I-5 Freeway	68.1	66.1	Residences-1075 Gage Ave, Gage Ave (east side)	Conditionally Acceptable
D. 1049 Gage Ave.	Traffic on Gage Ave.	53.6	51.6	Residences – 1049 Gage Ave.	Normally Acceptable

[a] Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.
[b] Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See compatibility considerations between land uses and exterior noise levels in the appendix for definition of compatibility designations.
Source: DKA Planning, 2022.

86 Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

Figure 4.13-1
Noise Measurement Locations



Construction

On-Site Construction Activities

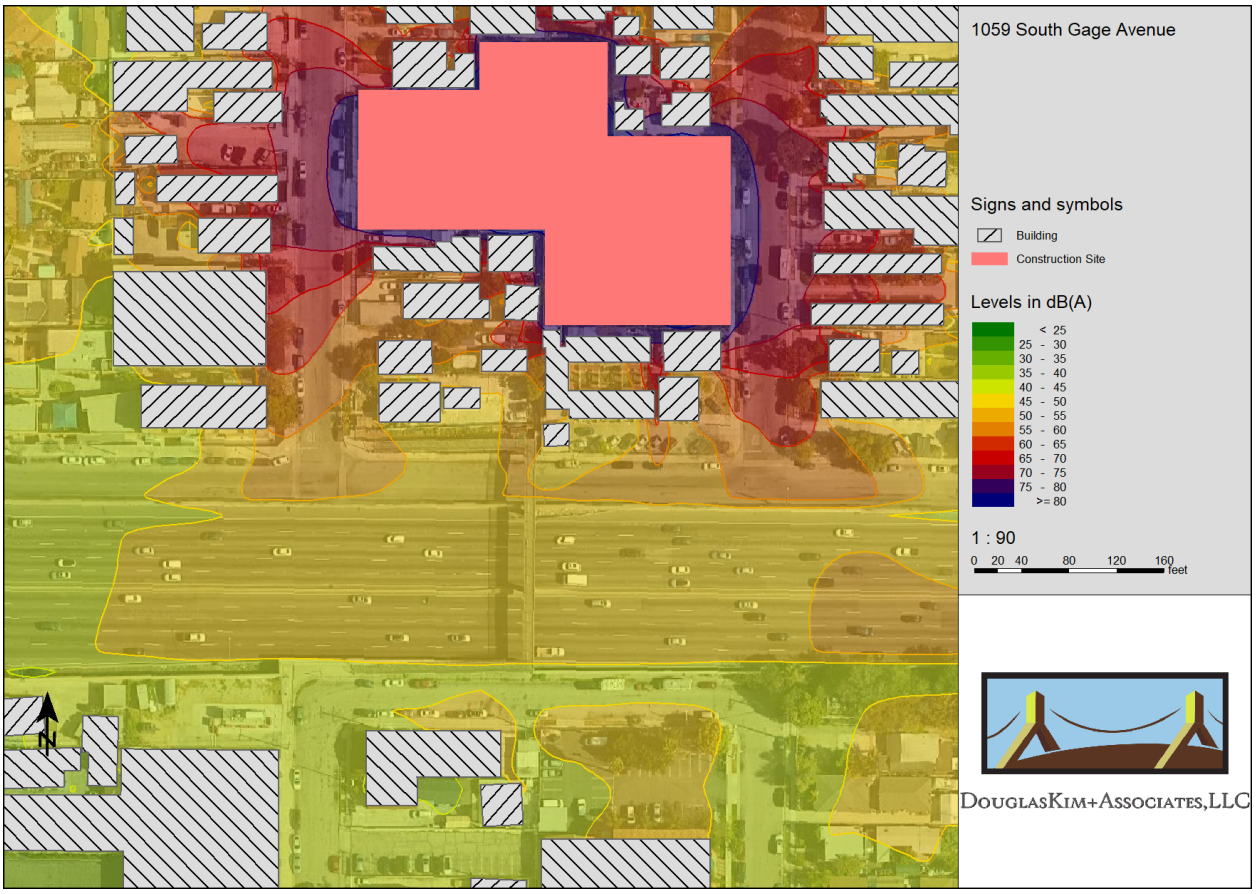
Construction would generate noise during the construction process that would span twelve months of demolition, site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site Monday through Saturday between 7:00 A.M. and 7:00 P.M. in accordance with Section 12.08.440 of the County's noise ordinance.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-

state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally lesser than during grading because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. **Figure 4.13-2** illustrates how noise would propagate from the construction site during the demolition and grading phase.

Figure 4.13-2
Construction Noise Sound Contours (without Mitigation)



For purposes of this analysis, the threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels. As shown in **Table 4.13-2**, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would elevate ambient noise more than 5 dBA at two of the six analyzed sensitive

receptors. Therefore, the Project's on-site construction noise impact would be less than significant.

Table 4.13-2
Construction Noise Impacts at Off-Site Sensitive Receptors (Without Mitigation)

Receptor	Absolute Noise Threshold*	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. LA Community Hospital	85.0	44.3	61.8	61.9	0.1	No
2. Residences – 1049 Gage Ave.	80.0	69.0	53.6	69.1	15.5	Yes
3. Residences – 1075 Gage Ave.	80.0	67.2	68.1	70.7	2.6	No
4. Residences – 1142 Eastman Ave.	80.0	44.5	61.8	61.9	0.1	No
5. Residences – Eastman Ave.	80.0	65.0	57.5	65.7	8.2	Yes
6. Residences – Gage Ave. (east side)	75.0/80.0	70.9	68.1	72.7	4.6	No

* Pursuant to LA County Code Section 12.08.440 for daytime construction between 7:00 A.M. and 8:00 P.M.
** Threshold for single-family and multi-family residential
Source: DKA Planning, 2022.

The applicant shall abide by the requirements contained in Title 12, Section 12.08, Noise Control Ordinance for the County of Los Angeles. The sections in Title 12 that apply to this Project include but are not limited to: 12.08.390 Exterior Noise Standards, 12.08.440 Construction Noise, 12.08.520 Refuse Collection Vehicles, and 12.08.530 Residential Air-Conditioning.

For all the residential receptors near the Project Site, maximum noise levels would not violate County Noise Ordinance Section 12.08.440(a), which establishes maximum noise levels allowable during construction. Specifically, it sets an 80 dBA limit at multi-family residential for construction that lasts less than ten days.[87] The limit for commercial uses is 85 dBA. Therefore, the Project's on-site construction noise impact would be significant, but mitigable. **Mitigation Measures MM-NOI-1** through **MM-NOI-5** would help comply with Title 12, Section 12.08.440.

The Project would utilize noise barriers on the northern perimeter of the Project Site from Eastman Avenue to Gage Avenue and southern perimeter of the Project Site that fronts the adjacent residential buildings on 1058 and 1064 Eastman Avenue.

87 The County's noise ordinance does not have standards for noise from mobile equipment lasting ten days or more. As a result, the standards for mobile source noise less than ten days (LA County Code Section 12.08.440) is used for longer construction activities.

Federal Transportation Administration (FTA) provides some general guidance on noise barriers in its Transit Noise and Vibration Impact Assessment Manual, September 2018:[88]

> *Noise barriers can be made of any outdoor weather-resistant solid material that meets the minimum sound transmission loss required by the project. Materials that are commonly used for noise barriers include 16-gauge steel, 1-inch thick plywood, and any reasonable thickness of concrete. Typically, a surface density of 4 pounds per square foot is required. Areas with strong winds may require more stringent structural requirements. It is critical to seal any gaps between barrier panels and between the barrier and the ground or elevated guideway deck for maximum performance.*

California Department of Transportation also provides some general guidance on noise barriers in its Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013:[89]

> *As a general rule, any material weighing 4 pounds per square foot or more has a transmission loss of at least 20 dBA. Such material would be adequate for a noise reduction of at least 10 dBA due to diffraction. Please note that this weight can be attained by a variety of material types. The denser a material is, the thinner it may be.*

Table 5-1 of the Technical Noise Supplement to the Traffic Noise Analysis Protocol, shows the effectiveness of Plexiglas, plywood, fir wood, aluminum, steel, concrete. Typical construction barriers are plywood, and a 1-inch thick plywood has a transmission loss of 23 dBA (there is a 10 dBA gap due to diffusion, which would result in a 13 dBA reduction), and a 0,5-inch plywood has a transmission loss of 20 dBA (and a 10 dBA reduction). Both of these plywood options would be adequate for achieving the necessary 10.6 dBA reduction on the northern perimeter and 3.3 dBA reduction on the southern perimeter.

Mitigation Measures

MM-NOI-1 A temporary noise barrier shall be installed along the northern perimeter of the Project Site from Eastman Avenue to Gage Avenue. The barrier shall be at least four meters in height, made of at least 1-inch thick plywood or other equivalent material shown by Caltrans to provide a transmission loss of 23 dBA (which would be adequate for a noise reduction of at least 13 dBA), and be capable of reducing construction-related noise levels at the adjacent residences by at least 10.6 dBA and not have any gaps or holes between the panels or at the bottom.

