Environmental Checklist Form (Initial Study)

Los Angeles County Planning

Project title: Green Dot - Animo Compton Project
Project No. PRJ2021-002810-(2)/ Case No.(s) RPPL 2021007647

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

Contact Person and phone number: Cristina de Jesus, Ed.D/ (323) 565-1600

Project sponsor's name and address: Green Dot Public Schools California
1149 South Hill Street, Suite 600, Los Angeles, CA 90015

Project location: 900 East Rosecrans Avenue, Los Angeles, CA 90059
APN: 6137-017-001; 6137-032-033 USGS Quad: Inglewood

Gross Acreage: 4.032

General plan designation: H9 - Residential 9

Zoning: R-1 - Single-Family Residence

Description of project: The Green Dot – Animo Compton Project (hereafter referred to as "proposed project" or "project") is located at 900 East Rosecrans Avenue, at the southwest corner of East Rosecrans Avenue and South Cahita Avenue, in the unincorporated West Rancho Dominguez-Victoria neighborhood of Los Angeles County. The project site has a gross acreage of approximately 4.03 acres and a net acreage of approximately 3.63 acres. The site is currently owned and is being used by Redeemer Presbyterian Church (hereafter referred to as "Church"). The western portion of the site is developed with the Church; an annex attached to the Church that contains offices, meeting rooms, and classrooms; a standalone modular building; a standalone classroom building; and surface parking, all of which will remain on the site (i.e., Church portion). The eastern portion of the site is developed with paved surfaces and a one-story, 5,646-square-foot building that currently accommodates various additional uses, such as a multi-purpose room, a preschool, administrative uses, restrooms, a breakroom, and a servery. The project is proposed on this eastern portion of the site (i.e., School portion), totaling approximately 2.2 acres, and would not result in any changes to the Church portion. The rear area of the School portion is comprised of vacant land with a weathered playground. See Figure 1 and Figure 2 for the location of the site in a regional and local context, respectively.

The proposed project involves the development of a public charter school that would be a combined charter middle school and high school for grades 6 through 12 on 2.2 acres. The proposed project would consist of the construction of a new, 33,769-square-foot, two-story school building and the repurposing and remodeling of the existing 5,646-square-foot, one-story building. The new, two-story school building would include 26 classrooms (ranging from 728 to 750 square feet in size)

and four laboratories (779 square feet each) for a total of 30 classrooms. The remodeling of the existing one-story building would include the incorporation of administrative offices, a 2,190-square-foot multi-purpose room, and a 1,612-square-foot outdoor shade structure on the eastern side of the building. The school would have a maximum enrollment of 600 students and 45 staff members, and would operate on weekdays from 7:30 a.m. to 5:00 p.m.

The project would also provide 61 parking spaces for the school on the existing parking lot, although only 59 are required by the Los Angeles County Code. Of these 61 parking spaces, 36 would be standard parking spaces, 22 would be compact parking spaces, and 3 would be ADA-accessible parking spaces. The Church would maintain a separate 80 parking spaces at the same parking lot. Additionally, the project would provide 120 uncovered, "U-racks on rails" bicycle parking spaces (short-term parking), and 3 permanently attached bicycle lockers (long-term parking). Access to the parking lot is provided off East Rosecrans Avenue (local access). As part of project operations and to facilitate access to the parking lot, Green Dot Public Schools California would distribute materials to parents/caregivers that detail drop-off/pick-up procedures on a bi-annual basis. Figure 3 includes the proposed site plan and access points.

Construction: Project construction is expected to commence in January 2024 and is anticipated to end in January 2025, for a total construction period of approximately 12 months. The project would require cut of 1,055 cubic yards of soil, in which 715 cubic yards of soil would be redistributed on-site and the remaining 340 cubic yards of soil would be exported off-site.

Surrounding land uses and setting: The area surrounding the site is comprised of a mixture of industrial, commercial, and residential uses. The site is bound by East Rosecrans Avenue to the north with industrial and commercial uses beyond located in the City of Compton. As shown in Figure 2, the site's southern, western, and most of the eastern property lines are not immediately bound by the surrounding roadways (i.e., East 145th Street, South Clymar Avenue, and South Cahita Avenue). Rather, a majority of the site is bound by single-family residences to the east, south, and west. Table 1 summarizes the surrounding land uses and zoning with respect to the project site.

Table 1 Surrounding Land Uses and Zoning

	Jurisdiction	Land Use	Zoning
Project Site	**Los Angeles County**	**H-9 (Residential 9)**	**R-1 (Single-Family Residence)**
North	City of Compton	MH (Heavy Manufacturing)	MH (Heavy Manufacturing)
South	Los Angeles County	R-1 (Single-Family Residence)	R-1 (Single-Family Residence)
East	Los Angeles County	R-1 (Single-Family Residence)	R-1 (Single-Family Residence)
West	Los Angeles County	R-1 (Single-Family Residence)	R-1 (Single-Family Residence)

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

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

Yes. Correspondence was sent by mail by the Los Angeles County Planning ("County Planning") on March 30, 2023, to the following tribal entities:

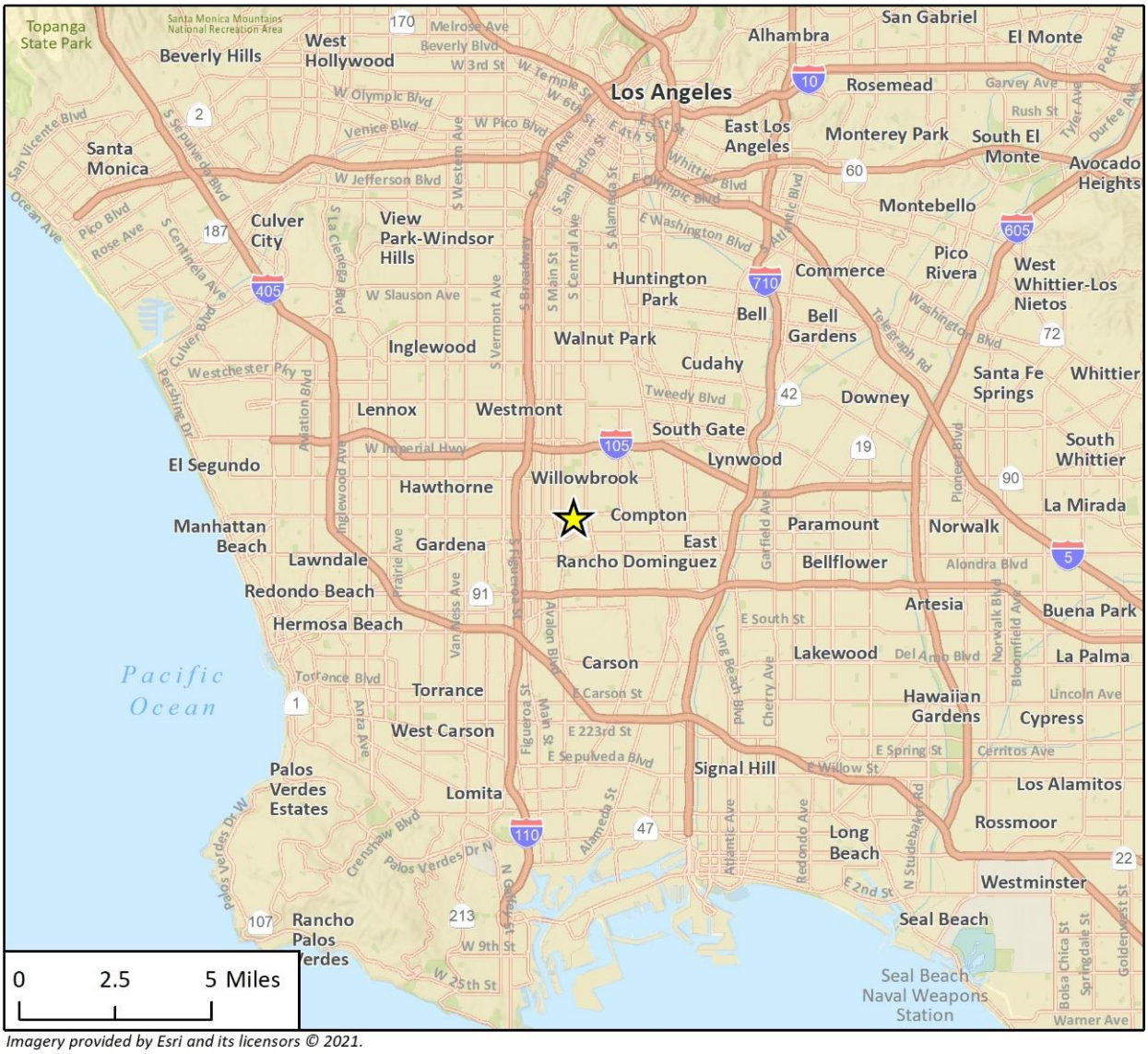
The Gabrielino Tongva Indians of California
San Manuel Band of Mission Indians
Gabrielino Tongva – San Gabriel Band of Mission Indians
Gabrieleno Band of Mission Indians – Kizh Nation
Band of Mission Indians Chumash
Fernañdeno Tataviam Band of Mission Indians

Please refer to the response to checklist item 18, for the results of this notification effort.

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

Public Agency	*Approval Required*
Los Angeles Regional Water Quality Board	NPDES General Construction Permit

Figure 1 Regional Location



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Project Location

N

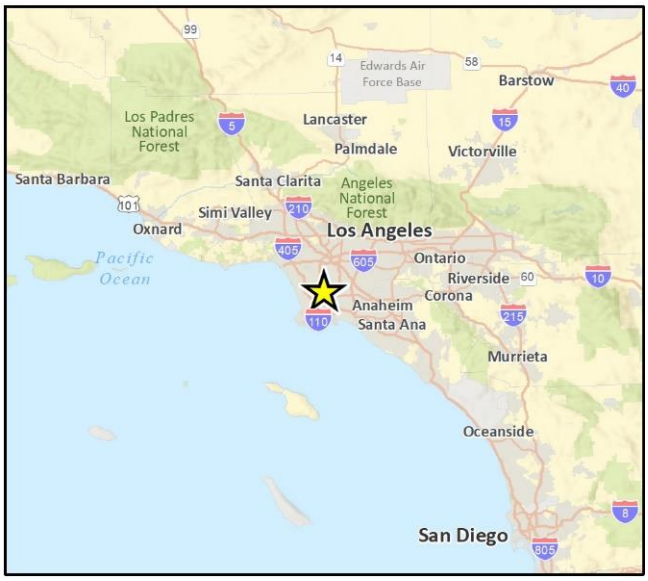

Fig 1 Regional Location

Revised 08/24/22

Figure 2 Project Site

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Fig 2 Project Location

Figure 3 Proposed Site Plan

Reviewing Agencies: [*See CEQA Appendix B to help determine which agencies should review your project*]

Responsible Agencies

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

Special Reviewing Agencies

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

Regional Significance

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

Trustee Agencies

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

County Reviewing Agencies

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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

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

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

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

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

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

_____ _____

Signature (Prepared by) Date

_____ _____

Signature (Approved by) Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

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

Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and focal views (visual access to a particular object, scene, or feature of interest). The project site is located in a developed, urban area in the West Rancho Dominguez-Victoria neighborhood of the County of Los Angeles. The site is flat and existing views are characterized by the surrounding by industrial, commercial, and residential uses. Due to the relatively level topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views in the project area. Therefore, the project would not be visible from or obstruct views from a scenic vista. No impact would occur.

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

The closest trail is the Rio Hondo River Trail located approximately 7.5 miles to the northeast of the project site. Due to distance and relatively level topography of the project area, the project would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail. No impact would occur.

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

There are two officially designated State scenic highways in Los Angeles County. This includes State Route 2 (SR-2; Angeles Crest Highway) approximately 24 miles north of the project site and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 21 miles northwest of the project site (California Department of Transportation [Caltrans] 2019). The project site is not visible from either designated scenic highway, and it is not located within a separate scenic corridor. According to Caltrans' State Scenic Highway System Map, the project site is nearest to State Route 1 (SR 1), which is an eligible (not designated) State scenic highway located approximately 10.2 miles southeast of the project site. The project site has been previously disturbed and does not contain any scenic resources, including protected trees, rock outcroppings, or historic buildings. As discussed in Section 3, *Biological Resources*, none of the seven trees to be removed are County-protected trees. Furthermore, as discussed in Section 4, *Cultural Resources*, the existing building that would be remodeled as part of the project does not qualify as a historic resource under CEQA. No impact would occur.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with	☐	☐	☒	☐

applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)

The project would involve construction of a new 33,769-square-foot, two-story school building and the repurposing of the existing 5,646-square-foot, one-story building. The one-story building under the project would retain a similar educational use when compared to existing operations since it would still accommodate administrative spaces and a multi-purpose room. Although the proposed two-story school building would be constructed on a currently undeveloped area of the site, the building would be similar in scale to the existing Church structures, which are between one- and two stories in height. Furthermore, as shown in Figure 3, the proposed two-story building would be tucked within the site behind existing structures and would not substantially degrade the existing visual character or quality of public views of the site. In addition, the project would construct minor landscaping and incorporate aesthetic improvements to enhance public views of the site. The project would include the planting of nine new trees at the northern and eastern boundaries of the site with public visibility from East Rosecrans Avenue and South Cahita Avenue. Therefore, impacts would be less than significant.

