El Camino College Fire Academy Mitigated Negative Declaration

Prepared for:

El Camino Community College District
16007 Crenshaw Boulevard
Torrance, CA 90506
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADT	average daily trips
AQMP	Air Quality Management Plan
Basin Plan	Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties
BMPs	Best Management Practices
C2	General Commercial
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalOSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CEOC/OAEOC	County Emergency Operation Center/Operational Area Emergency operation Area
CEQA	California Environmental Quality Act
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of Torrance
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
CRHR	California Register of Historical Resources
CRM	Cultural Resource Management
Cortese	EnvirStor Hazardous Waste and Substances List
dB	decibels
dBA	A-weighted decibel
District	El Camino Community College District
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
ECC	El Camino College
EIR	Environmental Impact Report
EMT	Emergency Medical Technicians
EOC	City of Torrance Emergency Operations Center
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
ft	feet
GHGs	greenhouse gases
gpm	gallons per minute
GPR	ground penetrating radar
GSAs	Groundwater Sustainability Agencies
GSPs	Groundwater Sustainability Plans
GTrans	Gardena transit

GWP	global warming potential
HVAC	heating, ventilation and air conditioning
I	Interstate
in	inches
JWPCP	Joint Water Pollution Control Plant
kBtu	kilo-British Thermal Units
Kizh Nation	Gabrieleno Band of Mission Indians – Kizh Nation
LACM	Natural History Museum of Los Angeles County
LACSD	Sanitation Districts of Los Angeles County
lbs/day	Criteria Pollutants Mass Daily Thresholds
L_{eq}	Energy equivalent or energy average level
LID	Low Impact Development
LOS	level of service
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MND	mitigated negative declaration
MRZ-1	Mineral Resource Zone-1
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MWD	Metropolitan Water District of Southern California
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NRHP	National Register of Historic Places
O_3	ozone
OAERP	Los Angeles County Operational Area Emergency Response Plan
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
$PM_{2.5}$; fine particulate matter	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM_{10}; course particulate matter	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PRIMP	Paleontological Resources Impact Mitigation Program
project or proposed project	El Camino College Fire Academy project
PUB	Public/Quasi-Public/Open Space
RCNM	Federal Highway Administration's Roadway Construction Noise Model
RTP/SCS	2016–2040 Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Los Angeles Regional Water Quality Control Board
SB	Senate Bill
SCCIC	South Central Coast Information Center
SCE	Southern California Edison
SO_x	sulfur oxides
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SLF	Sacred Lands File
SR	California State Route

Sustainability Plan	El Camino College Sustainability Plan
SVP	Society of Vertebrate Paleontology
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TCA	Traffic Circulation Analysis
telecom	wireless telecommunication
TMWD	Torrance Municipal Water Department's
UWMP	Urban Water Management Plan
VHFHSZ	High or Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
VP	Vertebrate Paleontology
WDR	waste discharge requirement
WEAP	Worker Environmental Awareness Program
WMP	Waste Management Plan
WQMP	water quality management plan

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1 Introduction

1.1 Project Overview

El Camino College was founded in 1947 and currently enrolls more than 25,000 students each semester. The campus, located in the city of Torrance at 16007 Crenshaw Boulevard, is approximately 126-acres in area (El Camino College 2021a). Training associated with the Fire Academy is currently conducted at El Camino College's Public Safety Training Center in Inglewood at 206 West Beach Avenue.

Currently, El Camino College offers the Fire Academy twice a year. It is a 16-week class that operates Monday through Friday, 7 AM to 5 PM. The training center classroom seats approximately thirty students and an engine room. Equipment on-site includes a Class A Diesel Pumpers and a Truck Company. The drill grounds are comprised of a four-story fire rescue training tower, a fire environment building; where the students combat live fires, and a Swede System I Flashover Training Container for Flashover Training (El Camino College 2021b).

El Camino College's Public Safety Training Center needs expanded facilities to handle the increasing demand for the program. Fire Departments from throughout the South Bay currently travel 25 miles away to Rio Hondo College to train. Local firefighter and Emergency Medical Technicians (EMT) recruits currently have to leave the South Bay to complete their educations (El Camino College 2021b).

1.2 California Environmental Quality Act Authority to Prepare a Negative Declaration

El Camino Community College District (District) is the California Environmental Quality Act (CEQA) lead agency responsible for the review and approval of the El Camino College Fire Academy project (project or proposed project). Based on the findings of the Initial Study for the project, the District has determined that a mitigated negative declaration (MND) is the appropriate environmental document to prepare in compliance with CEQA (California Public Resources Code, Section 21000 et seq.). As stated in CEQA, Section 21064.5, an MND may be prepared for a project subject to CEQA when an initial study has identified no potentially significant effects on the environment.

This MND has been prepared for the District and complies with Section 15070(a) of the CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the MND and the Initial Study Checklist (see Chapter 3 of this MND) is to determine any potentially significant impacts associated with the proposed project and to incorporate mitigation measures into the project design as necessary to reduce or eliminate the significant or potentially significant effects of the project.

1.3 List of Discretionary Actions

Approval of the following discretionary actions will be required to implement the proposed project: approval of the project by the District Board of Trustees.

1.4 Other Agencies that May Use the Mitigated Negative Declaration

This MND is also intended for use by responsible agencies that may have an interest in reviewing the project. All responsible agencies for the project, listed as follows, will therefore be involved in the review of this document:

- City of Torrance

1.5 Public Review Process

In accordance with CEQA, a good-faith effort has been made during the preparation of this MND to contact affected agencies, organizations, and persons who may have an interest in this project.

In reviewing the MND, public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. A copy of the Draft MND and related documents are available for review at the front desk of the District (see address below) between the hours of 7:45 AM to 4:30 PM, Monday through Friday.

El Camino Community College District
Administration Building
16007 Crenshaw Boulevard
Torrance, California 90506

Comments on the MND may be made in writing before the end of the public review period. A 30-day review and comment period from March 29, 2022 to April 27, 2022, has been established in accordance with Section 15072(a) of the CEQA Guidelines. Following the close of the public comment period, the District will consider this MND and comments in determining whether to approve the proposed project.

Written comments on the MND should be received at the following address by 4:30 p.m., April 27, 2022.

El Camino Community College District
16007 Crenshaw Boulevard
Torrance, California 90506
Contact: Jorge Gutierrez, Executive Director
Telephone: 310.660.3593 ext. 6172
Email: jgutierrez@elcamino.edu

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2 Project Description

2.1 Project Location

The proposed project site is located in the City of Torrance (City), in the southern portion of Los Angeles County (Figure 1, Project Location). Nearby cities include Lawndale, Gardena, Los Angeles, Carson, Lomita, Rolling Hills, Palos Verdes Estates, Redondo Beach, and some unincorporated areas. The proposed project site is approximately 2.6 acres and is located on the existing El Camino College campus.

More specifically, the proposed project site is located on the southern portion of the campus, south of West Redondo Beach Boulevard. The proposed project site is located in the existing Parking Lot L.

2.2 Environmental Setting

The proposed project site is located on the El Camino College campus at 16007 Crenshaw Boulevard and is accessible from the Interstate (I)-405 and California State Route (SR)-91. The El Camino College campus is 126 acres in size (El Camino College 2021a). Vehicular access is provided via driveways on Manhattan Beach Boulevard, Crenshaw Boulevard, West Redondo Beach Boulevard, and West 164th Street. Pedestrian access is available via sidewalk infrastructure adjacent to Crenshaw Boulevard and West Redondo Beach Boulevard. The nearest bus stops are located at the intersection of West Redondo Beach Boulevard and Crenshaw Boulevard to the east as well as West Redondo Beach Boulevard and Yukon Avenue to the west of the proposed project site.

El Camino College is located in a developed urban area of the City of Torrance and County of Los Angeles. The campus is bound by Manhattan Beach Boulevard to the north, Crenshaw Boulevard to the east, and the Dominguez Channel to the west and south. The campus is surrounded by residential communities to the north, east, south, and west. The Alondra Golf Course is located west of the campus.

The proposed project site is entirely located in the municipal boundaries of the City of Torrance. The project site is zoned as General Commercial (C2) and has a General Plan designation of Public/Quasi-Public/Open Space (PUB) (City of Torrance 2019 and 2005). The proposed project site is currently developed as a parking lot with several landscape features located throughout.

2.3 Project Characteristics

2.3.1 Proposed Project

The proposed project would involve the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas (Figure 2, Site Plan).

Four new classrooms would be constructed on the southern perimeter of the site, each would occupy a 24-foot by 40-foot area, and one-story tall. The locker room would be located on the southern perimeter, would include showers, restrooms, and lockers, and would occupy a 60-foot by 40-foot area and would be one-story tall. The modular multipurpose room would be located on the southern perimeter, occupy a 40-foot by 72-foot area and

would be one-story tall. The administrative office would be located on the southern perimeter, occupy a 24-foot by 42-foot area and would be one-story tall. The fire apparatus storage building would be located in the western perimeter of the project site and would include three apparatus bays, which would occupy a 60-foot by 50-foot area, and a supply, maintenance, storage, and laundry area. The fire tower would be located in the center of the project site, would be four-stories tall with an open roof deck above the fourth story, and would support fire simulation activities. The physical training area would surround the fire tower on all four sides. The ventilation props storage area would occupy a 28,500 square foot area and would be located on the southern perimeter of the site.

Landscaped areas would be located throughout the project site. The existing row of trees located at the eastern perimeter of the site would remain in place. The existing trees along the southern perimeter of the project site would remain in place. Two new landscaped areas would be introduced to the east and west of the classrooms and administration office modular buildings. An 8-foot tall perimeter fence would be installed around the entire project site.

Vehicular access to the project site would be via Redondo Beach Boulevard, Crenshaw Boulevard, and West 164th Street. No parking spaces would be available within the project site boundary; however, the project would be located adjacent to an existing parking lot which could be used for the project.

2.3.2 Proposed Operation

Once operational, the new Fire Training Facility would provide a South Bay training location for local firefighter and Emergency Medical Technicians (EMT) recruits. The Fire Training Facility would provide expanded facilities to handle an increasing demand for the El Camino College Public Safety Training Center. The proposed project would result in the generation of approximately 45 new students and 7 new employees.

The Fire Training Facility would operate year-round and Monday through Friday with periodic operation on nights and weekends. Typical training activities would occur at the following times:

- 6:00 AM to 7:00 AM: Student arrival
- 7:00 AM: Flag detail
- 7:30 AM to 8:30 AM: Physical fitness
- 9:00 AM to 12:00 PM: Classroom or training ground
- 12:00 PM to 1:00 PM: Lunch
- 1:00 PM to 4:00 PM: Classroom or training ground
- 4:00 PM to 5:00 PM: Clean up

The Fire Training Facility would occasionally operate on weekday nights and weekends. For example, graduations would be held on a Saturday in December in June from 8:00 AM to 2:00 PM. Training would occur on a Saturday, once every two months, from 7:00 AM to 4:00 PM. Approximately once or twice a year, training would occur on weekday evenings, from 5:00 PM to 9:00 PM.

2.3.3 Project Construction and Schedule

Phase 1 of the project would include concrete removal/demolition; site preparation; grading; underground utility construction (trenching); modular building installation of two classrooms, locker rooms, and the fire tower; paving, architectural coating, and fencing and landscaping. Phase 1 construction is anticipated to begin when school is in

session, beginning March 2022 and ending in September 2022, for an approximated construction duration of approximately 6 months.[1] Construction equipment would be staged either on site or in the adjacent parking lot. Construction phasing is anticipated as follows:

- Demolition (20 days)
- Site preparation (2 days)
- Grading (4 days)
- Trenching and utilities (21 days)
- Modular building installation (66 days)
- Paving (10 days)
- Architectural coating (10 days)
- Fencing and landscaping (30 days)

Phase 2 would involve site preparation; the construction of the two remaining classrooms and administration space; the installation of the multipurpose rooms and apparatus bays, which are modular structures; and the application of interior and exterior paints and coatings. Phase 2 construction is anticipated to begin in July 2024 and end in March 2025, for an approximated construction duration of 8 months. Construction equipment would be staged either on site or in the adjacent parking lot. Construction phasing is anticipated as follows:

- Site preparation (1 days)
- Modular building installation (176 days)
- Architectural coating (5 days)

Demolition would involve the removal of existing concrete and lighting located throughout the site, for a total of 3,400 cubic yards of material. Additional site clearing and rough grading would occur during the site preparation phase. All graded materials would be balanced on site.

A summary of the anticipated construction equipment, quantity of equipment, hours of operation of the equipment, and worker, vendor, and haul trips per phase is included in Table 1.

[1] Timing estimates of the proposed project buildout were based on the preliminary project phasing schedule. Because CalEEMod uses real dates (e.g., January 15, 2024) to calculate construction emissions, assumptions were made as to key dates for each phase. While all dates reflected in this MND are estimates and actual dates may differ depending on funding, weather, future campus needs, and other factors, this analysis represents a conservative assessment of air quality impacts.

Table 1. Anticipated Construction Scenario

Construction Phase	Worker Round-Trips per Day	Vendor Truck Round-Trips per Day	Total Haul Truck Trips	Equipment	Quantity	Hours/ Day
Phase 1						
Demolition	13	4	425	Rubber-tired dozers	1	8
				Concrete/industrial saws	1	8
				Tractors/loaders/backhoes	3	8
Site preparation	8	4	0	Graders	1	8
				Tractors/loaders/backhoes	1	8
				Rubber-tired dozers	1	7
Grading	10	4	0	Rubber-tired dozers	1	8
				Tractors/loaders/backhoes	2	7
				Graders	1	8
Trenching and utilities	8	2	0	Plate compactors	1	8
				Tractors/loaders/backhoes	1	8
				Trenchers	1	8
Modular building installation	32	2	0	Cranes	1	6
				Forklifts	1	6
				Tractors/loaders/backhoes	1	6
				Welders	3	8
				Generator sets	1	8
Paving	13	2	0	Pavers	1	6
				Cement and mortar mixers	1	6
				Rollers	1	7
				Tractors/loaders/backhoes	1	8
				Paving equipment	1	8
Architectural coating	6	2	0	Air compressors	1	6
Fencing and Landscaping	2	2	0	–	–	–
Phase 2						
Site preparation	5	4	0	Graders	1	8
				Tractors/loaders/backhoes	1	8
Building construction	4	1	0	Cranes	1	4
				Forklifts	2	6
				Tractors/loaders/backhoes	2	8
				Welders	3	8
				Generator sets	1	8
Architectural coating	1	2	0	Air compressors	1	6

Source: See Appendix A
Note: Water trucks were not modeled as equipment in the construction models; instead, they were modeled as vendor trips in the site preparation, grading, and trenching phases.

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3 Initial Study Checklist

1. **Project title:**

   El Camino College Fire Academy project (project)

2. **Lead agency name and address:**

   El Camino Community College District
   16007 Crenshaw Boulevard
   Torrance, California 90506

3. **Contact person and phone number:**

   Jorge Gutierrez, Executive Director
   310.660.3593 ext. 6172

4. **Project location:**

   16007 Crenshaw Boulevard
   Torrance, California 90506

5. **Project sponsor's name and address:**

   El Camino Community College District
   16007 Crenshaw Boulevard
   Torrance, California 90506

6. **General plan designation:**

   Public/Quasi-Public/Open Space (PUB)

7. **Zoning:**

   General Commercial (C2)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

   See Section 2.3, Project Characteristics.

9. **Surrounding land uses and setting (Briefly describe the project's surroundings):**

   See Section 2.2, Environmental Setting.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

See Section 1.3, List of Discretionary Actions.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 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. See Section 3.18, Tribal Cultural Resources.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Signature

3/22/22
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 a lead agency 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 agency 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 Environmental Impact Report (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 "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. 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. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    d. The significance criteria or threshold, if any, used to evaluate each question; and
    e. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No Impact. For the purposes of this analysis, a scenic vista is defined as a long, expansive view of a highly valued landscape from a publicly accessible vantage point. "Highly valued landscapes" can include natural open spaces, topographic formations including mountains or hills, or more generally, areas that contribute to a high level of visual quality.

The project site is located in the City of Torrance in Los Angeles County. The City's General Plan does not identify protected scenic vistas within the City. However, the General Plan identifies scenic view corridors, some of which are located south of the project site (City of Torrance 2010). Additionally, the City notes the hillsides along the City's western and southern boundaries provide views of the San Gabriel Mountains to the north and the hillsides in the Riviera neighborhood overlooking the Pacific Ocean. Neither of these examples are within the project site's vicinity. Under existing conditions, views of the project site are generally shielded by tall mature ornamental trees and in some cases not viewable due to a below grade underpass along Redondo Beach Boulevard. Moreover, views of the site from the south consist of the Dominguez Channel, ornamental trees, and the site's existing conditions as a surface parking lot as well as a parking structures north of Redondo Beach Boulevard.

The project would redevelop an existing parking lot to construct a fire training facility on the campus of El Camino College. As such, the project would result in a change in the overall composition of existing views of the project site. Existing fencing and landscaping would provide screening to reduce visibility.

Additionally, scenic vistas and other significant views identified in the City of Torrance's General Plan are not visible from the project site, and thus, would not be obstructed as a result of the project. Therefore, impacts to scenic vistas would not occur.

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

No Impact. There are no officially designated state scenic highways within the project site's vicinity (Caltrans 2021). The nearest scenic highway to the project site is the officially designated state scenic highway SR-2, which is located approximately 25 miles to the northeast. Due to distance, intervening terrain and development, views of the project site are not available to or from SR-2. As such, the project would result in no impact to scenic resources within a state scenic highway.

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

Less than Significant Impact. California Public Resources Code Section 21071 defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As of 2020, the City has an estimated population of approximately 145,438 (U.S. Census 2020). Thus, the project site is located in an urbanized area and the following analysis considers whether the project would conflict with applicable zoning or other regulations governing scenic quality. Although El Camino Community College District is the lead agency for the proposed project, the following analysis, shown in Table 2, has been prepared to demonstrate consistency with the City of Torrance where the project site is located.

Table 2. Torrance General Plan Consistency

Community Resources Element	
Objective CR.4: To create and maintain open space as an aesthetic enhancement within the urban environment.	**Not Applicable.** The proposed project would involve the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas. No open space is proposed on the project site. However, open space exists on the El Camino College campus, to the north of the project site. As such, persons who utilize the project site could use existing open space within the campus grounds. Furthermore, the project site is currently developed as a parking lot. Thus, the project would not conflict with the City's objective to maintain open space.
Policy CR.4.2: Require that developers and property owners improve their properties by providing landscaping and similar aesthetic treatments along roadways.	**Consistent.** The proposed project site is currently developed as a parking lot with several landscape features located throughout. Once operational, the project site would include landscaped areas throughout the project site. The existing row of trees

	located at the eastern perimeter of the site would remain in place. The existing trees along the southern perimeter of the project site would remain in place. Two new landscaped areas would be introduced to the east and west of the classrooms and administration office modular buildings. A perimeter fence would be installed around the entire project site.
Policy CR.4.3: Encourage planting of new trees, and preserve existing street trees in residential neighborhoods.	**Not Applicable.** The project site is not within a residential neighborhood. The closest residential neighborhood to the project site is to the south, located across from the Dominguez Channel.
Objective CR.18: To preserve significant stands of trees and to establish a comprehensive plan to protect and enhance the urban forest.	**Consistent.** The proposed project would include landscaped areas to be located throughout the project site. The existing row of trees located at the eastern perimeter of the site would remain in place. The existing trees along the southern perimeter of the project site would remain in place. Two new landscaped areas would be introduced to the east and west of the classrooms and administration office modular buildings. A perimeter fence would be installed around the entire project site. As such, the project as proposed would establish a comprehensive landscaping plan for the project site.
Policy CR.18.1: Preserve specimen trees whether they occur on public or private property, and promote the planting of new trees.	**Consistent.** Vegetation on the project site includes landscaped areas with existing trees along the perimeter of the site; none of which would be removed as part of the project and would remain in place. As such, the proposed project would be consistent with these policies.
Policy CR.18.2: Provide, maintain, and encourage appropriate street trees along all sidewalks and property frontages.	
Policy CR.18.3: Develop and implement a comprehensive citywide street tree program that includes sidewalk-appropriate, drought-tolerant, and native species.	**Not Applicable.** This policy is a responsibility of, and is directed to, the City of Torrance. However, the proposed project would include drought tolerant and native species in the new landscaped areas.
Objective CR.19: To preserve scenic vistas wherever possible.	**Consistent.** See the analysis prepared under Threshold 4.1(a), below, for more discussion on scenic vistas.
Policy CR.19.1: Make the preservation of scenic vistas an integral factor in land development decisions.	
Policy CR.19.2: Look for opportunities to create public open space areas with scenic vistas that all can enjoy.	
Policy CR.19.3: Coordinate with Southern California Edison and other utilities to underground utility lines in new developments and to systematically replace overhead lines with underground facilities, with a priority placed along major roadways, key commercial areas, and within viewsheds of the beach.	**Not Applicable.** The project site does not contain above ground utilities on site. The closest above ground utilities are the electrical transmission lines which run along Redondo Beach Boulevard and traverse some of the parking lot adjacent to the project site.
Objective CR.20: To minimize sources and adverse effects of light pollution.	**Consistent.** See the analysis prepared under Threshold 4.1(d), below, for more discussion on light and glare.
Policy CR.20.1: Establish regulations for private lighting that minimize or eliminate light	

pollution, light trespass, and glare (obtrusive light).	
Policy CR.20.2: Require that nonresidential uses adjacent or near residential neighborhoods provide shielding or other protections from outdoor lighting and lighted signage.	

Source: City of Torrance 2010, Chapter 3: Community Resources Element

Given the consistency analysis, above, the proposed project would not conflict with the City of Torrance's General Plan objectives or policies governing scenic quality.

City of Torrance Municipal Code

In addition to the City's General Plan, the City's Municipal Code contains regulations governing scenic quality. For example, Section 92.39.010 requires wireless telecommunication ("telecom") facilities on public and private property to reduce the visual effects of telecom equipment on public streetscapes and protecting scenic views by encouraging the location of antennas in non-residential areas. As stated previously, the project site does not contain above ground utilities on site. The closest above ground utilities are the electrical transmission lines which run along Redondo Beach Boulevard and traverse some of the parking lot adjacent to the project site. Therefore, the project would not conflict with this provision of the Municipal Code.

Furthermore, Section 75.1 of the Municipal Code (also known as the City's Tree Ordinance) governs the placement of trees within public rights-of-way. As mentioned previously, vegetation on the project site includes landscaped areas with existing trees along the perimeter of the site; none of which would be removed as part of the project and would remain in place. Thus, project implementation would follow local regulations governing trees within the public right-of-way, in accordance with the City's Municipal Code.

Based on the analysis above, the project would be consistent with the City's General Plan and Municipal Code. Therefore, impacts associated with zoning and other regulations regarding scenic quality would be less than significant.

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

Less than Significant Impact. Existing light and glare conditions in the project area are typical of a suburban residential area adjacent to major transportation corridors, consisting of streetlights, external building and landscape lighting and internal building lighting emanating from windows in residential neighborhoods. Existing sources of light and glare on the project site consist of safety lighting and overhead lighting in parking areas and drive aisles. The project would introduce additional internal building lighting for new structures. Additionally, the project would include relocation of existing mounted light fixtures to accommodate the new construction. Once constructed, the project would be consistent with Section 3.10.3 of the City's Municipal Code, which governs artificial lighting standards. Compliance with the City's regulations would reduce potential adverse impacts associated with light and glare by incorporating designs which direct rays to the project site and adjacent properties are protected from glare. Further, fencing and landscaping would reduce potential light and glare impacts resulting from the project. Therefore, impacts associated with light or glare would be less than significant.

3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	**AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

No Impact. According to the Department of Conservation's California Important Farmland Finder, the proposed project site is mapped as "Urban and Built-Up Land". Urban and Built-Up land is classified as land "occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures" (DOC

2021). This is consistent with the project site's existing conditions as a parking lot on the El Camino College campus. As such, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

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

No Impact. The proposed project site is entirely located in the municipal boundaries of the City of Torrance. The project site is zoned as General Commercial (C2) (City of Torrance 2019). Section 91.21.1, Permissible Uses, of the Torrance Municipal Code does not allow for agricultural uses. Therefore, the proposed project would not conflict with the existing zoning for agricultural uses. Additionally, the project site does not contain agricultural activities and does not contain any land covered by a Williamson Act contract. Therefore, the project would not conflict with a Williamson Act contract. No impacts would occur.