MM-NOI-2 A temporary noise barrier shall be installed along the southern perimeter of the Project Site that fronts the adjacent residential buildings on 1058 and 1064

88 Federal Transportation Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, September 2018, page 105: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

89 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 5.1.1 (Barrier Material and Transmission Loss): https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

Eastman Avenue. The barrier shall be at least three meters in height, made of at least 0.5-inch thick plywood or other equivalent material shown by Caltrans to provide a transmission loss of at least 20 dBA (which would be adequate for a noise reduction of at least 10 dBA), and be capable of reducing construction-related noise levels at the adjacent residences by at least 3.3 dBA and not have any gaps or holes between the panels or at the bottom.

MM-NOI-3 All construction equipment shall be equipped with the manufacturers' recommended noise suppression devices, such as mufflers and engine covers. These devices shall be kept in good working condition throughout the construction process.

MM-NOI-4 All construction equipment shall be properly maintained and tuned to minimize noise emissions.

MM-NOI-5 Stationary noise sources (e.g., generators and compressors) shall be located as far from residential receptor location as is feasible.

Construction Noise Impacts After Mitigation

As summarized in **Table 4.13-3**, construction noise impacts at all sensitive receptors would be less than significant following implementation of **Mitigation Measures MM-NOI-1** through **MM-NOI-5**.

Table 4.13-3
Construction Noise Impacts at Off-Site Sensitive Receptors (With Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Absolute Noise Threshold*	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. LA Community Hospital	41.2	85.0	61.8	61.8	0.0	No
2. Multi-Family Residences – 1049 Gage Ave.	56.5	80.0	53.6	58.3	4.7	No
3. Multi-Family Residences – 1067-1075 Gage Ave.	57.5	80.0	68.1	68.5	0.4	No
4. Multi-Family Residences – 1142 Eastman Ave.	41.6	80.0	61.8	61.8	0.0	No
5. Multi-Family Residences – Eastman Ave.	60.0	80.0	57.5	61.9	4.4	No
6. Multi-Family Residences – Gage Ave. (east side)	68.2	75.0/80.0	68.1	71.2	3.1	No

* Pursuant to LA County Code Section 12.08.440 for daytime construction between 7:00 A.M. and 8:00 P.M.
** Threshold for single-family and multi-family residential
Source: DKA Planning, 2023.

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor and contractor trips; and worker commute trips. These activities would generate up to an estimated 116 peak hourly PCE vehicle trips, as summarized in **Table 4.13-4**, during the demolition phase, assuming all workers travel to the worksite at the same time and that all worker trips, vendor trips, and haul trips use the same route (Whittier Boulevard) to travel to and from the Project Site. This includes converting noise from heavy-duty truck trips to an equivalent number of passenger vehicle trips. During this phase, construction vehicle trips would represent 10.9 percent of the 1,068 vehicles that travel east-west on Whittier Boulevard at Ditman Avenue during the A.M. peak hour.[90]

Whittier Boulevard would serve as part of the haul route for any soil and debris exported from the Project Site given its connection to the Santa Ana Freeway via Ditman Avenue to the west or Downey Road to the east. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Whittier Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

Table 4.13-4
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Whittier Blvd.[e]
Demolition	13	0	104[b]	**117**	10.9
Site Preparation	8	0	0	**8**	0.7
Grading	10	0	59[c]	**69**	6.4
Trenching	5	0	0	**5**	0.5
Building Construction	14	14[d]	0	**28**	2.6
Grading	13	0	0	**13**	1.2
Architectural Coating	3	0	0	**3**	0.3

[a] Assumes all worker trips occur in the peak hour of construction activity.
[b] The project would generate 838 haul trips over a 22-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent
[c] The project would generate 194 haul trips over a ten-day period with seven-hour work days. Assumes a 19.1 PCE.
[d] This phase would generate about five vendor truck trips daily over a seven-hour work day. Assumes a blend of vehicle types and a 9.55 PCE.
[e] Percent of existing traffic volumes on Whittier Boulevard east of Ditman Avenue.
Source: DKA Planning, 2022.

90 County of Los Angeles Public Works. Machine Count Traffic Volumes https://pw.lacounty.gov/tnl/trafficcounts/?street=Whittier&cross=Ditman. 2020 traffic counts adjusted by one percent annually to reflect 2022 baseline conditions.

Operation

On-Site Operational Noise

During long-term operations, the proposed elementary and middle schools would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant.

Mechanical Equipment

The Project would operate mechanical equipment on the roof that would generate incremental long-term noise impacts. HVAC equipment in the form of large rooftop units suitable for cooling large volumes of a building would be located on the rooftop. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[91]

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line-of-sight from these rooftop units to the sensitive receptors, which are almost exclusively one-story in height. The setback of these rooftop units combined with the setbacks of the building from common property lines, the edge of the roof, and height of the building would ensure that noise impacts are substantially attenuated at the nearby residences. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts.

All equipment would be fully enclosed within the new school structure, shielded from outside sources, and would therefore produce minimal noise impacts for off-site sensitive receptors. This includes any electrical or mechanical room.

Auto-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting the two schools from a driveway off Gage Avenue. During the peak A.M. hour (i.e., 7:00 A.M. to 8:00 A.M), about 250 vehicles would generate noise entering onto the property for child drop-offs.[92] This is a conservative assumption assuming the elementary and middle school bell times are not staggered. Nearly all incoming vehicles would queue along the drop-off line along the north side of the new school building before approximately 226 vehicles exit onto

91 County of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.

92 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, August 23, 2023.

Eastman Avenue. Noise would be generated by vehicles as engines idle, doors open and close, and children and staff talk during the drop-off process. While noise levels during this hour of student drop-off will be audible at off-site receptors, they will not result in substantial noise impacts over a 24-hour day.

Nearby residences across Gage Avenue and Eastman Avenue would have a direct line of sight to the driveway, approximately 80 feet away. As shown in **Table 4.13-5**, the peak use of the parking lot for vehicle drop-offs would elevate ambient noise levels by 0.6 dBA L_{eq} at residences on Gage Avenue and 0.2 dBA L_{eq} at residences on Eastman Avenue. Twenty-four hour CNEL levels would be well below the 5 dBA threshold of significance for operational sources of noise.

Table 4.13-5
Parking Lot-Related Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant ?
Residences – Gage Avenue (east side)	45.3	53.6	54.2	0.6	No
Residences – Eastman Avenue (east side)	44.8	57.5	57.7	0.2	No
Source: DKA Planning, 2022, using FTA Noise Impact Assessment Spreadsheet.					

In the P.M. peak hour, about 32 vehicles would enter the Project Site and 50 would exit after bell times, resulting in less noise impacts than the morning peak hour.

Parking lot noise for vehicles parking throughout the day would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. As such, the Project's parking lot activities would not have a significant impact on the surrounding noise environment.

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include human conversation, special events, trash collection, landscape maintenance, and commercial loading. These are discussed below:

Human conversation and recreation

Noise associated with everyday residential activities would largely be contained internally within the school buildings. Noise could include passive activities such as human conversation and

socializing in outdoor spaces, including lunchtime activities in the outdoor lunch patio and the play area for transitional and kindergarten students.

During the lunch period, up to 157 middle school or elementary school students would socialize, generating noise from the 2,350 square-foot outdoor patio. These activities would produce noise from human speech, which would generally be a function of the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.[93] Residents to the south of the Project Site would be partially shielded by the existing building along the south boundary of the Project Site, while residences along Eastman Avenue would be partially shielded from lunch patio noise by the new school building. Nevertheless, noise levels would be elevated from students eating and socializing on the patio.

During the play period, transitional kindergarten and kindergarten children would play in the 1,200 square-foot outdoor play area between the existing and new school buildings. This would result in elevated noise levels during that limited play period that would be audible at residences along both Eastman Avenue and Gage Avenue, particularly residences west of the play area along Eastman Avenue.

Regardless, noise from socializing and recreation at the outdoor lunch patio and play area, respectively, would not result in significant noise impacts, as noise standards for the operation of the school are based on 24-hour CNEL levels. Any noise at these outdoor spaces would be intermittent and would not elevate noise levels at the adjacent residences over a 24-hour period by 5 dBA CNEL or more.

The Project would include a cement block wall along the property lines adjacent to residential uses and the buildings themselves would physically attenuate noise toward adjacent properties. There would be no outdoor public address (PA) system.

Moreover, operational noise impacts would not violate exterior noise standards outlined in County ordinance 12.08.390. Specifically, the ordinance sets a standard that the exterior noise level of 70 dBA at residential receptors from 7:00 A.M. to 10:00 P.M.

Special events

Throughout the course of the academic school year, there would be 10-20 events held at the school for a variety of academic and cultural events. Most of these events would be held during the day, either during school or afterward. These events could involve parents and/or students. Like the regular school activities, most of these special events would occur inside the two school buildings. Occasional events would be held in the late afternoon (e.g., spelling bee and Back to School Night from 4:00 P.M. to 6:00 P.M.). No activities are planned in the evenings or at night.

93 Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

While some of these events could use outdoor spaces, noise impacts would be similar to and likely less than those associated with lunchtime activities and use of the outdoor play area.

Trash collection

On-site trash and recyclable materials for the school would be managed from the waste collection area. Haul trucks would access solid waste from Gage or Eastman Avenue, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[94] Intermittent solid waste management activities would operate during the day, similar to current service for the church facility. Trash collection activities would not substantially elevate 24-hour noise levels at off-site locations by 5 dBA CNEL or more.