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

The project would operate on weekdays from 7:30 a.m. to 5:00 p.m. and would not generate sources of daytime or nighttime light and glare affecting views. The site is in an urban area where there are moderate to high levels of sources of glare (e.g., sun's reflection of building windows and vehicles surfaces) and ambient lighting, including street lighting, vehicle headlights, architectural and nighttime security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas.

Artificial light impacts are largely a function of proximity and timing. Because the project is in an urban area, light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the project site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect. At operation, the project would include indoor lighting in the school and other amenity areas as well as exterior lighting and signage. However, the proposed school would not include sports fields with potential for evening or nighttime events requiring substantial lighting. Therefore, exterior lighting at nighttime would be primarily for security purposes but would not be so bright as to cause substantial light to spill off the site. Proposed exterior lighting would also be subject to applicable regulations contained within the Los Angeles County Code.

As with existing lighting, existing glare in the project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off reflective materials utilized in buildings and from vehicle windows and other surfaces. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets would be temporary, and continuously changing with the movement of the sun throughout the course of the day and the seasons of the year. Therefore, glare impacts are not expected to be substantial or to adversely affect day or night views. Light and glare impacts would be less than significant.

2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

The proposed project consists of the construction of a public charter school on 2.2 acres of land within a developed area comprised of industrial, commercial, and residential uses. According to the Department of Conservation's (DOC) Important Farmland Finder, the project site and surrounding uses are classified as Urban and Built-Up land (DOC 2022a). Therefore, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). No impact would occur.

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

The project site, and immediate surrounding areas to the east, south, and west, contain land use and zoning designations that allow for single-family residential uses. The project site and the adjacent area are not subject to a Williamson Act contract, and the project has no potential to conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	☐	☐	☐	☒

The project site is not zoned as forest land, timberland, or Timberland Production. Additionally, the surrounding area does not include any forest land, timberland, or Timberland Production land (County of Los Angeles 2022a). Therefore, the project has no potential to conflict with existing zoning for forest land, Timberland or Timberland Production. No impact would occur.

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

The project site is not designated as forest land nor does it contain forest land. Therefore, the project has no potential to lose forest land or convert forest land into non-forest uses. No impact would occur

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

As discussed under impacts a) and c) of this section, the project is not considered Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) nor does it contain forest land. Therefore, the project would not result in the conversion of Farmland to non-agricultural uses or conversion of forestland to non-forest use. No impact would occur.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

An Air Quality and Greenhouse Gas Emissions Study was prepared for the project by Rincon Consultants, Inc. (Rincon) in August 2023 to analyze the project's air quality impacts related to both temporary construction activity and long-term operation of the project. The Study is included as Appendix A and its findings are summarized in this section. See Appendix A for full modeling methodology and modeling outputs.

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

The project is not located within the AVAQMD but rather the SCAQMD. A project may be inconsistent with the SCAQMD Air Quality Management Plan (AQMP) if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, economy, community development, and environment. With regard to air quality planning, SCAG has prepared the 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy (2020-2045 RTP/SCS, or Connect SoCal), a long-range transportation plan that uses growth forecasts to project trends for regional population, housing and employment growth out to 2045 to identify regional transportation strategies to address mobility needs. These growth forecasts form the basis for the land use and transportation control portions of the 2022 AQMP (Rincon 2023).

The growth forecasts in SCAG's 2020-2045 RTP/SCS estimate that the population of the unincorporated County will be 1,258,000in 2045, an increase of 213,500 people from a population of 1,044,500 in 2016. The proposed project would involve the development of a public charter school for a maximum enrollment of 600 students and 45 staff members, including the repurpose and remodel of the existing one-story building to accommodate administrative offices and a multi-purpose room, the installment of a shade structure on the eastern side of the existing building, and the new construction of a two-story, 33,769-square-foot classroom building consisting of 26 classrooms (ranging from 728 to 750 square feet in size) and four laboratories (779 square feet each), with a student and staff restroom on each floor. The proposed project would not directly increase the County's population because no new housing is proposed, and the purpose of this facility is for educational use (Rincon 2023).

As shown in Table 2 and Table 3 under impact b) of this section, the project would not generate criteria pollutant emissions in excess of SCAQMD thresholds for ozone precursors (volatile organic compounds [VOC] and nitrogen oxide [NO_X]) or particulate matter with diameters of 2.5 microns or less ($PM_{2.5}$) (Rincon 2023). The project would be consistent with the AQMP and would not conflict with or obstruct the applicable air quality plan. Therefore, no impact would occur.

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

The Los Angeles County portion of the South Coast Air Basin (SCAB) is designated nonattainment for the national ambient air quality standards (NAAQS) for ozone, $PM_{2.5}$, and lead, as well as the California ambient air quality standards (CAAQS) for ozone, particulate matter with diameters of 10 microns or less (PM_{10}), and $PM_{2.5}$. The proposed project does not include any stationary sources of lead emissions (Rincon 2023). Therefore, implementation of the project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis. The following discussion assesses potential air quality impacts related to construction and operational emissions of criteria air pollutants for which the SCAB is in non-attainment, including ozone, PM_{10}, and $PM_{2.5}$.

Construction Impacts

The estimated maximum daily emissions of pollutants associated with construction of the proposed project are summarized in Table 2. As shown in the following table, emissions of VOC, NO_X, carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, and $PM_{2.5}$ would not exceed the applicable SCAQMD regional thresholds. Because air pollutant emissions generated by project construction would not exceed SCAQMD's regional significance thresholds, and project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. Impacts would be less than significant.

Table 2 Project Construction Emissions

	Maximum Emissions (lbs./day)					
Year	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2024	2	17	16	<1	4	2
2025	14	18	25	<1	2	1
Maximum Daily Construction Emissions	**9**	**23**	**30**	**<1**	**4**	**2**
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

VOC = volatile organic compounds; NO_x = Nitrogen oxides; NO_2 = Nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$ = particulate matter measuring 2.5 microns in diameter or less

Notes: All emissions modeling was completed using the California Emissions Estimator Model (CalEEMod). See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulatory compliance measures. Emissions presented are the highest of the winter and summer modeled emissions.

Operational Impacts

Table 3 summarizes the project's operational emissions by emission source. The majority of project-related operational emissions would result from vehicle trips to and from the site. As shown in the following table, operational criteria pollutant emissions would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Table 3 Project Operational Emissions

	Maximum Daily Emissions (lbs/day)					
Emission Source	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	3	3	31	<1	7	2
Total Project Emissions	**6**	**3**	**35**	**<1**	**7**	**2**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_x = Nitrogen oxides; NO_2 = Nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$ = particulate matter measuring 2.5 microns in diameter or less

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results that include compliance with regulatory compliance measures. Emissions presented are the highest of the winter and summer modeled emissions.

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

Localized Carbon Monoxide Hotspot Impact

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the NAAQS one-hour standard of 35 parts per million (ppm), the CAAQS one-hour standard of 20 ppm, or the NAAQS and CAAQS eight-hour standard of 9 ppm (CARB 2016; Rincon 2023).

The SCAQMD conducted a detailed carbon monoxide analysis for the SCAB during the preparation of the 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB that would be expected to experience the highest carbon monoxide concentrations. The highest carbon monoxide concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate 405 (I-405), which had an ADT of approximately 100,000 vehicles per day. The one-hour concentration of carbon monoxide at this intersection was 4.6 ppm, which is well below the one-hour NAAQS of 35 ppm and the one-hour CAAQS of 20 ppm.

Furthermore, the SCAB has been in attainment of the carbon monoxide NAAQS and CAAQS since 2007 (SCAQMD 2016; Rincon 2023).

SCAQMD monitoring station in SRA 12 (South Central LA County) reports CO emissions data and reports maximum one-hour and eight-hour CO concentrations. In 2021, the monitoring station reported maximum one-hour and eight-hour concentrations of 4.3 ppm and 3.7 ppm, respectively (SCAQMD 2023b). These are well below the respective one-hour and eight-hour standards of 20 ppm and 9 ppm. Given the ambient concentrations, which include mobile as well as stationary sources, a project in the SCAB would need to emit concentrations five times the hourly maximum ambient emissions for all sources near the South Central LA County station before project emissions would exceed the one-hour standard. Additionally, the project would need to emit three times the daily average for ambient concentrations near the monitoring station within eight hours to exceed the eight-hour standard. Typical development projects would not emit the levels of CO necessary to result in a localized hot spot. Therefore, the project would not expose sensitive receptors to substantial concentrations of CO, and no impact would occur.

Localized Significance Thresholds

The *Final LST Methodology* was developed to be used as a tool to analyze localized impacts associated with project-specific level proposed projects. If the calculated emissions for the proposed construction or operational activities are below the localized significant threshold (LST) emission levels found on the LST mass rate look-up tables (Appendix C of *Final LST Methodology*; SCAQMD 2009) and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant for air quality. The project analysis assumes the main construction and operational activity would be adjacent to single-family residences. Following SCAQMD methodology, the allowable emission for project utilizes the two-acre site with a 25-meter receptor distance, and the project is in SRA 12 (South Central LA County). Table 4 summarizes the project's maximum localized daily construction emissions from the proposed project. As shown therein, localized construction emissions would not exceed SCAQMD LSTs.

Table 4 Project LST Construction and Operational Emissions

	Pollutant (lbs./day)			
Year	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Construction Onsite Emissions	18	21	4	2
SCAQMD LST	36	346	7	3
Threshold Exceeded?	**No**	**No**	**No**	**No**
Maximum Operational Onsite Emissions	<1	4	<1	<1
SCAQMD LST	36	346	2	1
Threshold Exceeded?	**No**	**No**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NOx = nitrogen oxide; CO = carbon monoxide; PM10 = particulate matter with a diameter no more than 10 microns; PM2.5 = particulate matter with a diameter no more than 2.5 microns; SOx = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum onsite emissions are the highest emissions that would occur on the project site from onsite

sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Source: CalEEMod worksheets in Appendix A, see Table 3.1 – 3.12 "Construction Emission Details" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the project's potential to result in impacts related to TAC emissions during construction and operation.

Construction-related activities would result in temporary project-generated diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Generation of DPM, which was identified as a TAC by CARB in 1998, from construction projects typically occurs in a single area for a short period. The proposed project's construction would occur in phases over approximately 13 months with sensitive receptors adjacent to the project site. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, and a more extended exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a more extended period.

The proposed project would be consistent with the applicable AQMP requirements and control strategies intended to reduce emissions from construction equipment and activities. The proposed project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. However, given the construction area's proximity to nearby sensitive receptors on-site particulate matter emissions during grading and site preparation could result in potentially significant TAC emissions. Mitigation Measure AQ-1 would implement construction measures such as use of Tier 4 engines, which would reduce impacts to a less than significant level.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommended buffer distances between sensitive land uses and potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The project would not be located within the recommended siting distances for prominent TAC sources identified above. In addition, education land uses are not considered land uses that generate substantial TAC emissions based on reviewing the air toxic sources listed in CARB's guidelines. Therefore, the expected hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. The project would not expose off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Therefore, impacts associated with operational TACs would be less than significant.

With incorporation of the following Mitigation Measure AQ-1, the project would reduce DPM emissions by approximately 81 to 96 percent as compared to standard CalEEMod assumptions

for engine tier. With these reductions, toxic air contaminant concentrations at sensitive receptors would not be substantial, and construction-related health impacts would be less than significant.

Mitigation Measure

AQ-1 Construction Emissions Reduction

Prior to issuance of grading permits, the County shall confirm that the grading plan, building plans, and specifications stipulate that the following measures shall be implemented:

- All mobile off-road equipment (wheeled or tracked) used during construction activities shall meet the U.S. Environmental Protection Agency Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.
- Alternative fuel (natural gas, propane, electric, etc.) construction equipment shall be incorporated where available. These requirements shall be incorporated into the contract agreement with the construction contractor. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.
- Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.
- The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction.

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

The project would generate oil or diesel fuel odors during construction from equipment operations. These odors would be limited to the temporary construction period and would dissipate rapidly with distance. With respect to odors generated by project operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Educational uses are not identified on this list. In addition, the project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the proposed project would not generate other emissions, such as those leading to odors, affecting a substantial number of people (Rincon 2023). There would be no impact.

4. BIOLOGICAL RESOURCES

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

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These Acts afford protection to both listed species and those that are formal candidates for listing. The federal Bald and Golden Eagle Protection Act also provides broad protections to both eagle species that in some regards are similar to those provided by ESA. In addition, the CDFW Species of Special Concern, CDFW California Fully Protected Species, USFWS Birds of Conservation Concern, and CDFW Special Status Invertebrates are all considered special-status species. In addition to regulations for special-status species, most native birds in the United States (including non-status species) are protected by the federal Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Game Code (CFGC) (i.e., Sections 3503, 3503.5 and 3513). Under these laws, deliberately destroying active bird nests, eggs, and/or young is illegal. Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (Inventory) with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA.

There are two threatened bird species that could occur on site including the coastal California gnatcatcher (*Polioptila californica californica)* and the western snowy plover (*Charadrius nivosus nivosus)* (USFWS 2022a). In addition, there is the possibility that the candidate species, monarch butterfly (*Danaus plexippus*), could be found on site. The coastal California gnatcatcher nor western snowy plover are not likely to be found within the project site due to the existing development and the lack of suitable habitat. The absence of coastal sage scrub at the project site, the gnatcatcher's primary habitat, and the absence of sandy beach/dry salt flats at the project site, the western snowy plover's primary habitat, further diminishes the likelihood of encountering such birds. Monarch butterflies live mainly in prairies, meadows, grasslands and along roadsides (National Park Service 2022). Notably, monarch butterflies living west of the Rocky Mountain range overwinter in California along the Pacific coast, where microclimatic conditions are similar to that in central Mexico, typically seeking roosts in eucalyptus tree groves, Monterey pines, and Monterey cypresses. None of these tree types are currently found on the site, diminishing the potential for encountering these butterflies. No endangered, threatened or candidate plant species are known to occur on site (USFWS 2022a).