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

No Impact. The proposed project site is entirely located in the municipal boundaries of the City of Torrance. The project site is zoned as General Commercial (C2) (City of Torrance 2019). Section 91.21.1, Permissible Uses, of the Torrance Municipal Code does not allow for forest land, timberland, or Timberland Production. As such, the project would not conflict with existing zoning or cause rezoning of forest land, timberland, or Timberland Production. No impact would occur.

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

No Impact. The project site's existing conditions consist of a parking lot on the El Camino College campus with several landscape features located throughout. Given this, project implementation would not result in the loss of forest land or conversion of forest land to a non-forest use. No impact would occur.

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

No Impact. As previously stated, above, the project site's existing conditions consist of a parking lot on the El Camino College campus with several landscape features located throughout. Furthermore, the project site is zoned as General Commercial (C2), which does not allow for land uses associated with Farmland, forest land, or agricultural activities (City of Torrance 2019). Given this, project implementation would not result in the conversion of Farmland to a non-agricultural use or forest land to a non-forest use. No impact would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less than Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for the SCAB is the 2016 AQMP (SCAQMD 2017).[2] The 2016 AQMP focuses on available, proven, and cost-effective alternatives to traditional air quality strategies while seeking to achieve multiple goals in partnership with other entities seeking to promote reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2016 AQMP, and if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining

[2] The SCAQMD has initiated the development of the 2022 AQMP to address the attainment of the 2015 8-hour ozone standard (70 parts per billion) for the SCAB and the Coachella Valley. Preliminary rule development for the 2022 AQMP is expected to begin in July 2021 including control measures developed through Residential and Commercial Buildings and Mobile Source Working Groups.

consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*. As presented in that analysis and summarized in Section 3.3(b) below, the proposed project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the project would therefore be consistent with Criterion No. 1.

The second criterion regarding the potential of the proposed project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the proposed project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)[3] (SCAG 2016). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2017).[4] The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. The relevant local plan for the proposed project is the City's General Plan (City of Torrance 2010) and the El Camino College Comprehensive Master Plan (El Camino College 2017).

The City's General Plan Land Use Map designates the project site as Public/Quasi-Public/Open Space (PUB) (City of Torrance 2005) and is zoned General Commercial (C2) (City of Torrance 2019). The proposed project would involve the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building,

[3] SCAQMD is currently working on the next iteration of the AQMP, the 2022 Air Quality Management Plan. The 2022 AQMP will incorporate the recently adopted SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS). However, until the adoption of the 2022 AQMP, project AQMP consistency will be analyzed off the 2016 AQMP and the RTP/SCS that was adopted at the time, the 2016–2040 RTP/SCS.

[4] Information necessary to produce the emissions inventory for the South Coast Air Basin (SCAB) is obtained from the South Coast Air Quality Management District (SCAQMD) and other governmental agencies, including the California Air Resources Board (CARB), California Department of Transportation, and Southern California Association of Governments (SCAG). Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy are integrated in the 2016 Air Quality Management Plan (SCAQMD 2017).

a fire tower, a physical training area, a ventilation props storage area, and landscaped areas. The proposed project would be consistent with the City's PUB land use designation, which allows for open space, land owned by public agencies and jurisdictions (i.e., El Camino Community College District), and land owned by private entities for uses which serve the community, such as utilities (City of Torrance 2010).

As discussed in Section 3.11, *Land Use and Planning*, the proposed fire tower would be located in the center of the project site, would be four-stories tall with an open roof deck above the fourth story, and would support fire simulation activities. The physical training area would surround the fire tower on all four sides. Although the project is not permitted under the project site's existing C2 zoning, the proposed use would support educational operations associated with El Camino College's Fire Academy and would receive a zoning override in accordance with Government Code 53094. Additionally, the proposed project is similar to the general commercial zoning given that commercial uses generate employment. The 2017 Comprehensive Master Plan indicates that as of 2015, El Camino College employed 338 full-time and 571 part-time faculty members in addition to 430 classified employees and 783 student, temporary non-classified, and casual employees. The proposed Fire Academy would result in 7 new employees, which is a nominal effect to the existing staffing levels on campus. For context, the 2016 SCAG RTP/SCS growth forecast projects that employment in the City of Torrance will increase from 102,300 employees in 2012 to 109,404 employees in opening year 2025 (SCAG 2016). The addition of 7 additional employees would account for only approximately 0.1% of this growth. As such, the proposed project would not induce substantial employment growth inconsistent with projections for the region.

Given that the proposed project is consistent with the current land use designation and zoning and is not anticipated to result in substantial growth that would conflict with existing employment-population projections, it would not conflict with or exceed the assumptions in the 2016 AQMP. Accordingly, the proposed project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development, and the impact would be less than significant. No mitigation is required.

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

Less than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the proposed project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}; course particulate matter), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$; fine particulate matter), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[5] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2019; EPA 2021). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards, as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[6]

The proposed project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

Table 3. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NOx	100	55
CO	550	550
SOx	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead	3	3
Toxic Air Contaminants and Odor Thresholds		
Toxic air contaminants[b]	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and Acute Hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District;
[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
[b] Toxic air contaminants include carcinogens and noncarcinogens.

The project would result in a cumulatively considerable net increase for O_3, which is a nonattainment pollutant, if the proposed project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3. These emission-based thresholds for O_3 precursors are intended to

[5] An area is designated as in attainment when it is in compliance with the National Ambient Air Quality Standards and/or the California Ambient Air Quality Standards. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the U.S. Environmental Protection Agency and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.
[6] Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e., VOCs and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 and emission factors from the EPA's Compilation of Air Pollutant Emission Factors (AP-42), were used to estimate emissions from construction and operation of the project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including residential development. The following discussion summarizes the quantitative project-generated construction and operational emissions and impacts that would result from implementation of the proposed project. Detailed assumptions and results of this analysis are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

Construction Emissions

Construction of the proposed project would include demolition, site preparation, grading, trenching, modular building installation, landscaping, paving, and application of architectural coatings. These construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Application of architectural coatings, such as exterior paint and other finishes, and application of asphalt pavement would also produce VOC emissions. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

Proposed project construction emissions were estimated using a combination of CalEEMod default assumptions, and information provided by El Camino College where available. It was assumed that approximately 2.5 acres of the project site would require grading, with earthwork balanced onsite. Existing pavement and concrete would be demolished, generating approximately 3,400 CY of material that would be hauled offsite. It is assumed that construction of Phase I of the project would commence in March 2022[7] and would last approximately 6 months, while Phase II of the project was assumed to commence in July 2024 and last about 8 months. Default values for equipment mix, horsepower, and load factor provided in CalEEMod were used for all construction equipment. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site six days per week, up to a maximum of 8 hours per day, in accordance with the City's municipal code. Detailed construction equipment modeling assumptions are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

[7] The analysis assumes a construction start date of March 2022 which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Emissions generated during construction (and operation) of the project are subject to the rules and regulations of the SCAQMD. Rule 403 (Fugitive Dust)[8] requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites would be watered at least two times daily, resulting in an approximately 55% reduction of fugitive dust (CalEEMod default value), to represent compliance with SCAQMD standard dust control measures in Rule 403. The application of architectural coatings, such as exterior/interior paint and other finishes, and the application of asphalt pavement would produce VOC emissions; however, the contractor is required to procure architectural coatings that comply with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).[9] Given ECC's commitment to use of low-VOC paints during application of architectural coatings, it was assumed that all paints for project construction would have maximum VOC content of 50 g/L.

Table 4 shows the estimated maximum daily construction emissions associated with the construction of Phase I and Phase II of the proposed project. Per the applicant, during Phase I the demolition, site preparation, and paving subphases may overlap. The emissions from these three subphases were combined and presented as "overlapping subphases" in Table 4.

Table 4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Construction Year	VOCs[a]	NO_x	CO	SO_x	PM_{10}[b]	$PM_{2.5}$[b]
	Pounds per Day					
Phase I						
2022	6.17	42.16	32.12	0.07	7.52	3.59
Phase II						
2024	1.60	12.71	15.87	0.03	0.59	0.53
2025	8.34	11.95	15.78	0.03	0.51	0.45
Maximum	*8.34*	*42.16*	*32.12*	*0.07*	*7.52*	*3.59*
SCAQMD threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
See Appendix A for detailed results.
Estimates assume heavy-duty construction equipment would be operating at the site six days per week, up to a maximum of 8 hours per day, in accordance with the City's municipal code (City of Torrance 2021).
[a] These estimates reflect control of VOCs (low-VOC paints) required by SCAQMD Rule 1113.
[b] These estimates reflect control of fugitive dust (watering twice daily) required by SCAQMD Rule 403.

[8] SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. While SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming twice daily watering of active sites (55% reduction in PM_{10} and $PM_{2.5}$ [CAPCOA 2017]).

[9] SCAQMD Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

As shown in Table 4, the proposed project's maximum daily construction emissions would not exceed SCAQMD thresholds for any criteria pollutant.

Operation Emissions

Operation of the proposed project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from area sources, energy sources and mobile sources, which are discussed below. Emissions from these sources were estimated based on CalEEMod default assumptions for on-going operations of the proposed project land use, and emission factors from EPA's AP-42. For further detail on the assumptions and results of this analysis, please refer to Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

Area Sources

Area sources include emissions from consumer products, landscape equipment, hearths, architectural coatings, and periodic fire simulation trainings. The area source emissions for consumer products, landscape equipment, hearths, and architectural coatings were estimated based on CalEEMod default assumptions for on-going operations of the proposed project.

Operation of the proposed project also includes periodic fire simulation trainings in the proposed fire tower approximately 75 days per year. There will be up to three tests on these training days, for a maximum of 225 fire simulations per year. The simulations will either be common combustible fires using 50-lb wood pallets, or propane fires using a pre-piped system. Per the applicant, approximately 20 percent (45 per year) of all simulations will be common combustible, while the remaining 80 percent (180 per year) will be propane fires. To estimate the emissions from the wood and propane simulations, emission factors were obtained from the EPA's Compilation of Air Pollutant Emission Factors (AP-42), Section 1.6, *Wood Residue Combustion in* Boilers and Section 1.5 *Liquefied Petroleum Gas Combustion,* respectively (EPA 2021) and calculated using a spreadsheet model.

Energy Sources

Energy sources include emissions associated with building electricity, and natural gas usage (non-hearth). The energy source emissions were estimated based on CalEEMod default assumptions for on-going operations of the proposed fire academy.

Mobile Sources

Operation of the project would also generate criteria air pollutant emissions from mobile sources (vehicular traffic) as a result of new vehicle trips to and from the project. The maximum weekday (Monday-Friday) trip rates were taken from Section 3.17, Transportation, and were assumed to be 52 average daily trips. To account for the maximum intensity scenario, the weekday trip rate was also assumed for weekend trips (Saturdays and Sundays). CalEEMod default emission factors representing the vehicle mix and emissions were used to estimate emissions associated with vehicular sources.

The proposed project is assumed to begin partial operation following completion of Phase I in 2022. Full operations would begin in 2025 after completion of Phase II. Tables 5 and 6 summarize the estimated maximum daily emissions associated with operation of the proposed project by source for 2022 (after completion of Phase I) and 2025 (after completion of Phase II), respectively. Given that Phase I will be

operational during construction of Phase II, combined construction and operational emissions for 2024 and 2025 are also provided in Table 7.

As shown, the proposed project's maximum daily operational emissions of VOC, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD's significance thresholds. Complete details of the emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

Table 5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions in 2022

Source	VOCs[a]	NO_x	CO	SO_x	PM_{10}[b]	$PM_{2.5}$[b]
	Pounds per Day					
Area	0.25	0.00	0.01	0.00	0.00	0.00
Energy	0.00	0.04	0.04	0.00	0.00	0.00
Mobile	0.16	0.19	1.54	0.00	0.33	0.09
Total	*0.41*	*0.24*	*1.59*	*0.00*	*0.34*	*0.09*
SCAQMD threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
The total values may not add up exactly due to rounding.
See Appendix A for detailed results.

Table 6. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions in 2025

Source	VOCs[a]	NO_x	CO	SO_x	PM_{10}[b]	$PM_{2.5}$[b]
	Pounds per Day					
Area	0.46	0.59	0.72	0.03	0.43	0.37
Energy	0.01	0.08	0.07	0.00	0.01	0.01
Mobile	0.14	0.16	1.40	0.00	0.33	0.09
Total	*0.61*	*0.83*	*2.19*	*0.03*	*0.77*	*0.47*
SCAQMD threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
The total values may not add up exactly due to rounding.
See Appendix A for detailed results.

Table 7. Estimated Maximum Daily Combined Operational and Construction Criteria Air Pollutant Emissions in 2024 and 2025

Source	VOCs[a]	NO_x	CO	SO_x	PM_{10}[b]	$PM_{2.5}$[b]
	Pounds per Day					
2024						
Phase 2 Construction	1.60	12.71	15.87	0.03	0.59	0.53
Phase 1 Operation	0.41	0.24	1.59	0.00	0.34	0.09
Total	*2.01*	*12.94*	*17.46*	*0.03*	*0.92*	*0.62*
2025						
Phase 2 Construction	8.34	11.95	15.78	0.03	0.51	0.45
Phase 1 Operation	0.41	0.24	1.59	0.00	0.34	0.09
Total	*8.75*	*12.18*	*17.37*	*0.03*	*0.85*	*0.55*
Maximum Combined Emissions	*8.75*	*12.94*	*17.46*	*0.03*	*0.92*	*0.62*
55	*55*	*550*	*150*	*150*	*55*	*55*
No	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
The total values may not add up exactly due to rounding.
See Appendix A for detailed results.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$, and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. However, as indicated in Tables 5 through 7, project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.[10] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD.

Therefore, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

[10] The California Environmental Quality Act (CEQA) Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

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

Less than Significant Impact. The project would not expose sensitive receptors to substantial pollutant concentrations as evaluated below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest sensitive receptors to the project site are multi-family and single-family residences located approximately 150 feet south and southwest of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of proposed project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008). The project is located within Source-Receptor Area 3 (Southwest Coastal LA County). This analysis applies the SCAQMD LST values for a 1 acre site within Source-Receptor Area 3 with a receptor distance of 45.72 meters (150 feet).

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). Trucks and worker trips associated with the proposed project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Therefore, off-site emissions from trucks and worker vehicle trips are not included in the LST analysis. The maximum daily on-site emissions generated from construction of the proposed project are presented in Table 8 and are compared to the SCAQMD localized significance criteria for Source-Receptor Area 3 to determine whether project-generated on-site emissions would result in potential LST impacts. As shown, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized impacts of the proposed project would be less than significant.

Table 8. Construction Localized Significance Thresholds Analysis

Construction Year	NO_x	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day			
Phase I				
2022	38.02	29.86	6.67	3.34
Phase II				
2024	12.66	15.72	0.54	0.51
2025	11.90	15.64	0.46	0.44
Maximum Daily On-Site Emissions	*38.02*	*29.86*	*6.67*	*3.34*
SCAQMD LST Criteria[a]	*93*	*764*	*12*	*5*
Threshold exceeded?	No	No	No	No

Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
The total values may not add up exactly due to rounding.
See Appendix A for detailed results.

[a] Localized significance thresholds are shown for a 1-acre disturbed area and interpolated for a sensitive receptor distance of 45.72 meters in Source-Receptor Area 3 (Southwest Coastal LA County).

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

At the time that the SCAQMD Handbook (1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[11] (SCAQMD 2003b) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection

[11] SCAQMD's CO hotspot modeling guidance has not changed since 2003.

in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. The project's anticipated ADT of 52 is minimal, and is not of a magnitude expected to raise the traffic volumes at intersections within proximity of the proposed project to the 100,000 vehicles per day that could result in a CO hotspot.

Additionally, ambient CO levels are monitored at the Compton air quality monitoring station (CARB #70112), which is approximately 7 miles northeast of the project site and represents ambient air quality in the project area. Ambient CO levels monitored at this representative monitoring station indicate that the highest recorded 1-hour concentration of CO is 4.7 ppm (the State standard is 20 ppm) and highest 8-hour concentration is 3.5 ppm (the State standard is 9 ppm) during the past 3 years of available data (2018-2020) (EPA 2021). As discussed above, the highest CO concentrations typically occur during peak traffic hours, so CO impacts calculated under peak traffic conditions represent a worst-case analysis. Even if combined with the concentrations presented in the 2003 AQMP for the four worst-case intersections in the SCAB with ADT of approximately 100,000 vehicles per day, the CO concentrations at the Compton air quality monitoring station would not exceed the 1-hour or 8-hour standards or result in a CO hotspot.

Given the considerably low level of CO concentrations in the project area, and the minimal increase in daily trips, project-related mobile emissions are not expected to contribute significantly to CO concentrations, and a CO hotspot is not anticipated to occur. This conclusion is supported by the analysis in Section 3.17, which demonstrates that transportation impacts would be less than significant. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. The proposed project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the closest sensitive receptors to the project site are multi-family and single-family residences located approximately 150 feet south and southwest of the project site.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects. The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and use of heavy-duty trucks.

DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts; however, no short-term, acute relative exposure level has been established for DPM. Total project construction would last approximately 14 months over two phases and 3 years, after which project-related TAC emissions would cease. According to the Office of Environmental Health Hazard Assessment, health

risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual receptor; however, such assessments should also be limited to the period/duration of activities associated with the project. A 14-month construction schedule represents a short duration of exposure (2% of a 30-year exposure period), while cancer and chronic risk from DPM are typically associated with long-term exposure. Thus, the project would not result in a long-term source of TAC emissions.

Exhaust PM_{10} is typically used as a surrogate for DPM, and as shown in Table 4, which presents total PM_{10} from fugitive dust and exhaust, project-generated construction PM_{10} emissions are anticipated to be minimal, and well below the SCAQMD threshold. In addition, sensitive receptors are located approximately 150 feet from the active project construction areas, which would reduce exposure to TACs as TAC emission dispersion increases with distance. Due to the relatively short period of exposure and minimal DPM emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

As discussed above, during operation of the proposed project, fire simulations would occur on site approximately 75 days per year. There would be up to three tests on training days, for a maximum of 225 fire simulations per year. Of the 225 annual simulations, 45 would be common combustible fires using 50-lb wood pallets. These fires could result in TAC emissions and corresponding health risks to nearby sensitive receptors. The TACs related to the combustion of dry wood are outlined in the EPA's Compilation of Air Pollutant Emission Factors (AP-42), Section 1.6, *Wood Residue Combustion in Boilers* (See Table 1.6-3) (EPA 2021). SCAQMD Rule 444, *Open Burning*, includes specific requirements to minimize emissions and impacts from planned fires and to ensure that smoke is managed consistent with state and federal law in order to protect public health and safety. In accordance with this rule, the project would be required to submit to the SCAQMD a Burn Authorization Number request the day prior to each fire simulation event. Compliance with Rule 444 would ensure that fire simulations are conducted in a manner that minimizes risks and the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project. Impacts would be less than significant.

Health Effects of Criteria Pollutants

Construction and operation of the project would generate criteria air pollutant emissions. However, due to the nature of the project and the short duration of construction, which would last approximately 14 months over two phases and 3 years, the project would not exceed the SCAQMD mass-emission thresholds, as shown in Tables 5 through 7 above.

The SCAB is designated as nonattainment for O_3 for the NAAQS and CAAQS. Thus, existing O_3 levels in the SCAB are at unhealthy levels during certain periods. Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2021). The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Further, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project's emissions of O_3 precursors is speculative. Because the project would not involve activities that would result in O_3 precursor emissions

(i.e., VOCs or NO_x) that would exceed the SCAQMD thresholds, as shown in Tables 5 through 7, the project is not anticipated to substantially contribute to regional O_3 concentrations and its associated health impacts during construction or operation.

In addition to O_3, NO_x emissions contribute to potential exceedances of the NAAQS and CAAQS for NO_2. Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2021). As shown in Tables 5 through 7, proposed project construction and operations would not exceed the SCAQMD NO_x threshold, and existing ambient NO_2 concentrations would be below the NAAQS and CAAQS. Thus, the proposed project is not expected to result in exceedances of the NO_2 standards or contribute to associated health effects.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2021). CO hotspots were discussed previously as a less-than-significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

The SCAB is designated as nonattainment for PM_{10} under the CAAQS and nonattainment for $PM_{2.5}$ under the NAAQS and CAAQS. Health effects associated with PM_{10} include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). As with O_3 and NO_x, and as shown in Tables 5 through 7, the proposed project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the proposed project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related regional health effects for this pollutant.

In summary, the project would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health effects associated with those pollutants. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). During operation the project would have periodic trainings involving fire simulations that would be either common combustible fires using 50-lb wood pallets,

or propane with a pre-piped system. Per the applicant, trainings would occur 75 days per year with up to three tests per day, and the simulations would last no longer than 5 minutes. Additionally, the project proponent would be required to comply with SCAQMD Rule 444, which would minimize impacts and ensure that smoke is managed consistent with state and federal law in order to protect public health and safety. Given the brief nature of trainings and compliance with SCAQMD Rule 444, there would be no long-term operational impacts associated with odors. Impacts would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) Would the project 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 Game or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated. The proposed project site is an existing parking lot on the El Camino College campus, located within an urbanized area of the City of Torrance. As shown in Figure 1, Project Location, the project site is almost entirely paved with limited vegetation as landscape features. The campus is surrounded by residential communities to the north, east, south, and west. The Alondra Golf Course is located west of the campus. Directly south of the project site boundaries is the Dominguez Channel which creates the western and southern boundaries. Vegetation on the project site includes landscaped areas with existing trees along the perimeter of the site; none of which are would be removed as part of the project and would remain in place.

The project site does not support any naturally vegetated areas or connectivity to any habitats for candidate, sensitive, or special status species under existing conditions. The nearest open space (the Alondra Community Regional Park and Golf Course) is located directly west of the project site across Redondo Beach Boulevard; however, the existing land use on this site is predominately for recreational open space and does not support native habitats that would be impacted by the proposed project.

The existence of ornamental trees could provide nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (MBTA) (16 USC 703-712) and California Fish and Game Code Section 3503, 3503.5, and 3513. Construction activities could negatively affect individual birds or raptors that are nesting on or within the vicinity of the project site. Project activities could adversely affect or kill a nesting bird or raptor, and construction activities would also elevate noise levels and could cause disturbance to protected bird/raptor species nesting on site or adjacent to the construction areas. Construction could potentially occur during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (i.e., between February 15 – August 31). Thus, there is potential for construction activities and construction noise to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to the project site. Implementation of mitigation measure MM-BIO-1 would reduce this impact to below a level of significance. Construction impacts would therefore be less than significant with mitigation incorporated.

MM-BIO-1 To maintain compliance with the Migratory Bird Treaty Act and Fish and Game Code, if ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within the project footprint and a 300-foot buffer around the project footprint. Surveys shall be conducted within 3 days prior to initiation of activity and will be conducted between dawn and noon.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a qualified biologist. The buffer will be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests will be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned.

If active nests are found during pre-construction surveys or at any time throughout the course of construction activities during the nesting bird season, all clearing/construction activities within a minimum

of 300 feet of the nest shall be postponed until a wildlife biologist has identified the nesting species. If the bird species is not protected under the MBTA and/or the California Fish and Game Code, no further action is required and construction activities may proceed. If the avian species is protected under the MBTA and/or the California Fish and Game Code, a minimum buffer zone shall be established by the qualified biologist based on the type of bird/raptor species identified and the construction buffer shall be established on site through the erection of cones/flagging/fencing to clearly delineate the protection zone.

All construction activities shall avoid this protection zone until a qualified biologist has confirmed that the nest(s) is no longer active and the nest is vacated, and there is no evidence of second nesting attempts. Upon completion of any site survey for nesting birds conducted by a qualified biologist, documentation of the survey activity, findings, and any resulting actions taken shall be prepared and submitted to the District.