Landscape maintenance

Noise from gas-powered leaf flowers, lawnmowers, and other landscape equipment can generated substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generated 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[95] The landscape plan focuses on a modest palette of accent trees and raised planters that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Any intermittent landscape equipment would operate during the day and would represent a negligible impact that would not increase 24-hour noise levels at off-site locations by 5 dBA CNEL or more.[96]

Commercial loading. On-site loading and unloading activities would be managed in the surface parking lot and would be similar to current deliveries to the church facility. As a result, there would be negligible noise impacts on off-site receptors and impacts would not substantially increase CNEL noise levels at off-site locations.

Based on an assessment of these on-site sources, the impact of on-site operational noise sources would be considered less than significant.

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the school. The Project would add up to 827 net vehicle trips to the local roadway network on a peak weekday at the start of operations in late 2025, including up to 498 net hourly

94 RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

95 Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

96 While AB 1346 (Berman, 2021) bans the sale of new gas-powered leaf blowers by 2024, existing equipment can continue to operate indefinitely.

vehicle trips.[97] This would represent 47 percent of the 1,068 vehicles that travel east-west on Whittier Boulevard at Ditman Avenue during the A.M. peak hour.[98]

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Less Than Significant Impact. Construction activities would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

Federal Transit Administration (FTA)

In 2018, the FTA published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. **Table 4.13-6** summarizes FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

97 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, August 23, 2023.

98 County of Los Angeles Public Works. Machine Count Traffic Volumes https://pw.lacounty.gov/tnl/trafficcounts/?street=Whittier&cross=Ditman. 2020 traffic counts adjusted by one percent annually to reflect 2022 baseline conditions.

Table 4.13-6
FTA Vibration Damage Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.	

State

California's Civil Code Section 832 protects adjacent properties when excavation of a site occurs.

> *Each coterminous owner is entitled to the lateral and subjacent support which his land receives from the adjoining land, subject to the right of the owner of the adjoining land to make proper and usual excavations on the same for purposes of construction or improvement, under the following conditions:*
>
> *1. Any owner of land or his lessee intending to make or to permit an excavation shall give reasonable notice to the owner or owners of adjoining lands and of buildings or other structures, stating the depth to which such excavation is intended to be made, and when the excavating will begin.*
>
> *2. In making any excavation, ordinary care and skill shall be used, and reasonable precautions taken to sustain the adjoining land as such, without regard to any building or other structure which may be thereon, and there shall be no liability for damage done to any such building or other structure by reason of the excavation, except as otherwise provided or allowed by law.*
>
> *3. If at any time it appears that the excavation is to be of a greater depth than are the walls or foundations of any adjoining building or other structure, and is to be so close as to endanger the building or other structure in any way, then the owner of the building or other structure must be allowed at least 30 days, if he so desires, in which to take measures to protect the same from any damage, or in which to extend the foundations thereof, and he must be given for the same purposes reasonable license to enter on the land on which the excavation is to be or is being made.*
>
> *4. If the excavation is intended to be or is deeper than the standard depth of foundations, which depth is defined to be a depth of nine feet below the adjacent curb level, at the point where the joint property line intersects the curb and if on the land of the coterminous owner there is any building or other structure the wall or foundation of which goes to standard depth or deeper than the owner of the land on which the excavation is being made shall, if given the necessary license to enter on the adjoining land, protect the said adjoining*

land and any such building or other structure thereon without cost to the owner thereof, from any damage by reason of the excavation, and shall be liable to the owner of such property for any such damage, excepting only for minor settlement cracks in buildings or other structures.

Caltrans has identified building damage significance guidance that provides thresholds for different categories of structures, including historic buildings that may not be considered extremely fragile (**Table 4.13-7**).

County of Los Angeles

The Los Angeles County Municipal Code does not include criteria for assessing vibration impacts; therefore, for the purpose of determining the significance of vibration impacts experienced at buildings and structures near the project, the FTA's guidelines are used to determine vibration impacts.

Table 4.13-7
Caltrans Vibration Damage Potential Threshold Criteria

Structure and Condition	Significance Thresholds (in/sec PPV)	
	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
Source: California Department of Transportation, 2013.		

Existing Ambient Vibration Levels

The Project Site is improved with a 25,302 square-foot church with a surface parking lot. Intermittent vibration from solid waste management and collection activities are of short duration and use Gage or Eastman Avenue. These activities occur intermittently for the residences nearby as well. Occasional loading activities generate negligible vibration from trucks that load and unload goods. None of these activities involve use of equipment or heavy-duty vehicles that generate substantive groundborne vibration.

The primary source of groundborne vibration near the Project Site is vehicle travel, including the 192 daily vehicle trips traveling to and from the Project Site.[99] The blend of passenger vehicles, trucks, delivery trucks, and other vehicles generate minimal levels of vibration. As noted by federal guidance, "[i]t is unusual for vibration from sources such as buses and trucks to be

99 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, August 23, 2023.

perceptible…"[100] As such, vehicle movement generates imperceptible ground vibration, with the occasional exception of heavy-duty vehicles that travel over speed bumps, potholes, and other street irregularities.

There are several residences adjacent to the Project Site that could be exposed to groundborne vibration during construction and operation of the proposed development that include:

- Residences, 1075 Gage Avenue; five feet south of the Project Site.
- Residences, 1049 Gage Avenue; five feet north and east of the Project Site.
- Residences, Eastman Avenue (east side); five feet north and south of the Project Site.

Construction

Building Damage Vibration Impact – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. **Table 4.13-8** summarizes vibratory levels for common construction equipment.

Table 4.13-8
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.148 inches per second PPV are projected to occur at any of the residences nearest the Project Site.

[100] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

As shown in **Table 4.13-9**, this impact is below the 0.20 inches per second PPV threshold from FTA that is considered potentially harmful to non-engineered timber and masonry buildings. More distant receptors would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be less than significant.

Table 4.13-9
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bull-dozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bull-dozer		
FTA Reference Vibration Level (25 Feet)	**N/A**	**0.089**	**0.089**	**0.076**	**0.035**	**0.003**	**--**	**--**
1075 Gage Ave.	15	0.148	0.148	0.127	0.058	0.005	0.20[b]	No
1049 Gage Ave.	15	0.148	0.148	0.127	0.058	0.005	0.20[c]	No
Eastman Ave residences	15	0.148	0.148	0.127	0.058	0.005	0.20[c]	No

Includes ten-foot buffer for equipment maneuverability
FTA criterion for Category III (non-engineered timber and masonry buildings)
Source: DKA Planning, 2022.

Building Damage Vibration Impact – Off-Site Sources

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[101] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's haul route on Whittier Boulevard that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would therefore be considered less than significant.

[101] Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

Operation

During operation of the elementary and middle schools, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. Road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would be less than significant.

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?	☐	☐	☐	☒

No Impact. The Project Site is not located within two miles of a public airport. San Gabriel Valley Airport is 9.5 miles northeast of the Site. Los Angeles International Airport is 13 miles southwest. Santa Monica Airport is 15 miles west. Hollywood Burbank Airport is 15.5 miles northwest. Thus, implementation of the Project would not have the potential to expose people residing or working in the project area to excessive noise levels. Therefore, no impacts would occur.

Cumulative Impacts

Noise

Construction

On-Site Construction Noise

Noise from construction of development projects is localized and can affect noise-sensitive uses within 500 feet, based on the screening criteria. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between.

There are no current construction projects or reasonably foreseeable related projects within 1,000 feet of the Project Site, which is located in a mature residential area near the Santa Ana Freeway. Any potential related projects would likely be located on Whittier Boulevard, nearly 900 feet north of the Project Site or south of the Santa Ana Freeway in commercially-zoned arterials. During construction of the Project, it is not anticipated that other construction activity in the area would contribute to cumulative noise impacts at sensitive receptors. As a result, there are no reasonably foreseeable related projects that could contribute to cumulative noise impacts at the analyzed sensitive receptors. Based on this, there would not be cumulative noise impacts at any nearby sensitive uses located near the Project Site and related projects in the event of concurrent construction activities.

Construction-related noise levels from any related project would be intermittent and temporary. As with the Project, any related projects would comply with the County's restrictions, including restrictions on construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible for any individual related project and compliance with the noise ordinance.

Off-Site Construction Noise

Other concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Proposed Project would contribute up to 116 peak hourly PCE vehicle trips, which would represent 10.9 percent of the 1,068 vehicles that travel east-west on Whittier Boulevard at Ditman Avenue during the A.M. peak hour.[102] Any related projects would have to add 952 peak hour vehicles trips to double volumes on Whittier Boulevard. As there are no known related projects within 1,000 feet of the Project Site, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be less than significant.

Operation

The Project Site and East Los Angeles has been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. As there are no known related projects within 1,000 feet of the Project Site, cumulative noise due to operational traffic from the Project and related projects do not have the potential to exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from operations of new projects would be less than significant.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. As there are no known related projects within 1,000 feet of the Project Site, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

[102] County of Los Angeles Public Works. Machine Count Traffic Volumes https://pw.lacounty.gov/tnl/trafficcounts/?street=Whittier&cross=Ditman. 2020 traffic counts adjusted by one percent annually to reflect 2022 baseline conditions.