As the project site is currently developed, it does not provide suitable habitat for any special-status wildlife species, and the level of disturbance on the site precludes the presence of special-status plant species, as only ornamental plants are present on site.

However, there is the potential for nesting bird species, which are protected under the MBTA, to use trees located on or in the vicinity of the project site during the nesting season. Construction could result in damage or destructions of nests, which would result in a substantial adverse effect to these species. Therefore, to reduce potential impacts to raptors and migratory and nesting birds, Mitigation Measure BIO-1 would be required.

With the implementation of Mitigation Measure BIO-1, the proposed project would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species. Impacts would be less than significant with mitigation.

Mitigation Measure

BIO-1. Nesting Bird Avoidance

Project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (California Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the applicant shall:

a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
b) If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
c) Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest, or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
d) The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and federal laws pertaining to the protection of native birds. Such record shall be submitted to the County and received into the case file for the associated discretionary action permitting the project.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	☐	☐	☐	☒

Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, or riparian habitat. These habitats are protected under federal regulations such as the Clean Water Act; state regulations such as the Porter-Cologne Act, CDFW

Streambed Alteration Program, and CEQA; or local ordinances or policies such as city or county tree ordinances, special habitat management areas, and general plans.

There are no native vegetation communities, drainages, or wetlands present on the project site (USFWS 2022b). As these habitat and community types are not present on site, project construction would not directly impact sensitive natural communities (e.g., riparian habitat) identified in local or regional plans, policies, regulations or by CDFW or USFWS. No impact would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☐ ☒

As discussed under impact b) of this section, the project site is not located near, nor does it contain any wetland or riparian habitat (USFWS 2022b). Therefore, the project would have no impact on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means. No impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☐ ☒

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and breeding areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

The project site is located in a developed, urban area in the West Rancho Dominguez-Victoria neighborhood of the County of Los Angeles. The project site is currently developed with an existing one-story building and fencing, which act as barriers to wildlife movement through the site, and is surrounded by industrial, commercial, and residential uses. Furthermore, the CDFW Biogeographic Information and Observation System (BIOS) does not identify any mapped essential habitat connectivity areas or natural landscape blocks at or near the project site (CDFW 2022). Therefore, the project would not substantially interfere with movement of resident or migratory fish or wildlife, nor impede the use of wildlife nursery sites. No impact would occur.

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

The project site does not contain oak woodlands or other unique native woodlands. The site contains landscape ornamental trees, described further under impact f) of this section. Therefore, the project would not convert oak woodlands or other unique native woodlands and no impact would occur.

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

As discussed under impact g) of this section, the project site is not included in any Habitat Conservation Plans, Natural Community Conservation Plans, Wildflower Reserve Areas, or SEA. The proposed project is in a highly developed area and the nearest SEA to the project is Harbor Lake Regional Park, located 8.4 miles to the southwest.

The Los Angeles County Oak Woodlands Conservation Management Plan and California state law protect oak woodlands, while the Oak Tree Ordinance (Section 22.56.2050 of the Los Angeles County Code) protects individual oak trees. Additionally, the Protected Tree Ordinance protects oak trees (*Quercus* sp.), southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) that measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree. Per the CNPS, the project site does not contain any protected trees or coastal resources. According to project plans, project construction would include removal of seven on-site trees, consisting of four fern pines (*Podocarpus gracilior*), one jacaranda (*Jacaranda acutifolia*), one California pepper tree (*Schinus molle*), and one Mexican fan palm (*Washingtonia robusta*). Therefore, the project would not conflict with any local policies or ordinances protecting biological resources and no impact would occur.

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

The County's primary mechanism to conserve biological diversity is an identification tool and planning overlay called SEA, which are ecologically important land and water systems that are valuable as plant and/or animal communities, often integral to the preservation of threatened or endangered species, and conservation of biological diversity in the county. These areas also include nearly all of the wildlife corridors in the county, as well as oak woodlands and other unique and/or native trees (County of Los Angeles 2022b). As discussed under impacts d) and e) of this section, the project site is not within a wildlife corridor and does not contain oak woodlands or other unique native woodlands. The project site is also not located in an area identified in a Habitat Conservation Plan or a Natural Community Conservation Plan, or an SEA. The proposed project is in a highly developed area and the nearest SEA to the project is Harbor Lake Regional Park, located 8.4 miles to the southwest. Therefore, no impact would occur.

5. CULTURAL RESOURCES

A Cultural Resources Technical Memorandum was prepared for the project by Rincon in July 2021 and includes the results of a cultural resources records search, Sacred Lands File Search, and cultural resources site inspection. The Memorandum is included as Appendix B and its findings are summarized in this section. See Appendix B for the full records search results and Memorandum.

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

A search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) was completed on June 28, 2021. The search was performed to identify all previously recorded cultural resources, as well as previously conducted cultural resource studies, within the project site and a 0.5-mile buffer surrounding it. The CHRIS search included a review of the National Register of Historic Places, the CRHR, the Office of Historic Preservation Historic Properties Directory, the California Inventory of Historic Resources, and the Archaeological Determinations of Eligibility list. The SCCIC records search identified a single previously conducted cultural resource study within a 0.5-mile radius of the project site. This cultural resources study (identified as LA-01290) evaluated the Compton Co-generation Plant and did not include the project area.

The SCCIC record search also identified a single previously recorded cultural resource within a 0.5-mile radius of the project site. This cultural resource (identified as P-19-190179) represents the McKinley Elementary School and is located approximately 400 feet southwest of the project site (Rincon 2021). Therefore, the project has no relationship to either previously conducted cultural resources study or recorded cultural resource.

For a building to qualify as a historical resource under CEQA, it must possess significant associations within a defined historic context and retain sufficient historic integrity to convey those significant associations. A review of historic newspapers and online historic repositories failed to reveal consequential information related to the site's history and failed to indicate any documented association with events significant to our past. According to historic aerials and available Sanborn maps, the area was generally not very developed before the 1950s with sparse wood frame structures mostly related to agricultural activities. The project site was a formerly a portion of the Palmers' Guernsey Dairy before being developed. In 1956, the project site became the location of the Redeemer Presbyterian Church. The accessory structures are non-historic prefabricated storage buildings that were added to the site in 2000 and 2002, respectively. The western portion of the site includes a church building, formerly located in Hawthorne and moved to its current location by Redeemer Presbyterian Church in 1980. Buildings that have been moved from their original locations are generally not eligible for listing as historic resources (Rincon 2021).

Although the project site is located in the unincorporated West Rancho Dominguez-Victoria neighborhood of Los Angeles County, the City of Los Angeles' citywide historic resources SurveyLA provides historic context statements and an evaluative framework which is generally

applicable to the subject property.[1] Following the methodology and framework provided for under the historic context *Public and Private Institutional Development, 1850-1980* under the theme of *Religion and Spirituality, 1850-1980* and sub-theme of *Religious Property Types, 1850-1980*, a religious property type constructed during this era must retain integrity of location, design, and association to be eligible as a historical resource (Rincon 2021).

Location is the particular point or position where the historic property was constructed. Located at the corner of East Rosecrans Avenue and South Cahita Avenue, fronting South Clymar Avenue, the building at 900 East Rosecrans Avenue is in its historic location and retains integrity of location. Design is the combination of elements that creates the form, plan, space, structure, and style of a property and reflects its historic function. The building was significantly modified over time and its initial function as a church was subsumed by the adjacent church, relocated to the site from Hawthorne in 1980. At that time, the building began to be used as a preschool. The building was significantly altered with the addition of Molbon Hall in the early 1970s and updates to the exterior materials, including the addition of the brick façade and updated stucco exterior in the 1980s. The cumulative effect of these changes resulted in loss of the building's original design and it no longer retains integrity of design. Feeling is a property's expression of aesthetic of historic sense of a particular period of time. To have the aspect of feeling, physical features that express the historic character must remain. The effects of the alterations described have removed any features that express the building's historic character, and, therefore, the building no longer retains integrity of feeling. Association, or the direct link between an important historic event or person and a historic property, is also insufficient. There does not appear to be a relationship between the building and a historic event; therefore, it lacks integrity of association (Rincon 2021). Considering the existing building does not retain sufficient integrity, does not appear eligible for listing in the CRHR, and is not considered a historic resource for the purposes of CEQA, no impact to a historic resource would occur.

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

A Rincon Archaeologist, Pedro Gonzalez, conducted a field visit to the project site on June 30, 2021. The archaeologist surveyed the approximately 1.8 acres parcel that contains the project site using transects spaced no more than 10 meters apart. The archaeologist examined exposed ground surface for the following: artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were inspected visually. Results of the field survey identified no evidence of archaeological remains within the project site. However, there remains the unlikely chance that previously unknown archaeological resources could be found during ground-disturbing activities associated with construction of the project. Implementation of Mitigation Measure CUL-1 would reduce potential impacts to archaeological resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

CUL-1: Unanticipated Discovery of Archaeological Resources

[1] The City of Los Angeles has an active citywide survey program to identify and evaluate historic resources for long-term planning purposes. Known as SurveyLA, the citywide historic resources survey organizes projects by Community Planning Areas and uses multiple-property document driven historic context statements.

If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (as codified in 36 Code Federal Regulations Part 61) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation, Native American consultation, and archaeological monitoring may be warranted to mitigate any significant impacts.

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

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer.

Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

According to the geologic map of Saucedo et al. (2016), the project site is underlain by a single geologic unit, Quaternary older alluvium. A Geotechnical Investigation Report conducted for this project also observed artificial fill in their test borings within the project site (LK Geotechnical Engineering, Inc. [LK GE] 2021).

Artificial fill was found from the surface to a depth of 1 to 2 feet in the two test borings made for the geotechnical report (LK GE 2021). Artificial fill consisted of brown sandy clay. Artificial fill was deposited by humans; therefore, it has no paleontological sensitivity.

Quaternary older alluvium consists of moderately consolidated, poorly sorted, gravel, sand, silt, and clay, and is late to middle Pleistocene in age (Saucedo et al. 2016). According to the geotechnical report, the alluvium underlying the project site consisted of brown, poorly graded,

sandy clay to silty sand (LK GE 2021). Pleistocene-aged alluvial sediments have produced scientifically significant paleontological resources throughout the Los Angeles Basin, including taxa such as mammoths (*Mammuthus*), ground sloths (*Paramylodon, Megalonyx*), dogs (*Canis, Urocyon*), horse (*Equus*), rodents, birds, and reptiles (Jefferson 2010; Paleobiology Database 2022). Given this fossil-producing history, Quaternary older alluvium has a high paleontological sensitivity.

Ground disturbing activities in previously undisturbed sediments with high paleontological sensitivity (i.e., Quaternary older alluvium) may result in significant impacts to paleontological resources. The project would require up to 1,055 cubic yards of sediment to be excavated. The geotechnical report identified an approximately 1- to 2-foot-thick layer of artificial fill (with no paleontological sensitivity) in the project site (LK GE 2021). Therefore, much of this ground disturbance would affect artificial fill. However, excavations may still impact undisturbed Quaternary older alluvium, meaning that impacts to paleontological resources are potentially significant. Implementation of Mitigation Measure CUL-2 would reduce potential impacts to paleontological resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

CUL-2: Unanticipated Discovery of Paleontological Resources

> In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a Qualified Professional Paleontologist (as defined by the Society of Vertebrate Paleontology [SVP] in the 2010 *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*). The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the applicant shall retain a Qualified Professional Paleontologist to direct all mitigation measures related to paleontological resources. The Qualified Professional Paleontologist shall design and carry out a data recovery plan consistent with the SVP (2010) standards.

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

No human remains are known to exist within the project site. However, the unlikely discovery of human remains is possible during ground-disturbing activities associated with project construction. The State of California requires that ground disturbing activities cease if unanticipated human remains are unearthed, until the County Coroner has made the necessary findings as to the origin and disposition pursuant to State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. The find shall be treated in accordance with Public Resources Code Sections 5097.9 and 5097.933. Therefore, with compliance with existing regulations, impacts to humans remains would be less than significant.

6. ENERGY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

Construction Energy Demand

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions (see Appendix A for annual emissions). As shown in Table 5, project construction would require approximately 7,571 gallons of gasoline and approximately 35,762 gallons of diesel fuel.

Table 5 Estimated Fuel Consumption during Construction

Source	Gasoline	Diesel	MMBtu[1]
Construction Equipment & Hauling Trips	-	35,762 gallons	4,558
Construction Worker Vehicle Trips	7,571 gallons	-	831
Total Consumption			**5,389**

Notes: MMBtu = million metric British thermal units
[1] Energy consumption is converted to MMBtu for each source
Source: See Appendix C for energy calculation sheets.

The construction energy estimates represent a conservative estimate because the construction equipment used in each phase of construction was assumed to be operating every day of construction. Construction equipment would be maintained to all applicable standards, and construction activity and associated fuel consumption and energy use is typical for construction site and would be temporary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Gasoline consumption for the project would be attributed to the trips generated from individuals who are either working or dropping off children at the project site during normal operations and school staff and maintenance employees. The estimated number of average daily trips associated with the project is used to determine the energy consumption associated with fuel use from the operation of the project. Most of the fuel consumption would be from motor vehicles traveling to

and from the project site. Table 6 shows the estimated total annual fuel consumption of existing mobile homes and the project using the estimated trip generation and vehicle miles traveled (VMT) with the assumed vehicle fleet mix (see Appendix A for annual emissions). One gallon of gasoline is equivalent to approximately 109,786 Btu (CARB 2015), while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017).

