ADDENDUM TO THE ADOPTED INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR THE LA MIRADA HIGH SCHOOL NEW FOOTBALL STADIUM PROJECT

Prepared for:

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1.0 INTRODUCTION AND PURPOSE

The Norwalk- La Mirada Unified School District (District) is the lead agency under the California Environmental Quality Act (CEQA) (Public Resources Code sections 21000 et seq,) and the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, et seq.) for preparation of this Addendum to the La Mirada High School New Football Stadium Project Mitigated Negative Declaration (Addendum). The proposed project is an alteration of a modernization project at La Mirada High School located at 13520 Adelfa Drive in the City of La Mirada.

1.1 Approved Project

The District approved a new football stadium and field improvements at La Mirada High School, located at 13520 Adelfa Drive, La Mirada, CA 90638. The Norwalk-La Mirada Unified School District Governing Board adopted a Mitigated Negative Declaration for the La Mirada High School New Football Stadium Project (herein referred to as the Approved Project) on June 29, 2020.

The Approved Project included the replacement of home and visitor bleachers, field lighting, scoreboard, synthetic turf, synthetic track, home and visitor field houses (which include restrooms, concession structures, and team rooms), press box, ticket booth, fencing, paving, long jump/triple jump/high jump, existing shot-put throw area, existing discus throw areas, and pole vault venues. The project also included a new home/visitor path of travel which include ADA compliant accessibility features, extension of existing domestic water lines, new fire access lane, a new fire water line from the street for field houses, and a new fire hydrant. Additionally, the project involved an extension of the existing fire water line for a new fire hydrant, extension of the existing sewer line connection, and replacement of the existing storm drain.

The IS/MND for the Approved Project concluded that no significant unavoidable environmental effects would occur because of the proposed project. Potentially significant impacts related to Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Transportation, and Mandatory Findings of Significance would be mitigated to a less than significant level.

1.2 Proposed Project

The proposed project incorporates a change in the previously Approved Project to include the implementation of the preferred alternative in the Removal Action Workplan (RAW) prepared by Ninyo & Moore for the Department of Toxics Substance Control (DTSC). The RAW was prepared at the request of the District for DTSC's review. The RAW indicated that there were two specific areas of concern at the high school site. These two sites represent (1) the canyon fill area, located in the western portion of the site; and (2) the cut area, located in the eastern portion of the site. Both areas have reported chemical concentrations (i.e., arsenic) that were above DTSC screening levels.

The RAW presented several viable remedies, and a preferred alternative was selected due to it being easily implemented, effective, and would provide a long-term assurance to DTSC and the human occupants at the high school site that they would not face significant health risks due to any elevated levels of arsenic in the soil.

This remedy involves soil excavation and the use of conventional excavation equipment, such as backhoes, loaders, and dozers to remove an estimated 224 cubic yards (313 tons) of impacted soil from the high school site. Excavated soil would be either directly loaded into staged trucks or would be temporarily stockpiled on plastic sheeting next to each excavated areas until it could be loaded

out for offsite disposal. The soils removed from these areas would be transported offsite to an appropriate, licensed facility for disposal.

The proposed project is described in further detail in **Section 3.0** of this Addendum.

1.3 Existing Conditions

The La Mirada High School campus is currently developed with 15 permanent buildings (including an indoor gym), 13 relocatable (portable) buildings (including interim housing for gymnasium/locker buildings construction), 1 custodial building, 2 concession/restroom buildings, a joint track & field, soccer, and football field, three baseball/softball fields, six volleyball courts and eight basketball courts. Two existing surface parking lots are located in the north and west portions of the school campus.

1.4 Project Applicant for this Project

Norwalk-La Mirada Unified School District
Facilities Planning & Construction
15711 Pioneer Boulevard, Bldg. G
Norwalk, CA 90650

1.5 Lead Agency- Environmental Review

The Norwalk-La Mirada Unified School District is the Lead Agency for this project pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations. The Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment.

1.6 CEQA Overview

1.6.1 Purpose of CEQA

All discretionary projects in California are required to undergo environmental review under CEQA. A Project is defined in CEQA Guidelines § 15378 as the whole of the action having the potential to result in a direct physical change or a reasonably foreseeable indirect change to the environment and is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities, clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements.

- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

CEQA Guidelines § 15002 lists the basic purposes of CEQA as follows:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.

- Identify the ways that environmental damage can be avoided or significantly reduced.

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.6.2 Authority to Mitigate under CEQA

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. Under CEQA Guidelines § 15041 a Lead Agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards.

CEQA allows a Lead Agency to approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant effect. In such cases, the Lead Agency must specifically identify expected benefits and other overriding considerations from the project that outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.7 Purpose of an Addendum

The CEQA process begins with a public agency making a determination as to whether the project is subject to CEQA at all. If the project is exempt, the process does not need to proceed any further. If the project is not exempt, the Lead Agency takes the second step and conducts an Initial Study to determine whether the project may have a significant effect on the environment.

In cases where no potentially significant impacts are identified, the Lead Agency may issue a negative declaration (ND), and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare a mitigated negative declaration (MND) for the proposed project. If the Lead Agency determines that individual or cumulative effects of the project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an environmental impact report (EIR) to further analyze these impacts.

This project proposes an addendum to the previously approved Initial Study/Mitigated Negative Declaration (IS/MND) for the La Mirada High School New Football Stadium Project in compliance with CEQA.

Section 15164 of the State CEQA Guidelines states:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Refer to Section 2.0 of this document for a discussion of the rationale for preparing an addendum for the proposed project.

1.8 Organization of the Addendum

This document is organized to satisfy CEQA Guidelines § 15164, and includes the following sections:

Section 1.0 – Introduction and Purpose, which identifies the purpose and scope of the Addendum.

Section 2.0 - Rationale for Preparing an Addendum, which describes why an addendum is being prepared for the proposed project.

Section 3.0 - Project Description, which provides an overview of the project and other project details.

Section 4.0 - Determining Significance, which outlines the criteria for determining the significance of environmental impacts in this Addendum.

Section 5.0 - Environmental Analysis, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes mitigation measures, where needed, to render potential environmental impacts less than significant, as applicable.

Section 6.0 - References, which includes a list of documents cited in the addendum.

Section 7.0 - List of Preparers, which identifies the primary authors and technical experts that prepared the addendum.

Technical studies and other documents, which include supporting information or analyses used to prepare this addendum, are included in the following appendices:

Appendix A Adopted IS/MND for the La Mirada High School New Football Stadium Project

Appendix B Final RTC Document for the La Mirada High School New Football Stadium Project

Appendix C Draft Removal Action Workplan (RAW)

Appendix D Traffic Impact Assessment

Appendix E Noise Calculations

Appendix F Construction Emissions Calculations

1.9 Findings from the Addendum

1.9.1 Less than Significant Impacts/No Changes or New Information Requiring the Preparation of an MND or EIR

Based on the findings of this addendum, the project would have either less than significant impacts, or no changes or new information requiring the preparation of an MND or EIR for the following environmental categories:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Noise
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

1.9.2 No Impacts

Based on the findings of this addendum, the project would have no impact on the following environmental categories:

- Agriculture and Forestry Resources
- Land Use
- Mineral Resources
- Population and Housing
- Public Services
- Wildfire

2.0 RATIONALE FOR PREPARING AN ADDENDUM

2.1 CEQA Standards

Section 15164 of the State CEQA Guidelines provides the authority for preparing an Addendum to a previously certified Environmental Impact Report or adopted Negative Declaration. Specifically, § 15164 states:

> *(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in § 15162 calling for preparation of a subsequent EIR have occurred.*
>
> *(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in § 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
>
> *(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
>
> *(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
>
> *(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to § 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

As required in subsection (e) above, substantial evidence supporting the lead agency's decision not to prepare a Subsequent Negative Declaration pursuant to CEQA Guidelines § 15162 is provided in **Section 5.0** of this Addendum. The environmental analysis presented in **Section 5.0** evaluates new potential impacts associated with the proposed project in relation to the current environmental conditions.

Section 15162 of the State CEQA Guidelines provides that, after certification of an EIR or adoption of a MND for a project, "no subsequent [environmental review] shall be prepared for that project" unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, that certain criteria are met. Those criteria include the following:

> *(a) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(b) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
>
> *(c) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

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

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

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

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

The above standards represent a shift in applicable policy considerations under CEQA. The low threshold for requiring the preparation of an EIR in the first instance no longer applies; instead, agencies are "prohibited" from requiring further environmental review unless the § 15162 criteria are met [*Fund for Environmental Defense v. County of Orange* (1988) 204 Cal. App.3d 1538, 1544]. In addition, the "interests of finality are favored over the policy of favoring public comment, and the rule applies even if the initial review is discovered to have been inaccurate and misleading in the description of a significant effect or the severity of its consequences." [*Friends of Davis v. City of Davis* (2000) 83 Cal. App. 4th 1004, 1018; see *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th at p. 1130].

2.2 Summary of Environmental Findings

As analyzed in **Section 5.0**, the proposed project would not result in any new significant environmental impacts beyond those identified in the previously adopted IS/MND for the La Mirada High School New Football Stadium Project. The analysis contained herein demonstrates that the proposed project is entirely consistent with the Approved Project and many of the impact issues previously examined in the adopted IS/MND would remain unchanged with implementation of the proposed project.

The proposed project would result in little change with respect to each of the environmental issue areas analyzed in this Addendum (see **Table 2.2-1** below). Therefore, as described in further detail in **Section 5.0**, the level of CEQA analysis supports the determination that the proposed project would not involve new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects which would necessitate the preparation of a Subsequent EIR, as provided in § 15162 of the State CEQA Guidelines. Therefore, an Addendum to the previously adopted IS/MND serves as the appropriate form of documentation to meet the statutory requirements of CEQA. This Addendum provides analysis of the resource topics included in the previously adopted IS/MND for the Approved Project.

Table 2.2-1
Comparison of Environmental Findings Between the Proposed Project and the Approved Project

Environmental Issue	IS/MND Conclusions for Previously Adopted Project	Addendum Conclusions for Proposed Project	Project Impacts in Comparison to Conclusions of the Previously Adopted IS/MND
Aesthetics	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Agriculture and Forestry Resources	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Air Quality	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Biological Resources	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Cultural Resources	Less than Significant Impact with Mitigation Incorporated	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Energy	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Geology and Soils	Less than Significant Impact with Mitigation Incorporated	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Greenhouse Gas Emissions	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Hazards and Hazardous Materials	Less than Significant Impact with Mitigation Incorporated	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Hydrology and Water Quality	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Land Use and Planning	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Mineral Resources	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Noise	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Population and Housing	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact

Environmental Issue	IS/MND Conclusions for Previously Adopted Project	Addendum Conclusions for Proposed Project	Project Impacts in Comparison to Conclusions of the Previously Adopted IS/MND
Public Services	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Recreation	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Transportation	Less than Significant Impact with Mitigation Incorporated	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Tribal Cultural Resources	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Utilities and Service Systems	Less than Significant Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Wildfire	No Impact	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact
Mandatory Findings of Significance	Less than Significant Impact with Mitigation Incorporated	No Changes or New Information Requiring the Preparation of an MND or EIR	Equal Impact

Source: UltraSystems, 2021 and the Initial Study and Mitigated Negative Declaration for the La Mirada High School New Football Stadium Project (SCH No. 2020040345). April 2020.

3.0 PROJECT DESCRIPTION

3.1 Project Location and Setting

The project site is located on the grounds of the La Mirada High School campus, which is located within the City of La Mirada in southeast Los Angeles County (refer to Figure 3.1-1 and Figure 3.1-2). The proposed new football stadium would be in the northeastern portion of the La Mirada High School campus. The project site is approximately eight acres.

The La Mirada High School campus is currently developed with 15 permanent buildings (including an indoor gym), 13 relocatable (portable) buildings (including interim housing for gymnasium/locker buildings construction), 1 custodial building, 2 concession/restroom buildings, a joint track & field, soccer, and football field, three baseball/softball fields, six volleyball courts and eight basketball courts. Two existing surface parking lots are in the north and west portions of the school campus.

3.2 Background

Below is a summary of studies that have been conducted that lead to the need for preparation of this Addendum and the RAW on which the Addendum is based.

Phase I Environmental Site Assessment (ESA)

Ninyo & Moore conducted a Phase I ESA for the site in 2020. In response to the Phase I ESA, DTSC prepared a Phase I Environmental Site Assessment Determination Letter dated April 3 (DTSC, 2020a), concurring with the conclusions and stating "a PEA is needed for the site." According to the DTSC, the PEA should address organochlorine pesticides (OCPs) from historic agricultural land use, OCPs from termiticides application, and lead from LBP (Ninyo & Moore, 2021, pp. 4-5).