Off-Site Mobile Noise Sources

The Project would add up to 827 net vehicle trips to the local roadway network on a peak weekday at the start of operations in late 2025, including up to 498 net hourly vehicle trips.[103] This would represent 47 percent of the 1,068 vehicles that travel east-west on Whittier Boulevard at Ditman Avenue during the A.M. peak hour.[104] As there are known related projects within 1,000 feet of the Project Site, cumulative traffic associated with operation of the Project and related projects would not double traffic volumes on Whittier Boulevard that could increase ambient noise levels by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories. Further, such cumulative traffic would not elevate traffic noise levels by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Vibration

Construction

On-Site Construction Vibration

During construction of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). As noted earlier, the Project's potential to damage nearby buildings is less than significant. However, nearby structures could be subject to cumulative vibration impacts if concurrent construction and vibration activities were to occur within close proximity. Any such projects would need to limit or avoid use of pile drivers or other impacting equipment for any shoring of structures. There are no identified or reasonably foreseeable related projects that could generate cumulative vibration impacts when the Project begins construction in 2023. As such, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA's vibration damage criteria.

Off-Site Construction Vibration

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are buildings near the right- of-way of the anticipated haul route for the Project (i.e., Whittier Boulevard). These buildings would be exposed to groundborne vibration

103 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, August 23, 2023.

104 County of Los Angeles Public Works. Machine Count Traffic Volumes https://pw.lacounty.gov/tnl/trafficcounts/?street=Whittier&cross=Ditman. 2020 traffic counts adjusted by one percent annually to reflect 2022 baseline conditions.

levels that are far less than the levels identified by FTA as potential thresholds for building damage. Trucks from any related projects are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

Summary of Cumulative Construction Vibration Impacts

Due to the rapid attenuation characteristics of groundborne vibration and the proximity of major development proposed in this part of the Whittier Boulevard corridor, there is no potential for a cumulative construction vibration impact with respect to building damage associated with groundborne vibration from on-site sources. In addition, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant. Therefore, on-site and off-site construction activities associated with the Project and one or more potential related projects would not generate excessive groundborne vibration levels with respect to building damage.

Operation

The Project Site and surrounding Whittier Boulevard corridor have been developed with commercial, residential, medical, and other uses that will continue to generate minimal groundborne vibration. Similar to the Project, any related projects in the vicinity of the Project Site could generate vibration from ongoing day-to-day operations. However, given the commercial and residential zoning along Whittier Boulevard and adjacent residential neighborhoods, any related projects would not be typically associated with excessive groundborne vibration from on-site sources. However, each project would produce traffic volumes that are capable of generating roadway vibration impacts. The potential cumulative noise impacts associated with on-site and off-site vibration sources are addressed below.

On-Site Operation Vibration

During operation of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). In general, related projects in this corridor would be commercial retail, medical, or residential land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

Off-Site Operation Vibration

Like the Project, any concurrent development near the Project Site would contribute typical passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result

in significant, cumulative increases in groundborne vibration on Whittier Boulevard and other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

Summary of Operational Construction Vibration Impacts

Due to the rapid attenuation characteristics of groundborne vibration and the proximity of major development proposed in this part of the Whittier Boulevard corridor, there is no potential for a cumulative operations vibration impact with respect to building damage associated with groundborne vibration from on-site sources. In addition, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant. Therefore, on-site and off-site operations activities associated with the Project and one or more potential related projects would not generate excessive groundborne vibration levels with respect to building damage.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 extension of roads or other infrastructure)?	☐	☐	☐	☒

No Impact.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, the Project's indirect unplanned population growth impacts associated with construction activities would be less than significant.

Operation

The Project is located in an urbanized residential area of unincorporated Los Angeles County and is surrounded by residential uses. The Project does not propose to expand surrounding utility infrastructure (e.g., water, electricity, cell tower, gas, sanitary sewer, and stormwater drains) in the project vicinity that would induce substantial unplanned population growth in the area.. The Project would be served by onsite sewer main lines that would be maintained by the Los Angeles County Consolidated Sewer Maintenance District. Furthermore, because the Project proposes development in an already built-out neighborhood, it would not indirectly induce population growth through the extension of roads or other infrastructure.

The existing church use would be removed and a new school use would be developed. There will be 22 teachers and 6 full-time administrative members of the staff. These school jobs could be filled via the existing workforce from within the Los Angeles region. The school would not create the types of employment opportunities that would compel numerous people to move to the area from outside regions. Thus, employment associated with the Project Site development would not induce substantial unplanned population growth in the County. Therefore, no impacts would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. The Project Site is currently developed with a church and parking uses. No housing is on the Project Site, and no people live at the Site. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur.

Cumulative Impacts

Growth in the region could result in a net increase in the number of housing units and associated population and the amount of employment in the Project Site area and would contribute to growth in the County. However, as discussed previously, the Project includes development that would accommodate the existing workforce in the County. The Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth. Therefore, cumulative impacts related to unplanned growth would be less than significant.

4.15 PUBLIC SERVICES

This section is based on the following item, which are included as **Appendix I** to this MND:

I-1 School Response, Los Angeles Unified School District, October 17, 2023

I-2 Parks Response, Los Angeles County Department of Parks and Recreation, October 11, 2023

I-3 Library Response, Los Angeles County Library, November 20, 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically, altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐

Less Than Significant Impact. Fire protection and emergency medical services in the County of Los Angeles are provided by the Los Angeles County Fire Department (LACoFD) from 177 Fire Stations in 60 cities and the unincorporated areas of the County.[105] The Project Site and East Los Angeles is served by LACoFD Station No. 3, located at 930 Eastern Avenue, 4,600 feet driving distance from the Project Site.[106] The location, distance, and equipment, of the fire station near the Project Site are provided in **Table 4.15-1**. LACoFD's average response time for on-scene services is approximately five minutes and their standard is to arrive on scene within 30 minutes.

105 Los Angeles County Fire Department: https://fire.lacounty.gov/about-us-2/

106 Los Angeles County General Plan, Figure 12.7, Fire Department Battalions and Stations: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-7_Fire_Department_Battalions_and_Stations.pdf

Table 4.15-1
Fire Station

No.	Address	Distance	Equipment
3	930 Eastern Avenue	4,600 feet	Engine Quint Squad
Quint is a fire-fighting apparatus that serves the dual purpose of an engine and a ladder truck. "Quintuple" refers to the five functions that a quint provides - pump, water tank, fire hose, aerial device, and ground ladders https://www.lacountyfiremuseum.com/stations-and-apparatus/			

Construction of the Project would increase demands for fire protection and emergency medical services. The Project would have 525 students and 28 teachers and staff. This daytime population is expected to create the typical range of service calls to LACoFD that are largely related to medical emergencies, which consist of 77 percent of service calls, while fire calls consisted of 3 percent of service calls, and other incidents (false alarms, mutual aid, haz-mat) consisted of 20 percent.[107]The calls for service from the additional population at the Project Site could result in an increase in response times if the calls coincide with other calls for service. Because the project site is within 1 mile of an existing fire station and the Project Site is within a developed area that is currently served by this station, the Project would not result in the requirement to construct a new fire station.

Additionally, the Project would remove the existing church building and renovate another building, which was constructed pursuant to fire code standards of 1953, and develop new building structures pursuant to the most recent California building and fire codes, which would improve the structural fire safety over the existing buildings.

As all projects within the County, the Project would be required to comply with existing regulations within the Los Angeles County Fire Code (Title 32). The Project would require the installation of various fire protection systems, including sprinkler systems. Therefore, with implementation of the California building and fire codes, impacts related to fire protection services would be less than significant.

Sheriff protection? ☐ ☐ ☒ ☐

Less Than Significant Impact. The Los Angeles County Sheriff Department (LASD) provides law enforcement and protection services in unincorporated Los Angeles County, including the project area.[108] The Project Site is served by LASD East Los Angeles Station, located at 5019 Third Street, 2.25 miles driving distance from the Project Site.[109] The Station serves the cities of

107 Los Angeles County Fire Department, 2021 Statistical Summary: https://fire.lacounty.gov/wp-content/uploads/2022/06/2021-Statistical-Summary.pdf

108 Los Angeles Sheriff's Department: https://lasd.org/east-los-angeles/

109 Los Angeles County General Plan, Figure 12.8, Sheriffs Department Service Areas: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-8_Sheriffs_Department_Service_Areas.pdf

Commerce, Cudahy, Maywood, and the unincorporated areas of City Terrace and East Los Angeles. LASD generally adheres to the following, widely accepted industry standard among law enforcement agencies for responding to emergent, priority, and routine calls for service: ten minutes, twenty minutes, and sixty minutes, respectively.

Construction

If temporary lane closures are necessary for installation of utilities, emergency access would be maintained at all times. Flag persons would be provided as needed to ensure safe vehicle movements and pedestrian walkways, with signs posted to advise motorists and pedestrians of reduced speed and access.

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open around its boundaries. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for sheriff services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts would be less than significant.

Operation

The Project will have students, teachers, and staff during the day. As such, the Project could potentially increase the number of police service calls due to an increase in onsite persons as compared to the existing church use.