Once the proposed project has been constructed, construction-related disturbances would not occur, and landscaping trees would remain on site. As such, the project site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, long-term impacts to nesting and migratory birds would not be significant. Overall, impacts would be less than significant with mitigation incorporated. No further mitigation is required.

With implementation of MM-BIO-1, the proposed project would have less than significant impact with mitigation incorporated on the movement of native resident or migratory fish or wildlife species and established native resident or migratory wildlife corridors, and would not impede the use of native wildlife nursery sites.

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

Less than Significant Impact. There are no riparian habitat communities or other sensitive natural communities located on the project site, which is fully developed with urban uses and ornamental landscaping. As mentioned above, the Dominguez Channel is located to the south and west of the project site. According to the U.S. Fish and Wildlife Service's National Wetlands Inventory, this portion of the channel is categorized as part of a 11.33-acre riverine habitat. Further to the west, the Alondra Golf Course includes a 7.93-acre freshwater pond (USFWS and NWI 2021). Demolition and construction activities at the project site have the potential to release small amounts of construction debris or sediment into the storm drain system. However, any fugitive sediments would not flow into the Dominguez Channel with implementation of construction Best Management Practices (BMPs) as described in Section 3.10, Hydrology and Water Quality. Given this, the proposed project would have a less than significant impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and no mitigation is required.

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

Less than Significant Impact. There are no wetlands on the project site, which is fully developed as an existing paved parking lot. As previously mentioned above, demolition and construction activities at the

project site have the potential to release small amounts of construction debris or sediment into the storm drain system. However, any fugitive sediments would not flow into the Dominguez Channel with implementation of construction BMPs as described in Section 3.10, Hydrology and Water Quality. Given this, the proposed project would have a less than significant impact on state and federally protected wetlands. No mitigation is required.

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

Less than Significant with Mitigation Incorporated. The project site is located in a fully developed, urban area surrounded by urban land uses, the presence of which precludes native wildlife movement in the direction of the project site. Additionally, there are no wetlands or water bodies within the project site. Although the Dominguez Channel is located to the south and west of the project site, implementation of construction Best Management Practices (BMPs) as described in Section 3.10, Hydrology and Water Quality would reduce potential impacts related to fugitive sediments, for example. As such, the proposed project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

However, several trees on and adjacent to the project site would have the potential to provide potential nesting sites for birds and raptors that are protected under the MBTA (16 USC 703-712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. As discussed in Section 3.4(a), above, the proposed project construction has the potential to adversely affect protected nesting birds or raptors. For the reasons described in Section 3.4(a), impacts would be less than significant after implementation of MM-BIO-1. As such, impacts would be less than significant with mitigation incorporated. No further mitigation is required.

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

Less than Significant Impact. Vegetation on the project site includes landscaped areas with existing trees along the perimeter of the site; none of which are would be removed as part of the project and would remain in place. As such, project implementation would follow local regulations governing trees within the public right-of-way, in accordance with Chapter 5, Parkway Plantings, Walls and Fences ("Tree Ordinance") of Division 7 of the City of Torrance Municipal Code (City of Torrance 2021b). The proposed project would not impact any trees within the public right-of-way and would therefore not impact any trees subject to this chapter of the Municipal Code. As such, with compliance with the City's Municipal Code, the project would have a less than significant impact to local policies or ordinances protecting biological resources. No mitigation is required.

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

No Impact. According to the California Department of Fish and Wildlife, the nearest Natural Communities Conservation Plan (City of Rancho Palos Verdes Natural Community Conservation Plan/Habitat Conservation Plan) is located approximately 10 miles south/southwest from the project site, within the municipal boundaries of the City of Rancho Palos Verdes. As such, there are no adopted, approved, or

proposed Habitat Conservation Plans, or other approved local, regional, or state habitat conservation plans that cover habitats located within the project site's vicinity (CDFW 2019). Given this, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur and no mitigation is required.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The following analysis is based, in part, the Archaeological Resource Assessment prepared by Dudek in 2022, included as Appendix B.

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

Less than Significant Impact. As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a "historical resource" is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (Public Resources Code Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (Public Resources Code Section 21084.1; 14 CCR 15064.5(a)).

A review of historical maps and aerial photographs indicates that the project site was undeveloped as early as 1896. However, in the early 1930s, the Dominguez Channel was underway to be formally channelized and was depicted as it is today by 1941. The Dominguez Channel is located outside of the project site and is therefore outside the scope potential project impacts. The project site appears to remain undeveloped until at least 1972, when it is shown as a paved parking lot. Additionally, a review of the California Historical Resources Information System (CHRIS) database records search for the project site did not identify any historical resources, including both archaeological and built environment resources, within the project site.

Moreover, a pedestrian survey of the project site did not identify any extant structures within the project footprint. Therefore, impacts associated with historical resources would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated. A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an Archaeological Resources Assessment that was prepared for the project (Appendix B).

No prehistoric or historic-era archaeological resources have been identified as a result of CHRIS database records search, NAHC SLF search, background research, or the archaeological pedestrian survey. While the project site has been subject to two previous cultural resource investigations, neither study included a pedestrian survey of the project site. This suggests that the project site has not been subject to any surveys prior to the placement of fill soils or development of the project site.

A review of a geotechnical report prepared for the project site determined that fills soils were encountered between 7.5 to 10 feet (ft) from the existing ground surface within all seven exploratory boring locations. Current project design indicates that the minimum depth of ground disturbance for the project site is 12 inches (in) below the existing ground surface across the site for the demolition and removal of existing pavement and base, an assumed 5 ft below the existing ground surface for trenching for utilities, and a maximum depth of 8 ft below the existing ground surface for the scarification and excavation for new building foundations. Of note, the geotechnical investigations were limited to the landscaped areas along the perimeter of the project site accounting for approximately 10 percent of the site; the majority of the project site is paved (approximately 90 percent) and was not subject to any subsurface exploratory investigations and therefore, subsurface geological conditions within the paved areas are unknown. As such, due to the presence of fill soils and paved areas within the proposed project site, observation of intact native soils was not possible during the pedestrian survey, resulting in less than reliable survey results.

A review of historical maps and aerial images shows that the project site was undeveloped since at least 1896 and was not paved and utilized as a parking lot until at least 1972. In the early 1930s, a waterway is shown as partially overlapping the southern portion of the project site and appeared to be an offshoot of the slough to the southeast and outside of the project site. The slough, referred to in 1938 as Laguna Dominguez slough, was later subject to draining and then channelized to become the present-day Dominguez Channel, located south/southwest of the project site.

In consideration of all these factors, including the limitations of the subsurface exploratory boring and the findings in the geotechnical report prepared for the project (boring conducted only in landscape beds), the potential to encounter unknown intact archaeological resources between current grade and 7.5 to 10 ft below ground surface along the western and southern perimeter of the project site is unlikely; however, the potential to encounter unknown intact archaeological resources within the paved parking lot between current grade to the proposed depths of disturbance within the paved parking lot is possible. For these reasons, the project site should be treated as potentially sensitive for archaeological resources. In the event that unanticipated archaeological resources are encountered during project implementation, impacts to these resources would be potentially significant.

Thus, mitigation is required to address impacts related to the unlikely event of inadvertent discovery of archaeological resources during construction, as outlined in MM-CUL-1 and MM-CUL-2. MM-CUL-1 requires that all project construction personnel participate in a Workers Environmental Awareness Program training for the proper identification and treatment of inadvertent discoveries. MM-CUL-2 requires the retention of an on-call qualified archaeologist to address inadvertent discoveries and requires all construction work occurring within 100 feet of a find to immediately stop until the qualified archaeologist, meeting the Secretary of Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. Additionally, in consideration of the potential to encounter intact cultural deposits beneath fill soils, the qualified archaeologist shall monitor ground disturbing activities from 7.5 ft below current grade along the western and southern perimeter and after the removal of pavement and base within the parking lot area once fill soils have been removed to ensure no cultural deposits underly the fill layer. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, should oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs. With implementation of MM-CUL-1 and MM-CUL-2, potentially significant impacts to unknown archaeological resources would be reduced to less than significant with mitigation incorporated.

MM-CUL-1 **Workers Environmental Awareness Program** - All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries of archaeological or tribal cultural resources prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries of archaeological or tribal cultural resources. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological and tribal cultural materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological and tribal cultural resources. Each worker shall also be trained in the proper procedures to follow in the event that archaeological, tribal cultural resources or human remains are uncovered during ground disturbing activities. These procedures include but are not limited to work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor. Pursuant to MM-TCR-1, all interested tribes who have requested and engaged in formal tribal consultation for the El Camino College Fire Academy Project, pursuant to AB-52, will be invited to participate in the WEAP training and will be given the opportunity to speak regarding tribal cultural resources.

MM-CUL-2 **Retention of a Qualified Archaeologist for On-Call/Spot Monitoring** - A qualified archaeologist shall be retained and on-call to conduct spot monitoring and respond to and address any inadvertent discoveries identified during ground disturbing activities whether within disturbed, imported or native soils. In the event of an inadvertent discovery of archaeological or tribal cultural resources, a qualified archaeologist shall be retained to monitor all initial ground disturbance. Initial ground disturbance is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to archaeological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current project-related construction. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and

adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to further encounter cultural deposits or material. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance as previously defined in these mitigation measures causing monitoring to be hindered by the distance of the simultaneous activities. The need for an additional monitor shall be made by the qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards. The archaeological monitor shall be responsible for maintaining daily monitoring logs for those days monitoring occurs.

If monitoring is conducted, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the El Camino College District for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the South Central Coast Information Center (SCCIC) for inclusion on the CHRIS database and interested consulting tribes.

MM-CUL-3 **Inadvertent Discovery Clause** - In the event that potential prehistoric or historic-era archaeological resources and/or tribal cultural resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring not less than 50 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work (e.g., preparation of an archaeological treatment plan, testing, or data recovery) may be warranted. If Native American resources are discovered or are suspected, each of the consulting tribes for the Project will also be notified.

In the event that human remains are inadvertently encountered during construction activities, the remains and associated resources shall be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the Project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains.

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

Less than Significant Impact. No prehistoric or historic burials were identified within the project site as a result of the CHRIS records search or pedestrian survey. In the event that human remains are inadvertently encountered during construction activities, such resources would be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with these regulations would ensure that impacts to human remains resulting from the project would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – 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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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

Less than Significant Impact. Implementation of the proposed project would result in energy use for construction and operation, including use of electricity, natural gas, and petroleum-based fuels. The electricity and natural gas used for construction of the proposed project would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption. Additionally, although natural gas and electricity usage would increase due to the implementation of the project, the project's energy efficiency would meet the current Building Energy Efficiency Standards (Title 24). Further, while the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in vehicle miles traveled (VMT) over time.

The proposed project's impact on energy resources is discussed separately below for construction and operation. Energy consumption (electricity, natural gas, and petroleum consumption) was estimated using CalEEMod data from the air quality and GHG assessment. For further detail on the assumptions and results of the energy analysis, please refer to the Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.*

Construction Energy Use

Electricity

Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities would require electricity, including the conveyance of water that would be used for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Southern California Edison (SCE) is the electricity provider to the project site and provided approximately 81,000 Gigawatt-hours of electricity in 2019[12]. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available SCE electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Petroleum-Based Fuels

Petroleum-based fuel usage represents most energy consumed during construction. Petroleum fuels would be used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery and haul truck trips (e.g. hauling of material to disposal facilities).

Fuel consumption from construction equipment and vehicles was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. All off-road equipment and hauling and vendor trucks are assumed to be diesel, while worker vehicles are assumed to be gasoline. Construction is estimated to occur in 2022 for Phase I and 2024 and 2025 for Phase II of the project based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction equipment for Phase I and Phase II of the project are shown in Table 9.

[12] Obtained from: http://www.ecdms.energy.ca.gov/elecbyutil.aspx

Table 9. Estimated Construction Fuel Use

Construction Year	Fuel Use (gallons)		
	Off-Road Equipment (Diesel)	*On-Road Trucks (Diesel)*	*On-Road Workers (Gasoline)*
Phase I			
2022	9,755	1,615	1,438
Phase II			
2024	13,721	116	2
2025	4,763	47	85
Total	**28,239**	**1,778**	**1,525**

Notes: Conversion factors from The Climate Registry (2021).
See Appendix A for complete results.

As shown in Table 9, construction of the project is anticipated to consume 1,525 gallons of gasoline and 30,017 gallons of diesel over the two phases. The proposed project would be required to comply with the CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. Furthermore, the proposed project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that requires the vehicle fleet to reduce emissions by retiring, replacing, repowering older engines, or installing Verified Diesel Emissions Control Strategies. Therefore, impacts associated with construction would be less than significant.

Operational Energy Use

Electricity

The proposed project would require electricity for multiple purposes at buildout, including cooling, lighting, appliances, and lighting for the associated parking lot. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs presented in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

CalEEMod default values for energy consumption for the proposed fire academy were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end-use categories subject to Title 24 requirements (end-uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the proposed project would consume approximately 232,145 kilowatt-hours per year during operation. For context, in 2020, California used approximately 280 billion kilowatt-hours of electricity. Locally, in 2020, non-residential electricity demand in Los Angeles County was approximately 43 billion kilowatt-hours (CEC 2021a).

Natural Gas

The operation would require natural gas for various purposes, including water heating and natural gas appliances. Natural gas consumption associated with operation is based on the CalEEMod outputs presented in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

CalEEMod default values for energy consumption for the proposed fire academy were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end-use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the proposed project would consume approximately 299,117 kilo-British Thermal Units (kBtu) per year. For context, in 2020, California consumed approximately 1,233 billion kBtus of natural gas. Locally, in 2020, non-residential uses in Los Angeles County consumed about 170 billion kBtu of natural gas (CEC 2021b).

Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site by students and employees.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. As shown in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* and as discussed in Section 3.3, *Air Quality*, and Section 3.8, *Greenhouse Gas Emissions*, the annual VMT attributable to the proposed project were estimated based on project-specific trip generation information and CalEEMod default values for the proposed land use. Similar to the construction worker and truck trips, fuel consumption from students and facility is estimated by converting the total CO_2 emissions from operation of the project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, approximately 95% of the fleet are assumed to run on gasoline, while the remaining 5% are assumed to run on diesel. In the first year of assumed operations (2025), the proposed project would consume approximately 5,559 gallons of gasoline, and 240 gallons of diesel from vehicle travel.

As discussed previously, operation of the proposed project also includes periodic fire simulation trainings in the proposed fire tower approximately 75 days per year. There will be up to three tests on these training days, for a maximum of 225 fire simulations per year. Per the applicant, approximately 80 percent (180 per year) will be propane fires, which would last no longer than 5 minutes each. Assuming a 4.2 million BTU pre-piped system[13], this would amount to approximately 630 gallons of propane used per year to fuel the fire simulations.

[13] Personal communication with Fireblast.

Summary

Over the lifetime of the project, the fuel efficiency of the vehicles being used by students and employees is expected to increase. As such, the amount of gasoline consumed during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB 2017). Additionally, in response to Senate Bill (SB) 375, CARB has adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by the year 2020 and 13% by the year 2035 for light-duty passenger vehicles in the SCAG planning area. This reduction would occur by reducing VMT through the integration of land use planning and transportation. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

The proposed project would create additional electricity and natural gas demand by adding facilities to the existing campus. New facilities associated with the proposed project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of non-residential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

In summary, implementation of the project would increase the demand for electricity and natural gas at the project site and petroleum consumption in the region during construction and operation. However, as the project would be consistent with current regulations and policies, the project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. The project's energy consumption demands during construction and operation would conform to the State's Title 24 standards such that the project would not be expected to wastefully use gas and electricity. Since the proposed project would comply with Title 24 conservation standards, the proposed project would not directly require the construction of new energy generation or supply facilities or result in wasteful, inefficient, or unnecessary consumption of energy. Moreover, vehicle usage associated with the project would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. At a minimum, the proposed project would be subject to and would comply with, the 2019 California Building Code Title 24 (24 CCR, Part 6). Additionally, as discussed in Section 3.8, *Greenhouse Gas Emissions*, the proposed project would not conflict with the El Camino College Sustainability Plan, which was adopted in 2019 to achieve resource efficiency, including energy (see Table 12). The proposed project would also not conflict with CARB's Climate Change Scoping Plan, which identifies several strategies to reduce GHG emissions through energy efficiency. As discussed in further detail in Section 3.8, the proposed project would be subject to these strategies as many are state actions requiring no involvement at the project level. As such, implementation of the proposed project would not conflict with applicable plans for energy efficiency, and the impacts during construction and operation would be less than significant.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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

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

No Impact. The Alquist–Priolo Earthquake Zoning Act (Alquist–Priolo Act) requires the delineation of fault zones along active faults in California. The purpose of the Alquist–Priolo Act is to regulate development on or near active fault traces to reduce hazards associated with fault rupture. The Alquist–Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. A Geotechnical Exploration was conducted for the proposed project by Leighton Consulting, Inc. (hereafter referred to as Leighton) on August 23, 2021 and is included as Appendix C to this document. The geotechnical exploration included a literature review of active faults in the area. The review indicated that there are no known active faults traversing the site. The closest known active or potentially active fault is the Newport-Inglewood Fault approximately 3.5 miles to the east of the project site. For the reasons described above, the project site is not located within an Alquist-Priolo Earthquake Fault Zone. Thus, the potential for surface rupture of an Alquist-Priolo Earthquake Fault on the project site is low. Furthermore, project construction and operation would not increase the probability or exacerbate the potential for fault rupture to occur. Therefore, no impact would occur.

ii) Strong seismic ground shaking?

Less than Significant Impact. As with most of Southern California, the project site could be subject to seismic ground shaking. As stated in the geotechnical exploration, the principal seismic hazard that could affect the site is ground shaking resulting from an earthquake occurring along several major active or potentially active faults in Southern California. According to the geotechnical exploration, the most significant seismic source to potentially affect the project site is the Newport-Inglewood Fault, located approximately 3.5 miles from the project site. Leighton has determined seismic design parameters, provided within the geotechnical exploration, which would reduce the effects of seismic ground shaking. Generally, adequate engineering and construction techniques have been developed to reduce the risk of damage to structures from ground shaking to the extent feasible. The proposed project would be required to be designed to resist seismic forces in accordance with the criteria contained in the California Building Code. Furthermore, the proposed project would be designed and built in accordance with the applicable recommendations provided by Leighton. Although the project site is not located within an area that has been identified as being potentially susceptible to seismically-induced landslides, Leighton performed a slope stability analysis given the site's proximity to the adjacent, concrete-lined Dominguez Channel. The slope stability analyses tested both static and pseudostatic conditions and determined safe conditions (Appendix C). Since there are no other conditions present on-site that would amplify or otherwise worsen the effects of ground shaking, design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize hazards associated with seismic ground shaking to the extent practicable. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for strong seismic ground shaking to occur. The impact would be less than significant. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is the loss of soil strength due to a buildup of excess pore-water pressure during strong and long-duration ground shaking. Liquefaction is associated primarily with loose (low density), saturated, relatively uniform fine- to medium-grained, clean cohesionless soils. As shaking action of an earthquake progresses, soil granules are rearranged and the soil densifies within a short period. This rapid densification of soil results in a buildup of pore-water pressure. When the pore-water pressure approaches the total overburden pressure, soil shear strength reduces abruptly and temporarily behaves similar to a fluid. For liquefaction to occur there must be loose, clean granular soils; shallow groundwater; and strong, long-duration ground shaking.

As reported by Leighton, the south/southwestern portion of project site is located within an area of susceptibility for liquefaction as mapped on state liquefaction hazards maps (Appendix C). Additionally, Leighton found that groundwater was assumed to be at a depth of 20 feet below existing grade. As stated in Appendix C, based on the analysis prepared by Leighton, the potential for damaging liquefaction to occur at the project site's surface is considered low. Furthermore, with the implementation of recommendations, liquefaction-induced settlement is estimated to be within design tolerances for conventional shallow spread footings. Undocumented fill soils were encountered in exploratory borings to depth ranging from approximately 7.5 feet to 10 feet below the existing grade (Appendix C). Landslides are discussed below under Section 3.7(a)(iv). Design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize hazards associated with liquefaction and settlement to the extent practicable. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for seismic-related ground failure to occur. The impact would be less than significant. No mitigation is required.

iv) Landslides?

No Impact. The project site is level without significant slopes. The project site is not considered susceptible to static slope instability or seismically induced landslides (Appendix C). No impact would occur, as no known landslide areas are present on the project site or in the vicinity of the project site.

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

Less than Significant Impact. Construction of the proposed project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. Because the project would result in more than 1 acre of ground disturbance, the project would be subject to the National Pollutant Discharge Elimination System stormwater program, which includes obtaining coverage under the State Water Resources Control Board's General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit; Order 2009-0009-DWQ). Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation. The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP). Among the required items that must be included within a SWPPP are project design features intended to protect against substantial soil erosion as a result of water and wind erosion, commonly known as BMPs. Examples of best management practices that may be required by the erosion and sediment control plan include sandbag barriers, dust controls, perimeter controls, drain inlet protection, and proper construction site housekeeping practices. Implementation of such best management practices would minimize erosion during ground disturbance to the extent feasible.

During operation, the developed portion of the project site would be covered with buildings, hardscape, and landscaping, which would preclude erosion. Adherence to existing regulations and implementation of standard construction practices would ensure that soil erosion impacts are less than significant. No mitigation is required.

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

Less than Significant Impact. As described under Sections 3.7(a)(iii) and 3.7(a)(iv), the project site is not known to be susceptible to liquefaction hazards or landslide hazards. Further, the General Plan Safety Element Figure S-2 shows areas where previous occurrences of landslide and liquefaction movement, or local topographic, geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacements have occurred within the City (City of Torrance 2010). None of the areas illustrated on the General Plan figure included the project site or general vicinity. Furthermore, Leighton conducted a site-specific study of the on-site soils to determine their characteristics, to identify potential safety hazards, and to provide recommendations for constructing the proposed project in a manner that would minimize soil-related hazards. Based on the analysis described in the geotechnical exploration, the project site is generally underlain by cohesive soils, and not by clean sands or sandy soils, which have the potential to produce lateral ground displacements as a result of liquefaction. As such, the potential for damaging lateral ground displacement is considered a negligible risk (Appendix C). Incorporation of the geotechnical recommendations summarized in Appendix C, and compliance with the California Building Code, would ensure that the project is designed and constructed to minimize soil-related hazards, including the potential for settlement of compressible soils. As such, impacts would be less than significant. No mitigation is required.

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

Less than Significant Impact. Leighton notes in Appendix C that the Torrance area is known for having highly expansive clay. Further testing was conducted from soil sample borings which indicated that the expansion potential of near-surface soils range from low to medium (Appendix C). However, previous expansion testing collected from the main campus of El Camino College indicate a high potential for expansion. As such, Leighton recommends additional testing of soils upon completion of grading to confirm the subgrade conditions prior to construction. Furthermore, Appendix C notes foundations and exterior improvements are recommended to be supported in new engineered fill. Soils within the influence of foundations and slabs are anticipated to have a low expansion potential requiring a moderate level of design for expansive soil (Appendix C). Incorporation of the geotechnical recommendations summarized in Appendix C, and compliance with the California Building Code would further reduce any risks associated with expansive soils. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for soil expansion to occur. As such, impacts related to the proposed project being located on expansive soil creating substantial risk to life or property are considered to be less than significant. No mitigation is required.

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

No Impact. The project would connect to the existing sewer system for disposal of wastewater, and therefore, would not require septic tanks or other alternative wastewater disposal systems. As such, no impact would occur.

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

Less Than Significant with Mitigation Incorporated. The proposed project is located within the northernmost Peninsular Ranges Geomorphic Province (Norris and Webb 1990; CGS 2002). This geomorphic province is characterized by northwest trending mountain ranges and valleys that extend over 900 miles from the tip of the Baja Peninsula to the Transverse Ranges (e.g., the San Bernardino and San Gabriel Mountains in Southern California). Regionally, the Peninsular Ranges are bounded to the east by the Colorado Desert and the west by the continental shelf and offshore islands (Santa Catalina, Santa Barbara, San Nicholas, and San Clemente) (Norris and Webb 1990; CGS 2002). Regional mountain ranges in the Peninsular Ranges Geomorphic Province include the Santa Ana, San Jacinto, and Santa Rosa Mountains. Geologically, these mountains are dominated by Mesozoic, plutonic igneous and metamorphic rocks that are part of the Peninsular Ranges Batholith (Southern California Batholith) (Jahns 1954).

More specifically, the proposed project is located within the Los Angeles Basin. The basin is a sedimentary region connected to an anomalous group of east west-trending mountains collectively known as Transverse Ranges. The present basin is a coastal lowland area whose floor is marked by elongate low ridges and groups of hills that are located on the edge of the Pacific Plate (Jahns 1974). According to surficial geological mapping by Dibblee and Minch (2007) at a scale of 1:24,000, the study area is entirely underlain by elevated Quaternary alluvium (map unit Qae) that is Pleistocene age (~2.58 million–12,000 years ago). These locally derived (chiefly from the Santa Monica Mountains) sedimentary deposits are typically tan to brown in color and consist of clay, silt, and sand with coarser-grained sediments commonly associated with stream channels (Dibblee and Ehrenspeck, 1991). Pleistocene alluvium has high paleontological sensitivity throughout its extent in the Los Angeles Basin.

A paleontological records search request was sent to the Natural History Museum of Los Angeles County (LACM) on August 31, 2021, and the results were received on September 9, 2021. According to the records search, paleontological localities are documented within a 1-mile radius buffer of the proposed project boundaries. These documented localities are from similar geological units that may occur beneath the proposed project site. The nearest locality to the proposed project area, LACM IP (Invertebrate Paleontology) 237, was recovered due south of the proposed project area from deposits that likely occur at unknown depth below the surface of the proposed project area. The specimens consisted of unspecified invertebrates recovered from an unspecified depth below the surface. Further review of the paleontological records search indicated fossil yielding localities within the buffer including LACM IP 5096, LACM VP (Vertebrate Paleontology) 3266, LACM VP 3365, LACM VP 3382, and LACM VP 3319. These localities include both fossil invertebrate (e.g., crabs, clams, snails, barnacles, scallops, and pyrams) and vertebrate (e.g., mammoths) specimens. The LACM did recommend a full paleontological assessment of the project to be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Past excavation activities in the area surrounding the proposed project site have encountered paleontological resources in Timms Point Silt, calcareous siltstone, brown clay siltstone, and other Pleistocene unnamed sedimentary deposits. Further review of literature revealed Pleistocene fossil invertebrate and vertebrate localities within Los Angeles County. For instance, in his compilation of Pleistocene vertebrate localities in California, Jefferson (1991) lists many Pleistocene localities from Los Angeles County including and in addition to LACM 1266, LACM 1839, and LACM 1157. These localities yielded Ice Age land mammals such as mammoth, mastodon, bison, horse, and camel and Pleistocene marine invertebrate and vertebrate fossils.

No paleontological resources were identified within the proposed project area as a result of the institutional records search, and desktop geological and paleontological review, and the proposed project site is not anticipated to be underlain by unique geologic features. The proposed project area is mapped as being underlain by older Quaternary alluvial deposits that have produced significant paleontological resources near the proposed project site. Given this, lintact paleontological resources may be present within these deposits at the surface or at depth. Given the proximity of past fossil discoveries in the surrounding area, the proposed project is moderately to highly sensitive for supporting paleontological resources in areas underlain by Pleistocene alluvium. In the event that intact paleontological resources are located beneath the proposed project site, ground-disturbing activities associated with construction of the proposed project, such as grading during site preparation and large diameter drilling (more than 2 feet diameter), have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of **GEO-1**, impacts would be reduced to below the level of significance. Impacts of the proposed project are considered less than significant with mitigation incorporated during construction.

MM-GEO-1 **Paleontological Resources Impact Mitigation Program and Paleontological Monitoring.** Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Proposed Project. The PRIMP shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during initial rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed, early Pleistocene to late Pliocene unnamed marine sedimentary units and Monterey Formation deposits. The qualified paleontological monitor shall also be on site during initial grading below a depth of five feet below the ground surface in areas underlain by Holocene estuarine deposits to determine if they are old enough to preserve scientifically significant paleontological resources. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Less than Significant Impact. GHGs are those that that absorb infrared radiation (i.e., trap heat) in the Earth's atmosphere. The trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere), is referred to as the "greenhouse effect", and is a natural process that contributes to the regulation of the Earth's temperature, creating a livable environment on Earth. The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. Human activities that generate and emit GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. This rise in temperature has led to large-scale changes to the Earth's system (e.g., temperature, precipitation, wind patterns, etc.), which are collectively referred to as climate change. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The primary GHGs that would be emitted by project-related construction and operations include CO_2, CH_4, and N_2O.[14]

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare each GHG's ability to trap heat in the atmosphere relative to another gas. The reference gas used

[14] Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are generally associated with industrial activities, including the manufacturing of electrical components and heavy-duty air conditioning units and the insulation of electrical transmission equipment (substations, power lines, and switch gears.). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride in measurable quantities.

is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e). Consistent with CalEEMod Version 2020.4.0, this GHG emissions analysis assumed the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, *Air Quality*, the proposed project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA GHG Significance Threshold (SCAQMD 2008). This document, which builds on the California Air Pollution Control Officers Association's previous guidance, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2010). The 10,000 MT CO_2e per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per-service population for

project-level analyses and 6.6 MT CO_2e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (California Natural Resources Agency 2009).

To determine the proposed project's potential to generate GHG emissions that would have a significant impact on the environment, its GHG emissions were compared to the SCAQMD 3,000 MT CO_2e per year screening threshold recommended for non-industrial projects.

Construction Greenhouse Gas Emissions

Construction of the project would result in GHG emissions, which are primarily associated with off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold (SCAQMD 2008) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_2e per year. Therefore, the determination of significance is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod Version 2020.4.0 was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3, *Air Quality*. Construction of the project would be completed in two phases. Phase I is anticipated to commence in in March 2022[15] and would last approximately 6 months, while Phase II of the project was assumed to commence in July 2024 and last about 8 months. On-site sources of GHG emissions include off-road equipment, and off-site sources include haul trucks, vendor trucks, and worker vehicles. Table 10 presents the GHG emissions resulting from construction of the project. For further detail on the assumptions and results of this analysis, please refer to Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

[15] The analysis assumes a construction start date of March 2022 which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 10. Estimated Annual Construction GHG Emissions

Construction Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Phase I				
2022	128.72	0.02	0.00	130.15
Phase II				
2024	143.48	0.03	0.00	144.22
2025	49.85	0.01	0.00	50.10
Total Construction GHG Emissions				**324.47**
Amortized Emissions (30-year project life)				**10.82**

Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent. See Appendix A for complete results.

Operational Greenhouse Gas Emissions

CalEEMod Version 2020.4.0 was used to estimate potential project-generated operational GHG emissions from mobile sources, area sources (landscape maintenance equipment, and fire trainings), water use and wastewater generation, and solid waste (i.e., CO_2e emissions associated with landfill off-gassing).

As explained in Section 3.3, mobile source emissions were estimated based on project-specific trip generation estimates and CalEEMod default values for trip characteristics, and area source emissions were estimated using CalEEMod default values for the fire training facility. Regarding solid waste, to estimate potential GHG emissions associated with landfill off-gassing, CalEEMod default values were applied. Similarly, to estimate potential GHG emissions from supply, conveyance, treatment, and distribution of water and wastewater treatment, CalEEMod default values were applied. For additional details see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for mobile sources, as well as Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*.

The proposed project is assumed to begin operation by 2025 after completion of construction. Table 11 shows the estimated annual GHG emissions from operation of the proposed project. As discussed above, total annual operational emissions were combined with amortized construction emissions and compared to SCAQMD's recommended threshold of 3,000 MT CO_2e per year for non-industrial projects.

Table 11. Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Area	5.16	0.00	0.00	5.28
Energy	57.13	0.00	0.00	57.44
Mobile	51.26	0.00	0.00	52.03
Solid Waste	5.18	0.31	0.00	12.84
Water Use	5.50	0.03	0.00	6.53
Total Operational GHG Emissions				**134.12**
Amortized 30-year Construction Emissions				*10.82*
Project Operations + Amortized Construction Total				**144.93**
SCAQMD Threshold				*3,000*
Threshold Exceeded?				**No**

Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
The total values may not add up exactly due to rounding.
See Appendix A for complete results.

As shown in Table 11, estimated annual project-generated GHG emissions would be approximately 134 MT CO_2e per year due to project operation only. Estimated annual project-generated operational GHG emissions in 2025 plus amortized construction emissions (11 MT CO_2e per year) would be approximately 145 MT CO_2e per year. Therefore, the project would not exceed the SCAQMD threshold of 3,000 MT CO_2e per year, and the project's GHG contribution would not be cumulatively considerable and is less than significant.

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

Less than Significant Impact. The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Applicable plans for the proposed project site include the El Camino College Sustainability Plan, the SCAG's 2020-2045 RTP/SCS, and CARB's 2017 Scoping Plan. Each of these plans is described below along with an analysis of the proposed project's potential to conflict with the related GHG emission reduction goals.

The El Camino College Sustainability Plan

The El Camino College Sustainability Plan (Sustainability Plan) was adopted in January 2019 to identify short- and long-term goals to achieve resource efficiency in the areas of transportation, waste, water, energy, and general operations. While the plan does include goals that would result in a reduction of GHG emissions at the project site, the plan is not considered qualified per CEQA Guidelines Section 15183.5. Therefore, inclusion of this plan is for informational purposes only.

The relevant GHG reduction goals from the Sustainability Plan are outlined in Table 12, with an assessment of the proposed project's potential to conflict. As shown in Table 12, the proposed project would potentially conflict with the Sustainability Plan due to removal of parking area that has been previously identified as location for EV car-charging infrastructure and on-site solar.

Table 12. Project Potential to Conflict with the El Camino College Sustainability Plan

Goal	Project Conflict Assessment
Transportation	
Expand current transportation incentive program and reduce overall single occupied vehicle (SOV) use by 10% by 2021.	**No Conflict.** The proposed project would not inhibit ECC from reducing overall SOV. Once operational, the proposed project is only anticipated to generate 52 average daily trips. Additionally, the proposed project would be constructed on an existing parking lot thereby removing some of the existing parking spaces currently on campus further encouraging alternative modes of transportation.
Install four (4) more electric vehicle (EV) car-charging stations on campus by 2021.	**Potential to Conflict.** The proposed project site is currently developed as a parking lot. During proposed project construction, 293 parking spaces would be removed from Lot L. However, EV charging stations could be installed in the remaining portions of Lot L and therefore would not conflict with the EV charging station goals.
Waste Reduction	
Develop an educational and marketing plan for on-campus recycling by fall 2021.	**No Conflict.** The proposed project would not inhibit ECC from developing their on-campus recycling plan. Construction of the proposed project is anticipated to commence in March 2022 and would be operational in 2025. Once operational, the proposed Fire Academy would comply with the requirements of the finalized on-campus recycling plan.
Develop a comprehensive waste management plan by 2021 to include strategies for overall waste reduction, improved recycling efforts, and opportunities for composting.	**No Conflict.** The proposed project would not inhibit ECC from developing their waste management plan. Construction of the proposed project is anticipated to commence in March 2022 and would be operational in 2025. Once operational, the proposed Fire Academy would comply with the requirements of the finalized waste management plan.
Water Reduction	
Reduce campus water usage (measured in gallons, indoor and outdoor) by 15% by 2021	**No Conflict.** The proposed project would not inhibit ECC from achieving 15% reduction of campus water usage. Operational water use required by the proposed project would not result in substantial water use necessitating any water infrastructure improvements on or off site. Additionally, the proposed project would comply with all applicable state water reduction strategies including those required by the most recent California Green (CALGreen) Building Standards Code.
Develop campus demonstration project using reclaimed water by 2021.	**No Conflict.** The proposed project would not inhibit ECC from developing a reclaimed water demonstration project. Operation of the proposed project would not result in substantial water use or require improvements to existing water infrastructure at the site. The proposed project would comply with any reclaimed water policies that follow from the ECC demonstration project.
Energy Efficiency	
Reduce overall campus energy use by 12% by 2021	**No Conflict.** The proposed project would not inhibit ECC from achieving 12% reduction of campus energy use. Construction of the proposed project is anticipated to commence in March 2022 and would be subject to and would comply with all applicable state energy efficiency strategies including the most recent California Building Code Title 24 (24 CCR, Part 6). . Operational energy use required by the proposed project would not necessitate any off-site infrastructure improvements.
Install 3% on-site renewable energy by 2021.	**Potential to Conflict.** The proposed project site is currently developed as a parking lot (Lot L), which has been identified by ECC as a possible site for

	implementation of on-site PV solar (El Camino College 2021c). However, solar PV panels could be installed in the remaining portions of Lot L and therefore would not conflict with the renewable energy goals.
Develop a plan for the installation of building metering (one main water, gas, electric) on all buildings by 2021.	**No Conflict.** The proposed project would not inhibit ECC from developing a plan for building metering. Construction of the proposed project is anticipated to commence in March 2022 and would be operational in 2025. Buildings associated with the proposed Fire Academy would comply with any metering requirements that follow from the ECC's proposed building metering plan.

Source: El Camino College 2019.

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020–2045 RTP/SCS as a regional growth management strategy, which targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California Region pursuant SB 375. In addition to demonstrating the Region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands (SCAG 2020). Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

The primary objective of the RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375. Given that the proposed project involves development on an existing college campus that would not result in substantial population growth, the goals, and strategies of the RTP/SCS are not directly applicable. As indicated in the traffic impact analysis (Section 3.17), the proposed project would result in a minimal increase in daily trips that would have no measurable effect on the region's circulation system. Further, because the proposed project would generate less than 110 daily trips, a VMT analysis was not required, and the transportation impact was found to be less than significant. As such, the proposed project would not conflict with the goals and policies of the RTP/SCS.

The 2017 CARB Scoping Plan

The Climate Change Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs (CARB 2014, 2017). The Scoping Plan is not directly applicable to specific projects, and it is not intended to be used for project-level evaluations.[16] Under the Scoping Plan, however, several state regulatory measures aim to identify and reduce GHG emissions through measures focused on area-source emissions (e.g., energy usage and high-GWP GHGs in consumer products) and changes to the vehicle fleet (e.g., hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others. Given that CARB and other state agencies have adopted many of the measures identified in the Scoping Plan, the proposed project is subject to the state actions would project-

[16] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (California Natural Resources Agency 2009).

related GHG emissions reductions would be achieved independently. As such, the proposed project would not conflict with the applicable strategies of CARB's 2017 Scoping Plan.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

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

Less than Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Once construction is complete, construction-related hazardous materials would no longer remain on-site.

Project operation would require a variety of materials, some of which may be potentially hazardous. The proposed project would involve use of cleaning solvents, pesticides, fertilizers, and miscellaneous organics and inorganics that are typically used as part of building and grounds maintenance. Other potentially hazardous materials that may be associated with the proposed project include materials associated with the operations of a fire academy training facility. The hazardous materials used during operation of the proposed project would be used on site, transported to and from the site, and ultimately disposed of offsite. There is the potential for a hazardous materials incident to occur, if hazardous substances are handled improperly or unsafely such that the substance is released or the public is exposed to the substance. Handling of potentially hazardous materials associated with fire academy training onsite are regulated by the Occupational Safety and Health Administration (OSHA) and the California Occupational Safety and Health Administration (CalOSHA). In addition, existing campus policies, such as those delineated by El Camino College's Office of Safety and Health (El Camino College 2021e), would ensure student and faculty training and compliance related to handling, treating, storing, and disposing materials. Materials associated with project operations would be stored on site per regulatory and industry procedures and transported off site by qualified vendors, in accordance with applicable regulations. Compliance with applicable regulations involving hazardous materials and potentially hazardous materials during operation of the fire academy facility would ensure that such materials are transported, used, and disposed in a manner that minimizes potential effects to students, faculty, the public, and the environment. Upon compliance with applicable regulations, the proposed project would not be expected to create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials.

In summary, construction and operation of the proposed project would not be expected to create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials for the reasons described above. As such, impacts would be less than significant. No mitigation is required.

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

Less than Significant Impact. The proposed project is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, for the reasons outlined below.

As discussed under Section 3.9(a), construction of the proposed project would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered acutely

hazardous and are used routinely throughout urban environments for construction projects and structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For these reasons, construction of the proposed project is not anticipated to release hazardous materials into the environment that such a significant hazard to the public or the environment would occur.

Operation of the proposed project would require a variety of materials, some of which may be potentially hazardous. These materials are described in Section 3.9(a). In the event of an upset or accident condition involving hazardous materials used during operation, such materials could be released to the environment and could pose a hazard to the public or the environment. However, due to the types of materials that are expected to be used and the existing regulations that are in place to control the manner in which such substances are used, handled, stored, transported, and disposed, potential upset and accident conditions are unlikely to occur. Furthermore, on-site activities would be centered upon fire protection services training. Hazardous materials and/or wastes stored onsite for operation (including fire suppression chemicals) would be included in the existing hazardous material inventories, and appropriate permits and reports would be updated. Handling, storage, and disposal of these materials would continue to be conducted in accordance with applicable federal, state and local laws and regulations. Upon compliance with applicable local, state, and federal regulations, the likelihood of upset or accident conditions involving hazardous materials used at the project site would be reduced to the extent practicable.

In summary, construction and operation of the proposed project would not be expected to create a significant hazard to the public or to the environment through upset and accident conditions involving release of hazardous materials into the environment, for the reasons described above. As such, impacts would be considered less than significant. No mitigation is required.

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

Less than Significant Impact. The project site is located on the El Camino College campus. Additionally, the nearest school, Carr Elementary School (3404 168th Street, Torrance, California 90504), is located within one-quarter mile of the project site. As described in Sections 3.9(a) and 3.9(b), the use, storage, transport, and disposal of hazardous materials are regulated by local, state, and federal law. Compliance with applicable regulations during both construction and operation of the proposed project would ensure that local schools are not exposed to hazardous materials. As such, impacts would be considered less than significant. No mitigation is required.

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

No Impact. A search of regulatory database listings of hazardous materials sites was conducted by accessing the California Department of Toxic Substances Control (DTSC) EnvirStor Hazardous Waste and Substances List (Cortese) (DTSC 2021). The project site is not listed on database listings for hazardous materials (DTSC 2020). Additionally, the project site is not listed on the database listings prepared by the State Water Resources Control Board GeoTracker (SWRCB 2021). As such, the proposed project would not be located on a site that is included on a list of hazardous materials sites, and no impact would occur.

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?

Less than Significant Impact. The project site is not located within two miles of a public airport or public use airport. Hawthorne Municipal Airport is approximately 2.82 miles, Compton/Woodley Airport is approximately 4.58 miles, LAX is approximately 4.7 miles, and Torrance Airport is approximately 5.13 miles from the project site. As such, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. As such, impacts would be considered less than significant. No mitigation is required.

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

Less than Significant Impact. The proposed project would be required to comply with all applicable City codes and regulations related to emergency response and evacuation plans maintained by the El Camino College Police Department, the City of Torrance, and the Los Angeles County Fire Department. In the event of an emergency or disaster, the City of Torrance Emergency Operations Center (EOC) will provide emergency management and operations coordination. During an emergency or disaster, the EOC will be the centralized location for disaster and emergency management and will receive and disseminate warning information (City of Torrance 2021c). Moreover, the Los Angeles County Operational Area Emergency Response Plan (OAERP) guides and addresses a coordinated response to emergency events within the Operational Area (County of Los Angeles 2012). The County will collect and disseminate information and coordinate requests for mutual aid. In the event of an emergency, the County gathers, analyzes, and distributes information to support emergency response and evacuation to save lives, minimize injury to persons, and damage to property and the environment. Additionally, the County provides resources during a disaster such as public information, evacuation orders/routes, recovery programs, and mitigation to reduce future disasters.

As further discussed in Section 3.17, Transportation, construction of the proposed project is not anticipated to require road closures in public rights-of-way; construction staging would be within the project site or the adjacent parking lot. As such, construction would occur completely off public rights-of-way. Future operations at the project site would occur completely on-site and would not require road closures in public rights-of-way. Thus, emergency service response times and disaster evacuation routes would not be affected. Prior to operation, the proposed project would receive all required permits and certificates for occupancy and operation. Therefore, no interference or impairment of the emergency response or emergency evacuation plans would occur, and no impact would occur.

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

Less than Significant Impact. The project site is located on the El Camino College campus and surrounded by a suburban residential area. The nearest area designated within a Fire Hazard Severity Zone is approximately 5.6 miles to the south of the project site, located the Palos Verdes Peninsula (CAL FIRE 2021). As such, the project site would not result in exposure of people or structures directly involving wildfire zones. However, the proposed project would result in operations, including but not limited to controlled burns on site. During the plan check permitting process, the proposed project would be reviewed

by the Torrance Fire Department, which would verify adequate fire and emergency access, as well as other applicable provisions of the fire code. In the event of a wildland fire emergency, the Torrance Fire Department would provide fire protection services. Upon compliance with applicable fire code provisions, the proposed project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant. No mitigation is required.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Less than Significant Impact. A significant impact would occur if the proposed project would discharge water that does not meet existing water quality standards. Such standards include those of the State Water Resources Control Board (SWRCB) NPDES and waste discharge requirement (WDR) permit programs, and the Los Angeles Regional Water Quality Control Board (RWQCB) implementation of the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). The proposed project is not anticipated to violate any water quality standards or waste discharge requirements during construction or operation, for the reasons described below.

Construction

Stormwater Runoff

During construction of the proposed project, stormwater runoff could potentially violate applicable water quality standards by introducing pollutants to stormwater surface runoff. There are two primary ways that construction activities could adversely affect water quality: land disturbances and spills or leaks of pollutants. Land disturbances such as vegetation removal, compaction, grading, and temporary soil stockpiling could potentially increase sediment loads in stormwater runoff by eroding soils that have been loosened or newly exposed by construction activity. Materials that could spill or leak during construction include diesel fuel, gasoline, lubrication oil, cement slurry, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and construction-related trash and debris. The amount of such materials used during construction would be the minimum necessary to fuel vehicles, power equipment, and complete activities. Improper management of hazardous materials could result in accidental spills or leaks, which could locally contaminate stormwater runoff.

The potential water quality impacts associated with construction, as described above, would be temporary and highly localized and would only occur on an improperly managed construction site. Because land disturbances associated with the proposed project would be greater than one acre in size, the construction contractor would be required to submit a Notice of Intent to the SWRCB in order to obtain approval to carry out construction activities under the Construction General Permit. This permit includes a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction-phase impacts related to stormwater (and some non-stormwater) discharges. Compliance with the Construction General Permit requires that a SWPPP be developed and implemented by qualified individuals, as defined by the SWRCB.

The SWPPP is required to include BMPs for preventing water quality degradation, identifying stormwater collection and discharge points, and maintaining drainage patterns across a construction site. At a minimum, BMPs would include erosion controls (e.g., mulches, soil binders, erosion control blankets/mats, outlet projection/energy dissipation devices), sediment controls (e.g., silt fences, fiber rolls, gravel bags), tracking controls (e.g., stabilized construction entrance/exit, entrance/outlet tire wash), wind erosion controls, non-stormwater management, and materials and water management (cleanup and containment of trash and debris, stockpile management, spill prevention and control, hazardous waste management). Implementation of these BMPs would reduce the amount of sediment and other potential water pollutants that leave the project site during construction. The SWPPP would also include hazardous materials BMPs necessary to prevent or contain any spills or leaks that may be associated with construction equipment and materials. Because SWPPPs are designed and implemented to comply with the effluent standards and receiving water limitations contained in

the Construction General Permit, as well as the numeric and narrative water quality objectives in the Basin Plan, implementation of the SWPPP would prevent construction activities from having substantial adverse impacts on water quality. Additionally, the construction contractor would be required to comply with Torrance Municipal Code, which states required controls on runoff prior to obtaining a grading or building permit.

Non-Stormwater Runoff

Dewatering is not anticipated during construction of the proposed project. The shallowest groundwater in the vicinity of the project site is present at depths of 24 to 28.5 feet below existing grade (Appendix C). The proposed project would be constructed as a slab-on-grade structure and would not require extensive excavation (although grading to level the project site would occur). Given the approximate depth of groundwater at the project site, it is unlikely that construction of the proposed project would encounter groundwater; therefore, construction dewatering is not anticipated. Additionally, the proposed project would not include the installation of any groundwater wells. For these reasons, the proposed project construction is not expected to affect groundwater quality.

Conclusion

In summary, compliance with the Construction General Permit and local regulations for proper management of construction sites would prevent construction activities associated with the proposed project from having substantial adverse impacts on water quality. Construction impacts would be less than significant. No mitigation is required.

Operation

The project would be subject to the Municipal Separate Storm Sewer System (MS4) Permit, issued by the Los Angeles RWQCB. The MS4 Permit requires implementation of Low Impact Development BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The Low Impact Development (LID) Ordinance is designed to reduce runoff from impervious surfaces, including new development, through landscape design that promotes water retention, permeable surface design, natural drainage systems, and on-site retention where feasible (RWQCB 2013). These project-specific designs would reduce impacts to water quality associated with redevelopment.

Additionally, a project-specific water quality management plan (WQMP) would be prepared for operation of the proposed project. The WQMP would ensure appropriate BMPs are implemented for post-construction and operation of the project. The combination of LID BMPs, source control BMPs, and other treatment control BMPs addressed within the WQMP would address identified pollutants and hydrologic concerns from new development that could result in impacts to water quality standards.

Further, the project would be required to comply with sections of the City Municipal Code that set forth regulations to protect and enhance the quality of watercourses, water bodies, and wetlands within the City in a manner consistent with the federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the municipal National Pollutant Discharge Elimination System permit. Therefore, long-term impacts associated with water quality, including surface water quality and groundwater quality, would be less than significant.

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

Less than Significant Impact. According to the City's Urban Water Management Plan (UWMP), the City's water supply is predominantly sourced from imported water, groundwater, and desalinated and recycled water (City of Torrance 2016). Groundwater is supplied by one active well and one standby well in the City (City of Torrance 2016). According to the UWMP, well capacity is 2,000 gallons per minute (gpm) (City of Torrance 2016). The proposed project's water demand from the supplies sourced and described in the UWMP would represent a nominal proportion of the available water supply via groundwater. Moreover, the proposed project would connect to existing water lines surrounding the project site and not involve the direct pumping from groundwater wells. Therefore, the proposed project would not have the potential to directly deplete groundwater supplies.

However, interference with groundwater recharge can occur when pervious areas that provide for recharge are covered with impervious surfaces as a result of urban development. The project site is currently developed with a surface parking lot. The project would not involve a significant change in impervious surface area on the project site. . As such, development of the proposed project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

The proposed project would increase water demand relative to existing site conditions. As such, increased water demand would involve increased groundwater use. However, the proposed project would be developed in compliance with the California Green Building Code. The California Green Building Code implements water efficiency standards for appliances and fixtures and reduces the degree to which new development increases water demand. Finally, the landscape will be subject to the requirements of the California Model Water Efficient Landscaping Ordinance, which requires all new landscapes exceeding a minimum threshold of area to be designed to minimize water use through the use of effective landscape design and maintenance, water efficient irrigation, and climate-appropriate plants.

For the reasons described above, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Impacts would be less than significant. No mitigation is required.

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

i) result in substantial erosion or siltation on or off site;

Less than Significant Impact. The project site does not contain any streams, rivers, or other waterbodies; although the project site is adjacent to the Dominguez Channel. As such, development of the project site would not alter the course of a river or a stream. However, construction activities would have the potential to cause ground surface disruption during grading and excavation, which could create the potential for erosion to occur. Construction contractors would be required to implement erosion and sediment control BMPs, as described under Section 3.10(a). Implementation of required BMPs would minimize erosion during construction to the extent practicable. As such, construction impacts would be less than significant.

Upon project buildout, the site would be covered with buildings, hardscape, and landscaping, which would largely preclude on-site erosion and siltation. Any long-term changes in drainage patterns are expected to be minor, highly localized changes. Compliance with the project-specific LID Report would reduce stormwater runoff from the project site and would require capture and treatment of all runoff before it is discharged into the public storm drain system, thereby reducing the potential for on-site and off-site erosion and siltation.

Due to required compliance with existing regulations, any alterations to the existing drainage pattern at the project site would result in less than significant impacts relative to erosion or siltation. No mitigation is required.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Less than Significant Impact. As described in Section 3.10(c)(i), the project site does not contain any streams or rivers having the potential to be altered by the proposed project; although the project site is adjacent to the Dominguez Channel. As such, the proposed project is not expected to result in alteration of the course of a stream or river. Construction activities associated with the proposed project would temporarily alter drainage patterns. However, compliance with project-specific erosion and sediment control BMPs would ensure that on- and off-site flooding is minimized during construction to the extent practicable.

Upon project buildout, the site would be covered with buildings, hardscape, and landscaping, which could result in changes to on-site drainage patterns when compared to the existing vacant conditions of the site. However, any long-term changes in drainage patterns are expected to be minor, highly localized changes. As such, flooding as a result of increased surface runoff at the project site is not anticipated. Impacts would be less than significant during operation of the proposed project.

Due to required compliance with existing stormwater management regulations, any alterations to the existing drainage pattern at the project site would result in less than significant impacts relative to flooding. No mitigation is required.

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; or

Less than Significant Impact. During construction of the proposed project, drainage patterns and runoff quantities on the construction site may be temporarily altered. Compliance with a project-specific SWPPP would ensure that runoff quantities are controlled to the extent practicable, to avoid overwhelming the existing stormwater drainage system. Furthermore, the SWPPP would contain project-specific BMPs that would help prevent construction-related pollutants (such as sediments and fuels for equipment) from entering stormwater runoff. Upon compliance with the measures outlined in the SWPPP, construction activities associated with the proposed project are not expected to provide a substantial source of polluted runoff nor would they substantially increase runoff volumes leading to exceedances in the storm drain capacity.

The project site is currently developed with a surface parking lot. The project would not involve a significant change in impervious surface area on the project site. As such, the increase would not represent a

significant increase in potential runoff volumes from the project site. Additionally, as explained in Section 3.10(a), operation of proposed project could introduce new stormwater pollutants to the area such as trash, fertilizers, cleaning agents, and spilled or leaked petroleum products.

Overall, due to the minor changes in drainage patterns that would be associated with the proposed project, as well as compliance with applicable regulations, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant. No mitigation is required.

iv) impede or redirect flood flows?

No Impact. According to the geotechnical exploration prepared for the project, the project site is mapped within Flood Zone X by the Federal Emergency Management Agency (FEMA) (Appendix C). Flood Zone X is defined as an area of minimal flood hazard and, as such, the potential for flooding at the project site and surrounding area is unlikely. Accordingly, no impact would occur.

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

Less than Significant Impact. As stated under Section 3.10(c)(iv), the project area is not located within a 100-year flood zone or plain (Appendix C). Inundation hazard is flooding caused by failure of dams or other water-retaining structures as a result of earthquakes. As specified in the project-specific geotechnical exploration (Appendix C), due to the absence of such structures and upslope/up-gradient near the project site, the potential for earthquake-induced flooding is considered to be low. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. Tsunamis are predominately ocean waves generated by undersea large magnitude fault displacement or major ground movement. Based on separation of the site from the Alondra Aquatic Center pond by the Dominguez Channel, seiche impact at this site is highly unlikely (Appendix C). Also, due to site elevation at 47 to 50 feet above mean sea level and the inland location of the project site relative to the Pacific Ocean, tsunami risk at this site is not a consideration (Appendix C). In conclusion, impacts would be less than significant. No mitigation is required.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. As previously discussed, the project would comply with applicable water quality-regulatory requirements, including the implementation of a SWPPP, stormwater BMPs, and LID design, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts. In addition, with compliance with these regulatory requirements, the project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key surface water drainages throughout the jurisdiction of the Los Angeles RWQCB Basin Plan would not be adversely impacted. As a result, the project would not conflict with or obstruct the Los Angeles RWQCB Basin Plan.

With respect to groundwater management, the Sustainable Groundwater Management Act of 2014 empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSP) for crucial groundwater basins in California. According to the City's UWMP, the City's water supply is predominantly

sourced from imported water, groundwater, and desalinated and recycled water (City of Torrance 2016). Groundwater is supplied by one active well and one standby well in the City (City of Torrance 2016). According to the UWMP, well capacity is 2,000 gpm (City of Torrance 2016). The proposed project's water demand from the supplies sourced and described in the UWMP would represent a nominal proportion of the available water supply via groundwater. Therefore, the proposed project would not have the potential to directly deplete groundwater supplies.

The proposed project would have a less than significant impact relative to groundwater use and groundwater quality and, as such, would not conflict with any plans pertaining to groundwater management. Therefore, impacts associated with a water quality control plan or sustainable groundwater management plan would be less than significant. No mitigation is required.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The project site consists of an existing parking lot (Parking Lot L) used for El Camino College. Specifically, the proposed project site is located on the southern portion of the campus, south of West Redondo Beach Boulevard. The site is completely paved with several landscape features located throughout. Vehicular access is provided via driveways on Manhattan Beach Boulevard, Crenshaw Boulevard, West Redondo Beach Boulevard, and West 164th Street. Pedestrian access is available via sidewalk infrastructure adjacent to Crenshaw Boulevard and West Redondo Beach Boulevard. The proposed project would involve the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas. As such, the proposed project would redevelop an existing parking lot to support a new fire training

facility on the El Camino College campus. The project would not include new construction of on- or off-site infrastructure, such as buildings, roads, etc. that would physically divide the surrounding established community. Additionally, the project would not permanently affect or impede the movement of pedestrians or vehicles. No impact would occur.

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

Less than Significant Impact. The proposed project site is entirely located in the municipal boundaries of the City of Torrance. As such, the City zones the project site as General Commercial (C2) and designates the site as a Public/Quasi-Public/Open Space (PUB) land use (City of Torrance 2019 and 2005). The project site is currently developed as a parking lot with several landscape features located throughout. The proposed project would involve the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas. The proposed project would be consistent with the City's PUB land use designation, which allows for open space, land owned by public agencies and jurisdictions (i.e., El Camino Community College District), and land owned by private entities for uses which serve the community, such as utilities (City of Torrance 2010).

The proposed fire tower would be located in the center of the project site, would be four-stories tall with an open roof deck above the fourth story, and would support fire simulation activities. The physical training area would surround the fire tower on all four sides. Although the project is not permitted under the project site's existing C2 zoning, the proposed use would support educational operations associated with El Camino College's Fire Academy. As such, project implementation would require District action to override local zoning in accordance with Government Code 53094, which allows the governing board of a school district, by a vote of two-thirds of its members, to render a City's zoning ordinance inapplicable to a proposed use school district property. Moreover, Government Code Section 17519 defines a "school district" as any school district, community college district, or county superintendent of schools. Therefore, in accordance with Government Code 53094, which requires compliance with Government Code Section 65352.2 and Public Resource Code Section 21151.2, the proposed project would not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, less than significant impacts would occur. No mitigation is required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to Figure CR-5 of the City of Torrance Community Resources Element, the project site is classified as Mineral Resource Zone-1 (MRZ-1), which is considered an area where no significant mineral deposits are present or likely to be present (City of Torrance 2010). Additionally, the California Geologic Energy Management Division (CalGEM) WellFinder indicates the project site is not located within an oil or gas field, nor is there an active or plugged well on site. The closest wells are located 2,200 feet northeast, 3,200 feet west/southwest, and 2,800 feet northwest; all of which are plugged (CalGEM 2021). Given this, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Under existing conditions, the project site does not contain mineral extraction uses on site. The project site is zoned General Commercial (C2) and designated as Public/Quasi-Public/Open Space (PUB) in the City of Torrance's General Plan (City of Torrance 2019 and 2005), which precludes mining activities. Furthermore, as previously identified, the project site is classified as MRZ-1, which is considered an area where no significant mineral deposits are present or likely to be present (City of Torrance 2010). Given the above, implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Noise Fundamentals

Generally, federal and state agencies regulate mobile noise sources by establishing and enforcing noise standards on vehicle manufacturers. Local agencies generally regulate stationary noise sources and construction activities to protect neighboring land uses and the public's health and welfare. Noise-sensitive land uses include residences, hotels and motels, schools and universities, hospitals, and churches. The nearest noise-sensitive land uses to the project site are multi-family and single-family residences located approximately 150 feet south and southwest of the project site, a park (Alondra Park) located approximately 400 feet to the northwest, and El Camino College located approximately 300 feet to the north.

A brief background on the fundamentals of environmental acoustics is helpful in understanding how humans perceive various sound levels. Although extremely loud noises can cause temporary or permanent damage, the primary environmental impact of noise is annoyance. The objectionable characteristic of noise often refers to its loudness. Loudness represents the intensity of the sound wave, or the amplitude of the sound wave height measured in decibels (dB). Decibels are calculated on a logarithmic scale; thus, a 10 dB increase represents a 10-fold increase in acoustic energy or intensity, and a 20 dB increase represents a 100-fold increase in intensity. Decibels are the preferred measurement of environmental sound because of the direct relationship between a sound's intensity and the subjective "noisiness" of it. The A-weighted decibel (dBA) system is a convenient sound measurement technique that weighs selected frequencies based on how well humans can perceive them.

The range of human hearing spans from the threshold of hearing (approximately 0 dBA) to that level of noise that is beyond the threshold of pain (approximately 120 dBA). In general, human sound perception is such that

a change in sound level of 3 dB in a normal setting (i.e., outdoors or in a structure, but not in an acoustics laboratory without background noise levels) is just noticeable, and a change of 5 dB is clearly noticeable. A change of 10 dB is perceived as a doubling (or halving) of sound level. Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss if exposure is sustained.

Ambient environmental noise levels can be characterized by several different descriptors. Energy equivalent or energy average level (L_{eq}) describes the average or mean noise level over a specified period of time. L_{eq} provides a useful measure of the impact of fluctuating noise levels on sensitive receptors over a period of time. Other descriptors of noise incorporate a weighting system that accounts for a person's susceptibility to noise irritations at night. Community Noise Equivalent Level (CNEL) is a measure of cumulative noise exposure over a 24-hour period, with a 5 dBA penalty added to evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dBA penalty added to night hours (10:00 p.m. to 7:00 a.m.). Since CNEL is a 24-hour average noise level, an area could have sporadic loud noise levels above 65 dBA but that average lower over the 24-hour period.

Existing Noise Conditions

Currently, the project site generates noise associated with the existing and ongoing parking lot activities. Additionally, the project site and surrounding area is subject to traffic noise associated with nearby roadways, including Redondo Beach Boulevard and Crenshaw Boulevard.

Noise measurements were conducted near the project site in August 2021 to characterize the existing noise environment. The daytime, short-term (1 hour or less) staff-attended sound-level measurements were taken with a Soft-DB Piccolo sound level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute standard for a Type 2 (General Purpose) sound level meter. The accuracy of the sound level meter was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four noise measurement locations (ST1–ST4) that represent key potential sensitive receptors or sensitive land uses were selected near the project site. The measurement locations are shown in Figure 3, Noise Measurement Locations, and the measured average noise levels and measurement locations are provided in Table 13. Noise measurement data is also included in Appendix D, Noise Calculations. The primary noise sources at the measurement locations consisted of traffic. Secondary noise sources included distant conversations, and birds. As shown in Table 13, the existing daytime ambient noise levels ranged from approximately 57 dBA L_{eq} at ST1 to 66 dBA L_{eq} at receivers ST2 and ST4.

Table 13. Measured Noise Levels

Receptors	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	16501 Falda Avenue (Residential)	8/18/2021	12:02 p.m. – 12:17 P.m.	56.5	71.6
ST2	3211 W. 166th Street (Residential)	8/18/2021	12:27 p.m. – 12:42 p.m.	58.6	78.5
ST3	Southeastern portion of Alondra Park (Recreational)	8/18/2021	13:01 p.m. – 13:16 p.m.	66.2	77.2

Table 13. Measured Noise Levels

Receptors	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST4	South side of El Camino College (Institutional)	8/18/2021	13:29 p.m. – 13:44 p.m.	66.4	72.8

Source: Appendix D.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel; L_{max} = maximum sound level during the measurement interval.

Thresholds of Significance

City of Torrance General Plan

The Noise Element of the City's General Plan (City of Torrance 2010) is the guiding document for the City's noise policy and contains four objectives, N.1 through N.4, with accompanying policies designed to protect residents and businesses from excessive and persistent noise intrusions. Table 14 provides the City's interior and exterior noise standards. Objectives and policies relevant to the project are presented as follows:

- Objective N.1: To identify noise pollution and establish effective noise abatement methods.
  - Policy N.1.1: Continue to strictly enforce the provisions of the City's Noise Ordinance to ensure that stationary noise, traffic-related noise, railroad noise, airport-related noise, and noise emanating from construction activities and special events are minimized.
  - Policy N.1.4: Minimize unnecessary outdoor noise through enforcement of the noise ordinance and through permit processes that regulate noise-producing activities.
- Objective N.3: To minimize noise incompatibilities between land uses.
  - Policy N.3.1: Review industrial, commercial, or other noise-generating land use proposals for compatibility with nearby noise-sensitive land uses and require that appropriate mitigation be provided.
  - Policy N.3.2: Require the inclusion of noise-reducing design features for developments near noise-sensitive land uses.
  - Policy N.3.4: Work with property and business owners to avoid or resolve noise incompatibilities in commercial or industrial areas.
- Objective N.4: To research and implement new means of noise abatement.
  - Policy N.4.1: Encourage and support efforts by the State of California to abate noise pollution by using stricter quantitative noise standards, shorter compliance time governing operation of all types of motor vehicles, etc.
  - Policy N.4.2: Maintain open lines of communication between the City and all federal, State, and County agencies involved in noise abatement.
  - Policy N.4.3: Educate residents and businesses of the effects of noise pollution, ways they can assist in noise abatement, and noise abatement programs within the City.

Table 14. City of Torrance Interior and Exterior Land Use Compatibility Noise Standards

Land Use Categories		Energy Average CNEL	
Categories	*Uses*	*Interior*	*Exterior*
Residential	Low/ Medium Low/ Medium Density Residential	45	60/65[1]
	Medium High Residential	45	65/70[2]

Table 14. City of Torrance Interior and Exterior Land Use Compatibility Noise Standards

Land Use Categories		Energy Average CNEL	
Categories	*Uses*	*Interior*	*Exterior*
	High Density Residential	45	70 [1]
Commercial and Office	General Commercial / Commercial Center	–	70
	Residential Office	50	70
Industrial	Business Park	55	75
	Light Industrial		
	Heavy Industrial		
Public and Medical Uses	Public / Quasi-Public / Open	50	65
	Hospital / Medical	50	70
Airport	Airport	–	70 [2]

1 The normally acceptable standard is 60 dB(A). The higher standard is acceptable subject to inclusion of noise-reduction features in project design and construction.
2 Maximum exterior noise levels up to 70 dB CNEL are allowed for Multiple-Family Housing.
3 Regarding aircraft-related noise, the maximum acceptable exposure for new residential development is 60 dBA CNEL.
Source: City of Torrance 2010

City of Torrance Municipal Code

Chapter 6 "Noise Regulation" of the City's Municipal Code regulates noise within the City limits. The noise metric used for stationary sources, such as industrial or construction noise, is defined as noise level limits that cannot be exceeded for certain periods of time. The noise standards shown in Table 15 are for regulating the impact of stationary noise sources to a neighboring private property.

The stationary source noise level limits identified in Table 15 also have several possible corrections or adjustments based on the existing noise level, relative zoning of all affected properties, source, tone, and duration. Table 16 presents correction factors for applicable noise standards for specific types of noise sources.

Table 15. Stationary Noise Source Standards

	Maximum Allowable Noise Levels	
	Exterior Noise Level. dBA $L^{eq\,(h)}$	
Region[1]	*7 a.m. to 10 p.m.*	*10 p.m. to 7 a.m.*
Region 1	70	65
Region 2	60	55
Region 3	50	45
Region 4	55	50

1 The project site is located entirely within Region 4 with no other regions located within 1.5 miles.
L_{eq} (h) = hourly equivalent noise level
Source: City of Torrance 2008a

Table 16. City of Torrance Noise Standard Adjustments

Noise Condition	Adjustment Factor (dBA)
Noise contains a steady, audible tone, such as a whine, screech or hum	-5
Noise is a repetitive impulsive noise, such as hammering or riveting	-5
Noise occurs less than 5 hours per day or less than 1 hour per night	+5
Noise occurs less than 90 minutes per day or less than 20 minutes per night	+10
Noise occurs less than 30 minutes per day or less than 6 minutes per night	+15
Noise occurs on Sunday morning (between 12:01 A.M and 12:01 P.M. Sunday)	-5

Source: City of Torrance 2008a

The following additional sections of the City's Municipal Code (Noise Ordinance) are relevant to the project:

- **Section 46.2.4 - Schools, Hospitals, and Churches**. It shall be unlawful for any person to create any noise on any street, sidewalk or public place adjacent to any school, institution of learning or church while the same is in use or adjacent to any hospital, which noise unreasonably interferes with the workings of such institution or which disturbs or unduly annoys patients in the hospital, provided conspicuous signs are displayed in such streets, sidewalks or public place indicating the presence of a school, church or hospital.

- **Section 46.2.6 - Machinery, Equipment, Fans, and Air Conditioning**. It shall be unlawful for any person to operate any machinery, equipment, pump, fan, air conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any residential land to exceed the ambient noise level by more than five (5) decibels.

- **Section 46.3.1 – Construction of Buildings and Projects.**
    a) It shall be unlawful for any person within the City of Torrance to operate power construction tools, equipment, or engage in the performance of any outside construction or repair work on buildings, structures, or projects in or adjacent to a residential area involving the creation of noise beyond 50 decibels (dB) as measured at property lines, except between the hours of 7:30 A.M. to 6:00 P.M. Monday through Friday and 9:00 A.M. to 5:00 P.M. on Saturdays. Construction shall be prohibited on Sundays and Holidays observed by City Hall. An exception exists between the hours of 10:00 A.M. to 4:00 P.M. for homeowners that reside at the property.
    b) The Community Development Director may allow expanded hours and days of construction if unusual circumstances and conditions exist. Such requests must be made in writing and must receive approval by the Director prior to any expansion of the hour and day restrictions listed above.
    c) Every construction project requiring Planning Commission review or considered to be a significant remodel as defined by Section 231.1.2, shall be required to post an information board along the front property line that displays the property owner's name and contact number, contractor's name and contact number, a copy of TMC Section 46.3.1, a list of any special conditions, and the Code Enforcement phone number where violations can be reported.

d) Properties zoned as commercial, industrial or within an established redevelopment District, are exempted from the above day and hour restrictions if a minimum buffer of 300 feet is maintained from the subject property's property line to the closest residential property. The Community Development Director, may, however, revoke such exemption for a particular project if the noise level exceeds 50 decibels (dB) at the property line of a residential property beyond the 300 linear foot buffer.

e) Heavy construction equipment such as pile drivers, mechanical shovels, derricks, hoists, pneumatic hammers, compressors or similar devices shall not be operated at any time, within or adjacent to a residential area, without first obtaining from the Community Development Director permission to do so. Such request for permission shall include a list and type of equipment to be used, the requested hours and locations of its use, and the applicant shall be required to show that the selection of equipment and construction techniques has been based on minimization of noise within the limitations of such equipment as is commercially available or combinations of such equipment and auxiliary sound barriers. Such permission to operate heavy construction equipment will be revoked if operation of such equipment is not in accordance to approval. No permission shall be required to perform emergency work as defined in Article 1 of this Chapter.

For the purposes of determination of significant impact from construction noise, the City of Torrance applies a threshold of 75 dBA, based upon Table N-2 of the General Plan Noise Element. The City of Torrance General Plan Update Draft EIR (City of Torrance 2009), further states in Impact N-4 that "construction activities substantially elevating the ambient noise environment at noise-sensitive uses for a substantial amount of time" would be considered to result in a substantial temporary or periodic noise increase, resulting in a significant impact.

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

Short-Term Construction Impacts

Less than Significant Impact. Construction of the project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures. Construction would take place within the hours specified in Article 3, Section 46.3.1 of the City's Municipal Code. Construction operations would not occur between 6:00 p.m. and 7:30 a.m. Monday through Friday, 5 p.m. to 9 a.m. on Saturday or at any time on Sunday or on holidays observed by Torrance City Hall. No special construction techniques (i.e., pile driving or blasting) are anticipated to be necessary for this project. The following discussion addresses the noise levels calculated to result from construction of the project at nearby sensitive receptors.

On-Site Construction Noise

Consistent with the Air Quality analysis, CalEEMod was used to identify the construction equipment anticipated for development of the project. Based on this information, CalEEMod identified the anticipated equipment for each phase of project construction (see Table 1, Anticipated Construction Scenario).

Noise-sensitive land uses exist southwest and south of the project site as well as to the northwest and north. The closest noise-sensitive receivers consist of multi-family and single-family residences located approximately 150 feet southwest and south of the project site, across from a storm channel. To the northwest, across from Redondo Beach Boulevard, Alondra Park is approximately 400 feet away; to the north, also across from Redondo Beach Boulevard, El Camino College is approximately 300 feet away from the project site. With the construction equipment noise sources identified in Table 1, a noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, grader, scraper), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of time the equipment typically works in a given time period), and the distance from the noise-sensitive receiver to the construction zone. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this analysis. Refer to Appendix D for the inputs used in the RCNM model and the detailed results.

The results of the construction noise analysis using the RCNM are summarized in Table 17. As shown, the noise levels from construction are predicted to range from approximately 64 dBA L_{eq} (during the architectural coating phase) to 74 dBA L_{eq} (during the demolition and site preparation phases) at the nearest noise-sensitive receivers (i.e., residences located approximately 150 feet from construction activities). These maximum noise levels are considered to be a peak exposure, applicable to not more than 10%–15% of the total construction period, only while the construction activity is taking place along the property boundary closest to these nearest off-site receivers. The more typical construction noise levels (for construction taking place at a range of locations on site and modeled at the acoustical center for analysis purposes) range from approximately 61 dBA L_{eq} (during architectural coating) to approximately 70 dBA L_{eq} (during demolition) at the closest residences and are also shown in Table 17. The typical noise levels (based upon the acoustic center) are considered a better representation of the overall noise exposure experience for adjacent receivers over the duration of each construction phase. Noise levels at more distant receivers (i.e., Alondra Park and El Camino College, located north of the project site) would be lower. As shown in Table 17, construction noise levels would not exceed the City of Torrance construction noise threshold of 75 dBA L_{eq}, and thus would be less than significant.

Table 17. Construction Noise Analysis Summary

Land Use	Off-site Receptor Location	Distance from Construction Activity to Noise Receptor (feet) - Phase 1	Estimated Construction Noise Levels (dBA L_{eq}) - Phase 1							Distance from Construction Activity to Noise Receptor (feet) - Phase 2	Estimated Construction Noise Levels (dBA L_{eq}) - Phase 2		
			Demolition	Site Preparation	Grading	Trenching and Utilities	Modular Building Installation	Paving	Architectural Coating		Site Preparation	Building Construction	Architectural Coating

Residential	South and Southwest of the Project	Nearest Construction Activity /Receiver Distance (150')	74	74	73	70	71	72	64	Nearest Construction Activity /Receiver Distance (150')	74	71	64
		Typical Construction Activity /Receiver Distance (300')	70	68	68	65	66	68	58	Typical Construction Activity /Receiver Distance (225')	71	69	61
Recreational (Alondra Park)	Northwest of the Project	Nearest Construction Activity /Receiver Distance (400')	67	66	65	62	63	65	56	Nearest Construction Activity /Receiver Distance (450')	65	63	55
		Typical Construction Activity /Receiver Distance (620')	64	62	62	59	60	62	52	Typical Construction Activity /Receiver Distance (640')	58	60	52
Educational (El Camino College)	North of the Project	Nearest Construction Activity /Receiver Distance (300')	70	68	68	65	65	67	58	Nearest Construction Activity /Receiver Distance (430')	65	63	55
		Typical Construction Activity /Receiver Distance (460')	67	65	65	62	63	64	54	Typical Construction Activity /Receiver Distance (515')	64	62	53

Source: Appendix D.
Notes: L_{eq} = equivalent continuous sound level (energy-averaged sound level); dBA = A-weighted decibel;

Although construction noise levels would not exceed applicable thresholds, the noise during project construction would be higher than existing ambient noise levels. Therefore, the following BMPs are recommended to reduce noise from construction:

BMPs – Construction:

1. Ensure that all noise-producing project equipment and vehicles using internal combustion engines are equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features are in good operating condition that meet or exceed original factory specification. Ensure that mobile or fixed "package" equipment (e.g., arc-welders, air compressors) are equipped with shrouds and noise control features that are readily available for that type of equipment.

2. Ensure that all mobile or fixed noise-producing equipment used on the Project that are regulated for noise output by a local, state, or federal agency complies with such regulation while in the course of Project activity.
3. Implement construction noise reduction methods such as shutting off idling equipment and maximizing the distance between construction equipment staging areas and adjacent residences where feasible.
4. Material stockpiles and mobile equipment staging, parking, and maintenance areas should be located as far as practicable from noise-sensitive receptors.
5. Establish and enforce construction site and access road speed limits of 15 miles per hour during the construction period.
6. Ensure that the use of noise-producing signals, including horns, whistles, alarms, and bells, be for safety warning purposes only.
7. Ensure that project-related public address or music systems are not audible at any adjacent receptor.
8. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner will be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

Off-Site Construction Noise (Construction-Related Traffic)

Less than Significant Impact. It is anticipated that a maximum of approximately 32 worker vehicles would be traveling to and from the project site each day. Additionally, it is anticipated that there would be a maximum of 4 vendor truck trips per day. During the demolition phase of the project there would be approximately 425 total haul truck trips over an estimated 20-day period, for an average of 21 trucks per day. Designated delivery and haul routes for the project would be consistent with City requirements.

The existing traffic volumes (City of Torrance 2008b) near the project site are much higher in comparison to these project-related trips. For example, Redondo Beach Boulevard (the nearest roadway adjacent to the project site) has an average daily traffic volume of 32,000 and Crenshaw Boulevard has an average daily traffic volume of 33,000. Thus, the very small incremental increase associated with project-related construction would amount to a small fraction of a percentage point along project roadways. Based on the fundamentals of acoustics, a doubling (a 100% increase) would be needed to result in a 3 dB increase in traffic noise levels, which is the level corresponding to an audible change to the typical human listener (Caltrans 2013). Given that project construction would not measurably increase traffic volumes, and would not double traffic volumes on local roadways, no corresponding temporary increase in traffic noise levels would occur as a result of construction. Therefore, off-site construction noise impacts would be less than significant.

Long-Term Operational Impacts

Traffic Noise

Less than Significant Impact. Based upon the project's Transportation analysis, the project would result in an additional 52 daily vehicle trips on local roadways. An estimated 5 trips would occur during the AM peak-hour

and 5 trips would occur during the PM peak-hour. As discussed above (Off-Site Construction Noise), the nearby arterial roadways from which project-related vehicles would take access carry approximately 32,000 to 33,000 vehicles per day. The additional 52 daily vehicle trips related to the proposed project would amount to an increase in traffic of less than 0.2 percent. Thus, there would be a less than significant impact related to operational traffic noise.

On-Site Operational Noise

Less than Significant Impact. The project would result in the operation of a fire training facility, as described in Section 2.3.1. As shown in Figure 2 (Site Plan), the direct view from residential uses to the south and southwest of the project site would be partially blocked by the proposed buildings, which would reduce on-site noise levels to some extent. However, the buildings would have rooftop-mounted heating, ventilation and air conditioning (HVAC) equipment which would create noise. Additionally, on-site training activities (including from the proposed training tower) would take place which, would result in noise.

HVAC Equipment Noise

For the analysis of noise from HVAC equipment operation, a York Model ZE/ZF/ZR package HVAC unit was used as a reference. Based upon the square footages of the proposed buildings, it was assumed that one such HVAC unit (ranging from 3 to 6 tons in cooling capacity) would be required for each of the buildings. The York Model ZE/ZF/ZR package HVAC units have a sound power rating of 81 to 83 dBA in the 3 to 6 ton range (Johnson Controls 2015). It was conservatively assumed that no rooftop parapets would exist to shield sound from the HVACs unit at nearby noise-sensitive land uses. With this data, a Microsoft Excel–based outdoor sound propagation prediction model was used to calculate the combined noise level from all HVAC units at nearby community receptors using several assumptions:

- Treatment of exposed roof-mounted HVAC condenser units as point-type sound emission sources.
- Point-source sound propagation (i.e., 6 dB per doubling of distance) that conservatively ignores acoustical absorption from atmospheric and ground surface effects.
- Condenser units would be installed at building locations currently depicted in project site plans as of this writing.
- Because the condenser units are expected to be roof-mounted, the prediction model separately evaluates potential noise path occlusion due to the proposed project's intervening building structure.

Using the aforementioned noise prediction model, and without consideration of noise reduction due to acoustical shielding from structures other than the proposed project, the noise levels from the combination of all operating condenser units at the nearby receivers was estimated and summarized in Table 18. The maximum hourly noise level for all the HVAC equipment operating at each examined location would range from approximately 33 to 43 dBA $L_{eq,}$ which is below the City's noise standard for Region 4 properties of 50 dBA L_{eq} during nighttime hours (10 p.m. to 7 a.m.) and 55 dBA L_{eq} during daytime hours (7 a.m. to 10 p.m.).

Table 18. HVAC Noise Levels at Sensitive Receptors

Equipment	*Noise Level at Nearby Noise-Sensitive Receiver*	
	Receiver Location	*Average Noise Level (dBA L_{eq})*
HVAC	Nearest Residential Receiver, near ST1	42.7
HVAC	Residences to the south, near ST2	39.4
HVAC	Alondra Park, near ST3	32.9
HVAC	El Camino College Campus, near ST4	35.1
HVAC	Pool at multi-family residences to southwest	40.8

Source: Appendix D.
Note: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; ST = short-term noise measurement location (see Figure 3, Noise Measurement Locations).

The results of the HVAC equipment noise analysis indicate that the project would comply with the City Municipal Code and would also be well below the measured ambient noise levels, which ranged from approximately 57 to 66 dBA L_{eq}. Noise from HVAC operation would result in less than significant noise levels.

Outdoor Training Activity Noise

Based upon information provided by the applicant, training activities conducted onsite would include periodic use of the following equipment: power tools including chain saws, rotary saws, vehicle extrication tools, ventilation fans, and cordless tools. In addition, hand tools would be used such as hammers, prybars, haligans, axes, and sledgehammers. These would all be used periodically (not more than a few hours per day), and generally on weekdays between the hours of 8 a.m. and 4 p.m. Once or twice a year, training activities would be conducted in the evening hours, before 10 p.m. It is also anticipated that training activities would also be conducted periodically (approximately every other month) on Saturdays. It is anticipated that the noisiest equipment would consist of power saws, which would be used for training for approximately 3 days every other month. Based upon information provided by the applicant, a realistic worst-case training scenario (in terms of noise levels) was modeled using the aforementioned noise prediction model. The training scenario assumes the use of banging with a heavy tool such as a sledgehammer, axe or haligan, and operation of an engine pump, each operating approximately 10% (6 minutes) within a 1-hour period, and operation of a power saw approximately 20% (12 minutes) within the same 1-hour period. The noise prediction model also included simultaneous, continuous operation of the HVAC units atop the academy building during the 1-hour period. Air horns or sirens would not be in use during training activities, and all outdoor training activities would take place during daytime hours (7 a.m. to 10 p.m.).

The resulting noise levels at the same receiver locations assessed above for the HVAC-only conditions are provided in Table 19.

Table 19. On-Site (Outdoor Training Activity plus HVAC) Noise Levels at Sensitive Receptors

Equipment	*Noise Level at Nearby Noise-Sensitive Receiver*	
	Receiver Location	*Average Noise Level (dBA L_{eq})*
Heavy tools, power saw, engine pump, HVAC	Nearest Residential Receiver, near ST1	54.2

Heavy tools, power saw, engine pump, HVAC	Residences to the south, near ST2	50.7
Heavy tools, power saw, engine pump, HVAC	Alondra Park, near ST3	45.1
Heavy tools, power saw, engine pump, HVAC	El Camino College Campus, near ST4	50.4
Heavy tools, power saw, engine pump, HVAC	Pool at multi-family residences to southwest	51.8

Source: Appendix D.
Note: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; ST = short-term noise measurement location (see Figure 3, Noise Measurement Locations).

The results of the combined on-site noise analysis indicates that the project would comply with the City Municipal Code Region 4 noise standard for daytime hours of 55 dBA L_{eq}. The on-site noise levels would also be less than the measured ambient noise levels, which ranged from approximately 57 to 66 dBA L_{eq}. Therefore, noise from on-site operational activities would result in less than significant noise levels.

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

Less than Significant Impact. Operation of the project would include mechanical equipment that would produce negligible levels of groundborne vibration. Construction activities that might expose people to excessive groundborne vibration or groundborne noise could cause a potentially significant impact. Groundborne vibration information related to construction activities (including demolition) has been collected by the California Department of Transportation (Caltrans 2020), which indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begins to annoy people. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet (FTA 2018).

Groundborne vibration is typically attenuated over short distances. At the distance from the nearest vibration-sensitive receivers (residences located to the south and southwest) to where construction activity would be occurring on the project site (approximately 150 feet), and with the anticipated construction equipment, the peak particle velocity vibration level would be approximately 0.0061 inches per second. At the closest sensitive receptors, vibration levels would be well below the vibration threshold of potential annoyance of 0.1 inches per second; therefore, impacts associated with vibration-generated annoyance would be less than significant.

The major concern with regards to construction vibration is related to building damage, which typically occurs at vibration levels of 0.5 inches per second or greater for buildings of reinforced-concrete, steel, or timber construction. The highest anticipated vibration level associated with on-site project construction would be approximately 0.0061 inches per second, which is well below the threshold of 0.5 inches per second for building damage. Therefore, impacts associated with vibration-produced damage would be less than significant.

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

No Impact. The closest public airport to the project site is Hawthorne Municipal Airport, located approximately 2.9 miles north of the project site. The next-closest public airport is Compton/Woodley Airport

Torrance Municipal Airport, which is located approximately 4.6 miles east of the project site. According to the Los Angeles County Airport Land Use Commission, the project is not located within the Airport Land Use Plan for these or other local airports (ALUC 2004). The nearest private airstrip to the project site is the Goodyear Blimp Airship Base, located approximately 3.6 miles southeast of the project site. Therefore, no impacts associated with airport and aircraft noise would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project 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)?

Less than Significant Impact. The proposed project involves the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas. Project construction activities are anticipated to occur over 6 months, which would not result in a need for the relocation of construction workers to the project site's vicinity. Once operational, as described in Section 2.3.2, the new Fire Training Facility would provide a South Bay training location for local firefighter and EMT recruits. The Fire Training Facility would provide expanded facilities to handle an increasing demand for the El Camino College Public Safety Training Center. The proposed project would result in the generation of approximately 45 new students and 7 new employees. Therefore, the project would induce population growth directly from project operations.

According to the 2017 Comprehensive Master Plan, El Camino College projects enrollment to rise from 24,522 in 2015 to 27,273 in 2025 (El Camino College 2017). As such, within the 10-year planning period, enrollment projections would not be substantially affected by the addition of 45 new students associated with the El Camino College Fire Training Facility. Moreover, the project would result in new classroom and associated training facilities on campus which would be built to support the projected student population generated from the proposed project. Similarly, the 2017 Comprehensive Master Plan notes in the fall of

2015, El Camino College employed 338 full-time and 571 part-time faculty members, in addition to 430 classified employees, consisting of all non-academic and non-supervisory employees, classified supervisors, and classified managers/administrators (El Camino College 2017). As such, an additional 7 employees would result in a nominal effect to the existing staffing levels on campus.

Lastly, the proposed project would not include any new roads, housing, or associated infrastructure that could indirectly induce substantial population growth. Therefore, the project would not result in unplanned population growth indirectly.

Given the above, the proposed project would support a need for fire training facilities within the South Bay and would not result in unplanned population growth directly or indirectly. Less than significant impacts would occur. No mitigation is required.

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

No Impact. The project site is currently a paved parking lot on the El Camino College campus. Construction of the proposed project would result in a new fire training facility on campus. Project activities would not result in the demolition or displacement of existing housing or people. As such, the project would not result in a need for replacement housing. Therefore, no impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for 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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

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

Fire protection?

Less than Significant Impact. The project site would be supported by existing fire protection services provided by the City of Torrance and the Los Angeles County Fire Department. The nearest fire stations to the project site are Torrance Fire Department Station 3 (3535 West 182nd Street, Torrance, California 90504) and Los Angeles County Fire Department Station 158 (1650 West 162nd Street, Gardena, California 90247).

The need for new or altered fire station facilities is usually associated with substantial population growth, such that existing facilities cannot meet the increased demand for fire protection services. As stated in Section 3.14, Population and Housing, the proposed project would not include any permanent housing, the construction of which would result in significant population growth. Project implementation has the potential to add new students and employees to the campus population; however, any population growth related to the proposed project would be minor (as described in Section 3.14). Additionally, the proposed project would adhere to the California Fire Code and with the City of Torrance's Fire Code (Municipal Code, Chapter 5). Moreover, the project's proposed operations would consist of fire training activities. Fire suppression materials, adequate water supply, and trained personnel could assist in unplanned fires on the project site. As such, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Impacts would be less than significant and no mitigation is required.

Police protection?

Less than Significant Impact. The project site is located within the El Camino College campus and is currently served by the El Camino College Police Department. The Police Department has a staff of approximately 40 full-time and part-time employees (El Camino College 2021d). The Police Department is stationed at the northeast corner of Redondo Beach Boulevard and Crenshaw Boulevard in Parking Lot K (approximately 800 feet northeast of the project site) and is open 24 hours per day, 7 days per week (El Camino College 2021d). The Police Department is a full-service law enforcement agency that fully subscribes to the standards of the California Commission on Peace Officer Standards and Training (El Camino College 2021d). Additionally, the Police Department coordinates with other local, state and federal law enforcement agencies to maintain effective communication and provide quality services.

The proposed project involves the construction of the El Camino College Fire Training Facility, which would increase the land use intensity of the project site, resulting in approximately 45 new students and 7 new employees on site. The increased land use intensity at the project site could increase the frequency of emergency and non-emergency calls for the on-campus police department, as compared with existing conditions. However, the proposed project would employ lighting, and landscaping, and site design would minimize dead spaces hidden from public view to prevent loitering and crime. Additionally, the proposed project involves redevelopment of an existing parking lot (Parking Lot L), which would improve the overall

appearance of the site and reduce secluded areas on campus. These aspects of the project could lessen the demand for police protection services at the project site. Furthermore, police units are continuously mobile, and service calls are responded to by the nearest available patrol. The proposed project site is located within close proximity to the Police Department in Parking Lot K.

The need for new or altered police station facilities is usually associated with substantial population growth, such that existing facilities cannot meet the increased demand for police protection services. As stated in Section 3.14, the proposed project would not include any permanent housing, the construction of which would result in significant population growth. Project implementation would add new students and employees to the campus population; however, any population growth related to the proposed project would be minor (as described in Section 3.14). As such, the proposed project would not induce substantial population growth such that new or physically altered police facilities would be needed. Impacts would be less than significant and no mitigation is required.

Schools?

Less than Significant Impact. The project site is located on an existing community college campus. The proposed project would result in the generation of approximately 45 new students and 7 new employees, which are within the planned growth for El Camino College (see discussion under Section 3.14(a)). The project would result in the construction of new school facilities; however, the project would not result in significant environmental impacts related to the need for new or expanded school facilities. The need for new or expanded school facilities is typically associated with a population increase (e.g., from a new housing development) that generates an increase in enrollment large enough to cause new schools or school facilities to be constructed. The proposed project does not include the construction of any infrastructure or housing that would directly or indirectly induce substantial population growth in the surrounding area such that new or expanded school facilities would be required. For more discussion on the potential for substantial population growth, see Section 3.14 of this Draft IS/MND. For these reasons, construction and operation of the proposed project would not result in the need for new or expanded school facilities. Impacts would be less than significant and no mitigation is required.

Parks?

Less than Significant Impact. While the proposed project would incrementally increase the population on campus, the amount of growth would be minor relative to the College's existing and future population (see Section 3.14 for details) and, therefore, would not significantly exacerbate the need for new or expanded park facilities. As mentioned previously, the need for new or expanded public services such as parks is usually associated with substantial population growth, such that existing park facilities cannot meet the increased demand for open space. As stated in Section 3.14, the proposed project would not include any permanent housing, the construction of which would result in significant population growth. Project implementation would add new students and employees to the campus population; however, any population growth related to the proposed project would be minor (as described in Section 3.14). As such, the proposed project would not induce substantial population growth such that new or physically altered park facilities would be needed. Impacts would be less than significant and no mitigation is required.

Other public facilities?

Less than Significant Impact. As mentioned previously, the need for new or expanded public facilities, such as libraries, is usually associated with substantial population growth, such that existing facilities cannot meet the increased demand for public/government services. As stated in Section 3.14, the proposed project would not include any permanent housing, the construction of which would result in significant population growth. Project implementation would add new students and employees to the campus population; however, any population growth related to the proposed project would be minor (as described in Section 3.14). As such, the proposed project would not induce substantial population growth such that new or physically altered public/government facilities, including libraries would be needed. Impacts would be less than significant and no mitigation is required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. As described in Section 2.2, Environmental Setting, the proposed project site is located on the El Camino College campus and within the municipal boundaries of the City of Torrance. The closest recreational facilities to the project site is Alondra Community Regional Park and Golf Course, approximately 300 feet to the west.

The physical deterioration of neighborhood and regional parks occurs when the number of residents utilizing the facilities surpasses the parks' capacity, and when the local parks and recreational services cannot keep up with the maintenance demands of over utilized park facilities. As stated in Section 3.14, the proposed project would not induce significant population growth. Project implementation would add new students and employees to the campus population; however, any population growth related to the proposed project would be minor. As such, the proposed project would not induce substantial population growth such that physical deterioration of parks and recreational facilities would occur. No impact would occur and no mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The proposed project involves the construction of the El Camino College Fire Training Facility. Recreational facilities are not proposed as part of the project. Moreover, as described above in Section 3.16(a), the proposed project would not require construction or expansion of recreational facilities. No impact would occur and no mitigation is required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

This section analyzes the potential impacts of the project based on CEQA Guidelines Section 15064.3(b), which focuses on newly adopted criteria (VMT) for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changed from LOS or vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. This new methodology was required to be used statewide beginning July 1, 2020. Because the proposed project site is located in the City of Torrance, for the purposes of this section, the VMT analysis methodology and thresholds identified within the City's Traffic Impact Assessment Guidelines for Land Use Projects, January 2021 have been used.

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

Less than Significant Impact.

City of Torrance General Plan Circulation Element

The Circulation and Infrastructure Element of the City's General Plan (City of Torrance 2010) is the guiding document for the efficient and effective movement of people and goods between destination within Torrance and throughout the region. Per City's guidelines, a Traffic Circulation Analysis (TCA) related to LOS

or operation analysis is required if a project generates 500 or more trips per day. As shown in project's trip generation estimate (Table 20) because the project would generate 52 average daily trips (ADT), it would not result in a measurable effect on the circulation system and a TCA would not be required.

Transit, Bicycle, and Pedestrian Facilities

Torrance Transit, Gardena transit (GTrans) and Metro provides public transit bus service in the vicinity of the proposed project. The nearest bus stops are located at the Crenshaw Boulevard/Redondo Beach and Crenshaw Boulevard/166th Street intersections.

Torrance Transit Line 2 operates between Del Amo Mall and Harbor Freeway Station via El Camino College. It operates at a frequency of approximately an hour on weekdays and Saturdays. Line 5 operates between Lomita City Hall and Crenshaw Station at a frequency of approximately an hour on weekdays and weekends. Line 10 operates between Torrance Airport and Crenshaw Station via El Camino College. It operates at a frequency of approximately half hour on weekdays and an hour on Saturdays.

GTrans Line 3 operates between South Bay Galleria and MLK Transit Center via Redondo Boulevard. It operates at a frequency of approximately half hour on weekends. Metro Route 210 operates between South Bay Transit Center and Hollywood Vine Station via Crenshaw Boulevard. It operates at a frequency of approximately 20 minutes on weekdays and weekends.

There are existing sidewalks along both sides of Redondo Beach Boulevard and Crenshaw Boulevard south of Redondo Beach Boulevard. There are no marked bike facilities along roadways near the proposed project. The South Bay Bicycle Master Plan (City of Torrance 2011) indicates a proposed facility along Redondo Beach Boulevard within the City of Torrance.

The project would not preclude implementation of any plans or policies regarding existing or proposed bicycle or pedestrian facilities in the area. As such, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

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

Less than Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The Updated CEQA Guidelines state that "generally, VMT is the most appropriate measure of transportation impacts," and define VMT as "the amount and distance of automobile travel attributable to a project." "Automobile" refers to on-road passenger vehicles, specifically cars and light trucks. The Governor's Office of Planning and Research (OPR) has clarified in its Technical Advisory (OPR 2018) that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of a project on transit and non-motorized traveled.

The proposed project would result in the generation of approximately 45 new students and 7 new employees. Using the Junior/Community College trip rate per student per the Institute of Transportation Engineers (ITE 2021), Trip Generation Manual, 11 Edition, the proposed project is estimated to generate a total of 52 daily trips, with 5 AM peak hour trips and 5 PM peak hour trips.

The proposed project would be categorized under CEQA Guidelines Section 15064.3(b)(1), as a land use project, for the purpose of VMT analysis. A project's VMT analysis follows the guidelines are contained within the City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects, dated January 2021, and provides the screening criteria and methodology for VMT analysis. Projects that pass at least one screening criteria are generally expected to cause a less than significant impact without conducting a detailed VMT analysis. This is consistent with OPR's Technical Advisory which states that projects that meet the screening thresholds based on their location and project type may be presumed to result in a less-than-significant transportation impact (OPR 2018).

Small Project Screening

If a project generates a net increase of 110 or more daily vehicle trips[17], then further VMT analysis is required. Because the project would generate less than 110 daily trips, a less than significant transportation impact determination can be made.

Table 20. Project Trip Generation

Land Use	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Generation Rates[1]								
Junior/Community College	student	1.15	0.09	0.02	0.11	0.06	0.05	0.11
Trip Generation								
El Camino College Fire Academy	45 students	52	4	1	5	3	2	5

Notes:
1 Daily trip rates from ITE Trip Generation Manual, 11th Edition

Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be less than significant.

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

Less than Significant Impact. Vehicular access to the project site would be via existing roadways of Redondo Beach Boulevard, Crenshaw Boulevard, and West 164th Street. The proposed project would add new classrooms to the existing campus (by removing some of the existing parking spaces) and use the existing internal roadways for access and circulation. During construction, no lane closures, sidewalk closures, or changes in campus vehicular and pedestrian circulation would occur. Therefore, the proposed project

17 OPR's Technical Advisory, 2018: CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

would not increase hazards due to a geometric design feature or incompatible use and impact would be less than significant.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. Construction of the proposed project is not anticipated to require road closures in public rights-of-way; construction staging would be within the project site or the adjacent parking lot. The project would be designed and constructed to local standards and comply with emergency access requirements of the fire department. Upon completion, the project site would continue to be accessible via existing driveways along roadways of Redondo Beach Boulevard, Crenshaw Boulevard, and West 164th Street. Therefore, the construction or operation of the proposed project would not result in inadequate emergency access and impacts would be less than significant.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

The evaluation of potential impacts to Tribal Cultural Resources is based on the findings resulting from tribal consultation conducted by the District, as the lead agency, as well as the findings of the Archaeological Resources Assessment conducted by Dudek in 2022 (Appendix B). Background research conducted to inform this analyses include the results of a CHRIS records search conducted at the SCCIC, and the results of formal tribal consultation completed by the lead agency, the District, pursuant to California AB 52, all of which are briefly provided in this section.

Existing Setting – Ethnohistoric

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief and generally peripheral accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Geiger and Meighan 1976; Harrington 1935; Laylander 2000; Sparkman 1908; White 1963). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005: 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

Gabrieliño/Tongva

The ethnohistoric (and to a lesser degree, archaeological) record indicates that the majority of the work proposed for this project and vicinity was occupied by the Gabrieliño/Tongva. Surrounding cultural groups included the Chumash and Tataviam to the north and northwest, the Serrano and Cahuilla to the north and east, and the Juaneño/Acjachemen and Luiseño to the south and east.

The name "Gabrielino" (also spelled "Gabrieliño," "Gabrieleño," and "Gabrileño") refers to the Indigenous people of the Los Angeles Basin and surrounding areas who were conscripted by the Spanish to construct and attend Mission San Gabriel Arcángel, established in 1771. Though many of these people shared similar customs and spoke a similar language, the Spanish name was also applied to other groups of people who spoke different languages and practiced different customs (Kroeber 1925; Bean and Smith 1978). Many of these people were also conscripted to construct and attend Mission San Fernando Rey de España (established in 1797) and along with several other groups were thus called "Fernandeño" by the Spanish. These names therefore reference shared experience during the Spanish colonial era rather than uniform language or custom predating Spanish intrusion. In many cases, the names by which Native Americans in southern California identified themselves have been lost. However, we do know that at least some of the people from the area that is today Los Angeles called themselves Kumivit (Bean and Smith 1978), while others may have been referred to as Tobikhar, meaning "settlers" and perhaps derived from the word Tovar meaning "earth" (Gatschet 1876 and Hoffman 1885 cited in Heizer 1968; McCawley 1994a), Kij or Kizh, which translate as "houses" (Hale 1846 and Buschmann 1856 cited in Heizer 1968),

the Spanish derivative “Kichireno” (Harrington notes cited in McCawley 1994a) and Tong-va (Merriam 1955; Golla 2011 citing Harrington's notes on p.312). Today, many Indigenous people from the area with ancestries tied to Mission San Gabriel identify themselves as Tongva (King 1994; Golla 2011), while other groups with direct lineal connection to individuals who lived at Mission San Gabriel identify themselves differently (for example, the Gabrieleño Band of Mission Indians - Kizh Nation). In August of 1994, the California Assembly Joint Resolution No. 1996 recognized the “Gabrieliño” as the aboriginal tribe of the Los Angeles Basin. To be inclusive of all ethnolinguistically related tribal entities within the region, and to maintain consistency with the historical and anthropological literature about the ethnolinguistic population of the broader Los Angeles Basin, we refer to all as “Gabrieliño/Tongva” in this report.

Gabrieliño/Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands: Santa Catalina, San Clemente, and San Nicolas. The Gabrieliño/Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000, but recent ethnohistoric work suggests a number approaching 10,000 (O'Neil 2002). Houses constructed by the Gabrieliño/Tongva were large, circular, domed structures made of willow poles thatched with tule that could hold up to 50 people (Bean and Smith 1978). Indeed, the word kizh or kij was the word used by many Gabrieliño/Tongva to refer to these houses (Heizer 1968; Johnston 1962). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries. Cleared fields for races and games were created adjacent to Gabrieliño/Tongva villages (McCawley 1996). Archaeological sites composed of villages with various sized structures have been identified.

The largest, and best documented, ethnographic Gabrieliño/Tongva settlement was Yanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of downtown Los Angeles (McCawley 1996; NEA and King 2004). This settlement was reportedly first encountered by the Portola expedition in 1769, and in 1771, Mission San Gabriel was established. Yanga provided a large number of individuals to this mission; however, following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid work became increasingly common, which had the result of reducing the number of Native American neophytes from the immediately surrounding area (NEA and King 2004). Mission records indicate that 179 Gabrieliño/Tongva inhabitants of Yanga were brought to San Gabriel Mission (NEA and King 2004; King 2000). Based on this information, Yanga may have been the most populated village in the western Gabrieliño/Tongva territory. Second in size, and less thoroughly documented, the village of Cahuenga was located just north of Cahuenga Pass.

Father Juan Crespí passed through the area near Yanga on August 2-3, 1769. The pertinent sections from his translated diary are provided here:

> Sage for refreshment is very plentiful at all three rivers and very good here at the Porciúncula [the Los Angeles River]. At once on our reaching here, eight heathens came over from a good sized village encamped at this pleasing spot among some trees. They came bringing two or three large bowls or baskets half-full of very good sage with other sorts of grass seeds that they consume; all brought their bows and arrows but with the strings removed from the bows. In his hands the chief bore strings of shell beads of the sort that they use, and on reaching the camp they threw the handfuls of these beads at each of us. Some of the heathens came up smoking on pipes made of baked clay, and they blew three mouthfuls of smoke into the air toward each one of us. The Captain and myself gave them tobacco, and he gave them our own kind of beads, and accepted the sage from them and gave us a share of it for refreshment; and very delicious sage it is for that purpose.

> We set out at a half past six in the morning from this pleasing, lush river and valley of Our Lady of Angeles of La Porciúncula. We crossed the river here where it is carrying a good deal of water almost at ground level, and on crossing it, came into a great vineyard of grapevines and countless rose bushes having a great many open blossoms, all of it very dark friable soil. Keeping upon a westerly course over very grass-grown, entirely level soils with grand grasses, on going about half a league we came upon the village belonging to this place, where they came out to meet and see us, and men, women, and children in good numbers, on approaching they commenced howling at us though they had been wolves, just as before back at the spot called San Francisco Solano. We greeted them and they wished to give us seeds. As we had nothing at hand to carry them in, we refused (Brown 2001: 339-343).

The Portola party passed westward through the La Brea Tar Pits area (CA-LAN-159) the following day. This was a known area of Native American use for hunting and the gathering of tar and other area-specific resources. A pertinent excerpt from Father Juan Crespí's August 3, 1769 diary entry is provided here:

> The Captain told me that when they scouted here, in a ravine about half a league to the westward they came upon about forty springs of pitch, or tar, boiling in great surges up out of the ground, and saw very large swamps of this tar, enough to have caulked many ships. (Brown 2001: 341)

Upon leaving the La Brea Tar Pits, the Portola expedition continued westward, camping on August 4, 1769 near what is now the route of Interstate 405 before heading northward into the mountains. Details of the day's travels are provided below:

> At a quarter past six in the morning we set out from this copious spring at the San Esteban Sycamores .... We pursued our way northwestward and on going about a quarter-league [0.85 mile], we came into a little flat hollow between small knolls, and then onward across level tablelands of dark friable soil....we turned west-northwestward and on going two hours, all over level soil, came to the watering place: two springs rising at the foot of a high tableland, their origin being higher up on the large plain here....At this spot we came upon a village at the aforesaid tableland and as soon as we arrived and set up camp, six very friendly, compliant tractable heathens came over, who had their little houses roofed with grass, the first we have been seeing of this sort. They brought four or six bowls of the usual seeds and good sage which they presented to our Captain. On me they bestowed a good-sized string of the sort of beads they all have, made of white seashells and red ones, though not very bright-colored, that look to be coral. (Brown 2001: 345-349)

The name of the settlement encountered near the August 4, 1769 Portola camp is unknown and would have been located approximately 3 miles of Kuruvunga near Santa Monica and 5 miles from Sa'anga near the mouth of Ballona Creek. Sa'anga, has also been referred to as Guaspet or Guashna, (NEA and King 2004), Saan (Kroeber 1925), or Saa'anga or Waachnga (McCawley 1996). Ethnohistoric research completed by John Johnson (1988) pertaining to the inhabitants of San Clemente Island and Santa Catalina Island indicates that there were many marriage ties between these islands and a settlement near the Ballona wetlands. Mission records indicate that a total of 95 conscripts came from this place; 87 of these individuals were brought to Mission San Gabriel and the remaining eight to Mission San Fernando (NEA and King 2004). These records further suggest that marriage was common with the surrounding outside villages, but perhaps most often occurring with members of the larger village of Yanga.

More than 15 miles southwest of the Project site, just north of Alamitos Bay and west of the San Gabriel River, Povuu'nga (also Puvunga or Pubuna) was a large Gabrieliño/Tongva community and an important ritual center. Indeed, it was considered the birthplace of the Supreme Creator, Chinigchinich (Chengiichngech), and the First

Chief, Ouiot (Wewyoot), and was therefore of central importance to the Gabrieliño/Tongva as well as to neighboring groups who practiced the same religion at the time (Boscana 1846; Bean and Smith 1978; McCawley 1994a, 1994b).

At the time of Spanish contact, the basis of Gabrieliño/Tongva religious life was a reverence for Chinigchinich, the last of a series of heroic entities. Chinigchinich (more typically referenced obliquely as Y-yo-ha-rig-nain, - "The Giver of Life") gave instruction on laws and institutions, and also taught the people how to dance, the primary sacred act for this society. He later withdrew to the heavens, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. At that time, it was spreading south into the Southern Takic groups even as Christian missions were under construction and may represent a mixture of Native and Christian belief and practice (McCawley 1996).

The significance of Povuu'nga to Gabrieliño/Tongva culture and identity was such that its abandonment around 1805 signified "the final collapse of the economic and social integrity of south coastal Gabrieliño society" with their fate then "irrevocably tied to the missions and the ranchos" of the colonial introgressors (McCawley 1994b: 3-30). Nevertheless, a festival honoring Chinigchinich returned to the area in 1992 (Altschul 1994), and today the presumed location of Povuu'nga, a 22-acre parcel on the west side of the CSULB campus is protected by Declaration of Restrictive Convenant (Enriquez 2021). Other named settlements near the Project Area include Suanga (Soabit – presumably in Wilmington), Chowenga (Chaawvenga – presumably in San Pedro), Atababit (perhaps near Cabrillo Beach in San Pedro), and Juyuabit (presumably near the mouth of the Los Angeles River). Identification of Gabrieliño/Tongva settlement and rancheria location has been notoriously difficult (NEA and King 2004; Heizer 1968; McCawley 1996; King 1994; Stoll, Douglass, and Ciolek-Torello 2016; Johnston 1962; Engelhardt 1927; Merriam 1968).

In light of existing documentary and archaeological evidence, the Gabrieliño/Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and people exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most Native Californians, acorns were a staple food. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals (both terrestrial and marine), were also consumed (McCawley 1994a; Reddy et al. 2016; Reddy 2015; Kroeber 1925; Bean and Smith 1978; McCawley 1996).

A wide variety of tools and implements were used by the Gabrieliño/Tongva to gather and collect food. These included the bow and arrow, traps and snares, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996). Gabrieliño/Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used (and refashioned) to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

Deceased Gabrieliño/Tongva were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast with cremation predominant on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996). Cremation ashes have been found in archaeological contexts buried with stone bowls and in shell dishes (Ashby and Winterbourne 1966), as well as scattered among broken ground stone implements (Cleland, York, and Willey 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a wide variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile

points and knives. Offerings varied with the gender and status of the deceased (Johnston 1962; McCawley 1996). At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period (McCawley 1996).

To date, perhaps the most exceptional accounts of Gabrieliño/Tongva belief, custom, folk-lore, and language prior to the modern era come from two elaborate sources: a series of 22 letters written for the Los Angeles Star in 1852 by Hugo Reid, a Scottish immigrant to California, who transcribed the memories of his wife, Victoria Bartolomea Reid, a Gabrieliño/Tongva woman from the Comicrabit rancheria (Heizer 1968), and interviews conducted in 1903 with Mrs. James Rosemyer (Narcissa Higuera), a Gabrieliño/Tongva woman who then resided in Bakersfield (Merriam 1955). These manuscripts include (among other things) delicate, poetic, and dramatic accounts about the purpose and disposition of plants and animals in the Gabrieliño/Tongva world, spirituality, social hierarchy, mortuary custom, naming convention, song, and many other aspects of Gabrieliño/Tongva life, as well as accounts and assessments of the atrocities visited upon these people by the friars and soldiers of Spanish Mission imperialism (also see Welch 2006).

Sadly, much of the Gabrieliño/Tongva language has been lost since the 1930s, though enough survives in the written record to permit classification of it as part of the Takic sub-group of the Uto-Aztecan language family, closely related to the languages of neighboring peoples, including Serrano, Kitanemuk, Tataviam, Luiseño, Juaneño/Acjachemen, Cahuilla, and Cupeño, which are together related to other languages of the Northern Uto-Aztecan branch that includes the Numic, Tubatulabal, and Hopi languages (Golla 2011). The formal morphology of the language has been summarized by UCLA linguistics professor Pamela Munro (Munro 2000), and a comprehensive dictionary of Gabrieliño/Tongva language based on the notes of J. P. Harrington is under revision by Munro in collaboration with Gabrieliño/Tongva scholars. Of note for the current Project Area, the particular variant of Gabrieliño/Tongva language spoken in the vicinity of Long Beach and San Pedro may have been more similar to that spoken on Santa Catalina and the other southern Channel Islands, further illustrating the ethnic and cultural connections and contrasts among coastal/island peoples and those of the interior Los Angeles Basin (writes John P. Harrington in the Introduction to Johnston 1962: vii-viii).

AB 52 Consultation

The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives that have requested notification who are traditionally or culturally affiliated with the geographic area of the project site. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent letters by the District on October 11, 2021, via USPS certified mailing and email. The notification letters contained a project description, outline of AB 52 timing, an invitation to consult, a project location map, and contact information for the appropriate lead agency representative. To date, government-to-government consultation initiated by the District has not resulted in the identification of a tribal cultural resource within or near the project site. Table 21 summarizes the results of the AB 52 process for the project.

Table 21. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
Andrew Salas	**October 21, 2021:**

Table 21. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
Chairman Gabrieleno Band of Mission Indians – Kizh Nation	Executive Director of Facilities Planning and Services for the District, Jorge Gutierrez, received a received a response in a letter attached to an email from Savannah Salas, Admin Specialist, for the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). In the response, Ms. Salas acknowledged receipt of the notification letter sent by the District on October 11, 2021 and requested formal consultation regarding the Project. **November 23, 2021** Phone consultation was conducted between the Tribe and the District. **December 1, 2021** Following the consultation call, the Tribe emailed the District files, including screenshots of three historical maps overlaid on Google Earth and the pinned location of the project site, a map of approximate locations of Native American Rancherias, an image of a plaque that was erected in the City of Carson and dedicated to village site, and screen shots or excerpts of text from seven literary sources and explanatory text for each file provided. The files provided references to rancherias, Rancho San Pedro, a Gabrieleno community, trade routes and hydrographys or waterways near the project area as well as information regarding a Gabrieleno community. Additional documents provided to the District include letters from an archaeologist and the NAHC. The Kizh Nation state in their communication that the Tribe believes there is a higher than average potential to impact tribal cultural resources within the Project site. As such, the Tribe provided the District with proposed mitigation measures for the Project, which includes the requirement for a Native American Monitor to be present during all ground disturbing activities and the implementation of various protocols and procedures in the event that tribal cultural resources, archaeological resources, and/or human remains are identified within the Project site. **December 6, 2021** District responds to the Tribe's December 1, 2022 acknowledging and thanking the Tribe for the email and information within. **December 6, 2021** Tribe responds to the District's December 6, 2022 thanking the District for the email. **December 17, 2022** District sends Tribe follow up email stating the information the Tribe provided was under review and that the District will provide a response after the first of the year 2022.

Table 21. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
	February 3, 2022 District emails Tribe and provides mitigation measures for the Tribes review. **February 3, 2022** Tribe emails District and states that based on their review of the mitigation measures provided by the District, the Tribe does not agree with the mitigation measures. The Tribe provides their own mitigation measures and requests they be utilized instead. **February 22, 2022** District sends Tribe email and states that based on review of the mitigation measures provided by the Tribe, the District finds that the measures provided by the District to the Tribe on February 3, 2022 will be included in the CEQA document and that the District regrets they can find agreement with the Tribe. The District states that the consultation pursuant to AB-52 is considered closed. **February 22, 2022** The Tribe responds to the District email and states that the Tribe believes that consultation requires agreement and therefore does not consider the consultation closed. No further communication occurred after the last communication provided above on February 22, 2022.
Anthony Morales Chairperson Gabrieleno/Tongva San Gabriel Band of Mission Indians	No response has been received to date.
Sandonne Goad Chairperson Gabrieliño/Tongva Nation	No response has been received to date.
Christina Conley Tribal Consultant and Administrator Gabrieliño Tongva Indians of California Tribal Council	No response has been received to date.
Robert Dorame Chairperson Tribal Consultant and Administrator Gabrieliño Tongva Indians of California Tribal Council	No response has been received to date.
Charles Alvarez Gabrieliño -Tongva Tribe	No response has been received to date.
Lovina Redner Tribal Chair Santa Rosa Band of Cahuilla Indians	No response has been received to date.
Isaiah Vivanco Chairperson Soboba Band of Luiseno Indians	No response has been received to date.

Regulatory Context

California State Assembly Bill 52

AB 52 of 2014 amended Public Resources Code Section 5097.94 and added Public Resources Code Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Public Resources Code Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A tribal cultural resource is either:

- On the CRHR or a local historic register;
- Eligible for the CRHR or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in division (c) of Public Resources Code Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report by contacting those tribal groups who have previously provided formal written request for notification of projects under the agency's jurisdiction.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the Public Resources Code, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (Public Resources Code Section 21080.3.2[a]). Finally, the environmental document, for which the tribal consultation is focused, and the mitigation monitoring and reporting program (where applicable), developed in consideration of information provided by tribes during the formal consultation process, shall include any mitigation measures that are adopted (Public Resources Code Section 21082.3[a]).

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains can occur until the county coroner has examined the remains (Health and Safety Code Section 7050.5[b]). Public Resources Code Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the county coroner determines or has reason to believe the remains are those of a Native American, the county coroner must contact the NAHC within 24 hours (Health and Safety Code Section 7050.5[c]). The NAHC will notify the most likely descendant. With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the

NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. As previously discussed in Section 3.5(a), no previously recorded archaeological resources of Native American origin or tribal cultural resources listed in the CRHR or a local register were identified within the project site through the SCCIC records, NAHC SLF search nor as a result of information provided from consulting tribes. Therefore, the project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts would be less than significant.

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

Less than Significant Impact With Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications. A summary of the AB 52 consultation coordination is provided in Table 21.

As summarized above, the District notified all applicable tribes of the project, of which, one tribe requested formal consultation. This consultation was conducted and concluded on February 22, 2022. As a result of tribal consultation efforts, no TCRs were identified within the project site. Additionally, no archaeological resources of a Native American origin were identified as a result of the CHRIS or NAHC SLF records searches nor through extensive background research of documents, maps and aerial images. Therefore, the lead agency has not identified any TCRs within the project site that would warrant discretionary designation of a resource as a TCR. However, in an abundance of caution, and through careful consideration of the consulting tribe's request, the following mitigation measures shall be implemented to ensure that impacts to unknown TCRs will be treated appropriately throughout project construction.

MM-TRC-1 **Workers Environmental Awareness Program** - All interested tribes who have requested and engaged in formal Tribal consultation for the El Camino College Fire Academy Project, pursuant to AB-52, shall be notified by the El Camino College District (District) of the time and location of the Worker Environmental Awareness Program (WEAP) training no later than 72 hours prior to its scheduled occurrence. The District

shall provide all interested consulting tribes access and opportunity to participate in the WEAP training.

MM-TCR-2 **Retention of a Native American Monitoring** - Prior to any ground disturbance activities, the District shall contact any tribe(s), that requested and participated in formal AB 52 consultation (referred to as "interested Tribe"), with notification of the commencement of ground disturbing activities. The applicant shall make arrangements with the interested Tribe/s, to enter into a Native American Monitoring Agreement with the intent of securing a total of one Native American monitor to be present during initial ground disturbance occurring from 1 foot above native soils and below. Initial ground disturbance is defined as initial construction-related earthmoving of sediments from their place of deposition. As it pertains to cultural resource (archaeological or Native American) monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current Project-related construction. The need for cultural resource monitoring (archaeological and Native American) will be determined by a qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with interested tribes who shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance as previously defined in these mitigation measures causing monitoring to be hindered by the distance of the simultaneous activities. The need for an additional monitor shall be made by the qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with interested tribes. The Native American monitoring agreement(s) shall include, but not be limited to, outlining provisions and requirements for establishing on-site Native American monitoring for professional tribal monitors during initial ground disturbance as defined above.

The Native American monitor will complete daily monitoring logs that will 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., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the District upon written request to the Tribe.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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

Less than Significant Impact.

Water. According to the Torrance General Plan, the project site is located within the Torrance Municipal Water Department's (TMWD) service area boundaries. TMWD conducts water quality maintenance and monitoring and operation of the water system distribution system. TMWD is a direct member agency of the Metropolitan Water District of Southern California (MWD), which provides over 88 percent of the City's potable water supply (City of Torrance 2010). Water sources from the MWD include imported water from the Colorado River Aqueduct and from the State Water Project via the California Aqueduct, as well as groundwater from district wells. Additional water sources include groundwater (including desalinated water) purchased from the Water Replenishment District of Southern California and recycled water purchased

from the West Basin Municipal Water District. In addition to the Yukon Tank, which is the one active above-ground water storage tank in the City, TMWD maintains the Walteria and Ben Haggot reservoirs (City of Torrance 2010).

The proposed project would only minimally increase El Camino College's water demand and would not require any necessary improvements to existing infrastructure serving the project site. The project would not result in the need for additional water conveyance infrastructure beyond what is already planned as part of the TMWD's planning efforts. The District would construct all necessary infrastructure extensions of existing lines to the site to meet the water demands of the project. In addition, the District would pay all applicable connection fees and monthly charges that may be necessary as part of the final project. Any potential impacts related to water would be less than significant. Therefore, impacts associated with the construction of new or expanded water treatment facilities would be less than significant.

Wastewater. The Public Works Department of the City of Torrance maintains local sewer and storm drain systems. The Sanitation Districts of Los Angeles County (LACSD) is the regional agency responsible for the collection and treatment of wastewater, including construction, operation, and maintenance of sanitation facilities used to collect, treat, recycle, and dispose wastewater. Torrance and the project site lie within Sanitation Districts No. 5. The nearest wastewater treatment facility to the project site is the Joint Water Pollution Control Plant (JWPCP) in Carson. The JWPCP treats approximately 400 million gallons of wastewater a day (LACSD 2021).

Existing sewer infrastructure is located within roadways surrounding the El Camino College campus and the proposed project site, and it is anticipated to have adequate capacity to serve the proposed project. The proposed project would only minimally increase El Camino College's wastewater generation and would not require any necessary improvements to existing infrastructure serving the project site. The project would not result in the need for additional wastewater treatment capacity or infrastructure beyond what is already planned as part of the LACSD planning efforts. The District would construct all necessary infrastructure extensions of existing lines to the site to meet the sewer demands of the project. In addition, the District would pay all applicable connection fees and monthly usage charges that may be necessary as part of the final project. Any potential impacts related to wastewater would be less than significant.

Stormwater. The proposed project is not expected to generate increased stormwater runoff during operation. As described under Section 3.10, the drainage patterns of the site would not substantially change relative to existing conditions. New landscaping would be installed on the site. The new landscaping would reduce the amount of runoff from the project site. Additionally, the College would be required to comply with the LID Ordinance (see Section 3.10 for details). Compliance with the LID Ordinance and Torrance Municipal Code stormwater regulations would reduce the peak volume of stormwater runoff discharged into the City's storm drain system and would ensure that stormwater is retained on site, to the extent feasible. As such, the proposed project would not require the construction or expansion of off-site storm water drainage facilities, as the project would not contribute a substantial amount of new stormwater runoff relative to existing conditions.

Electric Power, Natural Gas, and Telecommunications. SCE provides electricity to the City (City of Torrance 2010). Electricity to the project site is provided by SCE via transmission lines located on the project site's northern perimeter along Redondo Beach Boulevard. These electrical transmission lines would be protected in place during construction-related activities. No off-site improvements for electric power infrastructure are anticipated with the implementation of the proposed project. The Southern California Gas

Company provides natural gas to the City via distribution lines and laterals within the City streets and easements (City of Torrance 2010). Existing gas lines serving the College campus would be protected in place during construction-related activities. No off-site improvements for natural gas infrastructure are anticipated with the implementation of the proposed project. Similarly, the proposed project would not require new or expanded telecommunication facilities.

Conclusion. In summary, the proposed project would adhere to state and local legislation pertaining to the payment of impact fees to accommodate the project's fair-share contribution to increased demand for utility infrastructure and services. As such, the project would have a less than significant impact to the environment as a result of the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities. No mitigation is required.

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

Less than Significant Impact. As previously discussed, the project site is located within the TMWD's service area boundaries. According to the City's General Plan, TMWD receives approximately 68 percent of its water supply from MWD and 32 percent from local supplies. Local sources include groundwater, desalinated groundwater, and recycled water. Recycled water comprises approximately 21 percent of TMWD's water supply, while groundwater supplies (including desalinated groundwater) make up approximately 11 percent (City of Torrance 2010).

The City's UWMP sets forth strategies the City pursues to ensure water service reliability during normal, dry, or multiple dry years. Like other communities in Southern California, Torrance will face additional water resource challenges in the future. Conservation strategies include water recycling, groundwater recovery, desalination, surface water storage, and in-region groundwater conjunctive use. The 2015 UWMP projects 31,607 acre-feet of potable water supplies will be available in 2020 and over time, recycled supplies are anticipated to provide 27 to 30% of the City's total water supply portfolio (City of Torrance 2016). The City projects 26,105 acre-feet of total water consumption in 2020.

Indoor and outdoor water consumption was calculated using CalEEMod. During operation, the project would consume 2.47 million gallons per year, or 7.58 acre-feet per year.

The estimated water consumption of the proposed project is less than 0.03 percent of the total projected water supply for 2020. Moreover, the City projects adequate water supply through the planning horizon of 2040 in normal year, single-dry year, and multiple-dry year scenarios (City of Torrance 2016). Additionally, the project site would be redeveloped in compliance with CalGreen (which includes water efficiency standards for appliances and fixtures). For these reasons, the City is expected to have sufficient water supplies to serve the proposed project. Impacts would be considered less than significant. No mitigation is required.

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

Less than Significant Impact. The proposed project would connect to existing sewer infrastructure surrounding the project site. Although the project would require the installation of additional utility infrastructure (e.g., sewer pipeline connections) on site, these facilities are considered part of the proposed project and are analyzed in this IS/MND for potential environmental effects. The proposed project is not expected to require construction of domestic wastewater treatment facilities. However, the proposed project includes the redevelopment of existing conditions, and, as such, would result in increased demand for wastewater treatment services.

The proposed project would only minimally increase the College's volume of wastewater treated by the wastewater treatment provider (JWPCP). The proposed project would not result in the determination by JWPCP that it does not have sufficient capacity to serve the proposed project's anticipated wastewater demand. As previously discussed, the JWPCP maintains sufficient wastewater infrastructure and service capacity and the proposed project will produce minimal wastewater. Impacts would be less than significant.

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

Less than Significant Impact. The City's non-residential solid waste is disposed through the City's Sanitation Division. These waste management services offer waste and recycling collection, green waste recycling programs, organics waste composting, special waste transportation, and transfer and materials recovery services to the City as well as many other areas in Southern California. Based on the CalEEMod solid waste generation rates, the proposed project would generate approximately 25.53 tons of solid waste per year (Appendix A). Solid waste generated by the proposed project would be collected and transported to a local or regional landfill. The increase in solid waste generation from implementation of the proposed project would be minimal. Regional landfills in the Los Angeles area are anticipated to have sufficient capacity to accommodate the minor increase in solid waste generation attributable to the proposed project. Additionally, the City adheres to the states Solid Waste Reuse and Recycling Access Act of 1991 (AB 341), which declares that cities and counties must divert 50% of all solid waste by 2000 and 75% of all solid waste by 2020, through source reduction, recycling and composting. Required compliance with this regulation would reduce the project's solid waste generation during construction. Moreover, the City requires that all demolition projects and construction or remodeling projects valued at $100,000 or more recycle or reuse at least fifty percent of the materials that leave a project site. A Waste Management Plan (WMP) form is part of the permit process for projects that meet these criteria (City of Torrance 2010). For these reasons, solid waste impacts resulting from the construction and operation of the proposed Project would be considered less than significant. No mitigation is required.

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

No Impact. The College is required to comply with all local, state, and federal requirements for integrated waste management (e.g., recycling, green waste) and solid waste disposal. As previously mentioned, the project would be required to comply with the Integrated Waste Management Act of 1989, which requires that at least 75% of all annual solid waste materials, including building and demolition materials (wood,

metal, electrical, piping, glass, drywall, asphalt, concrete), be diverted from landfills by 2020 (CalRecycle 2021). The City and waste management providers all adhere to AB 341, and, as such, the proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. No impact would occur.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – 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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The City of Torrance EOC serves as centralized emergency management during major disasters or events and is coordinated by the Director of Emergency Services. In the event of an emergency or disaster, the City of Torrance EOC will provide emergency management and operations coordination. During an emergency or disaster, the EOC will be the centralized location for disaster and emergency management and will receive and disseminate warning information. This includes but is not limited to public alerting, evacuation coordination (evacuation orders and routes), shelter activation, and request for assistance (City of Torrance 2021c).

The Los Angeles County OAERP guides and addresses a coordinated response to emergency events within the OA (County of Los Angeles 2012) The County Emergency Operation Center/Operational Area Emergency operation Area (CEOC/OAEOC) will collect and disseminate information to the OA and coordinate requests

for mutual aid. In the event of an emergency, the CEOC/OAEOC gathers, analyzes, and distributes information to support emergency response and evacuation to save lives, minimize injury to persons, and damage to property and the environment. Additionally, the CEOC/OAEOC provides resources during a disaster such as public information, evacuation orders/routes, recovery programs, and mitigation to reduce future disasters.

The County of Los Angeles identifies wildland fires as a high-priority hazard (County of Los Angeles 2015). However, the City of Torrance does not consider wildfire to be a priority hazard as the City is not located in or adjacent to any wildland or wildland-urban interfaces (City of Torrance 2017). Within the project vicinity, there are multiple fire stations including Torrance Fire, Redonda Beach Fire department, and Los Angeles County Fire Department. The City of Torrance Fire Department would provide primary fire and medical response to the project site. Los Angeles County Fire Department could provide support if needed. Torrance Alert is the mass notification system for the City that is used to notify those who live and work in the City of the necessary information during emergency events such as disaster notifications and evacuation orders (City of Torrance 2021d). The project is not located on or adjacent to a predesignated evacuation route (City of Torrance 2017).

As previously discussed in Section 3.17 Transportation, construction of the proposed project is not anticipated to require road closures in public rights-of-way; construction staging would be within the project site or the adjacent parking lot. Construction would occur completely off public rights-of-way. Future operations at the project site would occur completely onsite and would not require road closures in public rights-of-way. Therefore, no interference or impairment of the emergency response or emergency evacuation plans would occur, and no impact would occur.

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

Less than Significant Impact. The project site is not located in a High or Very High Fire Hazard Severity Zone (VHFHSZ), which has been designated by the California Department of Forestry and Fire Protection (CAL FIRE) based on factors such as fuel, terrain/slope, weather and other relevant factors (CAL FIRE 2011). The nearest VHFHSZ is located approximately 3.4 miles to the southwest. In addition, the project site is not located in a State Responsibility Area (CAL FIRE 2007). The project site is flat and contains limited vegetation as it is currently a developed parking lot with landscape features. The prevailing wind direction in the project area for the majority of the year is from the west, with average monthly wind speeds ranging from 6.9 to 8.6 mph (WeatherSpark 2021). Average wind conditions in the project area exhibit mild seasonal variation, and wind conditions at any given location may vary depending on topography and other factors. The project area is subject to seasonal Santa Ana winds, which typically present the highest fire danger. There have been no wildfires on the project site, in the surrounding vicinity, or within the City (CAL FIRE 2020). Surrounding vegetation, another factor that contributes to the fire environment, consists of, ornamental landscaping and bare ground.

Construction

The project does not include permenant occupants, but the project site would be temporarily occupied during construction activities by construction workers. The construction of the project would not influence prevailing winds or other factors that could exacerbate wildfire risk. However, the project construction would

introduce potential ignition sources to the project site including the use of vehicles, heavy machinery, and accidental human-caused ignitions or any potential hot work. Construction would include removal/demolition, site preparation, grading, underground utility construction, modular build construction of two classrooms, locker rooms, and a fire tower. The project would be conducted in accordance with the local and state regulations governing fire protection and safety. The project would comply with the 2019 California Fire Code and the 2019 California Building Code as modified and amended by the City to limit the potential for accidental ignitions related to construction activities.

Operation

Operation of the training facility would include the use of live fire training events, but these events would be conducted under specific weather conditions to ensure wildfire would not occur as a result. The project would provide a South Bay training location for local firefighters and EMTs and provide expanded facilities to handle the increasing demand for the El Camino College Public Safety Training Center. The project would result in the temporary occupation of 45 students and 7 employees. Operation of the project would occur year-round Monday through Friday with periodic operations on nights and weekends. Training is expected to occur between the hours of 6:00 AM and 5:00 PM. Live-fire training would comply with NFPA 1402 (NFPA 2019). It is not anticipated that the project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

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

Less than Significant Impact. The project would involve the construction and operation of new facilities grounds for the El Camino College Public Safety Training Center. The project includes extending utilities to the newly proposed structures as applicable via underground conduits. Construction of associated infrastructure would be conducted in accordance with local and state regulations governing fire safety.

Construction and operation of the project would not directly require new or expanded infrastructure other than that which is planned as part of the project. As discussed in Section 3.19, no new water/wastewater facilities, or other service utilities would be required for the project. The activities involved with the installation or maintenance of associated infrastructure would require ground disturbance and the use of heavy machinery associated with trenching, grading, site work, and other construction and maintenance activities. However, the project would be required to comply with all regulatory requirements and mitigation measures outlined within this IS/MND to mitigate impacts associated with trenching, grading, site work, and the use of heavy machinery. No adverse physical effects beyond those already disclosed and mitigated would occur as a result of the implementation of the project's associated infrastructure. Therefore, with compliance with regulatory requirements, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those already disclosed throughout this document, and impacts would be less than significant.

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

No Impact As identified in the Los Angeles County General Plan 2035 and discussed in Section 3.7, Geology and Soils, the project is not located in any seismically induced liquefaction zones (County of Los Angeles 2010) nor within a flood hazard area (County of Los Angeles 2021). Further, there have been no known landslides within the project area or the larger project vicinity (USGS 2019). The project does not include activities that would induce post-fire instability, such as prescribed burning.

The project site and surrounding areas are currently paved and flat. The project area would remain paved after construction and will not include large expanses of exposed soil. Further, the project is not in an FHSZ nor is it adjacent to an FHSZ. Therefore, the project would not increase the risk of flooding, landslides, or post-fire slop instability and there is no impact.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

Less than Significant Impact With Mitigation Incorporated. As discussed in Section 3.4, through implementation of MM-BIO-1, the project would not result in significant impacts to biological resources. As discussed in Section 3.5, through implementation of MM-CUL-1 through MM-CUL-3, the project would not result in significant impacts to cultural resources. In the event that intact paleontological resources are located on the project area, ground-disturbing activities associated with construction of the proposed project, such as grading during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of MM-GEO-1, impacts would be reduced to below a level of significance. The District determined that implementation of MM-TRC-1 and MM-TRC-2 would appropriately mitigate impacts to tribal cultural resources to less than significant levels. Therefore, with mitigation incorporated, the project would not 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, 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.

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

Less than Significant Impact with Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states that an EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Alternatively, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable through mitigation measures set forth in an MND or if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

The proposed project would potentially result in project-related biological resources, cultural resources, geological resources, and tribal cultural resources impacts that could be potentially significant without the incorporation of mitigation. Thus, when coupled with biological resources, cultural resources, geological resources, and tribal cultural resources impacts related to the implementation of other related projects

throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified herein, the project's biological resources, cultural resources, geological resources, and tribal cultural resources impacts would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, these other related projects would presumably be bound by their applicable lead agency to (1) comply with the all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulative impacts are always possible, by incorporating all mitigation measures outlined herein, the project would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, the project would result in individually limited, but not cumulatively considerable, impacts.

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

Less than Significant Impact With Mitigation Incorporated. As evaluated throughout this document, with incorporation of mitigation, environmental impacts associated with the proposed project would be reduced to less-than-significant levels. Thus, the proposed project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with incorporation of mitigation.

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4.2 List of Preparers

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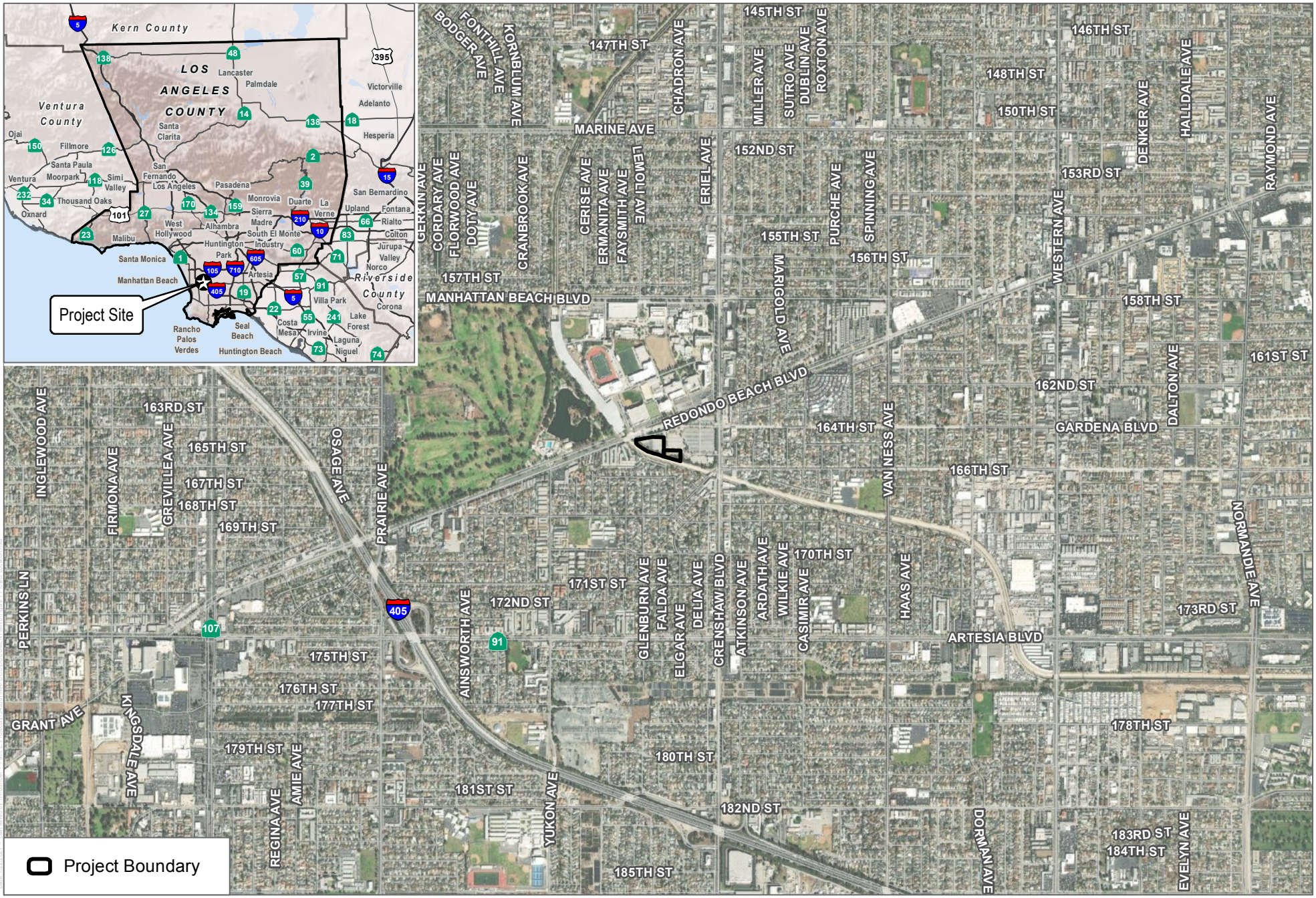

SOURCE: DigitalGlobe 2017

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

El Camino College Fire Academy Project

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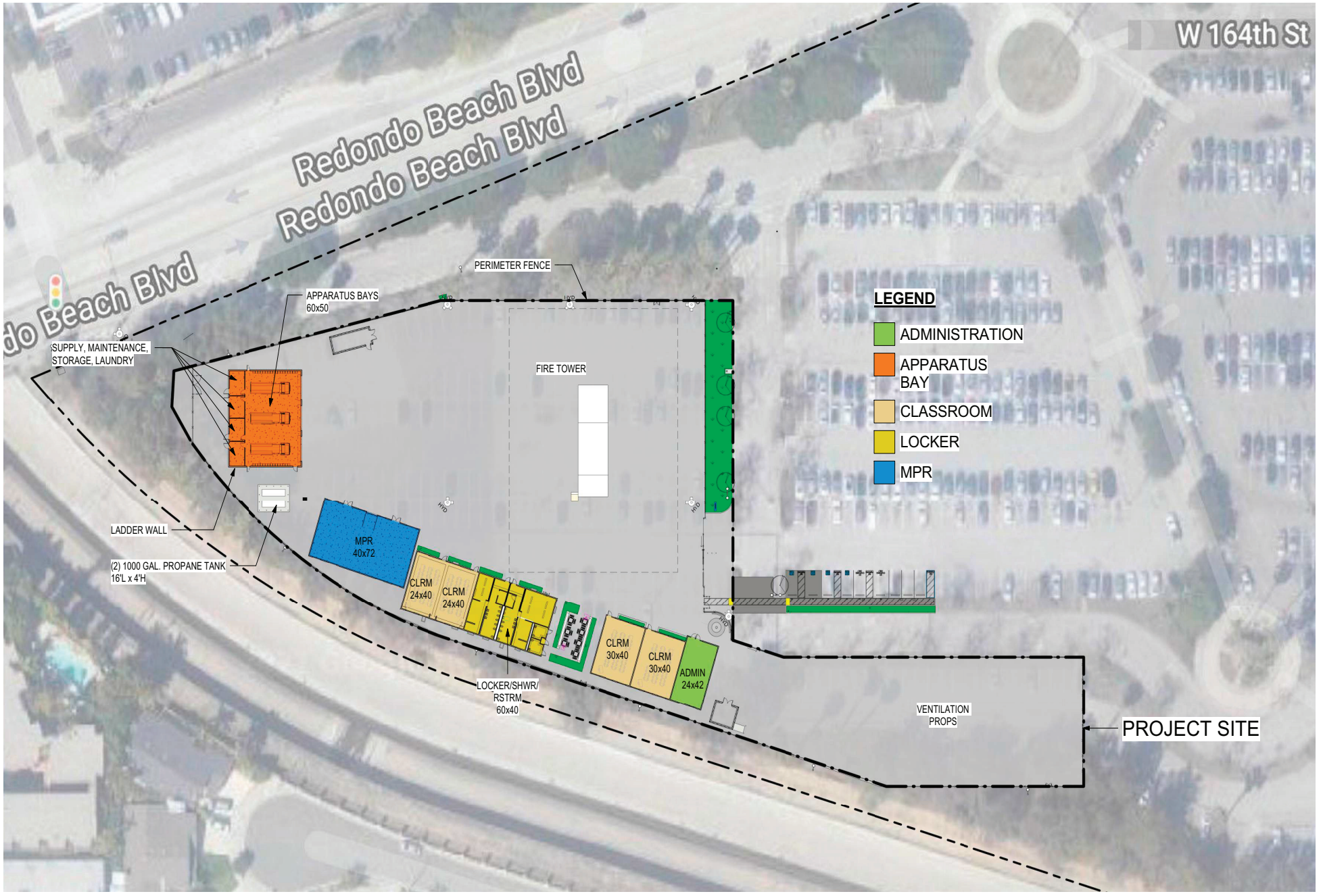

SOURCE: Perkins Eastman 2022

FIGURE 2

Site Plan

El Camino College Fire Academy Project

DUDEK

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SOURCE: County of Los Angeles; Bing Maps

DUDEK

0 150 300 Feet

FIGURE 3

Noise Measurement Locations

El Camino College Fire Academy Project

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