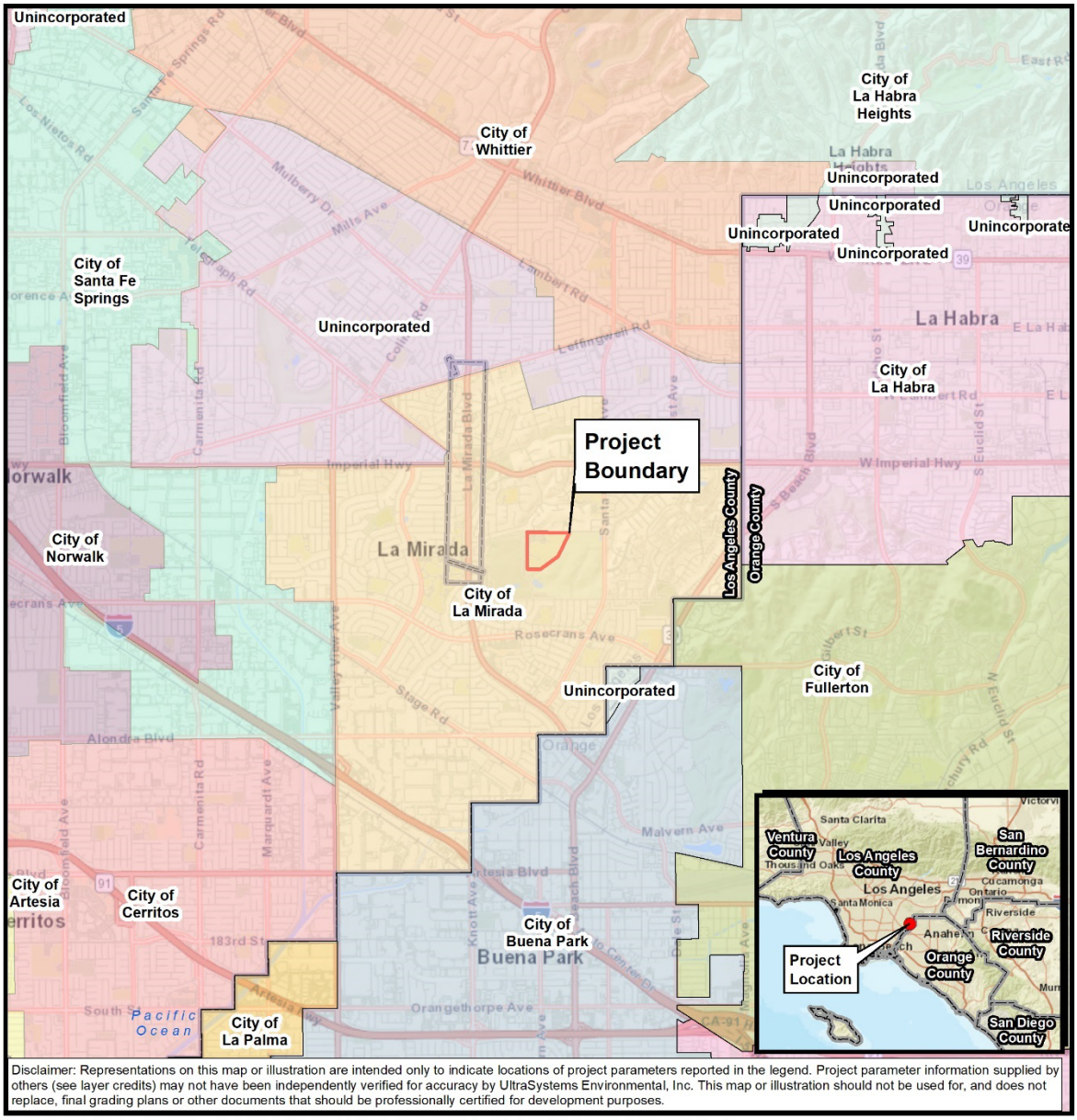
Preliminary Environmental Assessment (PEA)

Ninyo & Moore attended a scoping meeting (conference call) with the District and DTSC on May 19, 2020, to outline the site-specific work objectives for the project. DTSC determined lead in soil from lead based paint did not need to be evaluated in the PEA. Ninyo & Moore prepared and submitted the PEA work plan to DTSC on June 10, 2020. The DTSC conditionally approved the PEA work plan on July 3, 2020. Ninyo & Moore submitted the PEA report to DTSC on October 9, 2020. The PEA results indicated detected arsenic concentrations ranging from 3.1 to 24 milligrams per kilogram (mg/kg) in fill area (AOC1), and ranged from 2.5 to 31 mg/kg in cut area (AOC2) (Ninyo & Moore, 2021, p. 5).

DTSC Response Action

In the response to the PEA report, DTSC prepared the Adequacy of PEA for Public Review Letter dated November 6, 2020 (DTSC, 2020b). The DTSC letter identified the sole environmental issue on the site as the elevated arsenic in the soil. According to DTSC, the volume of arsenic-impacted soil requiring excavation exceeded what is considered acceptable as a housekeeping activity. DTSC determined that a response action was required for the site, and the PEA was adequate for public review. According to the DTSC, the response action should include a Supplemental Site Investigation (SSI) and/or a removal action as necessary to address arsenic-impacted soil at the site (Ninyo & Moore, 2021, p. 6).

Figure 3.1-1
Project Vicinity



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7032A_Norwalk_La Mirada_HS_RAW_Addendum\MXDs\7032A_La_Mirada_2_0_Project_Vicinity_2021_09_15.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; County of Los Angeles, 2013; County of Orange, 2018; UltraSystems Environmental, Inc., 2021.

September 15, 2021

Scale: 1:63,360

N

0 0.5 1 Miles

0 0.5 1 Kilometers

Legend

- Project Boundary
- County Boundary
- City Boundary

La Mirada High School – New Football Stadium Project Addendum

Project Vicinity

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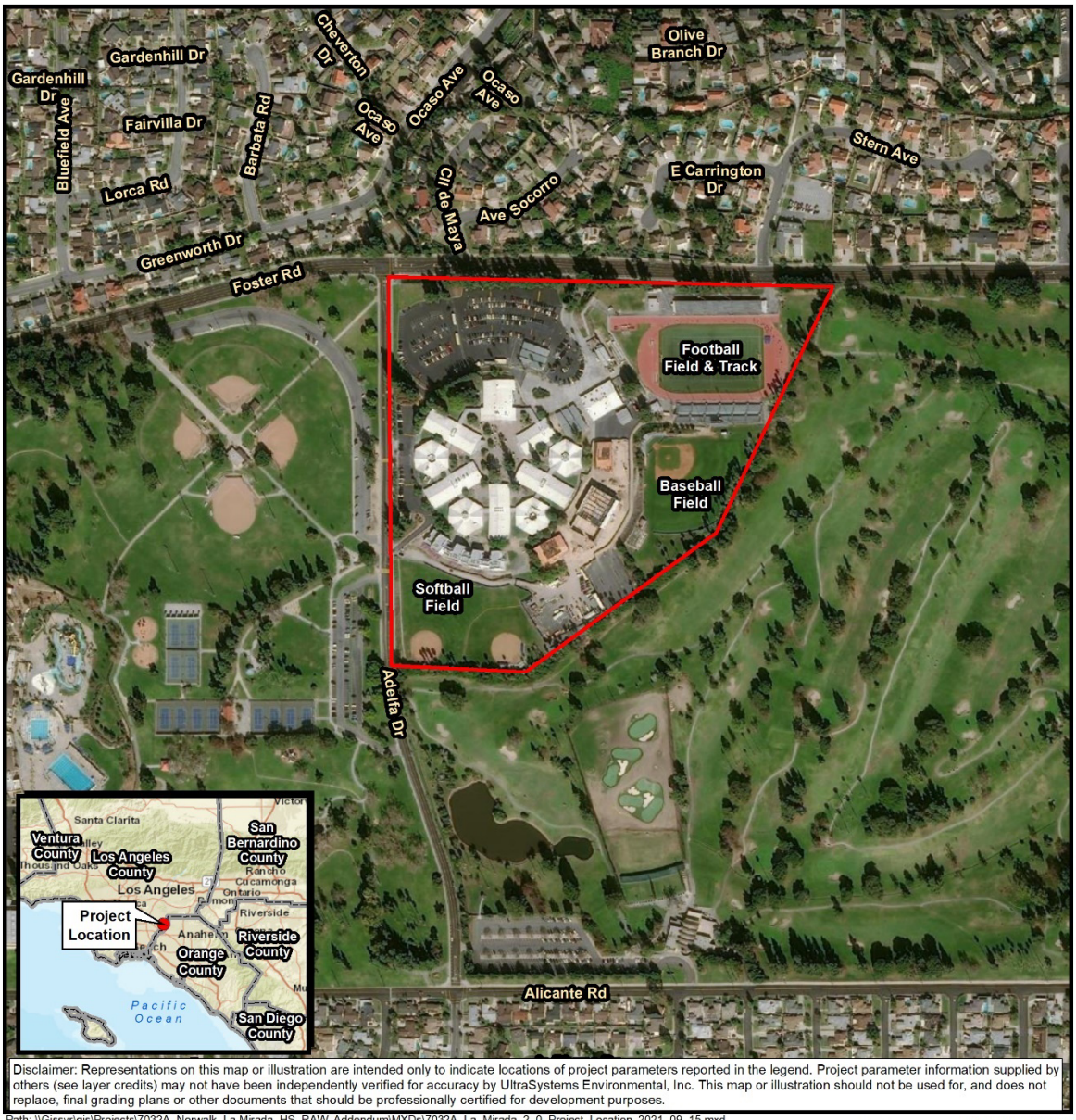
Figure 3.1-2
Project Location



Supplemental Site Investigation (SSI) for Arsenic

In March and April 2021, 54 borings were advanced with a hand auger to depths ranging from 5 to 7 feet below ground surface (bgs) at the site to horizontally and vertically delineate elevated arsenic concentrations reported during the PEA. A total of 240 soil samples (including 22 duplicate samples) were collected during the SSI. Arsenic concentrations ranging from 2.5 to 25 mg/kg were detected in the Canyon Fill Area (Area of Concern 1, or AOC1), and arsenic concentrations ranging from 2.3 to 49 mg/kg were detected in the Former Agricultural Land Use Area (AOC2) (Ninyo & Moore, 2021, p. 6).

Determination of SSI Report

In response to the SSI report prepared by Ninyo & Moore, the DTSC prepared a determination on the SSI results and conclusions based on the health risk screening evaluations. The DTSC concurred with the conclusions of the SSI that the site has been adequately characterized and its recommendation that arsenic impacted soil be removed. Therefore, the DTSC determined that a removal action is required. The site-specific cleanup goal was determined to be 24 mg/kg, that is, the upper end of background distribution of arsenic at the site (Ninyo & Moore, 2021, p. 7).

Project Components

Based on the data collected during the PEA and SSI, the DTSC determined that a "Response Action" was required to address the potential threat or hazard posed by the presence of elevated levels of arsenic at concentrations above the site-specific cleanup goal (CG) at the site.

Since the adoption of the IS/MND for the Approved Project, the project has been amended to include the cleanup of the site to remove potentially hazardous materials. A Removal Action Workplan (RAW) has been prepared by Ninyo & Moore (Ninyo & Moore, 2021) for the removal of arsenic impacted soil within the La Mirada High School (LMHS) New Football Stadium Project. (See **Appendix C**.)

The RAW includes a description of the on-site impacts, a plan for conducting the removal action (RA), and the goals to be achieved by the RA, as required by the California Health and Safety Code (H&SC) § 25323.1. The goal of the RAW is for impacted soil with the chemical of concern concentrations exceeding the CG to be excavated, removed from the site, and appropriately disposed off-site. The proposed action at the site focuses on reducing the threat to human health, and the environment, and to provide a solution that reduces the toxicity, mobility, and volume of impacted soil (Ninyo & Moore, 2021, p. 2).

Areas of Concern (AOCs)

The site was originally divided into three Areas of Concern (AOCs) based on the historical findings of a Phase I Environmental Site Assessment (ESA) and the project specifications (Ninyo & Moore, 2021, p. 1):

- **AOC1:** The fill area in the western portion of the project construction area, which may have been impacted by former agricultural use. AOC1 represents the canyon fill area in the western portion of the site. During the PEA, arsenic concentrations were reported above the screening levels, generally ranging from 3.1 to 16 mg/kg, with five samples exceeding the DTSC acceptable upper bound limit of 12 mg/kg, but did not exceed the site cleanup goal of 24 mg/kg (Ninyo & Moore, 2021, p. 9).