Table 6 Estimated Project Annual Transportation Energy Consumption

Source	Annual Fuel/Energy Consumption	MMBtu[1]
Transportation Fuels[2]		
Gasoline	109,321 gallons	12,002
Diesel	18,427gallons	2,349
Other Energy		
Electricity	0.51 GWh	1,740
Natural Gas	17,804 U.S. therms	1,655
Total Consumption		17,746

Notes: MMBtu = million metric British thermal units; GWh = Gigawatt hours
[1] Energy consumption is converted to MMBtu for each source
[2] The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from operation of the project
Source: See Appendix C for energy calculation sheets.

As shown in Table 6, operation of the project would have a total energy consumption of 17,746 MMBtu. Operation of the project would increase area energy demand from greater electricity, natural gas, and gasoline consumption when compared to the operation of the existing one-story building. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project. Operation of the project would consume approximately 0.51 GWh of electricity per year. The project is located within the Southern California Edison (SCE) service area. In 2020, the most recent year with available data, SCE's electricity generation and distribution infrastructure delivered 83.5 million MWh of electricity to its customers. Commercial users consumed the most electricity supplied by the SCE in 2020 with approximately 33.2 million MWh, or 40 percent of the total electricity provided by SCE. (California Energy Commission [CEC] 2020a). SCE would have sufficient supplies for the project.

Estimated natural gas consumption for the project would be 17,804 U.S. therms, per year. The project's natural gas demand would be serviced by the Southern California Gas Company (SoCalGas). In 2020, a total of approximately 5,231 million therms of natural gas were consumed by SoCalGas' customers. Of this total, commercial customers consumed 889 million therms of natural gas, or 17 percent of the total natural gas provided by SoCalGas (CEC 2020b). SoCalGas would have sufficient supplies for the project.

The project would comply with standards set in the California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. Furthermore, California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. In addition, the Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in

wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

In conclusion, the construction of the project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Project operations would increase the consumption of fuel, natural gas, and electricity when compared to existing conditions. However, the new school facility would be developed in conformance with regulatory compliance measures and the latest version of the California's Green Building Standards Code and California's Building Energy Efficiency Standards, which include measures related to renewable energy, indoor and outdoor water use, water reuse systems, and energy efficient light fixtures. For instance, based on project plans, the roof of the new school building would include 2,717 square feet of area for solar photovoltaic (PV) systems.
Therefore, the project would have a less than significant impact.

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

Senate Bill (SB) 100 mandates the use of 100 percent clean sources for electricity for California by 2045. Because the proposed project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy sources mandated by SB 100 and would not conflict with this statewide plan. As discussed under impact a) of this section, the new school facility would be developed in conformance with regulatory compliance measures and the latest version of the California's Green Building Standards Code and California's Building Energy Efficiency Standards, which include measures related to renewable energy, indoor and outdoor water use, water reuse systems, and energy efficient light fixtures. For instance, based on project plans, the roof of the new school building would include 2,717 square feet of area for solar photovoltaic (PV) systems. Therefore, the project would have a less than significant impact.

7. GEOLOGY AND SOILS

A Geotechnical Investigation Report was prepared for the project by LK GE in May 2021 to provide an estimate of the geotechnical factors that pertain to the stability of the proposed project improvements. The Report is included as Appendix D and its findings are summarized in this section. See Appendix D for the full Report.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

Based on a review of the California Seismic Hazard Zones map, the project site is not within an Earthquake Fault Zone (DOC 2022b). The closest fault to the project site is s the Newport-Inglewood Fault, which is mapped about 0.2 miles west of the project site (LK GE 2021). Therefore, implementation of the proposed project would not result in impacts associated with Alquist-Priolo Earthquake Fault Zoning. No impact would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The southern California region is seismically active and commonly experiences strong ground shaking resulting from earthquakes along active faults. Ground shaking resulting from a moderate to major earthquake (magnitude 6.0 or greater) can be expected during the lifespan of the existing and/or proposed structures (LK GE 2021). However, as discussed under impact a.i) of this section, the project site is not within an Earthquake Fault Zone (DOC 2022b). While the project would be susceptible to seismic activity given its location within a seismically active area, standard construction of the project would minimize this risk, to the extent feasible, through compliance with the 2019 CBC standards. Therefore, impacts from seismic activities would be less than significant.

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

According to the DOC, the project site is not within a liquefaction zone (DOC 2022b). Furthermore, based on relative dense soil encountered at the site, the liquefaction potential at the site is very low (LK GE 2021). Lateral spreading is caused by the accumulation of incremental displacements that develop within liquefied soil under cyclic loading. Due to the project site's low potential for liquefaction, no impact would occur.

iv) Landslides?	☐	☐	☐	☒

The regional topographic gradient at the project site is approximately 0.5 percent toward the southwest, and, therefore, the site is relatively flat (LK GE 2021). According to the DOC, the project site is not within a landslide zone (DOC 2022b). Therefore, there would be no impact related to the exposure people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides.

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

The project has the potential to expose surface soils to wind and water erosion during construction activities, though such soil movement may be limited since the project site is relatively flat. Wind erosion impacts would be minimized through soil stabilization measures required by SCAQMD Rule 403, which includes daily watering. Furthermore, on-site construction activities would be required to comply with Chapter 12.80, Stormwater and Runoff Pollution Control, of the Los Angeles County Code. In compliance with Chapter 12.80, the project applicant would apply for coverage under the Los Angeles County National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004001, effective December 28, 2012. This general permit requires preparation of project-specific stormwater pollution prevention plans (SWPPPs), and implementation of site-specific best management practices (BMPs) to address material management, non-stormwater discharge, sediment discharge, and erosion control. Information based on the soil type, slope, and other on-site characteristics would be used to develop appropriate BMPs to ensure that erosion and sedimentation would be controlled during construction of the project. Once construction is complete, the project site would be covered by the proposed paving, landscaping, and buildings. No areas of the project site would contain exposed soils other than landscaping, thereby reducing the potential for substantial soil erosion. Therefore, the project would result in a less than significant impact.

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

Lateral spreading is characterized by landslides that occur on gentle slopes caused by earthquake-induced liquefaction. Subsidence occurs the there is a downward settling of the grounds' surface. As discussed under impact a) of this section, the project site is not subject to significant impacts related to liquefaction, lateral spreading, and landslides (DOC 2022b; LK GE 2021). No impact would occur.

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

Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, these soils could have a detrimental effect on the proposed construction.

Soils on the project site have a “medium” expansive potential. Therefore, with implementation of Mitigation Measure GEO-1, which requires that construction of the project incorporates geotechnical engineering measures (e.g., over-excavation and subgrade preparation) identified by LK GE, impacts related to expansive soils would be less than significant.

Mitigation Measure

GEO-1. Geotechnical Engineering Investigation Recommendations

> Final design for the project shall incorporate engineering recommendations based on site-specific soil investigations, and shall consider expansive, collapsible soils, protection from corrosive soils, and other applicable soil conditions. More specifically, final design shall incorporate recommendations from the *Geotechnical Investigation Report [for the] Proposed 2-story Classroom Building [located at] 900 East Rosecrans Avenue [in the] County of Los Angeles, California* prepared by LK Geotechnical Engineering Inc. dated May 28, 2021, or subsequent analysis.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

The project does not include the construction of a septic tank or restrooms that would require modification of or alternative wastewater disposal systems. The project would connect to the existing municipal sewer line. No impact would occur.

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

The project site is relatively flat and not located within a Hillside Management Area, which have 25 percent or greater natural slopes per Section 22.104.030 of the Los Angeles County Code. No impact would occur.

8. GREENHOUSE GAS EMISSIONS

An Air Quality and Greenhouse Gas Emissions Study was prepared for the project by Rincon to analyze the project's greenhouse gas (GHG) impacts related to both temporary construction activity and long-term operation of the project. The Study is included as Appendix A and its findings are summarized in this section. See Appendix A for full modeling methodology and modeling outputs.

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The following discussion assesses the project's consistency with applicable plans and policies.

2022 Scoping Plan The principal state plans and policies are AB 32, the California Global Warming Solutions Act of 2006, and the subsequent legislation, SB 32 and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT.
- Building Carbonization.
- Maximizing recycling and diversion from landfills.

The proposed project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards. In addition, the proposed project would include parking spaces with electric vehicle charging stations in accordance with CALGreen requirements and a PV system consistent with the 2022 Title 24 Standards with 2,717 square feet of area on the new school roof for solar PV systems. Furthermore, Title 24 Standards would be served by Southern California Edison, which is required to increase its renewable energy procurement in accordance with SB 100 targets. The project site would be within a half mile of Metro 125 Bus Route and of existing residential and commercial uses. Therefore, the proposed project will not conflict with the 2022 Scoping Plan.

Unincorporated Los Angeles County Community Climate Action Plan

The County adopted the County Community Climate Action Plan (CCAP) in 2015 to implement GHG reduction strategies from unincorporated County communities to at least 11 percent below 2010 levels by 2020. The project's construction and operation would occur after the covered timeline of the CCAP and the project would not tier from the CCAP, and the County has not prepared a CCAP post-2020. However, the project's consistency with applicable CCAP GHG reduction strategies goals is still analyzed in Table 7 on the following page. As shown in Table 7**Error! Reference source not found.**, the project is consistent with the applicable GHG reduction strategies in the County's CCAP.

Table 7 Consistency with Applicable County Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy/Action	Project Consistency
Land Use and Transportation	
LUT-6, Land Use Design and Density. Promote sustainability in land use design, including diversity of urban and suburban developments. This action includes approaches that encourage transit-oriented districts (TODs), infill development, pedestrian-friendly and community-serving uses near transit stops, and increased transit use.	**Consistent.** The public charter school would be developed within 0.5 mile of the nearest bus stop at East Rosecrans Avenue and North Stanford Avenue.
LUT-9, Idling Reduction Goal. Encourage idling limits of three minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications.	**Consistent.** Section 2485 in Title 13 of the California Code of Regulations limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location unless engaged in a construction activity. The project shall comply with this regulatory requirement and would encourage construction contractors to further limit idling to three minutes or less when practicable and feasible.
Land Conservation and Tree Planting	
LC-1, Develop Urban Forests. Support and expand urban forest programs within the unincorporated areas.	**Consistent.** The project would include landscaping on the site including various trees and shrubs to complement the school's appearance.
LC-2, Create New Vegetated Open Space. Restore and revegetate previously disturbed land and/or unused urban and suburban areas. This action promotes the conversion of unused urban and suburban areas to parks and forests.	**Consistent.** The project would add landscaped areas along the northern and eastern borders of the site, as well as a small, landscaped area between the two school buildings.

Source: County of Los Angeles 2015

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG's 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals. According to the 2020-2045 RTP/SCS, the updated targets for the SCAG region are 8 percent

below 2005 per capita passenger vehicle emission levels by 2020 (this value is unchanged from the previous 2020 CARB target) and 19 percent below 2005 per capita passenger vehicle emissions levels by 2035. The revised 2035 target is higher than the previous CARB target of 13 percent for the SCAG region; nevertheless, the 2020-2045 RTP/SCS is projected to achieve this target. The 2020-2045 RTP/SCS includes implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region (SCAG 2020). The project's consistency with applicable 2020-2045 RTP/SCS strategies is discussed in Table 8. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 8 Project Consistency with Applicable SCAG RTP/SCS GHG Emission Reduction Strategies

Strategy/Action	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent.** The proposed project is an infill development that would construct a new public charter school. The proposed project would be within walking and biking distance of existing residential, commercial, and recreational uses and would include bicycle parking for students and staff. In addition, the project is within 0.5-mile of bus stops for Metro bus routes 51, 52, 125 and 127. These features would incentivize the use of public transit and active transportation for traveling to and from the site. Therefore, the proposed project would focus growth near destinations and mobility options.
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based	**Consistent.** The project would include parking spaces with electric vehicle charging stations in accordance with CALGreen requirements. Furthermore, based on project plans, the roof of the new school building would include 2,717 square feet of area for solar PV systems.

system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts, Community Revitalization and Investment Authorities, or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The project would be designed and operated to meet the applicable requirements of CALGreen. The project's indoor water use would be reduced by 20 percent through the inclusion of water efficient sinks and toilets. Furthermore, energy use would be reduced by implementing the requirements of 2022 Title 24 standards, including energy-efficient lighting and appliances. Therefore, the project would support implementation of sustainability policies.
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity	**Consistent**. The project is an infill development that would involve construction of a new public charter school and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would be consistent with the County's CCAP and Title 24 including CALGreen. Furthermore, the roof of the new school building would include 2,717 square feet of area for solar PV systems. Therefore, the project would support development of a green region.

- Reduce consumption of resource areas, including agricultural land Identify ways to improve access to public park space

Source: SCAG 2020

The plan consistency analysis demonstrates that the project complies with or exceeds the requirements of policies, regulations and GHG reduction actions/strategies outlined in the 2022 Scoping Plan, the County's CCAP, and the 2020–2045 RTP/SCS. Consistency with the above plans, policies, regulations, and GHG reduction actions/strategies would reduce the project's incremental contribution of GHG emissions to a less than significant level

The following discussion assesses potential GHG impacts related to construction and operational emissions.

Construction Emissions

As shown in Table 9, construction activities for the project would generate an estimated 417 metric tons (MT) of carbon dioxide equivalent (CO2e). When amortized over a 30-year period, construction of the project would generate approximately 14 MT CO2e per year.

Table 9 Estimated Construction Emissions of Greenhouse Gases

Construction Year	Annual Emissions MT CO_2e
2022	214
2023	203
Total	417
Amortized over 30 years	**14**

Notes: See Appendix A for modeling methodology and modeling results. Some numbers may not add up precisely due to rounding considerations.

Operational and Total Project Emissions

Table 10 combines the construction and operational GHG emissions associated with development of the project. As shown, annual emissions from the proposed project would be 1,095 MT CO2e/year.

Table 10 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions MT CO_2e
Construction	14
Operation	
Area	2
Energy	170
Mobile	868
Solid Waste	37
Water	5

Net Total	1,095

Notes: See Appendix A for modeling methodology and modeling results. Some numbers may not add up precisely due to rounding considerations.

9. HAZARDS AND HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (ESA) Report was prepared for the project by NV5 Alta Environmental (NV5) in August 2020 to identify conditions indicative of releases and threatened releases of hazardous substances, pollutants, contaminants, petroleum and petroleum products, and controlled substances on, at, in, or adjacent to the site. The Report is included as Appendix E and its findings are summarized in this section. See Appendix E for the full Report.

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☐

Project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials utilized during construction of the proposed project would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Operation and maintenance of the proposed project would likely involve an incremental increase in the use of common household materials comparable to those materials already in use in the project vicinity. Cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of the building and landscaping would also be utilized in the secondary activities associated with residential uses. Additional use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	☐	☒	☐	☐

As described under impact a) of this section, construction of the proposed project would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.

As discussed in the Phase I ESA Report, no evidence of Aboveground Storage Tanks (ASTs), Underground Storage Tanks (USTs), septic tanks or other evidence of a recognized environmental condition (REC), controlled REC, or historic REC in connection with the site was identified. Furthermore, the results of the vapor encroachment screen (VES) for potential chemicals of concern did not identify evidence of a potential vapor encroachment condition (VEC) in connection with the site (NV5 2020). were observed on site. Nonetheless, due to the age of the existing one-story building to be repurposed and remodeled, there is potential for encountering lead-based paints or asbestos-containing materials (ACMs) during project construction activities. Therefore, implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce impacts related to lead-based paints and ACMs to a less than significant level.

Mitigation Measures

HAZ-1. Lead-Based Paints

Any suspect lead-based paint located within the existing one-story building shall be sampled prior to any renovations or remodeling associated with the project. Any identified lead-based paints found to be present within the one-story building, or noted to be damaged, shall be abated by a licensed lead-based paint abatement contractor, and disposed of according to all State and local regulations.

HAZ-2. Asbestos-Containing Materials

Prior to the issuance of the demolition permit, the applicant shall provide a letter from a qualified asbestos abatement consultant that no ACMs are present in the buildings. Any identified ACMs found to be present within the one-story building, shall be abated by a qualified asbestos abatement consultant in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and federal rules and regulations. All ACMs removed from onsite structure shall be hauled and disposed of by a transportation company certified to handle asbestos and hazardous materials.

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

The project site is surrounded by residential uses and construction activities would occur adjacent to the Church. Furthermore, McKinley Elementary School is located approximately 400 feet southwest of the project site. During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed under impacts a) and b) of this section, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. In addition, implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce impacts related to lead-based paints and ACMs to a less than significant level. Furthermore, operation and maintenance of the project would likely involve the use of common commercial cleaning materials comparable to those materials already in use in the site vicinity. For these reasons, emissions or hazardous materials releases near sensitive land uses would be less than significant with mitigation.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would	☐	☐	☒	☐

it create a significant hazard to the public or the environment?

The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked for known hazardous materials contamination at the project sites:

- U.S. Environmental Protection Agency
  Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/Superfund Enterprise Management System (SEMS)/Envirofacts database search

- State Water Resources Control Board (SWRCB)
  GeoTracker search for leaking underground storage tanks (LUST) and other cleanup sites

- Department of Toxic Substances Control (DTSC)
  EnviroStor database for hazardous waste facilities or known contamination sites
  Cortese List of Hazardous Waste and Substances Sites

As discussed in Phase I ESA Report, the project site itself was not identified on any database. The Phase I ESA Report did find that two adjoining properties are listed and one additional site was identified within the search radius of the proposed project; however, all sites identified are unlikely to impact the project site due to the nature of the listings, the use of the site, time that the site was listed and current listed status, the developmental density of the setting, distance, presence of intervening drainage divides and inferred ground water movement (NV5 2020). Therefore, impacts would be less than significant.

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

The closest airport to the project site is the Compton/Woodley Airport located approximately 1.3 miles to the southeast. While the site would be subject to temporary and intermittent noise from aircraft overflights, the site is not within the airport's noise contours or area of influence and would not be affected by substantial noise or other hazards from aircraft operations (County of Los Angeles 2016). No impact would occur.

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

The project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. During construction and long-term operation, the proposed project would be required to maintain adequate emergency access for emergency vehicles, as required by the County. While the existing vehicle entrance providing access to a parking area off South Cahita Avenue would be removed, the project would maintain both driveway entrances off East Rosecrans Avenue and would not require the development of additional streets or introduce new features that would interfere with or obstruct an adopted emergency response plan. Implementation of the project would increase traffic to and from the project site; however, the project site is surrounded by major roadways, including East Rosecrans Avenue, North Central Avenue, and Avalon Boulevard,

which have sufficient capacity to provide access to and from the project site. Therefore, impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?	☐	☐	☐	☒

The project would not be in or near a California Department of Forestry and Fire Protection (CAL FIRE) recommended very high fire hazard severity zone (VHFHSZ) or state responsibility area (SRA) (CAL FIRE 2022). Furthermore, the project would be required to adhere to all standards and conditions required by the Los Angeles County Fire Department (LACoFD), including, but not limited to, restrictions on project design, imposition of construction standards, and payment of impact fees. The Land Development Unit of the LACoFD Fire Prevention Division sets Fire Department conditions specifically with regards to water and access, on every land development issue within Los Angeles County (County of Los Angeles 2022c). Project design review (e.g., plan check review, fire flow availability) by the Fire Prevention Division would ensure that the project has adequate fire access and payment of development fees would contribute to fire protection in Los Angeles County overall. No impact would occur.

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

The project site is in a developed, urban area in the West Rancho Dominguez-Victoria neighborhood of the County of Los Angeles. The site is currently developed and has access to adequate water pressure. Furthermore, the project would be required to adhere to all standards and conditions required by the LACoFD, including, but not limited to, restrictions on project design, imposition of construction standards, and payment of impact fees. Project design review (e.g., plan check review, fire flow availability) by the Fire Prevention Division would ensure that the project has adequate fire access and payment of development fees would contribute to fire protection in Los Angeles County overall. Impacts would be less than significant.

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

As discussed under impact g.i.) of this section, the project would not be located in or near a CAL FIRE- identified VHFHSZ or SRA (CAL FIRE 2022). The nearest VHFHSZ is located approximately 11.3 miles to the northwest, within Ballona Wetlands Ecological Reserve. In addition, the project is in a developed, urban area with adequate emergency access and water pressures. No impact would occur.

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

The proposed project consists of the construction of a public charter school that would not include uses that constitute a potentially dangerous fire hazard. No impact would occur.

10. HYDROLOGY AND WATER QUALITY

A Hydrology/Low Impact Development (LID) Report was prepared for the project by CCE Design Associates, Inc. (CCE) in March 2023 to analyze the grading and drainage design for the project. The Report is included as Appendix F and its findings are summarized in this section. See Appendix F for the full Report.

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

The proposed project would consist of the development of a new two-story school building and the renovation of an existing one-story building. Project development would require cut of 1,055 cubic yards of soil, in which 715 cubic yards of soil would be redistributed on-site and the remaining 340 cubic yards of soil would be exported off-site. Temporary site preparation, grading, and paving activities associated with project construction may result in soil erosion that could degrade downstream water quality. However, on-site construction activities would be required to comply with Chapter 12.80, Stormwater and Runoff Pollution Control, of the Los Angeles County Code. In compliance with Chapter 12.80, the project applicant would apply for coverage under the Los Angeles County NPDES Permit No. CAS004001, effective December 28, 2012.

This general permit requires preparation of project specific SWPPPs, and implementation of site-specific BMPs to address material management, non-stormwater discharge, sediment discharge, and erosion control. Information based on the soil type, slope, and other on-site characteristics would be used to develop appropriate BMPs to ensure that erosion and sedimentation would be controlled during construction of the project. Additionally, the project would be required to comply with the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the “Los Angeles County MS4 Permit”), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. ESCPs are required to include the elements of a SWPPP.

Pursuant to Section 2.1 of the Los Angeles County Department of Public Works (LACDPW) LID Manual, as the site is a new development that disturbs over one acre and adds more than 10,000 square feet of impervious surface area, the project is defined as a Designated Project and is required to implement post-construction stormwater management control measures. Meaning that the project must retain 100 percent of the Stormwater Quality Design Volume (SWQDV) onsite through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination of the three. The Hydrology/LID Report determined that, after construction, the project would meet the requirements outlined within the LACDPW LID Manual through the inclusion of the proposed underground infiltration system (CCE 2023).

Impacts from discharge or runoff from the proposed construction activities would be minimized by implementing site-specific BMPs and the proposed underground infiltration system. Adherence to

NPDES permit requirements, LID standards and BMPs would reduce impacts to water quality standards. Impacts would be less than significant.

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

The project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. According to the Geotechnical Investigation Report, no groundwater was observed on the site to a maximum depth of 41.1 feet below existing grade (LK GE 2021). Construction of the project is not anticipated to involve ground disturbance and drilling to depths beyond 40 feet; therefore, no dewatering (i.e., removal of groundwater) during construction is anticipated. While the project would increase impervious surfaces on the site compared to existing conditions, it would retain permeable landscaped areas throughout the site. Furthermore, the project does not propose groundwater extraction during operation and would not contribute to a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

As discussed under impact a) of this section, construction activities would be required to comply with Chapter 12.80, Stormwater and Runoff Pollution Control, of the Los Angeles County Code. In compliance with Chapter 12.80, the project applicant would apply for coverage under the Los Angeles County NPDES Permit. This general permit requires preparation of project specific SWPPPs, and implementation of site-specific BMPs to address material management, non-stormwater discharge, sediment discharge, and erosion control. Information based on the soil type, slope, and other on-site characteristics would be used to develop appropriate BMPs to ensure that erosion and sedimentation on- and off-site would be controlled during construction of the project. Impacts would be less than significant.

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

As discussed under impact a) of this section, the project disturbs over one acre and adds more than 10,000 square feet of impervious surface area and is therefore required to implement post-construction stormwater management control measures pursuant to Section 2.1 of the LACDPW LID Manual. Meaning that the project must retain 100 percent of the SWQDV onsite through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination of the three. As disused in the Hydrology/LID Report, the project is designed to decrease surface runoff to the extent feasible and with the inclusion of the underground infiltration system the project would achieve 100 percent retainment of SWQDV (CCE 2023). Therefore, the project would not

substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or off-site and impacts would be less than significant.

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

As discussed in the Hydrology/LID Report and based on the requirements set forth in the LACDPW LID Manual, the project is required to retain the SWQDV on-site using retention-based stormwater quality control measures. The project would implement an underground infiltration system (Contech perforated 96-inch CMP or similar) to retain the SWQDV. The infiltration system will include pre-treatment upstream in the form of a hydrodynamic separator (BioClean SCX-04 or similar) to remove trash and sediment prior to runoff entering the infiltration system. The implementation of this underground infiltration system would prevent the generation of runoff water that could have the potential to exceed the capacity of existing or planned stormwater drainage systems, in additional to limiting the amount of polluted runoff (CCE 2023). Furthermore, during construction, polluted runoff would be minimized by site-specific BMPs. Impacts would be less than significant.

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

As discussed in the Hydrology/LID Report, the project will be designed in a manner to meet flood control protection from the 50-year capital storm as well as the FEMA 100-year storm event (CCE 2023). Furthermore, the proposed project site is not within a floodplain. No impact would occur.

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

The project site is not within or near a 100-year flood zone or a 500-year flood zone (County of Los Angeles 2022b, Federal Emergency Management Agency [FEMA] 2008). According to the FEMA Flood Insurance Rate Maps (FIRM), the project site is in Zone X, meaning that the area is outside the 0.2 percent annual chance flood plain. Therefore, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces. Nonetheless, as discussed in the Hydrology/LID Report, the project will be designed in a manner to meet flood control protection from the 50-year capital storm as well as the FEMA 100-year storm event (CCE 2023). No impact would occur.

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

According to the LACDP, LID is a design strategy using naturalistic, on-site BMPs to lessen the impacts of development on stormwater quality and quantity with the goal mimicking the undeveloped runoff conditions of the development site with the post-development conditions (County of Los Angeles 2022d). According to Chapter 12.84, Low Development Standards, of the Los Angeles County Code, all new development projects involving one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area shall comply with the LID Ordinance. As discussed under impact a) of this section, the project would meet the requirements outlined within the LACDPW LID Manual through the inclusion of the proposed underground infiltration system (CCE 2023). Impacts would be less than significant.

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

The proposed project would not include onsite wastewater treatment. Furthermore, the project site is not in close proximity to surface water. The nearest waterway is a riverine, located approximately one mile northeast of the project site. In addition, the nearest body of water is a freshwater pond located approximately 1.2 miles north of the project site. Furthermore, as stated in the Geotechnical Investigation Report, ground water was not encountered during the geotechnical site visit at the maximum depth 41.5 feet (LK GE 2021). No impact would occur.

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

The project site is approximately 9.3 miles east of the Pacific Ocean and would not be exposed to significant impacts from tsunamis. As discussed under impact d) of this section, the project site is in Zone X of the FEMA Flood Insurance Rate Map (Map # 06037C1795F). Zone X is defined as an area outside of the 0.2 percent annual chance floodplain. Additionally, the project site is not identified as a flood hazard (County of Los Angeles 2014). No impact would occur.

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

As discussed under impact a) of this section, the project would comply with applicable NPDES requirements, which would include the use of BMPs during construction and operation of the project as detailed in a SWPPP and in the LID Ordinance. The project would meet the requirements outlined within the LACDPW LID Manual through the inclusion of the proposed underground infiltration system (CCE 2023). The project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

11. LAND USE AND PLANNING

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

The project site is located in a developed, urban area surrounded by industrial, commercial, and residential uses. The project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the project would be developed within a long-established urban area, the project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. No impact would occur.

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

The project site is zoned R-1 (Single-Family Residence) and is designated H-9 (Residential 9) (County of Los Angeles 2022a). According to the Los Angeles County Code, school uses are allowed within the R-1 zone with approval of a conditional use permit (CUP). The project includes a conditional use permit and, upon approval, the project would be consistent with all applicable County land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

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

As discussed in Section 4, *Biological Resources*, the project site is not located in an area identified in a Habitat Conservation Plan or a Natural Community Conservation Plan, or an SEA. The proposed project is in a highly developed area and the nearest SEA to the project is Harbor Lake Regional Park, located 8.4 miles to the southwest. Furthermore, as discussed in Section 7, *Geology and Soils*, the project site is relatively flat and not located within a Hillside Management Area. No impact to Hillside Management Areas or SEAs would occur.

12. MINERAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

According to the Los Angeles County 2035 General Plan, the project site is not identified as containing mineral resources that would be of value to the region and the residents of the state (County of Los Angeles 2022b). In addition, the project site is currently developed and is surrounded by industrial, commercial, and residential uses where mining operations are not expected to occur. Furthermore, as a proposed school use, the project would not involve any mining activities that would result in the loss of known mineral resources. No impact would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

As discussed under impact a) of this section, the project site is not identified as containing mineral resources (County of Los Angeles 2022b). Therefore, no impact would occur.

13. NOISE

A Noise and Vibration Study was prepared for the project by Rincon Consultants, Inc. (Rincon) in September 2022 to analyze the project's noise and vibration impacts related to both temporary construction activity and long-term operation of the project. The Study is included as Appendix G and its findings are summarized in this section. See Appendix G for full modeling methodology and modeling outputs.

Would the project result in:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☒	☐	☐

The following discussion assesses potential noise impacts related to construction and operation of the project.

Construction Impacts

Construction activity would result in temporary increases in ambient noise in the site vicinity on an intermittent basis and, as such, would expose surrounding noise sensitive receivers to increased noise. Due to the dynamic nature of construction, the Roadway Construction Noise Model (RCNM) was used to calculate maximum construction noise levels from the average center of on-site construction activity to the receivers surrounding the proposed School portion (Rincon 2022b). Therefore, noise was modeled at various distances between 15 feet and 150 feet from individual receivers. RCNM calculations are included in Appendix G and are shown in in Table 11.

Table 11 Construction Noise Levels at Various Distances from Surrounding Receivers

	Approximate L_{max}, dBA						
Construction Equipment	15 Feet	25 Feet	50 Feet	75 Feet	100 Feet	125 Feet	150 Feet
Bulldozer and Excavator	92	88	82	78	76	74	72
See Appendix G for modeling results.							

Maximum noise levels during project construction were calculated at approximately 92 dBA L_{max} at 15 feet from the source, which is anticipated to occur at properties abutting the eastern, southern, and western property lines of the proposed School portion. Overall, maximum noise levels at specific nearby sensitive receivers range from 92 dBA L_{max} at 15 feet from the source (i.e., abutting residential and Church properties) to 72 dBA L_{max} at 150 feet from the source (i.e., residential properties further east across South Cahita Avenue). According to Section 12.08.440 of the Los Angeles County Code, construction noise would have a significant impact if noise levels were to exceed applicable limits a during the allowed construction hours of 7:00 a.m. to 7:00 p.m. during the week. Furthermore, Section 12.08.460 of the Los Angeles County Code prohibits the loading, unloading, opening, closing or other handling of building materials or similar objects between the

hours of 10:00 p.m. and 6:00 a.m. in such a manner as to cause noise disturbance. Construction of the project would occur during daytime hours and, therefore, construction activities would not disturb nearby residences during more sensitive nighttime and early morning hours. Nonetheless, per Los Angeles County Code mobile equipment noise standards, construction noise would exceed 75 dBA L_{max} at nearby single-family residential properties with distances less than 125 feet from the center of on-site construction activities. Therefore, Mitigation Measure N-1 would be required to reduce noise during construction of the project. Implementation of Mitigation Measure N-1 would reduce construction noise at nearby residential properties to below the County's maximum noise level for construction noise to residential properties of 75 dBA L_{max} (Rincon 2022b). Therefore, impacts would be less than significant with mitigation.

Mitigation Measure

N-1. Construction Noise Reduction

The construction contractor shall be required to implement noise-reduction measures during construction, which may include but are not limited to:

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels.
- Retrofit mobile equipment with an industrial grade silencer or silencer of similar capacity.
- Enclose stationary equipment.
- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers.
- Erect temporary noise barriers with a minimum height of 12 feet along the project boundaries. The noise barriers shall be constructed with solid material with a density of at least 1 pound per square-foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.
- Comply with Los Angeles County Code Section 12.08.440A, which prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or any time on Sundays or holidays such that the sound creates a noise disturbance across a residential or commercial property line.
- Provide a sign at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager shall respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner. The sign shall have a minimum dimension of 48 inches wide by 24 inches high and be placed 5 feet above ground level.
- If a noise complaint(s) is registered, the contractor shall retain a County-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements shall be conducted for a minimum of 1 hour and shall include 1-minute intervals. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

Operational Impacts

Delivery and Trash Hauling Services

The project would require periodic delivery and trash hauling services. However, noise associated with delivery and trash-hauling trucks would be an intermittent noise source and are already a common occurrence in the project area due to existing residential and commercial uses that make

up the developed urban area. Therefore, such services associated with the project would not result in a substantial permanent increase in ambient noise levels without the project. Furthermore, Los Angeles County Code Section 12.08.460 prohibits the loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans or similar objects between the hours of 10:00 p.m. and 6:00 a.m. in such a manner as to cause noise disturbance. Therefore, operational noise impacts associated with delivery and trash-hauling trucks would be less than significant.

Heating, Ventilation, and Air Conditioning Units

Off-site receivers may periodically be subject to noise from project HVAC units, which would be located at the roof of the new school building and at ground level of the exisitng building to be repurposed. Exact locations of the ground-level HVAC units are unknown at this stage of planning; however, when compared to the proposed rooftop units, potential ground-level units at the rear of the existing building would be nearest to noise-sensitive receivers. Therefore, for this analysis, it was conservatively assumed that HVAC units nearest to off-site residences could be located at grade. With setbacks from the property line, it was assumed the HVAC units could be within eight feet of the property line. A Carrier 38HDR060 split system with a sound power level of 72 dBA would generate a noise level of approximately 57 dBA at a distance of seven feet. In addition, the five- to six-foot wall located at the eastern property line would provide noise attenuation of approximately 10 dBA from the HVAC unit to the nearby residences.Therefore, with attenuation from the wall and over an eight-foot distance, a ground-level HVAC unit would result in noise levels of approximately 46 dBA at the nearest single-family residences along South Cahita Avenue, which would be below the measured ambient noise level of 57 dBA L_{eq} at these residences. Furthermore, noise from HVAC equipment would typically occur during daytime school hours and not during more sensitive nighttime hours. Per Los Angeles County Code exterior noise standards, HVAC equipment noise would not exceed the 50 dBA daytime noise limit at nearby single-family residential properties. Therefore, operational noise impacts related to HVAC equipment would be less than significant.

Outdoor Noise

While existing preschool operations at the proposed School portion of the site currently generate outdoor noise from playing children, the project would repurpose the existing building and construct a new school building thereby increasing the student and staff population and associated outdoor noise. Therefore, the primary on-site noise source associated with operation of the project would consist of conversing students in outdoor areas, such as the proposed open quad area located between the proposed school buildings at the center area of the proposed School portion of the site or the covered seating area located at the eastern area of the proposed School portion. The project does not include a playground area, which are typically associated with higher levels of recreation noise. Rather, the proposed outdoor areas are anticipated to be used by students and staff for eating, reading, studying, and perhaps small group discussions. As such, outdoor noise would be an intermittent and temporary noise source, which would be limited to the daytime during school hours and when staff and students are outdoors (e.g., mornings prior to class start times, study breaks or lunch breaks throughout the day, afterschool prior to students getting picked up). Therefore, this analysis only includes noise generated during the daytime hours, as the school would not be operational during nighttime hours. This analysis assumes that up to 300 students would be gathered in the same outdoor area with half of these students, or 150 students, conversing at once. Furthermore, due to the approximately 200-foot distance of single-family residences to the west and the proposed location of the new, 35-foot school building between outdoor areas and single-family residences to the south and west, this analysis focuses on outdoor noise impacts to the nearest single-family residences along the eastern property line of the proposed School portion of the site.

Residences adjacent to the eastern property of the proposed School portion would be located as close as 25 feet from a gathering of 150 students in outdoor areas. Based on a reference noise level of 63 dBA L_{eq} at a distance of 3 feet from 20 people talking simultaneously, outdoor noise would be up to 72 dBA L_{eq} at 3 feet for 150 students conversing at once (City of Los Angeles 2011). Therefore, with attenuation over a 25-foot distance to the nearest single-family residence, conversing students would result in noise level of approximately 54 dBA at the nearest single-family residence along South Cahita Avenue.[2] Apart from the proposed 35-foot school building, the existing, approximately five- to six-foot tall, concrete property line wall along the eastern and southern property lines of the site (i.e., between abutting residences and the School portion) would provide additional shielding to most residences adjacent to the eastern property line of the proposed School portion. This wall would reduce noise levels by at least 5 dBA to 49 dBA (Federal Highway Administration [FHWA] 2006). However, as shown in Figure 4 on the following page, this wall is not consistent at the eastern property line of the site, converting to chain-link fence at the two single-family residences nearest to the proposed outdoor areas. These residences are located at 14317 South Cahita Avenue and 14321 South Cahita Avenue and are identified by APNs 6137-017-002 and -003, respectively. Compared to a solid concrete wall, the chain-link fence would not adequately reduce outdoor noise levels at these residences. According to a 24-hour noise measurement conducted between June 24, 2021 and June 25, 2021, the rear yards of these residences generally experience ambient noise levels between 45 dBA and 60 dBA. Nonetheless, per Los Angeles County Code exterior noise standards, outdoor noise would exceed the daytime standard of 50 dBA at nearest residential properties. As such, Mitigation Measure N-2 would be required to reduce noise from outdoor areas. Implementation of Mitigation Measure N-2 would reduce operational noise from students conversing outdoors by at least 5 dBA such that noise at the nearest single-family residences would not exceed the daytime standard of 50 dBA. Therefore, noise impacts from outdoor areas would be less than significant with mitigation.

Mitigation Measure

N-2. Outdoor Noise Attenuation

> The project applicant shall replace the existing chain-link fence with a concrete masonry unit wall, or other wall constructed of solid material, at least six feet in height. Specifically, the wall shall cover: 1) the approximately 100-foot, north-south stretch between the project site and the western property line of single-family residences located at 14317 South Cahita Avenue and 14321 South Cahita Avenue, and 2) the approximately 120-foot, east-west stretch between the site and the northern property line of the single-family residence located at 14317 South Cahita Avenue. This wall shall connect to the existing five- to six-foot wall located at the eastern property line to create one seamless solid wall between the project site and adjacent single-family residences. This feature shall be incorporated into project plans to be submitted by the applicant to the County of Los Angeles for review and approval prior to issuance of building permits.

[2] Noise levels would attenuate at a rate of 6 dBA per doubling of distance from a point source (i.e., a gathering of students).

Figure 4 View of Chain-Link Fence (Concrete Wall Beyond) along Eastern Property Line

Off-site Traffic Noise Impacts

The project would generate new vehicle trips and incrementally increase traffic on area roadways, particularly on East Rosecrans Avenue due to the location of the project's ingress driveway on the west side of the site and egress driveway between the Church portion and proposed School portion. According to the Transportation Impact Analysis prepared by Linscott Law & Greenspan Engineers (LLG), the project would result in a net increase of 967 daily vehicle trips onto East Rosecrans Avenue (LLG 2022). By comparison, the segment of East Rosecrans Avenue nearest to the site carries approximately 24,050 ADT (County of Los Angeles 2014). Conservatively adding all 967daily vehicle trips generated by the project to East Rosecrans Avenue would increase traffic along these roadways by approximately four percent. This traffic increase would, in turn, increase traffic noise by an estimated 0.2 CNEL along East Rosecrans Avenue.3 Therefore, the project would not generate substantial traffic noise from vehicle trips that would result a perceptible 3-dBA increase above existing traffic noise at East Rosecrans Avenue. Noise impacts associated with off-site traffic generated by the project would be less than significant.

Land Use Compatibility

The project would be subject to ambient noise levels in the project area, predominately from vehicular traffic along East Rosecrans Avenue. The project would repurpose an existing 5,646-square-foot building on the proposed School portion of the site and construct a new classroom building for the development of a charter middle/high school. Based on traffic noise levels calculated using the FHWA Traffic Noise Model, the project's northern frontage would be exposed to an estimated ambient noise level of 68 CNEL. New classroom buildings would also be located at the southern section of the proposed School portion, as shown in Figure 3. According to a 24-hour noise measurement conducted between June 24, 2021, and June 25, 2021, this area of the site is exposed to an estimated ambient noise level of 55 CNEL. According to the noise compatibility chart shown in **Error! Reference source not found.**, ambient noise up to 70 CNEL is 'normally acceptable' for a school. In addition, with exterior to interior attenuation from typical architectural materials of 25 dBA, interior noise levels would be well below the 45 CNEL standard.

Therefore, the project would be exposed to noise levels within the normally acceptable range for a school.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

Certain types of construction equipment can generate high levels of groundborne vibration. Construction of the proposed project would potentially utilize loaded trucks, jackhammers, and/or bulldozers during most construction phases and during the demolition phase. Vibration impacts are assessed based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the proposed School portion of the site to the edge of nearby off-site structures. Based on the distance of nearby structures to the proposed School portion, equipment was modeled at 15 feet from single-family residences, 30 feet from the Church to the west, and 75 feet from single-family residences to the east across South Cahita Avenue. Table 12 shows estimated groundborne vibration levels from project equipment that is likely to result in the highest vibration levels.

Table 12 Vibration Levels at Receivers

	in./sec. PPV		
Equipment	Single-Family Residences 15 Feet	Church 30 Feet	Single-Family Residences 75 Feet
Large Bulldozer	0.156	0.073	0.027
Loaded Truck	0.133	0.062	0.023
Jack Hammer	0.061	0.029	0.011
Small Bulldozer	0.005	0.003	<0.001
Threshold for Building Damage[1]	0.3	0.3	0.3
Thresholds Exceeded?	**No**	**No**	**No**

See Appendix G for modeling outputs.
[1] Caltrans 2020.

As shown in Table 12, groundborne vibration from typical construction equipment would not exceed the threshold of 0.3 in/sec. PPV for building damage at nearby residential structures. In addition, as a school use, the proposed project would not involve substantial stationary sources of vibration, such as heavy equipment. Therefore, operational vibration impacts would be less than significant.

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

[3] A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the proposed project would be approximately four percent of the estimated existing daily traffic along East Rosecrans Avenue.

As discussed in Section 9, *Hazards and Hazardous Materials*, the closest airport to the project site is the Compton/Woodley Airport located approximately 1.3 miles to the southeast. While the site would be subject to temporary and intermittent noise from aircraft overflights, the site is not within the airport's noise contours or area of influence and would not be affected by substantial noise or other hazards from aircraft operations (County of Los Angeles 2016). No impact would occur.

14. POPULATION AND HOUSING

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

The proposed project would involve the development of a public charter school for a maximum enrollment of 600 students and 45 staff members, including the repurpose and remodel of the existing one-story building to accommodate administrative offices and a multi-purpose room, the installment of a shade structure on the eastern side of the existing building, and the new construction of a two-story, 33,769-square-foot classroom building consisting of 26 classrooms (ranging from 728 to 750 square feet in size) and four laboratories (779 square feet each), with a student and staff restroom on each floor. As discussed under Section 3, *Air Quality*, the proposed project would not directly increase the County's population because no new housing is proposed, and the purpose of this facility is for educational use. The proposed project also would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the proposed project. No impacts related to population growth would occur.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Development of the new school building would not require displacement of any exiting people or housing since there are no residential uses currently on-site. No impacts related to the displacement of substantial numbers of existing people or housing would occur.

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐

The proposed project would be served by the LACoFD. LACoFD Station 95, located 1.7 miles southwest of the project site, is the nearest station to the project site. As discussed in Section 14, *Population and Housing*, the proposed project would not directly generate a net increase of residents. However, the school would accommodate 600 students which would incrementally increase the need for fire protection services within the County but would not require the construction of new fire facilities to maintain acceptable service ratios, response times, or other performance objectives. The project would be required to adhere to all standards and conditions required by the LACoFD, including, but not limited to, restrictions on project design, imposition of construction standards, and payment of impact fees. Adherence to these standards would result in a less than significant impacts associated with the provision of fire protection.

Sheriff protection?	☐	☐	☒	☐

The proposed project would be served by the Los Angeles County Sheriff's Department (LASD). As with fire protection services, the proposed project would incrementally increase the need for police protection services within the County. However, the proposed project would be required to adhere to all standards and conditions required by the County and the LASD, including the payment of impact fees. While the proposed project would incrementally increase the need for police protection, it would not require the construction of new facilities to maintain acceptable service ratios, response times, or other performance objectives. Therefore, the proposed project would result in a less than significant impact associated with the provision of police protection.

Schools?	☐	☐	☐	☒

The proposed project would include the development of a school building. The addition of school building would not increase demands for schools in the area and would not require construction of other new or expanded school facilities. Therefore, the proposed project would not have an adverse physical impact on existing schools, and no impacts would occur.

Parks?	☐	☐	☐	☒

As discussed in Section 14, *Population and Housing*, the proposed project would not directly generate a net increase of residents. Nonetheless, the remodeling of the existing one-story building would include the incorporation of a 2,190-square square-foot multi-purpose room and a 1,612-

square square-foot outdoor shade structure on the eastern side of the building. The proposed outdoor areas are anticipated to be used by students and staff for eating, reading, studying, and perhaps small group discussions. Therefore, there would not be a significant increase in the demand for usage of existing parks and recreational facilities elsewhere in the County. Impacts would be less than significant.

Libraries? ☐ ☐ ☒ ☐

Physical impacts to public services are usually associated with population growth, which increases the demand for public services and facilities. As discussed in Section 14, *Population and Housing*, the proposed project would not directly generate a net increase of residents. As a proposed school, students accommodated by the project may require the use of the County's library facilities for supplemental research and education; however, it is anticipated that the project would supply its students with resources and tools to complete coursework thereby reducing the need for use of off-site public libraries. Therefore, the proposed project would not result in impacts associated with the provision of other new or physically altered libraries. Impacts would be less than significant.

Other public facilities? ☐ ☐ ☐ ☒

Physical impacts upon other public services would also be associated with population growth. The proposed project would not directly generate a net increase of residents and would not result in impacts associated with the provision of other new or physically altered public facilities. Therefore, no impacts would occur.

16. RECREATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

As discussed in Section 14, *Population and Housing*, the proposed project would not directly generate a net increase of residents. The remodeling of the existing one-story building would include the incorporation of a 2,190-square-foot multi-purpose room and a 1,612-square square-foot outdoor shade structure on the eastern side of the building. The proposed outdoor areas are anticipated to be used by students and staff for eating, reading, studying, and perhaps small group discussions. Therefore, there would not be a significant increase in the demand for usage of existing parks and recreational facilities elsewhere in the county. Impacts would be less than significant.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

As discussed under impact a) of this section, the project would provide a multi-purpose room and an outdoor shade structure to sufficiently accommodate eating, reading, studying, and small group discussions. The proposed project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment, and no impact would occur.

c) Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

The project would be built on a partially developed, and partially vacant lot that would not interfere with regional trail connectivity. As discussed in Section 1, *Aesthetics*, the closest trail is the Rio Hondo River Trail located approximately 7.5 miles to the northeast of the project site. Due to distance, the project would not interfere with regional trail connectivity. No impact would occur.

17. TRANSPORTATION

A Transportation Impact Analysis was prepared for the project by LLG in October 2022 to identify and evaluate the potential transportation impacts of the proposed project on the surrounding street system. The Analysis is included as Appendix H and its findings are summarized in this section. See Appendix H for the full analysis.

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

The closest bus station to the project is the Rosecrans/Stanford bus station located approximately 795 feet to the northwest of the project site, which is serviced by Bus Route 5 of the Renaissance Transit System. Buses from 6 a.m. to 6 p.m. Monday through Friday and would provide future students with an alternative means of traveling to and from school (City of Compton 2023). The project site is not located near a bicycle facility. Nonetheless, the project does not include any features that would preclude the County or the nearby City of Compton from completing and complying with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

As discussed in the Transportation Impact Analysis, the State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA Guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in VMT. In January 2021, the LACDPW released VMT Tool Version 1.0 (the "VMT Tool"). The VMT Tool implements the methodologies, screening criteria, and significance thresholds described in the County's Transportation Impact Analysis (TIA) Guidelines (LLG 2022).

As estimated in the Transportation Impact Analysis, the project is expected to create a net increase of 967 trips per day, 260 net new vehicle trips (169 inbound trips and 91 outbound trips) during the a.m. peak hour and 27 net new vehicle trips (13 inbound trips and 14 outbound trips) during the p.m. peak hours (LLG 2022).

The TIA Guidelines do not provide specific impact criteria for school projects. However, per the TIA Guidelines, school projects should be analyzed similarly to office projects for VMT impact evaluation. The TIA Guidelines provide the following impact criteria for office land uses: "The project's employment VMT per employee would not be 16.8 percent below the existing employment VMT per employee for the Baseline Area in which the project is located." The project is in the South County Baseline Area, which generally consists of the region of the County which is situated below the Santa Susana and San Gabriel Mountain ranges. The TIA Guidelines further state that the baseline VMT applied in the TIA should be consistent with the year that the TIA

begins. The South County employment VMT baseline for the year 2021 (i.e., the year of commencement of this TIA process) is 16.5 VMT per employee. Therefore, the threshold of 16.8 percent below the baseline employment VMT is 13.8 VMT per employee. A significant transportation impact would result if the project VMT exceeds 13.8 VMT per employee. As shown in the Transportation Impact Analysis, the conservative daily employment VMT per employee for the project is 12.2 daily employment VMT, which is well below the threshold for the South County Baseline Area of 13.8 daily employment VMT per employee. Furthermore, student VMT can be assumed to be less that significant since the proposed project would be located closer to its targeted student population and would provide additional middle school options for families in the vicinity of the project site, thereby reducing the overall length of travel for parents/caregivers (LLG 2022).

Furthermore, as noted in the TIA Guidelines, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the County's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS. Based on the above, project-related VMT analysis and the conclusions reported in the Transportation Impact Analysis (i.e., which conclude that the project falls under the County's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), the project's cumulative VMT impact would also be less than significant.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☐ ☒

The project would not require any new street access and would be accessed entirely thought existing roadway entrances. Additionally, the use of the project site would be substantially compatible with the existing school building and church to the west of the project. Therefore, the project would not substantially increase hazards due to road design features, and no impacts would occur.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

While project construction could require temporary truck and equipment access and parking on and around the project site, construction would not require lane or roadway closures that would temporarily impair emergency response or evacuation. The proposed construction and operational activities would not include any new design or development that would prevent access to the project area in the event of an emergency or prevent emergency evacuation. The project would be designed, constructed, and operated pursuant to applicable standards outlined in the latest California Fire Code, and specifications for the proposed improvements would be subject to County requirements, including Chapter 22.46.1000, Infrastructure Improvement Standards, and Chapter 22.44.1590, Circulation, of the Los Angeles County Code to ensure that adequate dimensions for emergency vehicles is met. In addition, the project would be subject to the review of the LACoFD. Therefore, the project will have no impact related to emergency access.

18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or	☐	☐	☒	☐

County Planning and Rincon Consultants have conducted records searches with the California Native American Heritage Commission (NAHC) Sacred Lands File and the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) and responses from both agencies indicate that there are no known tribal cultural resources ("TCRs") identified for the Project Site. As such, it is not anticipated that the Project's grading activities will cause substantial adverse change to a tribal cultural resource. However, the lack of specific site information by these searches does not indicate the absolute absence of tribal cultural resources on the project site or the vicinity. Accordingly, Mitigation Measures, TR-1 through TR-3 shown in section two below will be implemented to establish protocols for the unanticipated discover of tribal cultural resource.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

One response to the initial notification was received from the Gabrieleno Band of Mission Indians–Kizh Nation. The Gabrieleno Band of Mission Indians – Kizh Nation indicated that the project site is located in an area where there is evidence of prehistoric or historic period tribal cultural activities such as its proximity to both a road that connected two Native Indian Villages and a lake/slough that had been drained and filled mid-century that may have left physical remains of those activities that could be considered to be tribal cultural resources. In response to the historical activity conducted in the vicinity of the Project Site, the Gabrieleno Band of Mission Indians – Kizh Nation requested that the County impose a requirement to retain a Native American monitor to observe grading activities that could potentially uncover important TCRs. Accordingly, Mitigation Measures TR-1 though TR-3, specified below, will be implemented and will supplement MM CUL-1 and CUL-2.