The potential for crime can be reduced with site-specific designs and features. The Project will be designed with the principles of Crime Prevention Through Environmental Design (CPTED), which focuses on defensible space, territoriality, surveillance, lighting, landscaping, and physical security. The Project will include standard security measures such as adequate security lighting, monitoring system, and secure key access to that offers a visual deterrent and human surveillance feature. The Project's landscaping will be maintained to minimize hiding areas and have appropriate hedge heights to allow visibility from the street. The Project will have visible numerical addresses on each building that can be easily viewed from the street.

The LASD will be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate sheriff's response. The potential for crime can be reduced with site-specific designs and features. The Project would include standard security

measures such as adequate security lighting, secure access to non-public areas and storage use access points.

Emergency access to the Project Site would be provided by the existing street system. The Project's direct minimal population increase and associated demand for police services, along with the provision of on-site security features, coordination with LASD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LASD and other public services.

The Project would not require any additional officers. Furthermore, the Project Site is part of an existing patrol area covered by the Los Angeles County Sheriff's Department. Therefore, with existing personnel, law enforcement personnel are anticipated to be able to respond in a timely manner, and within set standard response times, to emergency calls in the Project area. Therefore, the Project should not result in the need for, new or expansion of police protection facilities. Thus, substantial adverse physical impacts associated with the provision of new or expanded facilities would not occur. Therefore, impacts related to sheriff protection services would be less than significant.

Schools? ☐ ☐ ☐ ☒

No Impact. The Project includes development school. Thus, the Project would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, no impacts would occur.

Parks? ☐ ☐ ☐ ☒

No Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. Parks facilities are provided by the Los Angeles County Department of Parks and Recreation. The Project includes a 6,276 square feet outdoor play area. With provision of onsite recreational amenities, the Project would not result in significant environmental impacts related to parks. Therefore, no impacts would occur.

Libraries? ☐ ☐ ☐ ☒

No Impact. The Los Angeles County Library would provide library services to the project via the El Camino Real Library, located at 4264 Whittier Boulevard, 3,100 feet southwest of the Project Site.[110] The Project is the development of a new school which provides its own research and reading tools. The County recognizes that only residential projects add new residents which affect library service. Therefore, only residential development projects are subject to the library facilities mitigation fees set forth in County Code Section 22.264. Therefore, no impacts would occur.

Other public facilities? ☐ ☐ ☐ ☒

No Impact. The Project is not expected to result in significant demand for other public facilities or services. The Project is not perceived to create capacity or service level problems or result in substantial adverse physical impacts for any other public facility. As such, the Project would not significantly adversely affect other public facilities or services, and therefore would not require the construction of new or modified public facilities. Therefore, no impacts would occur.

Cumulative Impacts

Fire Department

Implementation of the related projects could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LACoFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LACC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther from the nearest Station to compensate for additional response time, and other recommendations made by the LACoFD to ensure fire protection safety. Through the process of compliance, the ability of the LACoFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LACoFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

Sherriff's Department

Implementation of the related projects could result in a net increase in the number of residents and employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LASD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LASD related to crime prevention features, and other

[110] Los Angeles County Library: https://lacountylibrary.org/library-locator/

applicable regulations of the LACC. Through the process of compliance, the ability of the LASD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LASD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

Schools

The Project is a school use, which would not contribute to other school-related impacts. The related projects could result in an increase in the number students in the Project Site area. However, similar to the Project, the applicants of all the related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

Parks

The related projects listed could result in an increase demand for parks and recreational services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of the related projects that consist of residential dwelling units would be required to meet LACC open space requirements and would be subject to the park fees pursuant to LACC Section 21.24.340, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

Library

Implementation of the related projects could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the County and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact. The Project is a school use which would not increase the population in the area. It would not increase the use of existing parks in the area. As discussed in response to Checklist Question 15(d) (Public Services – Parks), no impact would occur.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

No Impact. The Project is a school use which would not increase the population in the area. It would not increase the use of existing parks in the area. As discussed in response to Checklist Question 15(d) (Public Services – Parks), no impact would occur.

c) Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

No Impact. The Project Site is located within a fully developed urban area and is not located in the vicinity of a County regional riding or hiking trail.[111] The Project would not interfere with regional open space connectivity. There are no regional trails within the Project vicinity. The recreational areas for the school would not interfere with any regional open space connectivity. Therefore, no impact would occur.

[111] Los Angeles County General Plan, Figure 10.1, Regional Trail System: https://planning.lacounty.gov/assets/upl/project/gp_2035_2018-FIG_10-1_regional_trail_system.pdf

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question 15(d) (Public Services – Parks). As discussed there, cumulative impacts related to parks and recreational facilities would be less than significant.

4.17 TRANSPORTATION

This section is based on the following items, which are included as **Appendix J** to this MND:

J-1 Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, January 3, 2024

J-2 Vehicle Queuing Analysis, Linscott, Law & Greenspan, January 3, 2024

J-3 Queuing Analysis Approval Letter, Los Angeles County Public Works, January 10, 2024

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Less Than Significant Impact. The Project is a school use that will provide pedestrian walk-up access through sidewalks and pedestrian gates on Gage Avenue and Eastman Avenue. The sidewalks and crosswalks would not be affected. The Project Site is accessed by Metro bus line 18 on Whittier Boulevard. The Project would not affect this line or any stops.

The Project would provide short-term and long-term bicycle parking in accordance with the LACC. The Project would not affect any bike paths.

The County's Transportation Impact Analysis (TIA) Guidelines provide screening criteria for purposes of assessing whether a vehicles miles traveled (VMT) analysis is required to evaluate potential transportation impacts related to development projects. Based on the Project's proximity to public transit and satisfying the related screening criteria provided in the County's TIA Guidelines, it is determined that the Project is presumed to have a less than significant transportation impact.

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impact would be less than significant.

b) Conflict or be inconsistent with Guidelines for California Environmental Quality Act Section 15064.3(b)?	☐	☐	☒	☐

Less Than Significant Impact. This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The Project screens out from a Transportation Impact Analysis (TIA) per Section 3.1.2.3 of the Los Angeles County Public Works Transportation Impact Analysis Guidelines[112] (the TIA Guidelines).

Project Trip Generation

In conjunction with the County's TIA Guidelines, a vehicular trip generation forecast has been prepared using trip rates provided in the Institute of Transportation Engineers' (ITE) Trip Generation Manual.[113] The following trip generation rates were used to forecast the traffic volumes expected to be generated by the Project land use components:

- Charter Elementary School: ITE Land Use Code 536 (Charter Elementary School) trip generation average rates were used to forecast the traffic volumes expected to be generated by the charter elementary school component of the Project.

- Charter Middle School: ITE Land Use Code 522 (Middle School/Junior High School) trip generation average rates were used to forecast the traffic volumes expected to be generated by the charter middle school component of the Project.

- Charter Middle School: ITE Land Use Code 538 (Charter School K-12) trip generation average rates were used to forecast the traffic volumes expected to be generated by the charter middle school component of the Project.

In addition to the trip generation forecasts for the Project (which are essentially an estimate of the number of vehicles that could be expected to enter and exit the Project Site access points), an adjustment was made to the trip generation forecast based on the Project Site's existing land use. The existing land use to be removed is 25,302 square feet of church floor area. ITE Land Use Code 560 (Church) trip generation average rates were used to estimate the trip reduction related to the existing use from the Project Site. While it is anticipated that some students and employees will utilize public transportation for travel to and from the Project Site, a transit adjustment was not made to provide a conservative forecast of the Project's trip generation.

Table 4.17-1 attached to this memorandum provides the trip generation forecast for the Project. As shown, the Project on a typical weekday is forecast to result in 827 net new daily trips (e.g., 414 inbound trips, 413 outbound trips), 530 net new AM peak hour trips (280 inbound trips and 250 outbound trips), and 368 net new PM peak hour trips (183 inbound trips and 185 outbound trips).

112 Los Angeles County Public Works Transportation Impact Analysis Guidelines, Los Angeles County Public Works, July 2020.