- **AOC2:** The cut area in the eastern portion of the project construction area, which may have been impacted by former agricultural use. AOC2 represents the cut area in the eastern portion of the site. During the PEA, arsenic concentrations were reported above the screening level, generally ranging from 2.4 to 31 mg/kg, with 16 samples exceeding the DTSC upper bound level of 12 mg/kg, and three exceeding the site cleanup goal of 24 mg/kg (Ninyo & Moore, 2021, p. 9).

- **AOC3:** The clarifier (located off site to the southwest) which may have impacted the site subsurface with volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH). Based on the results of PEA sampling, this AOC was not considered an environmental concern and is not included in the RAW.

Estimated Soil Contamination

Ninyo & Moore estimated the volume of soil with elevated arsenic concentrations above the site cleanup goal based on the lateral extents. The lateral and vertical extents of the excavations were established based on results from the PEA and SSI, including subsequent step outs (in the four primary directions, where feasible) or step-down sample results above the site cleanup goal. The volume of soil with elevated concentrations of arsenic to be removed is estimated in Table 3-1. The total volume of arsenic-impacted soil proposed for excavation is approximately 224 cubic yards. However, this estimated volume is subject to change based on the results of grid sampling and excavation confirmation sampling. Based on an assumed conversion factor of 1.4 tons per cubic yard, it is estimated that the total amount of arsenic-impacted soil to be excavated (approximately 224 cubic yards) will weigh approximately 313 tons (Ninyo & Moore, 2021, pp. 9-10).

Table 3-1
Proposed Soil Excavation Areas and Estimated Volume/Weight (AOC1 and AOC2)

Area of Concern	Evacuation Area	PEA Borings with Arsenic > 24 mg/kg	RAW Figure Number	PEA Maximum Arsenic Concentration (mg/kg) (Sample ID)	Length (ft)	Width (ft)	Excavation Surface Area (ft^2)[a]	Depth of Excavation (ft bgs)[a]	Volume of Excavation (ft3)[b]	Volume of Excavation (yd^3)	Excavation Weight (Tons; x 1.4)
AOC1	EA1	AOC1-B3-SE1	7	25 (AOC1-B3-SE1-1.5')	5.0	5.0	25	2	50	1.9	2.6
AOC2	EA2	AOC2-B3-W2, AOC2-B3-W3	3	31 (AOC2-B3-W2-1.5')	12.5	10.0	125	3	375	13.9	19.4
AOC2	EA3	AOC2-B3-NW1	3	49 (AOC2-B3-NW1-5')	5.0	5.0	25	6	798	29.6	41.4
AOC2	EA4	AOC2-B4-W1, AOC2-B4-W1V	4	32 (AOC2-B4-W1V-2.5')	5.0	5.0	25	3	75	2.8	3.9
AOC2	EA5	AOC2-B4-N1, AOC2-B4-N2V	4	43 (AOC2-B4-N2V-1.5')	5.0	10.0	50	3	150	5.6	7.8
AOC2	EA6	AOC2-B11-W1, AOC2-B11V	5	30 (AOC2-B11V-7' [DUP])	10.0	5.0	50	8	2,030	75.2	105.3
AOC2	EA7	AOC2-B13, AOC2-B13-W1	6	31 (AOC2-B13-2.5')	20.0	10.0	20	6	2,558	94.8	132.7
Total Volume/Weight of Arsenic-Impacted Soil									6,036	223.6	313.0

Source: Table 1, Ninyo & Moore, 2021.
Notes:
[a] Excavation depths are estimated since contamination within boring groups may vary based on PEA results (e.g., AOC2-B3-W2 had arsenic exceedance to 1.5 feet bgs, but AOC2-B3-W3 had arsenic exceedance to 2.5 feet bgs)
[b] The volume of excavation for excavation depths greater than 4 feet bgs must also consider the 1:1 slope required for health and safety reasons, which increases the excavated volume of soil between 2x and 5.3x depending on depth and surface area
AOC - area of concern
bgs - below ground surface
DUP - duplicate
ft - feet
ft2 - square feet
ft3 - cubic feet
yd3- cubic yard
EA - Excavation Area
mg/kg - milligrams per kilogram
PEA - Preliminary Environmental Assessment

Removal Action Alternatives

Three removal action alternatives were evaluated for the chemicals of concern-impacted soil at the site. The three alternatives are described below and are summarized in **Table 3-2**.

- **Alternative 1 – No Action:** This alternative includes no institutional controls, no treatment of soil, and no monitoring. Arsenic-impacted soil would remain in place and undisturbed. Alternative 1 would not require the implementation of any removal measures at the site. Since elevated arsenic concentrations are present in shallow soils, this alternative would not reduce the health risk to exposure to soil at the site. In addition, as future construction work is proposed for the site, workers and the public may be exposed to impacted soil, making this alternative unacceptable (Ninyo & Moore, 2021, p. 13).

- **Alternative 2 – Containment Through Surface Cap:** The containment alternative would involve the over excavation of two feet of soil in arsenic impacted areas, the installation of a high visibility, woven membrane, and the placing of two feet of clean non-impacted soil above the membrane to match surface grade. Therefore, some of the COPC-impacted soil would be disturbed during placement of the surface cap, and some potential short-term risks to on-site workers, public health, and the environment could result from the dust or particulates generated during these activities. These risks could be mitigated using personal protective equipment for on-site workers and engineering controls, such as dust suppression and additional traffic and equipment operating safety procedures, for protection of the surrounding community. The short-term risks associated with this alternative would be low.

  The installation of a surface cap would include a land use covenant, Operation & Maintenance (O&M) Plan, long-term inspection and maintenance. Periodic inspections for settlement, ponding of liquids, erosion, and naturally occurring invasion by deep-rooted vegetation or burrowing animals would be required. In addition, precautions would have to be taken so that the integrity of the cap is not compromised by land-use activities. Based on these factors, the effort required to ensure long-term effectiveness is considered high (Ninyo & Moore, 2021, p. 13).

- **Alternative 3 – Excavation/Off-site Recycling or Disposal:** approximately 224 cubic yards (313 tons) of impacted soil will be excavated and removed from the site. Excavation and offsite disposal would be an effective means of removing impacted soil. Excavated soils would be loaded onto trucks and transported to the appropriate approved receiving facility. This alternative provides long-term effectiveness by removing the impacted soils from the site. This alternative would potentially cause temporary short-term impacts (including dust, noise, and traffic) to the site vicinity. However, these impacts would be reduced through control measures to an acceptable level, thereby providing short-term effectiveness to this alternative upon completion. Because this alternative would remove impacted soils, the accompanying toxicity, mobility, and volume would be reduced to an acceptable level (Ninyo & Moore, 2021, pp. 14-15).

Table 3-2
Summary of Removal Action Alternatives

Alternative No.	Alternative Name	Depth of Excavation	Volume of Soil to be Transported (cubic yards)	Brief Summary
1	No Action	0	0	No action would be taken. Arsenic-impacted soil would remain in place and undisturbed.
2	Containment Through Surface Cap	Up to 2 feet bgs	Up to 8 feet bgs	Containment treatment as implemented at the site would consist of capping the surface of the impacted areas with an engineered soil cover and/or membrane.
3	Excavation/Off-site Recycling or Disposal	Up to 8 feet bgs	186	This alternative includes excavation and off-site recycling, reuse, or direct landfilling of contaminated soils.

The preferred alternative in the RAW is Alternative 3, which was selected because it is easily implemented, effective, and provides long-term assurance that future occupants of the site will not face significant health risks due to elevated levels of arsenic in soil (Ninyo & Moore, 2021, p. 17). Alternative 3 involves soil excavation and the use of conventional excavation equipment, such as backhoes, loaders, and dozers to remove an estimated 224 cubic yards (313 tons) of impacted soil from the high school site. Excavated soil would be either directly loaded into staged trucks or would be temporarily stockpiled on plastic sheeting next to each excavated areas until it could be loaded out for offsite disposal. The soils removed from these areas would be transported offsite to an appropriate, licensed facility for disposal. Information in this section is from the Draft Removal Action Workplan for the project (Ninyo & Moore, 2021).

Construction Staging and Construction Worker Parking

Construction staging would be located entirely on the La Mirada High School campus. Construction workers would park their vehicles on the high school campus. All work including construction staging and parking related to RAW implementation will strictly be in the stadium area only on site.

Soil Excavation

Soil excavation would involve the use of conventional excavation equipment, such as backhoes, loaders, and dozers to remove the estimated 224 cubic yards (313 tons) of impacted soil from the site. Excavated soil would be either directly loaded into staged trucks, or would be temporarily

stockpiled on plastic sheeting next to the excavation areas until it could be loaded out for offsite disposal. The soils removed from the excavations would be transported offsite to an appropriate, licensed facility for disposal. Excavations will be sloped to avoid tripping hazards following the results of confirmation sampling.

Confirmation Sampling

Following the RA, soil samples will be collected and analyzed from the bottom and sidewalls of each excavation area to evaluate if the excavation extended a sufficient distance laterally and vertically to remove the soil that exceeds the CG for the chemical of concern. Confirmation soil sample locations will be selected in the field, as the excavation progresses and based on observations made in the field.

Sidewall samples will be collected at approximately one (1) sample for each 20 linear feet of sidewall, with a minimum of one (1) sidewall sample collected from each excavation sidewall. Each sidewall sampling location will consist of one sample collected at the middle depth for excavations less than or equal to 4 feet deep, and every 2 feet for excavations greater than 4 feet. Bottom floor samples will be collected at the rate of one sample for each 50 square feet of excavation area at the midpoint of each interval. For the planned excavations, approximately 61 confirmation samples (55 primary and 6 duplicates) will be collected. These samples will be analyzed for arsenic in general accordance with EPA Method 6010B. If the results of these samples exceed the CG of 24 mg/kg, then additional excavation will be performed within the excavation area until the impacted soil is removed from the site. Confirmation soil sampling, analysis, and evaluation will be repeated, as previously described, within any resulting excavation. The excavation will be considered complete if the concentrations detected in the confirmation samples are less than or equal to the cleanup goal.

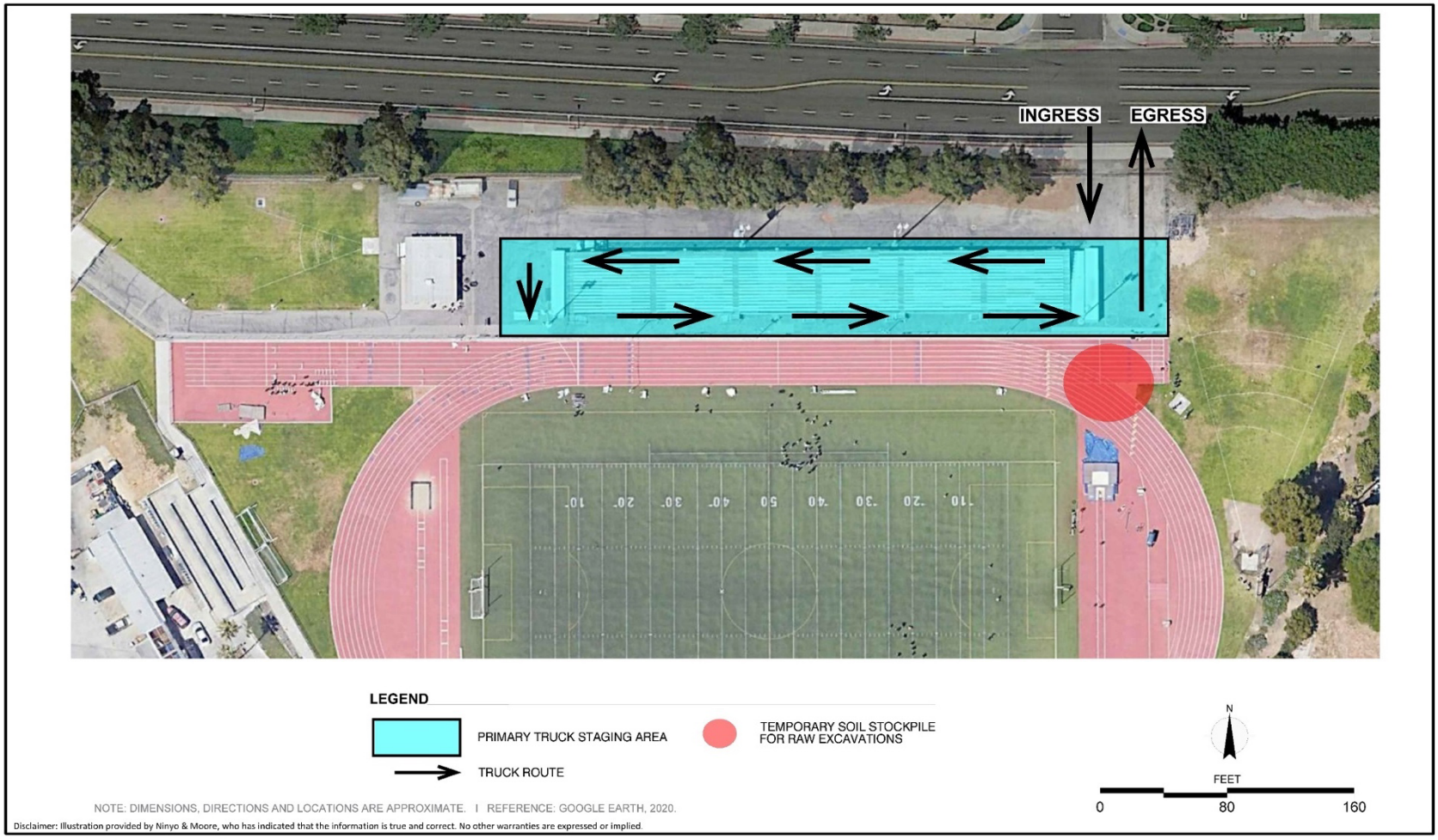
Limited Temporary Soil Stockpiling and Containment Control

Soil has not been profiled with respect to waste characterization, therefore soil will be temporarily stockpiled on site, pending confirmation soil sampling test results. Refer to **Figure 3.1-3** which shows the stockpile location. The staging process will be conducted so as to minimize dust generation. At the staging areas, excavated soil will be placed on an impermeable barrier base (e.g., plastic sheeting) and at the end of each day, covered with tarps or other appropriate materials (e.g., plastic sheeting) to prevent any storm water run-on and/or dust generation. If significant rainfall is anticipated, the staging areas will be bermed to contain any runoff. When possible, excavated soil may be placed in covered roll-off bins or drums, or may be loaded onto transportation trucks. A transportation plan indicating the approximate location where excavated soil will be temporarily stored and where transportation trucks will be staged is presented in the RAW as **Appendix C**.

The temporary onsite storage of excavated soil wastes will be secured and appropriately labeled with non-hazardous waste signs until offsite transportation and disposal are ready for loading. In no case will the waste storage be longer than five days after its generation. Direct loading will take place concurrently with excavation operations, with access of loaders to the stockpile from outside of the excavation areas, while excavation operations deposit impacted soil from the excavation areas to the staging areas.

In the event of stockpiling, heavy tarpaulins or plastic sheeting will be used to separate stockpiles or impacted soil from the ground during excavation activities. As a precautionary measure to avoid fugitive dust from stockpiled soil, a reasonable effort will be made to ensure that stockpiles do not exceed the height of the fence line or greater than 10 feet. Stockpiles will be covered or kept moist during non-work hours or overnight to minimize the potential for fugitive dust.

Figure 3.1-3
Truck Ingress/Egress and Soil Stockpile Location



Source: Ninyo & Moore, August 10, 2021.

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La Mirada High School – New Football Stadium Project Addendum
Truck Ingress/Egress and Soil Stockpile Location

Decontamination Area

Vehicles, excavation, and hand-held equipment will be decontaminated prior to leaving the site. A decontamination area will be prepared on site prior to impacted-soil excavation. This area will be designed to contain liquids and residue generated during the decontamination process. The decontamination area will be in an area easily accessible to incoming and outgoing vehicles and equipment and within proximity to the excavation areas. Decontamination procedures will include methods for removing soil from vehicle tires. In addition, personnel overseeing decontamination procedures will be responsible for ensuring soil is not tracked off site.

Materials removed from impacted equipment and rinsate collected during decontamination of impacted equipment will be containerized and stored on site pending profiling and disposal. After decontamination, the equipment will be visually inspected for signs of residue. Decontamination rinsate will be appropriately disposed of upon receipt of laboratory profiling data.

Soil Transportation and Disposal Off-Site

Arsenic-impacted soil stockpiles will be removed from the site within five days of excavation in accordance with SCAQMD Rule 1466. A transportation plan indicating how the excavated soil will be hauled from the site, describing truck routes for off-site disposal, and listing the frequency of truck trips and any holding areas at the site is presented in Appendix D of the Draft Removal Action Workplan. Refer to Figure 3.1-4 and Figure 3.1-5 below which show the non-hazardous waste disposal routes to two facilities. Figure 3.1-6 shows the route for hazardous waste disposal from the project site to the Kettleman City landfill. The plan also identifies entrance and exit gates, truck routes, approximate soil stockpile locations, truck and heavy equipment decontamination area, truck inspection/check point, and personnel and small equipment decontamination areas. Areas of the site outside of the decontamination areas may be used for truck staging and loading. Truckloads will be documented by non-hazardous, non-RCRA hazardous, or RCRA-hazardous bills of lading waste manifests.

Prior to the start of field work, the relevant agencies will be contacted regarding potential road construction. If there is impact from road construction along the planned truck route, then the transportation plan may be revised. This plan was prepared in general accordance with the DTSC's Transportation Plan, Preparation Guidance for Site Remediation (DTSC, 1994). Dust mitigation measures will be implemented at the on-site truck routes in accordance with the Community Air Monitoring Plan (CAMP), which is Appendix E of the RAW.

Site Restoration

Following the removal action, construction equipment and materials will be removed from the site. Decontamination water and contaminated soil will be transported to an appropriate disposal facility. If weather conditions prevent immediate restoration of the excavation areas, erosion controls will be established as necessary. After soil removal activities, the excavations will be sloped to prevent tripping hazards. However, if backfilling is needed at the remaining excavation areas, either on-site soil from areas outside removal areas (with DTSC approval) or an off-site certified source of clean backfill material will be identified. Imported soils will be appropriately tested or documented before backfilling activities commence to evaluate both environmental and geotechnical suitability. The District's construction contractor will be responsible for providing documentation of the source of clean fill material and will be responsible for performing or providing documentation of the required geotechnical and environmental analysis of the clean import fill material.

Figure 3.1-4
Non-Hazardous Waste Disposal Route- Simi Valley Landfill & Recycling Center

Figure 3.1-5
Non-Hazardous Waste Disposal Route- Antelope Valley Landfill

Figure 3.1-6
Hazardous Waste Disposal Route- Kettleman Hills Hazardous Waste Facility

Project Design Feature- Construction Contract Specifications

As detailed in **Section 5.1.13** of this document, regarding potential noise impacts, in order for the project to have a less than significant noise impact the following project design feature is required: construction contracts will contain a provision that only one of the following configurations of equipment can be used for any one-hour interval:

- One rubber-tired dozer; or
- One rubber-tired loader; or
- One rubber-tired dozer plus one rubber-tired loader; or
- One backhoe

Taking intervening buildings and/or terrain, and walls, into account, the change in construction noise exposure is less than 5 dB, as long as only one of the stated configurations runs in a given hour for a given sensitive receiver. This applies for both the nearest residence to each excavation site and the church. With the inclusion of the project design feature above, the proposed project would have a less than significant noise impact.

Security Measures

Appropriate barriers and/or privacy fencing will be installed prior to beginning the excavation process so that work areas are secure and safe and that trespassers or unauthorized personnel are not allowed on site. Security measures may include, but are not limited to the following:

- Posting notices directing visitors to the Site Manager.
- Maintaining a visitor's log. Visitors must have prior approval from the Site Manager to enter the site. In addition, visitors will not be permitted to enter the site without first receiving site-specific health and safety training from the Site Safety Manager.
- Installing barrier fencing to restrict access to sensitive areas such as exclusion zones.
- Providing adequate site security so that unauthorized personnel do not have access to work areas and/or excavated materials.
- Before leaving the site, personnel must sign out in the visitors' log.
- Maintaining a safe and secure work area, including areas where equipment is stored or placed, at the close of each workday.
- A visual plastic barrier should be installed along the fence.
- Persons requesting site access will be required to demonstrate a valid purpose for access and provide documentation to demonstrate they have received appropriate training. After work hours, access to the site will be controlled by the perimeter fence and a locked gate.

Project Schedule

Refer to **Table 3-3** below which shows the proposed work schedule for the RAW.

Table 3-3
Proposed Work Schedule

Activity	Calendar Days to Complete	Tentative Start Date
Field Preparation, Notifications, and Permitting	1 day	December 2021
RAW Implementation and Confirmation Sampling	5 days	December 2021
Preparation of Draft Removal Action Completion Report	30 days	January 2022

Source: Table 4, Ninyo & Moore, 2021

Summary of Requested Actions

Approval of Addendum by the Norwalk-La Mirada Unified School District Board of Education.

4.0 ENVIRONMENTAL CHECKLIST

The environmental factors checked below would be potentially affected by this project, involving at least one impact that would represent a new significant environmental effect, a substantial increase in the severity of a significant impact previously identified, or new information of substantial importance, as indicated by the checklist on the following pages.

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

Determination (To Be Completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been 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.

☒ I find that the amended project has previously been analyzed as part of an earlier CEQA document. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project which are documented in this ADDENDUM to the earlier CEQA document (CEQA § 15164).

Signature	Date
Printed Name	Title

5.0 ENVIRONMENTAL ANALYSIS

This section addresses each of the environmental issues addressed in the adopted La Mirada High School New Football Stadium Project IS/MND Environmental Checklist to determine if the proposed project has the potential to create new significant impacts or a substantial increase in the significance of a significant impact as compared to what was identified in Approved Project IS/MND, within the framework of CEQA Guidelines Sections 15162 and 15164.

5.1 IMPACT ANALYSIS

5.1.1 Aesthetics

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment (such as hills, vegetation, rock outcroppings, drainage pathways, and soils) features. Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views. Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity. Viewer groups identify who is most likely to experience the view. High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas. Duration of a view is the amount of time that a particular view can be seen by a specific viewer group. Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features.

The IS/MND for the Approved Project addressed visual resources, including the potential to impact scenic vistas, scenic resources, the potential to conflict with applicable zoning and other regulations governing scenic quality and the potential to create significant light and/or glare.

The project site does not contain notable visual resources such as rock outcroppings, trees, or historic buildings. The project site is not located in the vicinity of an officially designated or eligible state scenic highway, designated as part of the California Scenic Highway Program. Implementation of the Approved Project would not have an adverse effect on any scenic vista because no scenic vistas are identified in the project area (City of La Mirada General Plan, 2003, p. OSC-1).

Impact Analysis

The proposed project would have no impact on a scenic vista, would not affect scenic resources within a designated or scenic highway and would not substantially degrade the existing visual character of the project site or surroundings. Additionally, the proposed project would not introduce a substantial new source of light or glare.

During implementation of the proposed project, there would be elements on the project site that are not compatible with the project vicinity. These features may include construction equipment (e.g., small cranes, pickup trucks), stockpiled materials, and construction-area barriers and fencing. Construction elements would be inconsistent with the visual character of the project vicinity. While these elements would be removed following construction, they would nonetheless result in a temporary impact. However, during project construction, work areas would be screened from public view through the use of temporary barriers. The removal action, including field preparation, is scheduled to take six days. Therefore, short-term visual impacts during the construction phase would be less than significant.

Implementation of the proposed project would not result in long-term/permanent changes to the visual character of the site and public views of the site because the project does not propose any new buildings or structures that could block views. The project would not result in the removal or degradation of any significant visual resources, and would be consistent in appearance to the existing school campus land uses. Development projects on the La Mirada High School campus are subject to review by the Division of State Architect (DSA), which issues the building/construction permits for projects on campus. The proposed project would be developed in compliance with DSA requirements and would not conflict with regulations governing scenic quality. Therefore, the proposed project would have a less than significant impact in this regard.

The project site is located in an urban area, which is characterized by low to medium nighttime ambient light levels. Street lights, traffic on local streets and exterior lighting in surrounding developments are the primary sources of light that contribute to the ambient light levels in the project area. Light-sensitive uses in the project vicinity are limited to residences. Therefore, similar to the Approved Project, the proposed project would not result in any new significant aesthetics resources impacts and no mitigation is required.

Conclusion

The proposed project would have a less-than-significant impact regarding aesthetics. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to aesthetics, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.2 Agriculture And Forestry Resources

The project is located within an existing high school campus, in a developed urban area with no agricultural land or timberland on site.

Impact Analysis

Implementation of the proposed project would not result in the loss of important farmland or forest land or conversion of farmland or forest land to non-agricultural use. The proposed project would not alter the findings of the IS/MND for the Approved Project that no agricultural or forestry land is present on or near the project site and that the project would have no impact to agricultural and forestry resources. With the proposed project, no new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

Conclusion

The proposed project would have a no impact regarding agriculture and forestry resources. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to agriculture and forestry resources, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.3 Air Quality

The Approved Project concerns mainly construction activities in the replacement and/or upgrade of athletic facilities. Increases in long-term operational emissions are not expected; therefore, the project would be substantially equal to what was appropriately assumed for the site in any growth

rate or trip generation assumptions. Therefore, the proposed would not conflict with AQMP and impacts would be less than significant.