Mitigation Measures

TR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. Should a monitor from the Kizh be unavailable for the project or a mutually agreed upon contract cannot be attained, the project applicant may contract with a mutually agreed upon monitor who is familiar with tribal cultural resources.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor shall complete daily monitoring logs that shall provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency weekly.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh or monitor to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TR-2: Unanticipated Discover of Tribal Cultural Resource Objects (Non-funerary/Non-ceremonial)

A. Upon discover of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet unless a smaller radius is warranted based on the discovery as determined by the Kizh or monitor) and shall not resume until the discovered TCR has been fully assessed by the monitor and/or archaeologist. Should additional treatment of the discovery be required (i.e. testing and evaluation, data recovery) a preferred treatment plan shall be submitted within 48 hours by the monitor and/or archeologist to the project applicant/ lead agency. If a TCR has been identified, the monitor and/or archaeologist shall, in good faith, develop and discuss the timeline and scope of assessment or treatment plan with the project applicant, and work with applicant to limit the delays of their project, if possible. Furthermore, the monitor and the applicant shall meet weekly to discuss assessment or treatment plan activities and timeline

until the monitor's assessment or treatment plan is complete The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the manner of treatment preferred by Kizh for discovered human remains and/or burial goods. If following a discovery of remains and associated funerary objects or ceremonial objects another Native American tribe is identified as the Most Likely Descendant, their preferred manner of treatment shall be identified.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Water

Liberty Utilities supplies water to the project site. According to the 2020 Urban Water Management Plan (UWMP), Liberty Utilities' average water demand over the last 10 years was 10,524 -acre feet per year (AFY) (Liberty Utilities 2021). The 2020 UWMP water demand projection for 2025 is approximately 11,468 AF under an average weather year assuming passive conservation efforts, which is an increase of approximately 944 AF (Liberty Utilities 2021). The proposed project would demand an estimated 2.1 million gallons (6.6 AFY) of water according to CalEEMod estimations (see Appendix A for modeling results). Project water demand would represent 0.7 of the projected increase in water demand between 2020 and 2025. According to the 2020 UWMP, Liberty Utilities would be able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (Liberty Utilities 2021). Furthermore, according to a will-serve letter dated December 14, 2021, Liberty Utilities confirmed that they would have adequate supplies to provide water service to the project. The will-serve letter is included in Appendix I.

The proposed project's projected water demand is within forecasted water supply for the service area and would not require the construction of new water supply facilities, or expansion of existing facilities. Impacts would be less than significant.

Wastewater

The Los Angeles Bureau of Sanitation (LASAN) operates and maintains wastewater infrastructure for the proposed project site. LASAN's wastewater collection system serves over four million residential and business customers in a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (MGD) of wastewater. According to a will-serve letter dated October 4, 2022 from LASAN, the project site would be served by the Joint Water Pollution Control Plant (JWPCP), which treats an average flow of 243.1 MGD of wastewater and has the treatment capacity of 400 million MGD of wastewater. The will-serve letter is included in Appendix I.

The project would continue to connect to the existing storm drain system operated and maintained by the County. The proposed project would create demand for an estimated 2.1 million gallons of water per year, or approximately 5,877 gallons per day, according to CalEEMod estimates (see Appendix A for modeling results). Conservatively assuming that 100 percent of this water would subsequently be treated as wastewater, 5,877 gallons per day (or less than 0.01 MGD) demanded by the proposed project represents less than 0.01 percent of the remaining treatment capacity of approximately 157 MGD of wastewater at the JWPCP. Therefore, JWPCP would have adequate

capacity to provide wastewater treatment and the project would not require the construction of new or expanded wastewater conveyance or treatment facilities. Impacts would be less than significant.

Stormwater Drainage

As discussed in Section 9, *Hydrology and Water Quality*, the proposed project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well as LID requirements that would apply to the construction and operation of the proposed project to further reduce storm water runoff. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less than significant level and no new conveyance infrastructure would be required.

Electric Power, Natural Gas, Telecommunications

The project site is in an existing developed area, which has existing infrastructure for electric power, natural gas, and telecommunications services. The proposed project consists of the construction of a new school building and the renovation of an existing building, is contingent upon the approval of the applicant's Conditional Use Permit. If approved, the subject site's zoning would be consistent with the proposed educational use, as discussed in Section 11, *Land Use and Planning*. The proposed school building would not cause substantial unplanned population growth, as discussed in Section 14, *Population and Housing*; would not result in wasteful or inefficient use or energy, as discussed in Section 6, *Energy*; and would not require or result in the construction of new electric power, natural gas, or telecommunication facilities or expansion of existing facilities. Although the proposed project would create an incremental increase in demand upon these facilities, this impact would be less than significant.

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

As previously discussed under impact a) of this section, Liberty Utilities supplies water to the project site. Liberty Utilities' average water demand over the last 10 years was 10,524 AFY. The 2020 UWMP water demand projection for 2025 is approximately 11,468 AF under an average weather year assuming passive conservation efforts, which is an increase of approximately 944 AF (Liberty Utilities 2021). Estimated water demand and supply is shown on Table 13.

Table 13 Water Supply and Demand in Single and Multiple Dry Years (AF)

Year-Type	2025	2030	2035	2040	2045
Average Year					
Total Supplies	11,468	11,526	11,585	11,646	11,706
Total Demands	11,468	11,526	11,585	11,646	11,706
Single Dry Year					
Total Supplies	10,800	10,857	10,915	10,972	11,030
Total Demands	10,800	10,857	10,915	10,972	11,030
Multiple Dry Year (1st, 2nd, and 3rd Year Supply)					

Total Supplies	11,881	11,944	12,007	12,070	12,134
Total Demands	11,881	11,944	12,007	12,070	12,134

Units in acre-feet (AF)

Source: Liberty Utilities 2021

The proposed project would demand an estimated 2.1 million gallons (6.6 AFY) per year of water according to CalEEMod estimations (see Appendix A for modeling results). Project water demand would represent 0.7 percent of the projected increase in water demand between 2020 and 2025. Furthermore, according to the 2020 UWMP, Liberty Utilities will be able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (Liberty Utilities 2021).

The proposed project's water demand is within forecasted water supply required to for the service area and have sufficient water supplies during normal, dry and multiple dry years. Impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☒ ☐

As discussed under impact a) of this section, 5,877 gallons per day (or less than 0.01 MGD) of wastewater generated by the proposed project represents less than 0.01 percent of the remaining treatment capacity of 157 MGD of wastewater at the JWPCP. Therefore, wastewater treatment plants in the area would have capacity to serve the projects projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ☐ ☐ ☒ ☐

The proposed project would result in the generation of construction waste, which would require disposal. However, the handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the project site. Furthermore, on January 4, 2005, the County adopted an ordinance that requires at least 50 percent of all debris generated by construction and demolition (C&D) projects located in unincorporated areas of Los Angeles County to be recycled or reused. The ordinance amends Title 20 of the Los Angeles County Code by adding Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, which requires all construction projects to recycle or reuse a portion of all construction and demolition debris, soil, rock, and gravel removed from a project site unless a lower percentage is approved by the Director of the LACDPW. On January 1, 2017, the LACDPW began to enforce the following C&D diversion requirements in accordance with the 2016 CALGreen Manual: all projects that generate C&D debris are to recycle or reuse the C&D debris at a minimum rate of 65 percent, all Universal Waste recovered from a nonresidential project site must be disposed of properly, and all trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled

(County of Los Angeles 2020). The project shall comply with the standards that are in effect at the time of the permit issuance and impacts would be less than significant.

Waste Management Inc. provides solid waste collection for the project. Solid waste generated by operation of the project would likely be taken to the Antelope Valley Recycling and Disposal Facility or the Lancaster Landfill and Recycling Center as they are both operated by Waste Management (County of Los Angeles 2021b). Table 14 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for the landfill.

Table 14 Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)1	Estimated Closure Date
Antelope Valley Recycling and Disposal Facility	3,600	2,785	815	2044
Lancaster Landfill and Recycling Center	3,000	395	2605	2044

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

Sources: CalRecycle 2022, LADPW 2021

According to CalEEMod, operation of the proposed project would generate approximately 117 tons per year or 0.3 tons of waste per day (see Appendix A for modeling results). This estimate is conservative since it does not factor in any recycling or waste diversion programs. The 0.3 tons generated by the project would result in less than 0.01 percent of the estimated remaining daily capacities of waste per day at Lancaster Landfill and Recycling Center. All waste generated during construction of the project would be handled and disposed of in compliance with all applicable federal, State, and local statutes and regulations related to solid waste. Impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ☐ ☐ ☒ ☐

As discussed under impact d) of this section, the project would be required to comply with the County of Los Angeles' waste reduction programs, including recycling and other diversion programs to divert the amount of solid waste deposited in landfills. In addition, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (California Public Resources Code Section 42911), the proposed project would provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The implementation of these programs would

reduce the amount of solid waste generated by the proposed project and diverted to landfills, which in turn would aid in the extension of the life of affected disposal sites. The project would comply with all applicable solid waste statutes and regulations; therefore, solid waste impacts would be less than significant.

20. WILDFIRE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The project would not be located in or near a California Department of Forestry and Fire Protection (CAL FIRE) recommended very high fire hazard severity zone (VHFHSZ) or state responsibility area (CAL FIRE 2022). The nearest VHFHSZ is located approximately 11.3 miles to the northwest, within Ballona Wetlands Ecological Reserve.

As discussed in Section 17, *Transportation*, the project would not impede access to emergency services. The project would be designed, constructed, and operated pursuant to applicable standards outlined in the latest California Fire Code, and specifications for the proposed improvements would be subject to County requirements, including Chapter 22.46.1000, Infrastructure Improvement Standards, and Chapter 22.44.1590, Circulation, of the Los Angeles County Code to ensure that adequate dimensions for emergency vehicles is met.

While project construction could require temporary truck and equipment access and parking on and around the project site, construction would not require lane or roadway closures that would temporarily impair emergency response or evacuation. Therefore, no impact would occur.

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

As discussed under impact a) of this section, the project is not located in or near a designated VHFHSZ and would not be situated near steep slopes. The project would adhere to applicable standards outlined in the latest California Fire Code, and County regulations put forth in the County Development Code. Therefore, the project would not exacerbate wildfire risks, and would not expose occupants to pollutant concentrations or the uncontrolled spread of wildfire. No impact would occur.

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

The project would not result in significant environmental effects associated with the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric

power, natural gas, or telecommunications facilities. The project would require installation of standard water and sewer laterals or appurtenances to serve the proposed buildings and landscaping. New or relocated utilities and systems associated with the project would comply with state and local fire codes to reduce the risk of fires, and none of these potential infrastructure improvements would exacerbate fire risk on-site. No impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

The project site is relatively flat and is not located on an area of significant slopes. As discussed in Section 7, *Geology and Soils*, the project site is not susceptible to landslides or downstream flooding. The project would be required to comply with the County's Development Code. In addition, the project would be required to implement all recommendations of the geotechnical report through the County's design review process. Implementation of the recommendations from the site-specific geotechnical analysis in the design and construction of the project would reduce potential hazards from post-fire landslides or slope instability. Impacts would be less than significant.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

The project would comply with latest version of the California Fire Code, and all other applicable regulations related to wildland fires to ensure the lowest possible risk of exposing people or structures, either directly or indirectly to wildland fire. Furthermore, as discussed in Section 9, *Hazards and Hazardous Materials*, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Impacts would be less than significant.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐

As discussed in Section 4, *Biological Resources*, the project area does not include any mapped essential habitat connectivity areas in the immediate vicinity of the project site. In addition, regional wildlife movement is restricted given the built-out nature of the project area surroundings, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites would be impacted by the project. However, construction of the project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. However, as discussed in Section 4, *Biological Resources*, the proposed project includes Mitigation Measure BIO-1 that requires the project site to be surveyed if construction occurs during the nesting bird season (generally February 1 to August 31). If active nests are identified, construction buffers would be implemented to reduce proximity to nests and minimize impacts to nesting birds. Therefore, with implementation of the Mitigation Measure BIO-1, potential impacts would be less than significant. Furthermore, as discussed in Section 5, *Cultural Resources*, and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on unanticipated cultural resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CUL-1 and CUL-2, which would require adherence to existing local, State and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, paleontological resources, and tribal cultural resources. Furthermore, in the event human remains are found on-site during project construction, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the Native American Heritage Commission, which will determine and notify an MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, with compliance with existing regulations, impacts to humans remains would also be less than significant.

[Placeholder: Tribal consultation information to be provided by the County of Los Angeles. If necessary mitigation is identified based on consultation results, it will be incorporated to this section.]

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

As concluded in Sections 1 through 20 of this document, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation with respect to all environmental issues considered in this document. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including air quality, GHG, noise, and transportation. As discussed in the analysis herein, the proposed project would result in less than significant impacts with respect to GHG emissions and less than significant impacts with mitigation with respect to air quality emissions (i.e., TACs). Therefore, the project would not contribute to cumulative impacts related to these issues. Both the noise and traffic analyses (see Sections 13 and 17, respectively) consider cumulative increases in traffic under existing plus project conditions and conclude that impacts would be less than significant with respect to noise and VMT. Some of the other resource areas (agricultural and mineral) were determined to have no impact in comparison to existing conditions. As such, the Project would not contribute to cumulative impacts related to these types of issues. Other location specific impacts (e.g., geology, hazards, and hazardous materials) are by their nature specific to the area and impacts at one location do not add to impacts at other locations or create additive impacts. As such, cumulative impacts would be less than significant (not cumulatively considerable).

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

In general, impacts to human beings are associated with air quality, GHG emissions, hazards and hazardous materials, and noise impacts. As detailed in analyses for GHG emissions, hazards and hazardous materials, and noise, the proposed project would not result, either directly or indirectly, in adverse hazards related to GHG, hazardous materials, or noise. Furthermore, the project would result in less than significant air quality impacts associated with TACs with implementation of Mitigation Measure AQ-1. Compliance with applicable rules, regulations, and identified mitigation measures reduce potential impacts on human beings to a less than significant level.

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