113 Institute of Transportation Engineers, Trip Generation Manual , 11th Edition, Washington, D.C., 2021.

Table 4.17-1
Project Trip Generation

Land Use [1]	Size	Daily Trip Ends [2] Volumes	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Charter Elementary [3] [4] [5]	336 students	622	191	169	360	119	123	242
Charter Middle [6] [7] [8]	189 students	397	94	84	178	69	69	138
Subtotal Project Driveway Trips		**1,019**	**285**	**253**	**538**	**188**	**192**	**380**
Existing Site								
Church [9]	25,302 sf	(192)	(5)	(3)	(8)	(5)	(7)	(12)
Subtotal Existing Driveway Trips		**(192)**	**(5)**	**(3)**	**(8)**	**(5)**	**(7)**	**(12)**
Net Increase Driveway Trips		**827**	**280**	**250**	**530**	**183**	**185**	**368**

[1] Source: ITE Trip Generation Manual, 11th Edition, 2021.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 536 (Charter Elementary School) trip generation average rates per number of students.
- Daily Trip Rate: 1.85 trips/student; 50% inbound and 50% outbound
[4] ITE Land Use Code 536 (Charter Elementary School) trip generation average rates per number of students.
- Weekday, AM Peak Hour of Generator Trip Rate: 1.07 trips/student; 53% inbound/47% outbound
[5] ITE Land Use Code 536 (Charter Elementary School) trip generation average rates per number of students.
- Weekday, PM Peak Hour of Generator Trip Rate: 0.72 trips/student; 49% inbound/51% outbound
[6] ITE Land Use Code 522 (Middle School/Junior High School) trip generation average rates per number of students.
- Daily Trip Rate: 2.10 trips/student; 50% inbound and 50% outbound
[7] ITE Land Use Code 538 (Charter School K-12) trip generation average rates per number of students.
- Weekday, AM Peak Hour of Generator Trip Rate: 0.94 trips/student; 53% inbound/47% outbound
[8] ITE Land Use Code 538 (Charter School K-12) trip generation average rates per number of students.
- Weekday, PM Peak Hour of Generator Trip Rate: 0.73 trips/student; 50% inbound/50% outbound
[9] ITE Land Use Code 560 (Church) trip generation average rates.
- Daily Trip Rate: 7.60 trips/1,000 SF of floor area; 50% inbound/50% outbound
- Weekday, Peak Hour of Adjacent Street Traffic, One Hour Between 7:00 and 9:00 AM: 0.32 trips/1,000 SF of floor area; 62% inbound/38% outbound
- Weekday, Peak Hour of Adjacent Street Traffic, One Hour Between 4:00 and 6:00 PM: 0.49 trips/1,000 SF of floor area; 44% inbound/56% outbound
Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, January 3, 2024

Vehicle Miles Traveled Analysis

The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA Guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). Section 15064.3, subdivision (b)(1) states the following:

- **Development Projects**. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

The California Natural Resources Agency certified and adopted the CEQA Guidelines in December 2018, which are now in effect. Accordingly, Los Angeles County Public Works (LACPW) has adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G question:

- For a development project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

For development projects, the intent of this question is to assess whether a proposed project or plan adequately reduces total VMT. LACPW provides the following guidance regarding screening and impact criteria to address this question. The following screening criteria and impact criteria are only meant to serve as guidance for projects to determine whether a TIA should be performed, and the criteria to determine if a project generates a significant transportation impact. The criteria shall be determined on a project-by project basis as approved by LACPW.

Proximity to Transit Based Screening Criteria

Per Section 3.1.2.3 of the TIA Guidelines, if a project is located near a Major Transit Stop or HQTC, the following question should be answered:

- Is the project located within a one-half mile radius of a Major Transit Stop or an existing stop along a HQTC?

Per the California Public Resources Code Section 21155(b), a HQTC is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. The Project is located within 1,000 feet of eastbound and westbound transit stops along the Whittier Boulevard corridor. The Whittier Boulevard corridor is served by Metro Local Line 18 (Metro 18). Metro 18 provides eastbound and westbound service from the Wilshire & Western transit stop in the Koreatown area of the City of Los Angeles to the Montebello Metrolink Station in the City of Montebello.

Page 83 of the Connect SoCal Transit Technical Appendix[114] describes the relevant methodology for determining peak period bus service intervals (also called frequency). SCAG utilized the peak commute periods defined within the SCAG regional travel demand model (i.e., the weekday morning peak period is from 6:00 AM to 9:00 AM, and the afternoon peak period is from 3:00 PM to 7:00 PM). The peak frequency is calculated by dividing 420 minutes (i.e., the total seven-hour

[114] https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_transit.pdf?1606002122

peak commute period converted to minutes) by the total population of bus trips occurring during the combined peak periods. Bus lines must have an average service frequency of 15 minutes or less over the seven-hour period to meet the HQTC criteria.

To identify the number of bus trips occurring during the peak commute hours, the total number of trips from the line's point of origin is looked at, and a trip is included if its median time falls within the AM or PM peak period. To calculate the median time, the time at the trip origin is subtracted from the arrival time at the final station, divided by two, and then added to the origin time. For example, for a westbound Metro 18 trip departing the Montebello Metrolink Station at 6:16 PM and arriving at Wilshire & Western at 7:38 PM, the total trip time is 82 minutes, therefore the median time would be 6:57 PM. This sample would therefore be included as occurring within the PM peak period.

An analysis for Metro 18 has been provided based on the current schedule provided on Metro's website. The peak hour headways and service frequency (in minutes), are summarized in **Table 4.17-2**. As shown, the average service frequency during the peak periods is 6.7 minutes for the eastbound direction and 6.8 minutes for the westbound direction. Therefore, Metro 18's current service frequency meets the SCAG threshold of 15 minutes or less in each direction. As a result, Whittier Boulevard currently qualifies as a HQTC.

Table 4.17-2
High-Quality Transit Corridor Analysis [1]

Route	No. of buses during peak hours [2]			Average Frequency in Peak Hours (minutes)	Eligible Line [3]
	Direction	AM	PM		
Metro Line 18 [4]	EB	25	38	6.7	**Yes**
	WB	28	34	6.8	

[1] Source: Southern California Association of Governments
[2] AM Peak Hours: 6:00 AM - 9:00 AM / PM Peak Hours: 3:00 PM - 7:00 PM
[3] Bus routes must have an average service frequency of 15 minutes or less over the seven-hour period.
the seven-hour peak period.
[4] Source: Los Angeles County Metropolitan Transportation Authority (Metro) website, 2023.
Transportation Impact Analysis Screen-Out, Linscott, Law & Greenspan, January 3, 2024

It is noted that while the Wilshire & Western transit stop and the Montebello Metrolink Station are the start and end points for Metro 18, not all trips start or end at these stations. However, all Metro 18 trips serve the eastbound and westbound stops within the half-mile radius of the Project Site, and therefore, the peak hour headways and average service frequencies shown in **Table 4.17-2** are applicable.

According to the TIA Guidelines, if the answer to the question above is yes, then the following subsequent questions should be considered. If the answer to all four questions is no, further analysis is not required, and a less than significant determination can be made, and a Traffic Impact Analysis does not have to be prepared.

- Does the project have a Floor Area Ratio less than 0.75?

The Project's overall lot area is 50,994 square feet. Per Section 22.04.050(E) of the Los Angeles County Code (LACC), the first floor of the new Building 1 will provide 17,876 square feet of floor area and the second floor will provide 11,800 square feet of floor area. Building 2 will provide 8,749 square feet of floor area. The overall gross floor area of the building is 38,425 square feet, which results in a Floor Area Ratio (FAR) of 0.754.

- Does the project provide more parking than required by the LACC?

While LACC Section *22.112.070-A* would require the Project to provide 54 vehicular parking spaces, under AB 2097, the Project is not required to meet a minimum parking requirement because it is located within a half-mile of a HQTC. Specifically, the Site is within 1,000 feet of eastbound and westbound transit stops along the Whittier Boulevard corridor. The Whittier Boulevard corridor is served by Metro Local Line 18 (Metro 18). Metro 18 provides eastbound and westbound service from the Wilshire & Western transit stop in the Koreatown area of the City of Los Angeles to the Montebello Metrolink Station in the City of Montebello. Metro 18's current service frequency meets the SCAG threshold for 15 minutes or less in each direction, and therefore, Whittier Boulevard currently qualifies as a HQTC. The Project will voluntarily provide 38 vehicular parking spaces.

Per Table 22.112.100-A of the LACC, the bicycle parking requirements for the Project is required to provide 88 short-term bicycle parking spaces and two long-term bicycle parking spaces. The Project will provide bicycle parking onsite in accordance with Table 22.112.100-A of the LACC.

- Is the project inconsistent with the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)?

The 2020-2045 SCAG RTP/SCS entitled Connect SoCal, was adopted by SCAG in September 2020. "Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians."

The Project is consistent with the SCAG RTP/SCS. Connect SoCal prioritizes growth near destinations and mobility options that facilitate multimodal access to work, educational and other destinations. Additionally, Connect SoCal encourages infill development, and development in Priority Growth Areas, such as HQTAs. As the Project is an infill development located within one-half mile of transit stops along a HQTC, it will facilitate multimodal transportation. Additionally, the Project will provide bicycle parking facilities onsite, and is located within an area with excellent pedestrian infrastructure. Therefore, the Project is consistent with SCAG's greenhouse gas reduction goals, and the overall goals of Connect SoCal. Chapter 3 of Connect SoCal provides the goals and visions of the plan.

The County's TIA Guidelines provide screening criteria for purposes of assessing whether a VMT analysis is required to evaluate potential transportation impacts related to development projects. Based on the Project's proximity to public transit and satisfying the related screening criteria provided in the County's TIA Guidelines, it is determined that the Project is presumed to have a less than significant transportation impact.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Cumulative Impacts

Pursuant to the TIA, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects should be reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the County's ability to serve transportation user needs as defined by the County's transportation policy framework. No cumulative impact has been identified with the Project that would preclude the implementation of any transportation related policies, programs, or standards. Therefore, cumulative impacts would be less than significant.