Construction activities for the Approved Project, including soil disturbance dust emissions and combustion pollutants from onsite construction equipment and from offsite trucks hauling dirt would create a temporary addition of pollutants to the local airshed. Construction emissions were estimated using methodologies and formulas from CalEEMod Version 2013.2 (CAPCOA, 2017).[1] As shown in **Table 5.1-1**, all construction emissions associated with the project would be below the regional and localized significance thresholds.

Table 5.1-1
Estimated Construction Emissions

Stage	Maximum Daily Emissions (lbs/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	1.3	10.9	12.3	0.62	0.62
Construction	1.5	15.2	14.5	0.87	0.76
Project Maximum Daily	**1.5**	**15.2**	**14.5**	**0.87**	**0.76**
SCAQMD Daily Threshold	75	100	550	150	55
Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**
Localized Significance Threshold		165	1,855	42	10
Exceed Thresholds?	**N/A**	**No**	**No**	**No**	**No**

Operational emissions were not calculated for the Approved Project because the school district does not anticipate any changes in student enrollment, frequency of use of the football stadium, or number of participants or spectators at football games. The Approved Project would not exceed SCAQMD thresholds during construction or operation and impacts would be less than significant.

During construction or operation of the Approved Project, emissions of ROG, NOX, PM10, and PM2.5 are not expected to exceed the SCAQMD regional significance thresholds. The SCAQMD estimates that emissions that do not exceed the project specific thresholds will not result in a cumulative impact.

The SCAB, in which the project site is located, is in nonattainment for federal ozone and PM2.5 standards. Therefore, the SCAQMD is required to prepare and implement an AQMP and to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards. While the SCAQMD does not have direct authority over land use decisions, it was recognized that changes in land use and circulation planning were necessary to maintain clean air. The Approved Project is compliant with the AQMP. The localized significance analysis in the IS/MND prepared for the Approved Project demonstrated that during construction activities, no localized significance thresholds are expected to be exceeded. Therefore, impacts due to the emissions of particulate matter, NO_2, and CO would be less than significant.

1 The CalEEMod software itself was not used.

Due to the short-term nature of project construction for the Approved Project, impacts from exposure to diesel exhaust emissions during construction would be less than significant. With the Approved Project, no changes will occur to the number of parking spaces, bleacher seating capacities, football stadium use, or number of students as a result of the project. Therefore, impacts from operation of the Approved Project would be less than significant.

Impact Analysis

For the purpose of the air quality analysis, implementation of the RAW was considered to be "construction," inasmuch as it will use the same types of onsite earthmoving equipment and methods, and nonrecurring transportation as the construction phase of a development project. In addition, after the RAW is fully executed, there will be no operational activities. **Table 5.1-2** describes the onsite equipment use and **Table 5.1-3** summarizes projected vehicle use. Criteria pollutant emissions from onsite sources were calculated by the same methods used by the California Emissions Estimator Model (CalEEMod), Version 2020.4.0 (BREEZE Software, 2021).[2] Onroad emission factors were obtained from the California Air Resources Board's EMFAC2017 model, Version 1.0.3, and represent estimated annual emission rates for Los Angeles County in the South Coast Air Basin for calendar year 2022. For the regional criteria pollutant calculations, only the mileage within the South Coast Air Basin to and from Kettleman Landfill (for hazardous soil) and to and from Crosby & Overton (for rinsate) was considered.

Table 5.1-2
Onsite Equipment Characteristics

Equipment Type	BHP	Load Factor	No. of Days	No. of Pieces	Hours/ Day	Total Hours
Rubber Tired Dozer	247	0.40	15	1	6	90
Rubber Tired Loader	203	0.36	15	1	6	90
Backhoes	97	0.37	15	2	6	180

Table 5.1-3
Onroad Travel Assumptions

Vehicle Type	No. of Days	Trips/ Day	Round Trip Miles		VMT/Day	
			In-Basin	Total	In-Basin	Total
Employee vehicle	15	4	30	30	120	120
T7 single construction	15	1	180	392	180	392
LHD1	15	1	41	41	41	41

Table 5.1-4 shows the results of the construction emissions calculations for the proposed project. Details of the calculations are provided in **Appendix** F. Emissions of all criteria pollutants would be below their respective SCAQMD regional thresholds. For the localized significance analysis, only onsite emissions are analyzed. These, too, would be below the SCAQMD's localized significance thresholds[3] for NO_x, CO, PM_{10} and $PM_{2.5}$. Criteria pollutant emissions from the RAW activities were not added to those of the Approved Project, because significance thresholds are in terms of

2 CalEEMod was not run for this assessment.
3 There is no significance threshold for ROG.

maximum daily emissions. Construction of the Approved project cannot begin until the RAW is completely implemented; hence there will be no overlap in daily emissions.

Table 5.1-4
Estimated Construction Emissions From RAW Implementation

Stage	Maximum Daily Emissions (lbs/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Offroad	1.093	11.377	7.192	0.525	0.0482
Hauling	0.034	1.346	0.189	0.077	0.039
Employee Commuting	0.004	0.015	0.228	0.001	0.012
Project Maximum Daily	**1.1**	**12.7**	**7.6**	**0.6**	**0.5**
SCAQMD Daily Threshold	75	100	550	150	55
Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**
Localized Significance Threshold	N/A	165	1,855	42	10
Exceed Thresholds?	**N/A**	**No**	**No**	**No**	**No**

Conclusion

The proposed project would have a less-than-significant impact regarding air quality. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to air quality, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.4 Biological Resources

The project site is an existing school campus located within an urbanized area, which contains a joint football field and track, three baseball/softball fields, numerous outdoor courts, and an indoor gym. The existing onsite vegetation consists of turf grass field and non-native trees/ornamental shrub species that do not support sensitive habitats and provide low habitat value for special-status species. According to a literature review, including the assessment of site photographs, the project lacks suitable soils, biological resources, and/or physical features to support special-status plant or wildlife species on the project site or within the project vicinity. Therefore, impacts to sensitive habitat, or to sensitive plant and wildlife species is not anticipated (UltraSystems, 2020, p. 4.4-4).

An UltraSystems biologist researched readily available information, including relevant literature, databases, agency web sites, various previously completed reports and management plans, GIS data, maps, aerial imagery from public domain sources, and in-house records to: 1) assess habitats, special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that may occur in and near the project site; and 2) identify local or regional plans, policies, and regulations that may apply to the project. Aerial imagery from multiple sources was overlaid with geospatial data by utilizing Geographic Information System (GIS) software (ArcGIS 10.1) to identify: 1) the presence and geographic range of candidate, sensitive, or special-status species and potentially suitable habitats; and 2) proposed and final critical habitats, wetlands, waters of the State (WOS), and waters of the United States (WOUS), in the vicinity of the project site. A Biological

Study Area (BSA) was defined for the project and includes the high school and a 500-foot buffer zone around the perimeter of the school campus (UltraSystems, 2020, pp. 4.4-1 – 4.4-2).

According to the literature review and project site photos, the project site and surrounding areas do not function as a wildlife movement corridor. The project site does not contain wildlife travel routes, such as a riparian strip, ridgeline, drainage, or wildlife crossings such as a tunnel, culvert, or underpass. However, common wildlife species such as coyotes, northern raccoons, striped skunks, and Virginia opossums could be expected to travel within areas surrounding the project site. The project site and adjacent areas do not support resident or migratory fish species or wildlife nursery sites. No established resident or migratory wildlife corridors are located within the project site. Therefore, the project would not interfere substantially with or impede 1) the movement of any native resident or migratory fish or wildlife species, 2) established native resident or migratory wildlife corridors, or 3) the use of native wildlife nursery sites. (UltraSystems, 2020, p. 4.4-4).

The project site is located within the densely developed City of La Mirada, and is not located in an area covered by a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved HCP; therefore, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impact would occur (UltraSystems, 2020, pp. 4.4-15).

Project Design Feature (PDF) BIO-1, recommended for the Approved Project, requires preconstruction nesting bird surveys; and exclusion of disturbances within 200 feet of occupied nests until a biologist can determine that the young have fledged, or the nest has become inactive. PDF BIO-1 states: If project construction occurs between March 1 and August 31, a qualified avian biologist shall conduct a preconstruction nesting bird survey no earlier than one week prior to construction. If the nests are still occupied, a buffer of 200 feet shall be maintained around any active nest, and the avian biologist shall visit the site once a week, until the avian biologist can determine that the young have fledged or the nest has become inactive" (UltraSystems, 2020, pp. 4.4-11).

With the implementation of PDF BIO-1, the Approved Project would have less than significant impacts to native bird species protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Therefore, with implementation of PDF BIO-1, the proposed project would not have substantial adverse effect, either directly or through habitat modifications, to habitat, plant and wildlife species and less than significant impacts would occur.

Impact Analysis

The proposed project would not cause a substantial net impact to biological resources compared to impacts of the Approved project. The District has indicated that no plants, trees, or bushes would be removed as part of the proposed project (Yoon, 2021). The proposed project would not result in any impacts not previously evaluated in the IS/MND for the Approved Project. If required, PDF BIO-1 for the Approved Project for bird species protected under the MBTA would be implemented if remediation activities such as soil removal would occur during nesting season.

Conclusion

The proposed project would have a less-than-significant impact regarding biological resources. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to biological resources, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.5 Cultural Resources

The IS/MND for the Approved Project included a cultural resources analysis that was conducted for the La Mirada High School project site that includes a California Historic Resources Inventory System (CHRIS) records and literature search at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The report includes a search by the Native American Heritage Commission (NAHC) of their Sacred Lands File (SLF) for potential traditional cultural properties, as well their list of local Native American tribes and tribal representatives to contact. The SCCIC records search was conducted on September 10, 2019.

The Cultural Resources section of the IS/MND for the Approved Project describes the cultural resources setting based on prehistoric and historic archaeological resources and historic structure information in and adjacent to the project site. Based on the cultural resources records search conducted at the SCCIC, no historical resources have been recorded within the project's Area of Potential Effect (APE) boundary. No historical cultural resources would be impacted by the project.

Contingency plans to address the unexpected discovery of cultural resources during implementation of the RAW are addressed in the IS/MND for the Approved Project through mitigation measures MM **CUL-1** through **CUL-4**. With implementation of mitigation measures **CUL-1**, **CUL-2** and **CUL-3**, potential impacts from the Approved Project related to archaeological resources would be less than significant. Specifically, MM **CUL-2** provides for the halting of construction activities within a 30-foot radius of historical or unique archaeological discoveries made during construction work, and for a qualified archaeologist to be notified and afforded the necessary time to recover, analyze, and curate any historical or unique archaeological discoveries that may be found during construction activities, as well as make recommendations for archaeological monitoring to be conduct as needed to ensure the protection of possible further cultural resources that may exist. In the unlikely event of an unexpected discovery of human remains, implementation of MM CUL-4 and adherence to all applicable codes and regulations would ensure that impacts related from the Approved Project to the accidental discovery of human remains would be less than significant.

Impact Analysis

Since the footprint for the proposed project is consistent with the IS/MND for the Approved Project, the analysis presented in the cultural resources section of the IS/MND for the Approved Project covers cultural resources that could potentially be impacted by the proposed project. The mitigation measures (**MM CUL-1** through **MM CUL-4**) identified in the IS/MND for the Approved Project would similarly reduce impacts to cultural resources from proposed project implementation. The proposed project would therefore result in less than significant impacts to cultural resources.

Conclusion

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the IS/MND for the Approved Project (**MMs CUL-1** through **CUL-4)** would reduce impacts to a less-than-significant level. No new mitigation measures would be required. With regard to cultural resources, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.6 Energy

As detailed in the IS/MND for the Approved Project both construction and operation of the Approved Project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. During construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of sports field facilities, typically do not involve the consumption of natural gas. Construction of the Approved Project would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site.

The consumption of resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the Approved Project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth on the high school campus and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Therefore, the energy demand requirements associated with the Approved Project would be less than significant.

Impact Analysis

The proposed project would not modify the design, layout, or energy efficiency of the Approved Project; therefore, the proposed project would not result in impacts not previously documented in the IS/MND for the Approved Project. Energyimpacts associated with the proposed project would be less than significant.

Conclusion

The proposed project would have a less-than-significant impact regarding energy. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to energy, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.7 Geology and Soils

The IS/MND for the Approved Project found that the project site is not within a designated State of California Alquist-Priolo Earthquake Fault Zone, or within an area designated as a seismic hazard zone (Converse Consultants, 2019, p. 7). The nearest zoned fault segments are the Whittier Fault Zone located approximately 4.2 miles north of the site (Converse Consultants, 2019, p. 7) and an unnamed historic fault segment approximately 2.3 miles east of the site, north of the West Coyote Hills generally paralleling South Idaho Street from West Risner Way to Sandalwood Avenue (CGS, 1991; USGS, 2019a). No known active or potentially active faults trend toward or through the project site and the potential for surface rupture resulting from the movement of these or other known, nearby faults is considered to be low. Therefore, impacts related to the 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 during the life of the project would be less than significant.