Cumulative VMT impacts are evaluated through a consistency check with SCAG's RTP/SCS, which is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. Per the County's TIA, projects that are consistent with the RTP/SCS in terms of development location and density are part of the regional solution for meeting air pollution and GHG emissions reduction goals. Projects that have less-than-significant VMT impact are deemed to be consistent with the SCAG's RTP/SCS and would have a less-than-significant cumulative impact on VMT.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

Less Than Significant Impact. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Driveway location and design will be subject to LA County Public Works (LACPW) review, which will ensure that County standards regarding sight lines and turning movements are in compliance. Therefore, a less than significant impact would occur.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project will coordinate with LADPW on construction and best management practices, including but not limited to: install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety. Sidewalks could be closed adjacent to the Project Site and pedestrians will be directed across the streets prior to the Project Site. Sidewalk will be reopened as soon as reasonably feasible taking construction and construction staging into account. Therefore, impacts would be less than significant.

Pedestrian access to the Project would be provided at entrances along Gage Avenue and Eastman Avenue which would lead to the school buildings or designated walkways adjacent to the parking and circulation areas. Access to the outdoor play area above the parking area is accessed from the classroom building. The Project would not mix pedestrian and automobile traffic. Therefore, a less than significant impact would occur.

Queuing Analysis Summary[115]

For student drop-off and pick-up operations, motorists will be directed to enter the site's drop-off/pick-up area by making a right-turn from Gage Avenue, travel through the onsite drop-off/pick-up lane, complete the student drop-off or pick-up, and then exit onto Eastman Avenue via a right-turn movement. Signs will be posted at the ingress and egress driveways indicating turning restrictions. Traffic monitors will also assist in directing vehicles through the drop-off/pick-up area.

The site shall restrict left turn ingress on Gage Avenue and left turn egress onto Eastman Avenue at all times.[116]

The Project Applicant, Extera Public Schools, has provided a letter describing its commitment to stagger the student start and dismissal times, implement two lines of onsite vehicle queuing during the drop-off and pick-up periods, and to utilize traffic monitors to facilitate safe and efficient student drop-off and pick-up operations at the Project.

The start and dismissal times of the Project's middle school and elementary school components will be staggered by a minimum of 20 minutes, thereby dispersing the arrival of traffic over a longer period of time.

The Project's onsite drop-off/pick-up area can accommodate 20 queued vehicles within two lanes of queuing: six vehicles in the drop-off/pick-up zone and 14 vehicles queued onsite in advance of the drop-off/pick-up zone.

Using trip generation rates published by ITE and based on the M/M/s queuing model, it is forecast that during the morning student drop-off period, the Project will generate an average queue of

115 Vehicle Queuing Analysis, Linscott, Law & Greenspan, January 3, 2024.

116 Queuing Analysis Approval Letter, Los Angeles County Public Works, January 10, 2024.

5.02 vehicles and a peak queue of eleven vehicles. This peak queue can be accommodated by the Project's drop-off/pick-up area which can accommodate 20 queued vehicles onsite. The Project will not cause vehicles to queue onto Gage Avenue.

Other Hazards

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, a less than significant impact would occur.

d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

Less Than Significant Impact. Project development would not result in inadequate emergency access. Direct access to the project site would be provided by a new private driveways from Gage Avenue and Eastman Avenue. The Project would also be required to construct internal access and provide fire suppression facilities, including fire hydrants, in conformance with the County Code Title 32, Fire Code. The Project will be subject to all requirements of the Fire Department and shall comply pursuant to the requirements of the Uniform Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, a less than significant impact would occur.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:				
i) 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 § 5020.1(k), or	☐	☒	☐	☐

This section is based on the following item, which is included as **Appendix K** to this MND:

K AB 52 Formal Notification, Los Angeles County, November 20, 2023

Less Than Significant Impact with Mitigation Incorporated. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American tribes to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a request in writing to be notified of proposed projects. The tribe must respond in writing within 30 days of the AB 52 notice. AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource." If a tribe does not request consultation in writing within 30 days of the date of the AB 52 Project Notice, then the County has met its requirements under AB 52, and no AB 52 consultation is required.

Pursuant to the requirements of Assembly Bill 52, the County sent informational letters about the Project and requests for consultation to each tribe on the County's list of tribes requesting consultation. A formal notification of the Project was sent to the following Native American tribes and groups:

- Gabrieleño Band of Mission Indians-Kizh Nation.

The Local Government Tribal Consultation List Request was sent to the Native American Heritage Commission on September 25, 2023. A response dated November 15, 2023 was received via email and included in Appendix C-3 of this MND and stated the following, “A search of the SFL (Sacred Lands File) was completed for the project with negative results.”

A request for the Project Review/Quick Check was submitted to the South Central Coastal Information Center (California State University, Fullerton-Department of Anthropology) on September 25, 2023. The results of the Project Review/Quick Check was received on November 15, 2023 and included in Appendix C-1 of this MND.

During the notification period, the Gabrieleño Band of Mission Indians-Kizh Nation responded and requested consultation with the County. The tribe identified potential tribal cultural resources and provided recommended measures as included in **Mitigation Measure MM-TCR-1** below. Consultation with the tribe concluded on November 20, 2023. Requirements for consultation under CEQA have been satisfied. Therefore, impacts to TCRs would be less than significant with mitigation incorporated.

Mitigation Measure

MM-TCR-1 Tribal Cultural Resources Monitoring

- **Tribal Monitor**. Prior to the commencement of any ground disturbance activities, the Applicant shall retain a qualified Tribal monitor (Tribal Monitor) or 3rd Party Monitor who is approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government to provide tribal monitoring/consulting services. The term “ground disturbance activities”, as found in these project mitigation measures, refer to activities that may include clearing vegetation, pavement removal, grading, excavation, trenching, drilling, and potholing/auguring within the project site. The Applicant shall submit a letter to the County of Los Angeles (County) to confirm the name and contact information of the Tribal Monitor or 3rd Party Monitor who is retained for the project.

- **Tribal Cultural Resources Monitoring Plan**. Prior to the commencement of any ground disturbance activities, the Tribal Monitor or 3rd Party Monitor shall prepare and submit a Tribal Cultural Resources Monitoring Plan (Monitoring Plan) to the County for review and approval at least 30 days before those activities commence. The Monitoring Plan shall include methods for monitoring ground disturbance activities; procedures to follow when resources are discovered; protocol for identifying and evaluating tribal cultural resources; and proposed measures to mitigate potential impacts to tribal cultural resources to less than significant levels.

- **Worker Environmental Awareness Program (WEAP).** Prior to the commencement of any ground disturbance activities, the Tribal Monitor or 3rd Party Monitor, will provide a WEAP training to construction crews that provides

information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should unanticipated tribal cultural resources discoveries be made during construction. In addition, workers will be shown examples of the types of resources that would require notification of the Tribal Monitor or 3rd Party Monitor.

- **Discovery of Tribal Cultural Resources**. If tribal cultural resources are encountered during construction, all ground disturbance activities within 25 feet of the find shall stop until the Tribal Monitor can evaluate the significance of the find. Construction activities may continue in other areas of the project site. If the discovery proves significant, the Tribal Monitor or 3rd Party Monitor shall recommend appropriate measures, subject to County approval, to mitigate potential impacts to tribal cultural resources to less than significant. Such measures may include but are not limited to resource avoidance, reburial, and preservation for educational purposes. The Tribal Monitor shall coordinate with the project Applicant to ensure that all measures approved by the County are implemented.

- Within 90 days after monitoring has ended, the Tribal Monitor shall prepare and submit a final monitoring report documenting all encountered tribal cultural resources, the significance of the resources, and the treatment of the resources to the County and the California Native American Heritage Commission.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Tribal Monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the County who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the Tribal Monitor and determined to be reasonable and appropriate.

ii) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Less Than Significant Impact with Mitigation Incorporated. To avoid potential adverse effects to tribal cultural resources (TCRs), **Mitigation Measure MM-TCR-1** has been included to provide for monitoring of excavation and grading activities to avoid potential impacts to tribal cultural resources that may be unearthed by project construction activities. There are no known tribal cultural resources on or adjacent to the Project Site, and no potentially significant impacts are anticipated. The following conditions are included in the event of any inadvertent discoveries during grading and construction activities:

Additionally, as described previously, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, they shall contact the Native American Heritage Commission. Therefore, impacts to TCRs would be less than significant with mitigation incorporated.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The County would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. In addition, all other projects would be subject to separate environmental review as applicable, and other mitigation measures regarding discovery and handling of tribal resources would be implemented as necessary to mitigate any potential impacts. As such, the Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

4.19 UTILITIES AND SERVICE SYSTEMS

This section is based on the following items, which are included as **Appendix L** to this MND:

L-1 Wastewater Response, Los Angeles Sanitation Districts, September 29, 2023

L-2 Sewer Area Study, Tritech Engineering Group, November 6, 2023

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	☐	☐	☒	☐

Less Than Significant Impact.

Water

Domestic water services are provided to the Project Site by California Water Service Company's East Los Angeles District (Cal Water), which uses a combination of local groundwater and purchased water from the Metropolitan Water District of Southern California (MWD), which is imported from the Colorado River and the State Water Project in northern California. The East Los Angeles water system currently includes 10 active wells, 26 booster pumps, 16 storage tanks, and three MWD connections.[117]

As shown on **Table 4.19-1**, the Project would consume a net increase of approximately 9,235 gallons of water per day (or 0.009 mgd). It should be noted that this amount does not take into account the effectiveness of water conservation measures required in accordance with the County's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation).