The Approved Project would be constructed in accordance with applicable California Building Code (CBC) (Title 24, Part 2, California Code of Regulations) used throughout the state, and requirements from State of California's Department of General Services, Division of the State Architect (DSA). Therefore, impacts from strong seismic ground shaking would be less than significant.

The project site is not located within a zone of required investigation for liquefaction mapped by the CGS (CGS, 1991; 1999). As detailed in the Geotechnical Study report prepared for the Approved Project, the site is comprised of dense granular materials and stiff fine-grained soil, and liquefaction potential is anticipated to be very low. Based on the generally high blow count and the fine-grained soils in test borings, the total seismically-induced settlement is anticipated to be negligible (Converse Consultants, 2019, p. 8)

The project site is not located within a mapped landslide zone (CGS, 1991 and CGS, 1999); the mapped landslide hazard zone nearest to the proposed project is located approximately 1.3 miles east, in the northwestern slopes of the West Coyote Hills (CGS, 1991). In addition, topography within and surrounding the project site is relatively flat. Therefore, no impacts on people or structures due to landslides are anticipated, and mitigation is not required.

The Approved Project would be required to comply with applicable Clean Water Act regulations and with the State of California Porter-Cologne Water Quality Control Act prior to conducting any ground-disturbing activities; therefore, the potential for substantial soil erosion or the loss of topsoil from the Approved Project would be less than significant.

The topography at the project site and in the immediate vicinity of the site is relatively flat. Under these circumstances, the potential for lateral spreading at the project site is considered very low (Converse Consultants, 2019, p. 9).

The project site is approximately 1 mile north of an area of land subsidence caused by groundwater withdrawal mapped by the U.S. Geological Survey (USGS, 2019b). The Geotechnical Study report for the Approved Project estimates ground subsidence at the proposed project site due to remedial grading as 0.1 foot, (Converse Consultants, 2019, p. 17). For these reasons, the potential for subsidence would be less than significant.

The uppermost four to five feet of soil onsite is fill soil considered unsuitable for supporting the proposed improvements. The geotechnical investigation report for the Approved Project recommends over-excavation to five feet below ground surface, or three feet below proposed footing bottoms, whichever is greater (Converse Consultants, 2019, p. 13). Impacts from collapsible soils would be less than significant after compliance with recommendations in the geotechnical investigation report.

A soil sample from boring BH-8 yielded an The soils unit mapped on the project site has an expansion index of 56, indicating medium potential for soil expansion (Converse Consultants, 2019, p. 15). Although expansive soils are present on the project site, incorporation into project plans of mitigation measure GEO-1 set forth in the IS/MND would mitigate the effects of soil shrinkage and expansion. The Approved Project would also be inspected and signed off in the field by a certified Division of the State Architect inspector to ensure that these requirements are implemented. For these reasons, potential expansive soils impacts would be less than significant after mitigation.

The Approved Project would not include septic tanks or alternative waste water disposal systems. For this reason, no impact from septic tanks or alternative waste water disposal systems within the proposed project site would occur from the Approved Project.

Although the project proposes precise grading activities, it is not anticipated to directly or indirectly destroy any paleontological resources or site or unique geologic feature since previous grading activities have yielded negative results. Grading activities associated with development of the Approved Project would cause new subsurface disturbance and could result in the unanticipated discovery of paleontological resources. With implementation of mitigation measures GEO-2 and GEO-3, potential impacts of the Approved Project related to paleontological resources would be less than significant.

Impact Analysis

Seismic and Geologic Hazards

The IS/MND for the Approved Project found that the project is subject to potentially significant but mitigable impacts with regard to expansive soils. The proposed project would not involve construction of structures for human occupancy and thus would not cause hazards arising from expansive soils.

Paleontological Resources

The proposed project would involve excavations to depths up to 8 feet below ground surface and thus could damage fossils that may be buried in site soils. Implementation of **MM GEO-2** and **MM GEO-3** would reduce impacts of the proposed project to less than significant. No new impacts would occur after implementation of mitigation, and no new mitigation measures are required.

Conclusion

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the IS/MND for the Approved Project (**MM GEO-1**, **MM GEO-2** and **MM GEO-3**) would reduce impacts to a less-than-significant level. No new mitigation measures would be required. With regard to geology and soils, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.8 Greenhouse Gas Emissions

The IS/MND for the Approved Project assessed short-term construction GHG emissions using methodologies and formulas from CalEEMod Version 2013.2.4 Estimated emissions were compared with SCAQMD Interim Thresholds to determine potential significance. Even though construction equipment would emit minor amounts of CH4 and N2O, the predominant GHG emission during construction would be CO_2. **Table 5.1-5** shows the estimated GHG emissions from demolition and construction activity from the proposed project. Since construction GHG emissions would be well below the SCAQMD threshold of 3,000 metric tons CO_2e annually, the proposed project's GHG impacts would be less than significant and no mitigation would be required.

[4] The CalEEMod software was not run for this analysis.

Table 5.1-5
Construction GHG Emissions

Emission Source	GHG Emissions (tons/year)			
	CO_2	CH_4	N_2O	CO_2e
Demolition	35.0	0.004	0.000	35.2
Construction	131.1	0.033	0.001	132.2
Total	**166.1**	**0.037**	**0.001**	**167.4**

Operational emissions were not calculated, since changes in long-term impacts from the proposed project are not expected. However, following SCAQMD guidance, it is common practice to "amortize demolition and construction GHG emissions over 30 years (SCAQMD, 2008b). The amortized value would be **5.6 metric tons CO_2e** per year. Therefore, long-term GHG emissions due to the Approved Project would have less than significant impacts, and no mitigation would be required.

The City of La Mirada does not have any specific climate action plan but has been given a list of GHG Reduction Measure Templates (GCCG, 2019b) by Gateway Cities Council of Governments that provide recommended GHG measures related to regional measures; energy efficiency and conservation; renewable energy; land use and community design; water and wastewater systems; waste reduction and recycling; sustainable transportation; green infrastructure, parks, urban forestry and agriculture; and green business and industry. However, since changes in long-term, operational GHG emissions are not expected and the construction emissions are short-term, the Approved Project would not be expected to conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. Therefore, the Approved Project would have a less than significant impact in this regard and no mitigation measures are required.

Impact Analysis

The proposed excavation, haul, and disposal of contaminated soil would last 15 days. GHG emissions were calculated by the same methods as for criteria pollutants, except that VMT included truck travel both within and outside the South Coast Air Basin. (See **Section 5.1.3**.) **Table 5.1-6** shows the GHG emissions from the proposed project. Project emissions would total **23.4 metric tons** of CO_2e. The 30-year amortized annual value would be **0.78 metric ton**.

Table 5.1-6
Construction GHG Emissions for the Proposed Project

Emission Source	GHG Emissions (tons/year)			
	CO_2	CH_4	N_2O	CO_2e
Offroad	13.46	0.0044	N/A	13.58
Hauling	8.93	0.0000	0.0014	9.33
Employee Commuting	0.53	0.0000	0.0000	0.54
Total	**22.9**	**0.004**	**0.001**	**23.4**

Although GHG emissions from the Approved Project and the proposed project will not occur on any single day, they need to be combined to assess the overall impact of the project. The combined CO_2e emissions will be **190.8 metric tons**. The 30-year amortized annual value would be **6.4 metric tons**,

The proposed project would not involve changes to operation of the school, and thus would not change operational GHG emissions, compared to the Approved Project.

Conclusion

The proposed project would have a less-than-significant impact regarding greenhouse gases. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to greenhouse gas emissions, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.9 Hazards and Hazardous Materials

In the IS/MND for the proposed project, the analysis in the Hazards and Hazardous Materials section refers to the Phase I Environmental Site Assessment (Phase I ESA) prepared for the project by Ninyo & Moore on January 24, 2020 (Ninyo & Moore, 2020). The Phase I ESA presents information resulting from a site reconnaissance of the project area, historical land uses on the project site and in the project vicinity, and a comprehensive database search to determine if the project site or vicinity contain Recognized Environmental Conditions (RECs). The term recognized environmental conditions means "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (Ninyo & Moore, 2020, p. 1).

The current ticket booth was constructed on the site by 1963, and the current concession stands and bleachers were developed on the site by 1977. Based on the age of the site buildings and structures, asbestos and lead-based paint (LBP) may be present on the site (Ninyo & Moore, 2020, p. 16). After implementation of MM HAZ-1 for the Approved Project, potential impacts from ACMs and LBP would be less than significant.

The former agricultural usage of the site is considered an REC (Ninyo & Moore, 2020, p. 20). Due to the historical agricultural use of the property and the identification of a Vapor Encroachment Condition, the Phase I ESA recommends submittal of the Phase I ESA to the Department of Toxic Substances Control (DTSC) for review and that appropriate investigation (e.g., a Preliminary Environmental Assessment) (PEA) be conducted. Potential impacts from the Approved Project regarding the transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials to the public or the environment during the operational phase would be less than significant, and mitigation is not proposed.

La Mirada High School and Reginald M. Benton Middle School are the only schools within one quarter mile of the project site. Structures on the project site contain ACMs and LBPs. However, with implementation of **MM HAZ-1**, impacts of the Approved Project regarding ACMs and LBPs would be less than significant. The Approved Project would comply with federal, state, and local regulations for storage and use of all chemicals on site. Therefore, impacts regarding release of

hazards during operation with regard to being within one quarter mile of an existing or proposed school, would be less than significant.

The project site is not listed on the Cortese-listed and there are no Cortese-listed properties located within 0.5 mile of the La Mirada High School. Therefore, the Approved Project would have no impact in this regard.

The project site is not within the boundary of the Fullerton Municipal Airport Land Use Plan (Orange County Airport Land Use Commission, 2004, Figure 1). Additionally, the project site is over two miles from the Fullerton Municipal Airport. Therefore, the Approved Project would not expose persons to excessive noise associated with airport operations and there would be no impacts in this regard and no mitigation is warranted.

Mitigation measure **TRANS-1** would ensure that the Approved Project would have a less than significant impacts regarding emergency response during the construction phase. The Approved Project would not increase the number of students attending and is not expected to increase traffic to and from the site thus it would not result in substantial changes to circulation patterns or emergency access routes in the area. Therefore, operation of the Approved Project would have no impact regarding emergency response or evacuation plans.

The Approved Project would include required fire suppression design features identified in the latest edition of the California Building Code (CBC), and would comply with California's DSA and Los Angeles County Fire Authority requirements. With adherence to applicable regulations and the proximity to the nearest fire station, the Approved Project would have no impacts regarding wildland fire would and no mitigation would be required.

Impact Analysis

A Supplemental Site Investigation (SSI) for the project site completed by Ninyo & Moore in April 2021 identified arsenic levels up to 49 mg/kg in Area of Concern 2 (AOC2), and 25 mg/kg in AOC1, above the site-specific cleanup goal of 24 mg/kg. The DTSC determined that a removal action is required. The SSI is described further in **Section 3.0** of this Addendum.

The proposed remedial action workplan involves excavation of approximately 224 cubic yards of arsenic-contaminated soil and transporting the soil to two landfills, one in Simi Valley in Ventura County and one in Palmdale; the RAW is described in further detail in **Section 3.0** of this Addendum. RAW implementation would have a favorable impact on hazards to persons at the school from contaminated soils. The RAW cleanup goal for arsenic is 24 mg/kg.

The RAW includes a transportation plan (see **Section 3.0** of this Addendum for details). Soil would be transported between the hours of 9:00 a.m. and 4:00 p.m. to avoid rush hours. Each transportation contractor would have a contingency plan for emergencies including accidental release of contaminated soil (such as resulting from a traffic collision). A spill response company will be available on-call to respond to any accidents involving the transport trucks. No new significant impact on emergency response plans or emergency evacuation would occur, and no new mitigation measure regarding emergency response or emergency evacuation plans is needed. Mitigation Measure (MM) **TRANS-1** in the IS/MND requires preparation and implementation of a construction management plan. The proposed project does not involve construction in addition to that proposed in the Approved Project, and the proposed project would not cause new hazards

related to emergency response planning or emergency evacuation. **MM TRANS-1** would apply to the proposed project as well as to the Approved Project.

RAW implementation would not change impacts regarding ACMs and LBPs compared to Approved Project development, which would remain less than significant after implementation of **MM HAZ-1**. The proposed project would not include demolition or alteration of existing structures, and therefore would not cause new hazards related to ACMs and LBPs requiring implementation of **MM HAZ-1**.

Conclusion

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the IS/MND for the Approved Project (**MM HAZ-1** and **MM TRANS-1**) would reduce impacts to a less-than-significant level. No new mitigation measures would be required. With regard to hazards and hazardous materials, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.10 Hydrology and Water Quality

As detailed in the IS/MND for the Approved Project construction is anticipated to include the transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials commonly associated with construction activities. However, chemical transport, storage, and use would comply with the Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); California's Hazardous Waste Control laws (27 CCR § 15100, Unified Program); Occupational Health and Safety Administration (OSHA), Los Angeles County Fire Department and RWQCB requirements. For these reasons, potential violations of water quality standards or waste discharge requirements would be less than significant during project construction. The Approved Project is not anticipated to result in water quality impacts that would negatively affect the beneficial uses of either surface or groundwaters; the project would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or ground water quality. The Approved Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant and mitigation would not be required.

The Approved Project would result in a negligible increase of impermeable areas. Therefore, the project would not have a significant impact on groundwater supplies and would not interfere substantially with groundwater recharge.

The Approved Project would involve negligible expansion of existing facilities and would not involve the introduction of significant impervious areas, nor would it involve substantial changes in the existing drainage pattern of the area, and no streams, rivers, or drainage channels exist on the site that would contribute runoff to the local drainage network. The Approved Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or result in substantial additional sources of polluted runoff during either the construction or operational phases. Therefore, impacts are anticipated to be less than significant and mitigation is not proposed.

The flood hazard zone nearest to the project site is the 100-year flood hazard zone associated with La Mirada Creek; this flood hazard zone is approximately 0.45 mile west of La Mirada High School, at an elevation approximately 100 feet lower than that of the high school. Therefore, the Approved

Project would not impede or redirect flood flows; no impact would occur, and mitigation is not proposed.

The tsunami inundation zone nearest to the project site would be at the confluence of Coyote Creek and the San Gabriel River, approximately 9.25 miles to the southwest. Therefore, it is not anticipated that the Approved Project would become inundated due to a tsunami and no impacts would occur in this regard. A review of aerial imagery (Google Earth, 2019) revealed no water bodies within a five-mile radius of the project site large enough to generate a seiche. Therefore, the Approved Project would not be inundated by a seiche and no impacts would occur in this regard.

Impact Analysis

The proposed project would result in similar less than significant hydrology and water quality impacts as the Approved Project. The proposed project would involve grading and soils movement, similar to the construction activities evaluated in the IS/MND for the Approved Project. The RAW contains several provisions to avoid or minimize water quality impacts. At the staging areas, excavated soil will be placed on an impermeable barrier base (e.g., plastic sheeting) and at the end of each day, covered with tarps or other appropriate materials (e.g., plastic sheeting) to prevent any storm water run-on and/or dust generation. If significant rainfall is anticipated, the staging areas will be bermed to contain any runoff. When possible, excavated soil may be placed in covered roll-off bins or drums, or may be loaded onto transportation trucks (Ninyo & Moore, 2021, p. 25).

In the event of stockpiling, heavy tarpaulins or plastic sheeting will be used to separate stockpiles or impacted soil from the ground during excavation activities. As a precautionary measure to avoid fugitive dust from stockpiled soil, a reasonable effort will be made to ensure that stockpiles do not exceed the height of the fence line or greater than 10 feet. Stockpiles will be covered or kept moist during non-work hours or overnight to minimize the potential for fugitive dust (Ninyo & Moore, 2021, p. 22). Proposed project implementation would not cause new or substantially increased significant water quality impacts, and no new mitigation measures are required.

Conclusion

The proposed project would have a less-than-significant impact regarding hydrology and water quality. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to hydrology and water quality, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.11 Land Use and Planning

The project site is located in a highly urbanized area with single-family residential development to the north, a golf course to the east, and school campus to the west and south. (Google Earth Pro, 2019). The Approved Project would not alter the existing street grid surrounding the project site or surrounding area. Furthermore, no residential uses would be displaced by Approved Project-related activities and the physical arrangement of the surrounding community would not be modified or divided. Therefore, the Approved Project would not physically divide an established community and no impact would occur. The Approved Project does not propose land use changes, zone changes, or changes to the City's General Plan. Additionally, as discussed in Sections 4.1 through 4.21 of the IS/MND for the Approved Project, the Approved Project would be consistent with applicable plans, policies and regulations. The Approved Project would have no impact

regarding conflict with existing state, regional, county, or local laws, policies, regulations, plans or guidelines.

Impact Analysis

The proposed project would result in similar land use and planning impacts as the Approved Project. The proposed project would not result in impacts not previously evaluated in the IS/MND for the Approved Project. No residential uses would be displaced by proposed project-related activities and the physical arrangement of the surrounding community would not be modified or divided. The proposed project does not propose land use changes, zone changes or changes to the City's General Plan. The proposed project would have no impact regarding inconsistency with applicable land use plans and policies.

Conclusion

The proposed project would have a no impact regarding land use and planning. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to land use and planning, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.12 Mineral Resources

The project site is not located within a designated Mineral Resource Zone, and therefore not located in an area with significant mineral resource deposits. Based on review of the California Department of Conservation, Division of Oil, Gas and Geothermal Resources mapping, the project site is not located within a known oil and gas field or in the vicinity of oil and gas wells (DOC, 2019).

The IS/MND for the Approved Project determined that the project site is not designated by the City of La Mirada General Plan or zoning map as being in an area designated for mineral resources extraction activities. Therefore, no impacts would occur regarding the availability of known mineral resources or locally important mineral resource recovery sites. The IS/MND for the Approved Project found that the Approved Project would have no impact to mineral resources.

Impact Analysis

The proposed project would not result in mineral resources impacts,consistent with the analysis in the IS/MND for the Approved Project. The project site and surroundings are developed with school, residential, and recreational uses and thus are not available for mining. The proposed project would not result in impacts not previously evaluated in the IS/MND for the Approved Project.

Conclusion

The proposed project would have a no impact regarding mineral resources. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to mineral resources, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.13 Noise

For the Approved Project the construction equipment's contribution to noise exposures at the nearest sensitive receivers would be slightly above the corresponding existing ambient levels.

Given the logarithmic basis of the decibel unit, the result would be an increase of 2.0 to 4.5 dBA L_{eq}. Short-term noise exposures would increase by less than the criterion[5] of 5 dBA L_{eq} at all the evaluated construction noise exposure locations. At two locations, the increase would be less than 3 dBA and therefore not detectable by most people.

Although the significance criterion (5 dBA) is in terms of a permanent increase in community noise equivalent level (CNEL), which is a 24-hour time-weighted average, the result here still supports a finding of a less than significant impact because (1) the exposure is temporary and will disappear when construction is complete, and (2) the CNEL value of the construction exposure increase would be even lower than 5 dBA because for most hours of the day construction would contribute nothing to the total exposure. Therefore, construction impacts from the Approved Project on offsite receivers would be less than significant.

Noise exposures to the nearest onsite sensitive receiver for which ambient data were available (#4) were estimated. The maximum outdoor exposure would increase by 3.1 dBA, a less than significant amount. Exposures in the classrooms at the high school would be even lower. Construction-related noise levels from the Approved Project would be short-term and would occur over about 18 months of school attendance. During this time, not all phases of construction would involve intensive use of heavy equipment. Therefore, construction noise impacts from the Approved Project would be less than significant.

The Approved Project would replace the Football Stadium facilities at La Mirada High School but would not increase the number of seats at the stadium. Neither student enrollment nor the number of faculty and support staff would increase. The level of noise-producing maintenance activities such as lawnmowing and leaf blowing would not change. Therefore, noise from onsite sources from the Approved Project would not change compared to existing conditions.

The Approved Project would not include any blasting, drilling, or pile driving. Construction equipment such as loaded trucks, jack hammers, and small bulldozers may temporarily increase groundborne vibration or noise at the project site. The vibration level of construction equipment, measured as peak particle velocity (PPV) at the nearest sensitive receiver (140 feet) is at most 0.006 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings, and 57 vibration decibels (VdB), which is less than the FTA threshold for human annoyance of 80 VdB. Vibration impacts from the Approved Project would therefore be less than significant. Operation of the Approved Project would not involve significant sources of groundborne vibration or groundborne noise. Thus, operation of the Approved Project would result in a less than significant impact.

The nearest airport is Fullerton Municipal Airport, whose nearest runway is approximately three miles southeast of the project site. The project site is outside the boundaries of the Fullerton Municipal Airport Land Use Plan (Orange County Airport Land Use Commission, 2004, Figure 1). Therefore, the Approved Project would not expose people residing or working in the project area to excessive noise levels from airport operations and no impact would occur.

5 This criterion was used in the IS/MND for the Approved Project. It is commonly used in CEQA noise evaluations, although it is not established by State of California or City of La Mirada regulations.

Impact Analysis

The proposed project (site cleanup and haul away) would require the operation of construction equipment associated with excavation of the project site and operation of haul-away trucks. It would not result in new operational noise impacts.

The types and numbers of pieces of equipment to be deployed for implementing the RAW were determined as part of the air quality and greenhouse gas emissions analyses for this project.[6] Equipment characteristics are shown in **Table 5.1-7**. For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated percentage of operating time that the equipment would be producing noise at the stated level.[7,8]

Table 5.1-7
Construction Equipment Characteristics

Equipment Type	No. of Pieces	Maximum Sound Level @ 50 feet (dBA)	Usage Factor
Rubber-Tired Dozers	1	79	0.40
Rubber-Tired Loaders	1	79	0.40
Tractors/Loaders/Backhoes	2	85	0.37

As discussed in **Section 3.0** of this document, as a project design feature for the proposed project, construction contracts will contain a provision that only one of the following configurations of equipment can be used for any one-hour interval:

- One rubber-tired dozer; or
- One rubber-tired loader; or
- One rubber-tired dozer plus one rubber-tired loader; or
- One backhoe

Noise exposures were estimated for the nearest residences on the north side of Foster Road and for the La Mirada Church of the Nazarene, at 15575 Foster Road, by the same methods as used for the Approved Project. In addition, this analysis accounted for noise attenuation by intervening terrain and structures, and a wall along the north side of Foster Road. **Table 5.1-8** shows the results of the analysis. Detailed results are provided in **Appendix E.**

6 See **Section 5.1.3**.
7 Equipment noise emissions and usage factors are from Knauer, H. et al. (2006), except where otherwise noted.
8 Rubber tired dozer noise emissions data are from Nugent (2015).

Table 5.1-8
Estimated Maximum One-Hour Construction Noise Exposures at Nearest Sensitive Receivers

Excavation Sites	Sensitive Receiver	Distance (feet)	1-Hour L_{eq} (dBA)		
			Existing[a]	Projected[b]	Change
EA4, EA5	Residences across Foster Road from project site	291	58.56	63.54	+4.98
EA2, EA3	La Mirada Church of the Nazarene	162	55.5	57.7	+2.2

[a]Average of four measurements for residences and two measurements for the church.
[a]Existing ambient plus contribution of construction equipment during the loudest construction phase (field reconstruction).

None of the increases in short-term exposures equals or exceeds 5 dBA L_{eq}. Therefore, noise exposures from implementation of the RAW will be less than significant.

Conclusion

The proposed project would have a less-than-significant impact regarding noise. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to noise, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.14 Population and Housing

The IS/MND for the Approved Project concluded that the project does not include a housing component or otherwise support an increase in the resident population of the City. Existing infrastructure is in place at the high school and no extension of roads is proposed. The project would not result in the loss of residences nor would it displace people. The project would not directly or indirectly induce population growth in the project area because it involves improvements to an existing high school campus. Therefore, no impact would occur.

Impact Analysis

Like the Approved Project, the proposed project would not be growth-inducing and would not result in impacts to population or housing. The proposed project would not result in impacts not previously evaluated in the IS/MND for the Approved Project. Therefore, the proposed project would have no impact regarding population and housing.

Conclusion

The proposed project would have a no impact regarding population and housing. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to population and housing, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.15 Public Services

The IS/MND for the Approved Project found that the Approved Project would not adversely affect the existing service capacity of the Los Angeles County Fire Department as little or no additional

calls for service are anticipated to be generated by project implementation. Additionally, the Approved Project would not expand the student capacity of the school nor would it result in additional seats for the football stadium. Therefore, the Approved would be within the existing capacity of the fire department and would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire department facilities. No impact would occur and no mitigation is warranted.

The Approved Project would not adversely affect existing service capacity of the Los Angeles County Sheriff's Department because scheduled activities and the level of usage of the facilities would not change compared to existing conditions. The Approved Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police department facilities and would have no adverse impacts associated with demand for police protection services. No impact would occur and no mitigation is warranted.

The Approved Project would replace existing athletic facilities related to the football stadium and would not increase seating capacity or usage levels. The Approved Project would not directly or indirectly induce population growth in the project area. Therefore, no impacts related to the provision of schools would occur.

The Approved Project includes improvements to athletic facilities related to the football stadium at an existing high school campus and would not directly or indirectly induce population growth in the project area nor would it result in substantial adverse physical impacts to parks. Therefore, no impacts would occur.

The Approved Project includes improvements to athletic facilities related to the football stadium at an existing high school campus and would not directly or indirectly induce population growth in the project area. Therefore, no impacts to other public facilities such as libraries and medical facilities would occur.

Impact Analysis

RAW implementation would not increase the numbers of persons or the total building area at the school. Demands for public services facilities are generated by the population and the total building area in the affected service areas (fire protection and police protection); the numbers of households in the affected service areas (schools); and the population in the affected service areas (parks and libraries). Therefore, the proposed project would not result in any impacts on local public services such as fire protection, police protection, schools, or other public facilities (such as libraries or medical facilities). The proposed project would not create an increased demand for fire, police, school or public facilities usage and therefore would have no impact on public services.

Conclusion

The proposed project would have a no impact regarding public services. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to public services, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.16 Recreation

The increase in use of recreational facilities is generated by population growth. The Approved Project would not directly or indirectly induce any population growth in the project area. The Approved Project proposes a new football stadium and associated improvements at the high school, which would meet the needs of the high school and allow them to practice at the high school instead of offsite. Therefore, there would be no adverse impact on existing neighborhood or regional parks and facilities. The Approved Project would replace components of the football field as well as the following additional recreational improvements at the La Mirada High School: construction of new home and visitor bleachers, field lighting, a scoreboard, synthetic turf, synthetic track, jump/pole vault venues, and home and visitor field houses. Construction and operation of the new football stadium would comply with federal, state, and local requirements. As discussed in Sections 4.1-4.21 of the IS/MND for the Approved Project, no significant adverse physical effects on the environment are expected from construction and operation of the Approved Project. With adherence to all applicable regulations and implementation of the recommended mitigation measures, adverse physical effects on the environment from the Approved Project would be less than significant.

Impact Analysis

RAW implementation would not increase population and thus would result in no impact related to demand for recreational facilities. The proposed project would not result in impacts not previously evaluated in the IS/MND for the Approved Project.

Conclusion

The proposed project would have a less-than-significant impact regarding recreation. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. Regarding recreation, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.17 Transportation

The IS/MND for the Approved Project found that during project construction traffic flow along Foster Road has the potential to be impacted when construction work is being done in the public right-of-way for the proposed extension of existing domestic water lines, connection to existing sewer line, and fire water line connections. Preparation of a construction management plan, per mitigation measure **TRANS-1** would reduce the potential for disruptions to existing pedestrian facilities and traffic flow along Foster Road during the project construction phase. After implementation of mitigation measure **TRANS-1** the Approved Project would have less than significant construction-phase impacts on pedestrian and bicycle facilities and less than significant impacts regarding pedestrian and bicycle flow to and from the project site.

The Approved Project does not propose to increase the use of the football stadium beyond the number of athletic events which currently occur onsite. Therefore, operation of the Approved Project would not result in an increase in vehicle trips generated by the project during the operational phase. Additionally, the Approved Project would not increase the student capacity at the school nor would it increase student enrollment. Therefore, the Approved Project would have no operational traffic impacts.

The frequency and intensity of use of the Approved Project facilities will not change from the current condition, and thus there will be no change in VMT associated with the Approved Project. Additionally, the Approved Project would not increase the student capacity at the school nor would it increase student enrollment. Thus, there will be no impact or conflict with CEQA Guidelines Section 15064.3, subdivision (b).

The Approved Project would not expand the high school campus outside of its existing boundaries, which do not currently create hazards due to a geometric design or incompatible uses. Additionally, all construction would occur on the La Mirada High School campus. Therefore, the Approved Project would not substantially increase hazards due to a geometric design feature or incompatible uses. In addition to the improvements to the football field would not create any hazards or dangerous intersections. Therefore, no impact would occur in this regard from the Approved Project.

Regarding emergency access, partial lane closures may be needed along Foster Road, which could potentially impact emergency vehicle access to the project site. The construction trip generation intensities will vary based on the construction phase, truck hauling patterns, and construction employment intensities. To ensure that there would be less than significant impacts to emergency access during the construction phase of the Approved Project, mitigation measure **TRANS-1** is proposed. Mitigation measure **TRANS-1** would reduce potential impacts of the Approved Project regarding emergency access to a less than significant level because this mitigation measure requires identification of how emergency access to and around the project site will be maintained during project construction. After implementation of mitigation measure **TRANS-1**, potential impact from the Approved Project to emergency access would be reduced to a less than significant level.

Operation of the Approved Project would not alter or impact roads or sight lines. The project site including the football field, adjacent to Foster Road, has a chain link fence that is located parallel to Foster Road. Existing entrance/exit points to the project site would remain unaltered and the Approved Project would not impact the existing entrance/exit points to the football field. Therefore, operation of the Approved Project would have no impact on emergency access.

Impact Analysis

The proposed project (site cleanup and haul away) would introduce construction equipment, worker vehicles, and haul trucks during the remediation action. Activities evaluated in the CalEEMod run for the proposed project include excavation and off-site disposal/haul away of 224 cubic yards of impacted soil. Soil haul is anticipated to require one day and involve 15 dump truck trips. One-way distances from La Mirada High School to the three destination disposal facilities are:

- Antelope Valley Landfill: 81 miles
- Simi Valley Landfill: 62 miles
- Kettleman Hills Hazardous Waste Facility: 197 miles (ESRI, 2021).

Operation of construction equipment, worker vehicles, and haul trucks would be temporary, lasting approximately six workdays. The proposed project would not result in impacts not previously evaluated in the IS/MND prepared for the Approved Project.

Conclusion

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the IS/MND for the Approved Project (MM TRANS-1) would reduce impacts to a less-than-significant level. No new mitigation measures would be required. With regard to transportation, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.18 Tribal Cultural Resources

The IS/MND for the Approved Project stated that the project site has been previously disturbed. Accordingly, it is unlikely that any tribal resources exist on the site. Due to the developed nature of the project site, the school, and the surrounding area, the fact that the proposed project would require only minimal grading and excavation into previously disturbed ground, the absence of nearby recorded cultural resource sites, and the absence of traditional sites recorded in the NAHC's SLF, it is less likely that significant tribal cultural resources would be encountered during construction of the proposed project. However, any tribal cultural resources accidentally discovered during construction would be evaluated and protected in compliance with State CEQA Guidelines § 15064.5(f). Therefore, impacts from the Approved Project would be less than significant.

Assembly Bill (AB) 52 requires meaningful consultation with California Native American tribes on potential impacts on tribal cultural resources (TCRs), as defined in Public Resources Code § 21074. The District initiated AB 52 outreach to local tribes for the project. Letters were sent by Ms. Bomee Yoon, Facilities Coordinator, of the Facilities, Planning and Construction Department of the District, which is the Lead Agency, to the listed local Native American tribes asking if they wished to participate in AB 52 consultation concerning the Project. The letters were sent on December 20, 2019 to five tribes; the Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, and the Gabrielino-Tongva Tribe. The District received one reply on January 9, 2020 from Gabrieleno Band of Mission Indians - Kizh Nation's Chairman Salas that they would like to consult on the project. (There were no replies from other tribes.) The District and the Gabrieleno – Kizh Nation met several times via telephone February through June 2020 and discussed potential mitigation measures consisting of tribal monitoring during construction activities into native soil. Consultation was concluded June 26, 2020. The Gabrielino – Kizh Nation was contracted by the District to conduct tribal monitoring of construction activities.

Impact Analysis

The proposed project would be located within the previously evaluated project footprint and would not result in impacts to potential cultural resources not previously documented in the IS/MND prepared for the Approved Project.

Conclusion

The proposed project would have a less-than-significant impact regarding tribal cultural resources. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to tribal cultural resources, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.19 Utilities and Service Systems

The IS/MND for the Approved Project concluded that the project would result in a small increase in the number of plumbing fixtures; however, because the numbers of persons attending events would not change compared to existing conditions, no significant impact in water usage, wastewater generation, storm water drainage, use of natural gas, use of electricity, or use of telecommunications equipment is anticipated. The IS/MND also concluded that sufficient water supplies would be available to serve the project and reasonably foreseeable future development and that the Approved Project would have a less than significant impact regarding water supplies. The Approved Project would not produce wastewater in an amount that would have a significant impact on wastewater treatment facilities. Solid waste generated by the Approved Project during operation would be similar to existing conditions. Since sufficient permitted landfill capacity exists to support operation of the proposed project, no adverse impact on either solid waste collection service or the landfill disposal system would occur. Therefore, impacts from the Approved Project on existing solid waste disposal facilities would be less than significant.

Impact Analysis

Excavation of contaminated soils would not result in impacts not previously evaluated in the IS/MND for the Approved Project. The proposed project would have a less than significant impact regarding water usage, wastewater generation, storm water drainage and utilities. As detailed in the RAW, materials removed from impacted equipment and rinsate collected during decontamination of impacted equipment will be containerized and stored on site pending profiling and disposal. Decontamination rinsate will be appropriately disposed of upon receipt of laboratory profiling data (Ninyo & Moore, 2021, p. 26). However, the amount of water utilized to rise equipment would not require or result in the relocation or construction of new or expanded water facilities. Additionally, the amount of wastewater generated by construction personnel would not require or result in the relocation or construction of new or expanded water facilities. Therefore, based on the preceding information, the proposed project would have a less than significant impact regarding utilities and service systems.

Conclusion

The proposed project would have a less-than-significant impact regarding utilities and service systems. No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the proposed project. With regard to utilities and service systems, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.20 Wildfire

As detailed in the IS/MND prepared for the Approved Project, the project site is not located within a Fire Hazard Severity Zone State Responsibility Area (SRA). Furthermore, the project site is not located within a Fire Hazard Severity Zone Local Responsibility Area (LRA) (CAL FIRE, 2011). The project site is surrounded by urban development such as a golf course, single-family residential homes, and a school campus that are well maintained and low-risk fire hazards. Therefore, the Approved Project would not expose project occupants (i.e., those working at the project site during project operations) to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project site is relatively flat and is not located in an area with steep slopes or unstable ground conditions. Therefore, the Approved Project would not 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.

Impacts Analysis

The proposed project would have no impacts regarding wildfires. the project site is not located within a State Responsibility Area (SRA). Furthermore, the project site is not located within a Fire Hazard Severity Zone Local Responsibility Area (LRA) (CAL FIRE, 2011). The proposed project would not result in impacts not previouslyevaluated in the IS/MND prepared for the Approved Project.

Conclusion

The proposed project would have a no impact regarding wildfire. No new or substantially more severe significant impacts would occur and therefore no additional mitigation measures would be required. With regard to wildfire, there are no changes or new information requiring the preparation of an MND or EIR.

5.1.21 Mandatory Findings of Significance

With the implementation of project design feature (PDF) **BIO-1**, the Approved Project would have less than significant impacts to native bird species protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Therefore, with implementation of PDF **BIO-1**, the Approved Project would not have substantial adverse effect, either directly or through habitat modifications, to habitat, plant and wildlife species and less than significant impacts would occur.

Grading activities associated with development of the Approved Project would cause new subsurface disturbance and could result in the unanticipated discovery of unique archeological resources. Mitigation measures **CUL-1** through **CUL-3** are recommended to reduce potential impacts regarding cultural resources to a less than significant level. With implementation of mitigation measure **CUL-1** and **CUL-2**, potential impacts related to archaeological resources would be less than significant. In the unlikely event of an unexpected discovery, implementation of mitigation measure **CUL-3** and adherence to all applicable codes and regulations would ensure that impacts related to the accidental discovery of human remains would be less than significant.

Because the Approved Project would not increase environmental impacts after mitigation measures are incorporated, any incremental contribution to cumulative impacts would be negligible and would be less than significant.

As discussed in Sections 4.1 through 4.20 of the IS/MND for the Approved Project, potential impacts were found to either be no impact, less than significant impact, or less than significant after mitigation. Therefore, with the implementation of recommended mitigation measures in this document, the Approved Project would have a less than significant impact on human beings, both directly and indirectly

Impact Analysis

As described throughout **Section 5.0** of this document, the proposed project would have no new or substantially more severe significant impacts than the Approved Project and additional mitigation measures would not be required. The proposed project would incorporate mitigation measures, as applicable and described in **Section 5.0** to reduce potential impacts to a less than significant level.

The proposed project would not result in impacts not previously evaluated in the IS/MND prepared for the Approved Project.

Conclusion

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the IS/MND for the Approved Project would reduce impacts to a less- than-significant level. No new mitigation measures would be required. With regard to mandatory findings, there are no changes or new information requiring the preparation of an MND or EIR.

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