[117] California Water Service East Los Angeles District: https://www.calwater.com/district-information/?dist=ela

Table 4.19-1
Estimated Wastewater Generation and Water Consumption

Land Use	Size	Water Consumption Rate	Total (gallons/day)
Existing Uses (to be Removed)			
Church	25,302 sf	50 gpd / 1,000 sf	(1,265)
Proposed Uses			
School	525 students	20 gpd / student	10,500
		Net Total	**9,235**

sf = square feet gpd = gallons per day
Conservatively assumes that all water converts to wastewater.
Rates: Los Angeles County Public Works (LACPW) factors: https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000.

LACPW has determined the sewer infrastructure has the capacity to accommodate the Project.

For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Wastewater

Wastewater from the Project Site is conveyed via County sewer infrastructure to the Joint Water Pollution Control Plant which currently provides primary, secondary, and tertiary treatment for a design capacity of 260 million gallons of wastewater per day within a portion of the Los Angeles County Sanitation Districts (LACSD).[118]

As identified on **Table 4.19-1**, the Project would generate approximately 9,235 gallons of wastewater per day (or 0.009 mgd). With a remaining daily capacity of 260 mgd, the LACSD would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

The sewer lines consist of local and trunk sewers. LACPW owns the local sewers and Los Angeles County Sanitation District owns the trunk sewers. Since the local sewer lines belong to LACPW, a sewer area study was done to determine the capacity of the sewer lines. The calculated Project flow compared to the pipe capacity is less than 100% (55.2%), which means the Project will not adversely impact the existing sewer capacity.[119] The point of connection to the local sewer system shall be proposed by the applicant.

Therefore, Project impacts related to wastewater treatment would be less than significant.

[118] Los Angeles County Sanitation Districts: https://www.app.lacsd.org/facilities/?tab=2&number=1

[119] Sewer Area Study, Tritech Engineering Group, November 6, 2023.

Storm Water Drainage Facilities

As discussed in response to Checklist Question 10(c)(iii), Project impacts related to storm drainage facilities would be less than significant.

Electric Power Facilities

As discussed in response to Checklist Question 6(a), Project impact related to electric power facilities would be less than significant.

Natural Gas Facilities

As discussed in response to Checklist Question VI(a), Project impact related to natural gas facilities would be less than significant.

Telecommunications Facilities

The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

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

Less Than Significant Impact. California Water Service Company (Cal Water) is an investor-owned public utility supplying water service to approximately 1.8 million Californians through over 481,000 connections. Cal Water incorporated in 1926 and has provided water service to communities served by the East Los Angeles District since 1928. The 2020 Urban Water Management Plan (UWMP) is a foundational document and source of information about the East Los Angeles District's historical and projected water demands, water supplies, supply reliability and potential vulnerabilities, water shortage contingency planning, and demand management programs.

Water use in 2020 was 14,230 acre-feet (AF). Residential customers accounted for most of the District's service connections and 52 percent of its water uses. Non-residential water uses accounted for 42 percent of total demand, while distribution system losses accounted for 6 percent. Water use is projected to be 3,833 AF in 2025 and 13,514 AF in 2030, with reductions due to efficiencies in water fixtures and other conservation requirements. Cal Water will meet its projected demand through 2045 and accounts for normal, single dry-year, and multiple dry-year

hydrologic conditions.[120] As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

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?	☐	☐	☒	☐

Less Than Significant Impact. As discussed in response to comment 19(a), Project impacts related to wastewater treatment would be less than significant.

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?	☐	☐	☒	☐

Less Than Significant Impact. In 2019, a majority of the solid waste from the unincorporated area of Los Angeles County, where the Project Site is located, that was disposed of in landfills, went to the Mid-Valley Sanitary Landfill. The Mid-Valley Sanitary Landfill is permitted to accept 7,500 tons per day of solid waste and is permitted to operate through April 2033. In December 2019, the facility received an average of 5,000 tons per day. Thus, the facility had additional capacity of 2,500 tons per day (CalRecycle).

Project construction would generate solid waste for landfill disposal in the form of demolition debris from the existing building and infrastructure that would be removed from the site. Construction waste in the form of packaging and discarded materials would also be generated by the proposed project. Section 5.408.1 of the California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. As the Mid-Valley Sanitary Landfill had additional capacity, the facility would be able to accommodate the addition of solid waste during construction of the Project.

The Project includes development of a school serving 525 students. Based on the CalRecycle solid waste generation rate of 1 pound per student per day[121], the Project would generate

resident, the 204 residents are estimated to generate 96 tons of solid waste per year. However, pursuant to AB 341, at least 75 percent of the solid waste is required to be recycled, which would reduce the volume of landfilled solid waste to approximately 24 tons per year (or 0.6 tons per day). As the Mid-Valley Sanitary Landfill had additional capacity of 2,500 tons per day tons per

120 Cal Water 2020 UWMP: https://www.calwater.com/docs/uwmp2020/ELA_2020_UWMP_FINAL.pdf

121 CalRecycle: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates

day, the facility would be able to accommodate the addition of 0.06 tons of solid waste per day from the Project. Thus, impacts related to solid waste generation and landfill capacity would be less than significant

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

No Impact. State regulation AB 939 required every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects. All solid waste-generating activities within the County are subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. The Project would be required to comply with all applicable federal, state, and local statutes. Therefore no impact would occur.

Cumulative Impacts

Water

Implementation of the Project in conjunction with the related projects could result in an increased cumulative on water conveyance infrastructure. It should be noted that any amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the County's Green Building Code, both of which would likely substantially reduce the cumulative water consumption (and wastewater generation).

Cal Water (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2045. In terms of Cal Water's overall water supply condition, any related project that is consistent with the County's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in Cal Water's water supply planning efforts so that projected water supplies would meet projected demands. Similar to the Project, each related project would be required to comply with County and State water code and conservation programs for both water supply and infrastructure.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA review process. The CEQA analysis would compare the existing to the proposed uses and the ability of Cal Water's supplies and infrastructure to provide a sufficient level of water service. Future development

projects within the service area of the Cal Water would be subject to the water conservation measures outlined in the County's Green Building Code, which would partially offset the cumulative demand for water. Cal Water' undertakes expansion or modification of water service infrastructure to serve future growth in the County as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

As with the Project, the applicants of the related projects would be subject to review by Cal Water to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in this area of the County is subject to Cal Water and requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the County is required to comply with Fire Code requirement for fire flow and other fire protection requirements and are subject to ongoing evaluations by Cal Water, the LACDPW, and the Los Angeles County Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater

Implementation of the related projects could increase the need for wastewater treatment. It should be noted that any amount does not take into account the net decrease in wastewater generation (and water consumption) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the County's Green Building Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation. With a remaining treatment capacity of approximately 270 mgd, the LACSD would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

Stormwater

Refer to the cumulative impact discussion provided in response to Checklist Topic 10 (Hydrology and Water Quality).

Electricity and Natural Gas

Refer to the cumulative impact discussion provided in response to Checklist Topic 6 (Energy).As with the Project, all of the related projects would be required by the County to comply with all applicable federal, state, and local statutes and regulations, including the Construction and

Demolition Waste Recycling, the Curbside Recycling Program, and Zero Waste Plan, and no impacts related to this issue would occur as a result of cumulative development.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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?	☐	☐	☐	☒

No Impact. The Project Site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction, the Project would be required to maintain adequate emergency access for emergency vehicles via project roadways as required by the County. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. Therefore, the project would not impact an adopted emergency plan or emergency evacuation plan within or near a very high fire hazard severity zone. Therefore, no impact would occur.

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?	☐	☐	☐	☒

No Impact. The Project Site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone.[122] Adjacent areas to the Project Site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks and result in exposure of persons to pollutant concentrations from a wildfire. Therefore, no impact would occur.

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?	☐	☐	☐	☒

[122] Los Angeles County General Plan, Figure 12.5, Fire Hazard Severity Zones Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-5_Fire_Hazard_Severity_Zones_Policy_Map_Responsibility.pdf

No Impact. The Project Site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone.[123] Adjacent areas to the Project Site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks and result in exposure of persons to pollutant concentrations from a wildfire. Therefore, no impact would occur.

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?	☐	☐	☐	☒

No Impact. Implementation of the Project would not introduce people or structures to a fire hazard severity zone. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

Cumulative Impacts

None of the related projects is located near lands that are classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur as a result of cumulative development.

[123] Los Angeles County General Plan, Figure 12.5, Fire Hazard Severity Zones Policy Map: https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_12-5_Fire_Hazard_Severity_Zones_Policy_Map_Responsibility.pdf

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Less Than Significant Impact with Mitigation Incorporated. As discussed under Checklist Topics 4 (Biological Resources) the Project would not 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 a rare or endangered plant or animal and V (Cultural Resources), or eliminate important examples of the major periods of California history or prehistory.

As discussed under Checklist Topic 18 (Tribal Cultural Resources), the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources with **Mitigation Measure MM-TCR-1**.

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. As discussed throughout this IS/MND, the Project's contribution to cumulative impacts would not be considerable.

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 discussed throughout this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings.