TO: Members of the Board of Trustees
FROM: Adriana D. Barrera, Interim Chancellor
DATE: May 7, 2014
SUBJECT: BOARD LETTER FOR MAY 14, 2014 MEETING

Board Meeting Location
Next week's Board meeting will be held at Los Angeles Southwest College. The meeting times and locations are as follows:

<table>
<thead>
<tr>
<th>Meetings</th>
<th>Time</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Budget &amp; Finance Committee Meeting</td>
<td>2:00 p.m. – 3:15 p.m.</td>
<td>Student Services Education Center Building, 2nd Floor, Room 209</td>
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<td>Break</td>
<td>3:15 p.m. – 3:30 p.m.</td>
<td>Student Services Education Center Building, 3rd Floor, Rooms 301A and 301B</td>
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<td>Convene for Public Session</td>
<td>3:30 p.m.</td>
<td>Student Services Education Center Building, 3rd Floor, Room 309</td>
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<tr>
<td>Recess to Closed Session</td>
<td>Immediately Following Public Session</td>
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</table>

Budget & Finance Committee Meeting (Svonkin Chair, Moreno, Eng)
The committee will meet from 2:00 p.m. to 3:15 p.m. in the Student Services Education Center Building, 2nd Floor, Room 209. For the committee's agenda refer to Attachment A.

Parking
Parking for Board Members and Chancellor will be located in Parking Lot 1. A campus map has been included for your convenience.

Agenda Format
Under Reports from the Chancellor, the following will take place:

- Reports from the Chancellor regarding District activities or pending issues
  - Presentation on Los Angeles Southwest College's Career and Technical Education
  - Presentation on Southern California Marine Institute and the Alta Sea Project

Confidential Matters
The attached correspondence is confidential and should not be shared with other persons.

- Office of General Counsel
  - Enclosed for your review is background information pertaining to District-related litigation matters. (Refer to Attachment B)
  - Enclosed for your review is an update pertaining to the status on personnel actions. (Refer to Attachment C)
  - Enclosed for your review is an update pertaining to complaints of discrimination/harassment. (Refer to Attachment D)
Enclosed is a letter in response to a question posed by Board Member Eng regarding the Firestone Educational Center Master Plan. *(Refer to Attachment E)*

- **Human Resources**
  
  Enclosed for your review is information pertaining to a personnel matter. *Due to its size, this document will be sent via U.S. mail.*

**Other Matters**

Enclosed for your review is information regarding Firestone Education Center Subsequent Final Environmental Impact Report: Mitigation Monitoring and Reporting Program and Findings of Fact and Statement of Overriding Considerations, from Jim O'Reilly, Chief Facilities Executive. *(Refer to Attachment F)*

Please let me know should you have any questions regarding the meeting.
MEMO

Date: May 5, 2014

To: Members, Board of Trustees

From: James O'Reilly
Chief Facilities Executive

RE: Firestone Education Center Subsequent Final Environmental Impact Report: Mitigation Monitoring and Reporting Program and Findings of Fact and Statement of Overriding Considerations

At the board meeting on May 14, 2014, you will be asked to consider several documents related to the Subsequent Environmental Impact Report (SEIR) for the Firestone Education Center (FEC). There will be an agenda item on the upcoming board report that will give you the opportunity to:

- Certify the SEIR for the FEC Master Plan;
- Adopt the California Environmental Quality Act (CEQA) Findings of Fact and Statement of Overriding Considerations (Findings);
- Adopt a Mitigation Monitoring and Reporting Program (MMRP); and
- Approve the 2013 FEC Master Plan.

The SEIR and master plan have been provided to you previously. Attached for your review is the MMRP and Findings referenced in the board item.

You will recall that the board held a public hearing on April 23, 2014 to recognize the proposed development of the FEC in the city of South Gate on an approximately 18-acre portion of the former Firestone Tire and Rubber manufacturing facility.

Consideration of the aforementioned actions is in keeping with district practices and in compliance with board rule B-24, which stipulates that the Board shall receive the draft facilities master plan, subsequent draft EIR and related documents; shall hold a public hearing; and at a later board meeting shall then consider certification of the subsequent EIR, approval of the facilities master plan and adoption of related documents.

Should you have any questions, please feel free to call me at (213) 891-2048.

C: Adriana Barrera, interim chancellor
   Marvin Martinez, president, East Los Angeles College
   Thomas Hall, director, facilities planning and development
   Terri Mestas, director, LACCD bond program management office
   Bob Herrman, CPM director, East Los Angeles College
INTRODUCTION

California Public Resources Code Section 21081.6 requires that public agencies approving a project with an Environmental Impact Report (EIR) adopt a Mitigation Monitoring and Reporting Program (MMRP) for that project. In its findings concerning the environmental effects of a project for which a Subsequent EIR was prepared, a Lead Agency must also include a finding that a MMRP has been prepared and provides a satisfactory program that would ensure avoidance or sufficient reduction of the significant effects of the proposed project.

PURPOSE

The purpose of the MMRP is to ensure that the mitigation measures identified in the Subsequent EIR to mitigate the potentially significant environmental effects of the project are, in fact, properly carried out. The implementation of this MMRP shall be carried out by the Los Angeles Community College District (LACCD), and other agencies or entities (e.g., developer or consultants) specified below. Mitigation measures will be implemented during: (1) development of the design; (2) preparation of the construction contracts; (3) pre-construction (4) the construction phase; (5) pre-occupancy and/or (6) project operation.

RESPONSIBILITIES AND DUTIES

Monitoring of mitigation measures has been assigned to specific agencies and/or entities with regard to their particular areas of expertise, as specified in Table 1. Many of these monitoring actions are included in existing policies, laws, and regulations, while others require additional oversight to ensure that mitigation measures are implemented, and that LACCD will monitor the implementation of these measures. Monitoring will consist of determining whether:

- Specific issues were considered in the design development phase;
- Construction contracts included the specified provisions;
- Specific actions occurred prior to construction; and
- Required measures were implemented during construction and/or after implementation of the project.

MONITORING AND REPORTING PROCEDURES

Upon the request of the LACCD, a monthly report affirming compliance with these mitigation measures shall be provided. In addition, where needed, an independent environmental consultant may be retained to ensure mitigation compliance, timely preparation of reports, and to assist LACCD. An annual mitigation monitoring report shall be prepared for this project by LACCD until compliance with the required mitigation measures is complete. The report shall be placed on file at both the LACCD office at the Facilities Planning and Development Department and at the East Los Angeles College campus in the office of the Vice President of Administration.
### TABLE 1: FIRESTONE EDUCATION CENTER MITIGATION MONITORING AND REPORTING PROGRAM

<table>
<thead>
<tr>
<th>Mitigation Measures</th>
<th>Timing/Phasing</th>
<th>Responsible Party</th>
<th>Monitoring Party</th>
<th>Status</th>
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<td><strong>AIR QUALITY</strong></td>
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<td>AQ1</td>
<td>Preparation of Construction Contracts and Construction Phase</td>
<td>LACCD: Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>AQ2</td>
<td>Preparation of Construction Contracts and Construction Phase</td>
<td>LACCD: Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>AQ3</td>
<td>Preparation of Construction Contracts and Construction Phase</td>
<td>LACCD: Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td><strong>CULTURAL RESOURCES</strong></td>
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<td>CR1</td>
<td>Development of Design, the Construction Phase and Project Operation</td>
<td>LACCD: Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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- **AQ1**: The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter).
- **AQ2**: Construction contractors shall utilize materials that do not require painting, as feasible.
- **AQ3**: Construction contractors shall use pre-painted construction materials, as feasible.
- **CR1**: Impacts resulting from the demolition of Building 4 and alteration of Building 3 shall be minimized through archival documentation of as-built and as-found condition. Prior to issuance of demolition permits, the Los Angeles Community College District shall ensure that documentation of the buildings and structures proposed for demolition is completed in the form of a Historic American Building Survey Level I documentation that shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation (National Park Service 1990). The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History (National Park Service 1983). The original archival-quality documentation shall be offered as donated material to the new campus library where it would be available for current and future generations. Archival copies of the documentation also would be submitted to the South Gate’s Leland R. Weaver Public Library where it would be available to local researchers. Completion of this mitigation measure shall be monitored and enforced by the Los Angeles Community College District.
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| CR2 Impacts related to the loss of Building 4 and its connections to Building 3 shall be reduced through the development of a retrospective display detailing the history of the historic district, its significance, and its important details and features. This display can be in the form of a physical exhibit, kiosk, a web page, or some combination of these media types. The display shall include images and details from the Historic American Building Survey documentation and any collected research pertaining to the historic district. The display content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (National Park Service 1983). The display shall be completed within two years of the date of completion of the proposed project. Completion of this mitigation measure shall be monitored and enforced by the Los Angeles Community College District. | Development of Design, and Project Operation | LACCD: Construction Project Managers and its Construction Contractors | LACCD Facilities Planning and Development Department |}
| CR3 If evidence of archaeological resources (artifacts or features) are discovered during construction related earth-moving activities, all ground-disturbing activities (e.g., grading, grubbing, vegetation clearing) within 100 feet of the resource shall be halted and Los Angeles Community College District shall be notified. Los Angeles Community College District shall hire an archaeologist who meets the Secretary of the Interior’s professional qualification standards shall be retained to assess the significance of the resource. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by the archaeologist and Los Angeles Community College District and shall be consistent with the Secretary of the Interior's Standards for Archaeological Documentation. Any identified archaeological resources shall be recorded on the appropriate Department of Park and Recreation 523 (A-L) form and filed with the appropriate Information Center. | Preparation of Construction Contracts, and the Construction Phase | LACCD: Construction Project Managers and its Construction Contractors | LACCD Facilities Planning and Development Department |}
| CR4 All project-related ground disturbances that could potentially impact paleontologically sensitive Quaternary older alluvium shall be monitored by a qualified paleontological monitor on a full-time basis, as this geologic unit is considered to have a high paleontological sensitivity. Since Quaternary older alluvium is estimated to occur at depths of ten feet and greater, all excavations deeper than ten feet will be monitored full-time. Additionally, any excavations that occur in surficial younger (Holocene age) Quaternary alluvial and fluvial deposits and/or topsoil (estimated to occur at less than ten feet in depth) shall be spot-checked on a part-time basis at the discretion of the Qualified Paleontologist to ensure that underlying paleontologically sensitive sediments are not being impacted. | Preparation of Construction Contracts, and the Construction Phase | LACCD: Construction Project Managers and its Construction Contractors | LACCD Facilities Planning and Development Department |
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<td>CR5</td>
<td>Preparation of Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>If human remains are discovered during any demolition/construction activities, all ground-disturbing activity within a 100 foot radius of the remains shall be halted immediately, and the Los Angeles County Coroner shall be notified immediately, according to Public Resources Code Section 5097.98 and California Health and Safety Code Section 7050.5. If the human remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission, and the guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains. The Native American Heritage Commission will consult with the Most Likely Descendant, if any. The Most Likely Descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The Los Angeles Community College District shall be responsible for the approval and implementation of the Most Likely Descendant recommendations as deemed appropriate, prior to resumption of ground-disturbing activities within 100 foot radius of where the remains were discovered.</td>
<td>Preparation of Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td><strong>HAZARDS AND HAZARDOUS MATERIALS</strong></td>
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<td>HM1 Should Los Angeles Community College District encounter any previously unidentified contaminants requiring remediation during construction, an action plan shall be developed, approved by Department of Toxic Substances Control as appropriate, and implemented, in conjunction with construction activities in the contaminated area. As needed, the investigation and remediation of a release or threatened release of any hazardous substances at or from the project site can be overseen by the Department of Toxic Substances Control in accordance with the Voluntary Cleanup Agreement between Department of Toxic Substances Control and Los Angeles Community College District.</td>
<td>Construction Contracts and Construction Phase</td>
<td>LACCD Facilities Planning and Development</td>
<td>Department of Toxic Substances Control</td>
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<td>HM2 Prior to the demolition of Building 4, asbestos containing materials shall be removed from Building 4 in accordance with the recommendations contained in the Limited Hazardous Materials Testing Report dated January 19, 2013, and California Code of Regulations Title 8. Removal must be conducted by a California Occupation Safety and Health Administration-register and State-licensed asbestos removal contractor. Abatement operations shall be performed under the direct observation of a California Certified Asbestos Consultant or Certified Site Surveillance Technician. For all abatement activities which involve the removal of at least 100 square feet of hazardous materials, notifications must be made to the South Coast Air Quality Management and California Occupation Safety and Health Administration, 10 days and 24 hours, respectively, prior to initiation of such activities.</td>
<td>Pre-Construction</td>
<td>LACCD Facilities Planning and Development</td>
<td>Department of Toxic Substances Control</td>
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<td>HM3 Prior to the demolition of Building 4, lead based paint and other hazardous materials shall be removed from Building 4 in accordance with the recommendations contained in the Limited Hazardous Materials Testing Report dated January 19, 2013, and California Code of Regulations Title 22. For all abatement activities which involve the removal of at least 100 square feet of hazardous materials, notifications must be made to California Occupation Safety and Health Administration 24 hours prior to initiation of such activities.</td>
<td>Pre-Construction</td>
<td>LACCD Facilities Planning and Development</td>
<td>Department of Toxic Substances Control</td>
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<td><strong>NOISE AND VIBRATION</strong></td>
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<td>All construction equipment shall be equipped with muffler devices.</td>
<td>Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>Prior to initiating construction activity, the construction contractor shall coordinate with the site administrators for the Firestone Education Center to discuss construction activities that generate high noise levels. Coordination between the site administrator and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to mitigate potential disruption of classroom activities.</td>
<td>Pre-Construction, Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.</td>
<td>Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>The construction contractor shall locate construction staging areas away from noise-sensitive uses.</td>
<td>Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
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<td>Haul routes shall be located on major arterial roads within non-residential areas, as feasible.</td>
<td>Construction Contracts and Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
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<td><strong>PUBLIC SERVICES</strong></td>
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<td>PS1 Prior to the construction of the proposed project, Los Angeles Community</td>
<td>Pre-Construction</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>College District shall provide to the Los Angeles County Fire Department all</td>
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<td>building plans, construction plans, construction schedules, and, if applicable,</td>
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<td>proposed construction and street or lane closures related to the proposed project for</td>
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<td>Los Angeles County Fire Department review and approval.</td>
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<td>PS2 At least three days in advance of any street or lane closure that may affect</td>
<td>Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>Fire and/or Paramedic responses in the area, Los Angeles Community</td>
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<td>College District shall notify the Los Angeles Sheriff Department, South Gate Police</td>
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<td>Department, Los Angeles County Fire Department, and Fire Stations 16, 147, and 54.</td>
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<td><strong>TRANSPORTATION AND TRAFFIC</strong></td>
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<td>Intersection No. 8: Santa Fe Avenue/Project Driveway-Ardmore Avenue</td>
<td>Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<tr>
<td>TT1 LACCD shall install a traffic signal and construct two inbound travel lanes and</td>
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<td>two outbound travel lanes and associated roadway restriping and signage. The</td>
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<td>outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide</td>
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<td>a shared left/through lane and an exclusive right-turn only lane while two inbound</td>
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<td>travel lanes would be provided. In addition, adequate northbound left-turn storage</td>
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<td>along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided.</td>
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<td>Approvals will be obtained from the California Public Utilities Commission, Union</td>
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<td>Pacific Railroad and the City of South Gate as required.</td>
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<td>Intersection No. 9: Santa Fe Avenue/Project Driveway-Orchard Place</td>
<td>Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>TT2 LACCD shall restripe the northbound and southbound approaches on Santa Fe</td>
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<td>Avenue to provide a northbound left-turn lane and a southbound left-turn lane. This</td>
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<td>improvement can be accommodated within the existing Santa Fe Avenue roadway</td>
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<td>width.</td>
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<td>Intersection No. 10: Santa Fe Avenue/Firestone Boulevard</td>
<td>Construction Phase</td>
<td>LACCD; Construction Project Managers and its Construction Contractors</td>
<td>LACCD Facilities Planning and Development Department</td>
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<td>TT3 LACCD shall install eastbound and westbound exclusive right-turn only lanes. The</td>
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<td>existing eastbound and westbound combination through-right turn lanes shall be</td>
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<td>restriped to provide a 10-foot through lane with a 12-foot wide right-turn only</td>
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<td>lane for both the eastbound and westbound approaches. Up to two on-street parking</td>
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<td>spaces shall also be removed along the north and south sides of Firestone Boulevard.</td>
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<td>Additionally, LACCD shall coordinate with the City of South Gate regarding the</td>
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<td>proposed relocation of the existing eastbound near-side bus stop to a far-</td>
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</table>
### Table 1: Firestone Education Center Mitigation Monitoring and Reporting Program

<table>
<thead>
<tr>
<th>Mitigation Measures</th>
<th>Timing/Phasing</th>
<th>Responsible Party</th>
<th>Monitoring Party</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.</td>
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<tr>
<td>On-Site Transportation Demand Management Measures</td>
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<tr>
<td>TT4 LACCD shall implement an enhanced Transportation Demand Management (TDM) program for the proposed project. The measures incorporated into the TDM project shall further decrease the number of vehicular trips generated by persons traveling to/from the site by offering specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, rail, walking, bicycling, etc.) and ridesharing. TDM measures may include the following:</td>
<td>Operation Phase</td>
<td>LACCD Administration</td>
<td>LACCD Administration</td>
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<tr>
<td>• TDM Web Site Information. Transportation information shall be provided in a highly visible and accessible location on the school's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, students and visitors of available alternative transportation modes to access the campuses and travel in the area. The web site shall also highlight the environmental benefits of utilization of alternative transportation modes.</td>
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<tr>
<td>• TDM Promotional Material. ELAC shall provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes shall be made available to employees, students and visitors during typical business hours.</td>
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<tr>
<td>• Transit Welcome Package (TWP). All new students and employees of the college shall be provided with a TWP in addition to holding Transportation Fair each semester. The TWP at a minimum shall include information regarding ELAC’s arrangement for free or discounted use of the transit system, area bus/rail transit route information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the ELAC campuses.</td>
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<tr>
<td>• Internet-Based/Independent Study Education. ELAC shall offer internet-based and independent study classes which allows for a portion or all of the education activities to occur without students and faculty needing to be physically on-site at an ELAC facility.</td>
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<tr>
<td>• Public Transit Passes. To the extent feasible, ELAC shall offer free or discounted public transit coordination with various transit providers for all students and staff. The program shall allow students to be able to use their ELAC identification card for either free or substantially discounted transit passes.</td>
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<tr>
<td>• Carpool Program for Employees. ELAC shall provide preferential</td>
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</table>
### TABLE 1: FIRESTONE EDUCATION CENTER MITIGATION MONITORING AND REPORTING PROGRAM

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>parking within the parking garage for employees who commute to work in ELAC registered carpool. An employee who drives to work with at least one other employee to the campus may register as a carpool entitled to preferential parking within the meaning of this provision.</td>
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<tr>
<td>• Public Transit Stop Enhancements. Working in cooperation with other transit agencies and the City of South Gate, ELAC shall seek to improve existing bus stops with enhanced shelters and transit information within the immediate vicinity of the Firestone Education Center campus. Enhancements may include weather protection, lighting, benches, telephones, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative.</td>
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<tr>
<td>• Convenient Parking for Bicycle Riders. ELAC shall provide locations at the site for convenient parking for bicycle commuters for working employees, students attending classes, and visitors. The bicycle parking shall be located within the Firestone Education Center campus and/or in the public right-of-way adjacent to the campus such that long-term and short-term parkers can be accommodated. Bicycle parking means bicycle racks, a locked cage, or other similar parking area. ELAC shall observe utilization of bicycles at the Firestone Education Center campus each semester and, if necessary, make arrangements for additional bicycle parking if the demand for bicycle parking spaces exceeds the supply.</td>
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<tr>
<td>• Student Parking Pricing. ELAC shall require that students pay for their own parking.</td>
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<tr>
<td>• Student Hiring Policies. ELAC shall provide preferential consideration to hiring current ELAC students for part-time employment based on satisfaction of other requirements of the available positions.</td>
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<tr>
<td>• Local Hiring Program. When hiring, ELAC shall conduct outreach to residents who live within one mile of the Firestone Education Center campus (or other facility to where the position of employment is offered), based on satisfaction of other requirements of the available positions.</td>
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<tr>
<td>• Expanded Bicycle Routes. ELAC shall coordinate with the City of South Gate in an effort to enhance and expand the current network of bicycle routes serving the campus</td>
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</table>

**SOURCE:** TAHA, 2014
INTRODUCTION

The Subsequent Environmental Impact Report (EIR), which consists of the Final Subsequent EIR published in March 2014 and the Draft Subsequent EIR published in January 2014, identified significant environmental impacts that will result from the implementation of the 2013 Firestone Education Center (FEC) Master Plan (proposed project). However, the Los Angeles Community College District (LACCD) finds that the inclusion of certain mitigation measures as part of project approval will reduce most, but not all, identified significant impacts to less-than-significant levels. Those impacts that are not reduced to a less-than-significant level are identified and overridden due to specific economic, legal, social, technological, or other feasibility considerations. As required by the California Environmental Quality Act (CEQA), the LACCD, in adopting these Findings of Fact and Statement of Overriding Considerations (Findings), also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. The LACCD finds that the MMRP meets the requirements of Public Resources Code (PRC) Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate significant effects of the proposed project. In accordance with CEQA and the CEQA Guidelines, the LACCD adopts these findings as part of the certification of the Subsequent EIR for the proposed project. Pursuant to PRC Section 21082.1(c)(3), the LACCD also finds that the Subsequent EIR reflects the LACCD’s independent judgment as the lead agency for the proposed project.

FINDINGS REQUIRED UNDER CEQA

PRC Section 21081 and CEQA Guidelines Section 15091 require a public agency, prior to approving a proposed project, to identify significant impacts of the proposed project and make one or more of three allowable findings for each of the significant impacts.

- The first allowable finding is that “changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR” (CEQA Guidelines Section 15091, subd. (a)(1)).

- The second allowable finding is that “such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency” (CEQA Guidelines Section 15091, subd. (a)(2)).

- The third allowable finding is that “specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final environmental impact report” (CEQA Guidelines Section 15091, subd. (a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Subsequent EIR for the proposed project as fully set forth therein. Although CEQA Guidelines Section 15091 does not require findings to address environmental impacts that an EIR identifies as merely “potentially significant,” these findings will, nevertheless, fully account for all such effects identified in the Subsequent EIR.
For each of the significant impacts associated with the proposed project, the following sections are provided:

**Description of Significant Effects** – A specific description of the environmental effects identified in the EIR, including a conclusion regarding the significance of the impact.

**Mitigation Measures** – Identified mitigation measures or actions, that are required as part of the proposed project.

**Finding** – One or more of three specific findings in direct response to CEQA Guidelines Section 15091.

**Reference** – A notation on the specific section in the EIR, which includes the evidence and discussion of the identified impact.

For the environmental impacts identified in the EIR as less than significant, a statement explaining why the impacts are less than significant is provided.

**PROJECT BACKGROUND**

East Los Angeles College (ELAC), part of the LACCD, established the South Gate Educational Center (SGEC) as a satellite campus in 1997 to better serve a growing student population that resides in the southern portion of the ELAC’s service district. ELAC serves an area of approximately 100 square miles within Los Angeles County that includes all or parts of Alhambra, Bell, Bell Gardens, City of Commerce, Cudahy, East Los Angeles, Huntington Park, Los Angeles, Maywood, Montebello, Monterey Park, Rosemead, San Gabriel, South San Gabriel, South Gate, and Vernon. The SGEC, located at 2340 Firestone Boulevard in the City of South Gate, is approximately seven miles southeast of ELAC located at 1301 Avenida Cesar Chavez in the City of Monterey Park.

The SGEC occupies a 51,000-square-foot building with 17 classrooms, a computer lab, a bookstore, a library, and student support services and offers a variety of career and academic courses. Student enrollment at the SGEC has increased by about 32 percent between the fall semesters of 2007 and 2011. Approximately 4,912 students were enrolled in classes at the SGEC during the fall semester of 2011. About 2,330 of those students attended classes at both the SGEC and other ELAC locations. Due to rapid student growth and a lack of adequate facilities and curriculum offerings, the SGEC has become deficient in meeting the community’s current and future needs. Deficiencies include inadequate parking and the need for many students to commute to the ELAC campus to supplement their coursework.

The passage of Bond Measure AA in 2003 provided funding to LACCD for the purchase and development of a new satellite campus site to meet the demand for greater educational access and opportunities for the communities currently served by the SGEC. In December 2009, LACCD certified the 2009 East Los Angeles College Firestone Education Center Final Environmental Impact Report, which allowed LACCD to acquire the project site with the intent of relocating and expanding the SGEC. Following the certification of the 2009 Final EIR, a Master Plan and EIR was prepared for the FEC in 2011, referred to as the 2011 FEC Master Plan. The 2011 FEC Master Plan was never approved nor was the 2011 FEC Master Plan EIR certified. The 2011 FEC Master Plan anticipated a two-phase project that would ultimately serve up to 12,000 students. However, subsequently LACCD analyzed capacity load ratios to ensure new projects are appropriate in concept, scale, and budget. As a result, the programming of the FEC has now been reduced to accommodate 9,000 students, and the 2011 FEC Master Plan has been updated to reflect these changes.

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1East Los Angeles College, South Gate Student Enrollment 2007-2011, email from Ryan Cornner, Associate Dean of Research, November 19, 2012.  
2Ibid.
PROJECT OBJECTIVES

In accordance with CEQA Guidelines Section 15124, EIRs shall include a statement of objectives of the proposed project. A description of the project’s objectives defines the project’s intent and facilitates the formation of project alternatives. LACCD’s statement of project objectives is as follows:

- Provide a full-service education center to replace the existing SGEC and create a true campus environment for ELAC’s satellite campus;
- Provide greater capacity to adequately serve the existing and future demand for higher education facilities in the southeast Los Angeles County region;
- Develop and implement plans and procedures to enhance ELAC satellite campus’ visibility and reputation for quality;
- Foster a culture of academic excellence by strengthening the educational programs offered at the ELAC satellite campus that will lead directly to greater student success;
- Create community-oriented development that successfully serves students and the community; and
- Provide economic benefits to the City of South Gate and its residents.

DESCRIPTION OF THE PROPOSED PROJECT

The proposed project consists of the construction and operation of the FEC, a new LACCD satellite campus that would replace the existing SGEC, provide for expanded and improved educational facilities, and accommodate existing and projected student enrollment. The FEC would accommodate up to 9,000 students. The timeframe for this level of enrollment is uncertain; however, for purposes of analysis, based on LACCD projections it is assumed that student enrollment capacity would be met in 2031.\(^3\) The FEC would offer academic programs parallel to those available at the main ELAC campus and allow students to complete their degree and transfer requirements at one convenient location.

The proposed project includes the demolition of the 220,550-square-foot Building 4 and its connections to Building 3, and the construction of a new 100,000-gross-square-foot building and an approximately 1,600-space parking structure on the northern portion of the project site.\(^4\) In addition, the project site would be improved with an approximately 60-space surface parking lot, landscaping, an open space area, and other outdoor amenities. Vehicular access and circulation improvements would also be implemented on- and off-site. Vehicular access to the project site would be provided via three driveways; two driveways on the west side of Santa Fe Avenue and a third driveway on the north side of Firestone Boulevard. The driveway at Santa Fe Avenue across from Ardmore Avenue and the Firestone Boulevard driveway would be signalized. Buildings 1, 2, and 3 would not be used for college uses, and LACCD would continue to lease these facilities to tenants for warehousing and other appropriate uses. Existing uses within Building 4 would be relocated to Building 1 or 3.

\(^3\)Depending on a number of factors including the economy, State funding and growth restrictions, and availability of educational facilities elsewhere, the date when this level of enrollment could occur may be delayed.

\(^4\)Building 4 is connected to Building 3 through a first floor passageway, a third floor bridge, and a building extension.
ENVIRONMENTAL EFFECTS FOUND TO BE LESS-THAN-SIGNIFICANT

LACCD determined that the proposed project would have less-than-significant impacts in the following environmental topic areas:

AESTHETICS

Visual Character (Draft Subsequent EIR p. 4.1-15)

LACCD finds that the proposed project would result in less-than-significant impacts related to visual character. The proposed project would not degrade the visual quality or character of the project site. The proposed project would result in the replacement of Building 4 with the new FEC building and parking structure. While Building 4 is a contributor to the California Register-eligible South Gate Historic District, it was determined not to be individually eligible for listing on the California Register. The removal of Building 4 would not degrade the project site because it is not one of the prominent buildings on-site, and its removal would not take away from the quality of the existing buildings that would remain. All other development on the project site, including Buildings 1, 2, and 3, all of which are individually eligible for listing on the California Register, would remain under the proposed project. These buildings would continue to be dominant visual features on the project site; and the historic character of the project site would be retained. The proposed FEC building at 50 feet tall (three stories) would be consistent with existing building heights, which range from two- to four-stories. The design of the FEC building would also follow specific design criteria. The design criteria calls for the architecture of the FEC building to be of high quality, sustainable, and enduring with the character of an educational institution that would be attractive and inspirational for its students, faculty, and staff, and a symbol of renewal and revitalization for the community at large. The parking structure at 70 feet tall is higher than the existing buildings on-site, but would only be visible from Santa Fe Avenue. In addition, the street edge of the project site along Santa Fe Avenue would be landscaped, which would improve the quality of the visual character in the community and provide a connection to the surrounding neighborhood.

Scenic Resources (Draft Subsequent EIR p. 4.1-17)

LACCD finds that the proposed project would have less-than-significant impacts related to scenic resources within a State-designated scenic highway. The proposed project would not result in the damage of a scenic resource within a State-designated scenic highway. The demolition of Building 4 and its connections to Building 3 would result in the removal and alteration of historic structures, considered scenic resources. However, there are no State-designated scenic highways in the City of South Gate. And, due to the height and scale of Building 1 and orientation of the buildings on the project site, Building 4 is only visible from Santa Fe Avenue. Accordingly, its removal would not be evident from Firestone Boulevard, nor would it alter the visibility of dominant visual features. Therefore, the proposed project would result in less-than-significant impacts related to scenic resources.

Views and Vistas (Draft Subsequent EIR p. 4.1-17)

LACCD finds that the proposed project would have less-than-significant impacts related to views and vistas. The proposed FEC building and parking structure would not block existing views of significant visual features in the project area including Buildings 1 and 2 located on the project site or the water tower located across Santa Fe Avenue from the project site. Although the proposed 50-foot-tall FEC building and 70-foot-tall parking structure would be taller than Building 4, these buildings would be located behind Buildings 1 and 2, and therefore would not be situated such that views of these significant visual features would be
obstructed. Also, considering that the height of the water tower is approximately 130 feet tall and the height of the proposed parking structure would be 70 feet tall, the water tower would continue to be visible from vantage points throughout the City of South Gate. Therefore, the proposed project would result in less-than-significant impacts related to views and vistas.

**Light and Glare (Draft Subsequent EIR p. 4.1-17)**

LACCD finds that the proposed project would have less-than-significant impacts related to light and glare. The proposed project would extend the operating hours of the site into the evening with nighttime classes in the FEC building and the operation of the parking structure, adding further illumination to the site. However, lighting for the campus would include directional lighting techniques and low wattage bulbs that direct light downwards and minimizes light spillover to adjacent residential uses.

**Shade and Shadows (Draft Subsequent EIR p. 4.1-18)**

LACCD finds that the proposed project would have less-than-significant impacts related to shade and shadows. No project-related shadows would be cast onto any residences during the summer months. During the spring and fall months, shadows would not be cast onto the single-family residences along Independence Avenue until 5:00 p.m. During the winter months, shadows would be cast onto single-family residences along Independence Avenue from 12:00 p.m. to 3:00 p.m. However, shadow sensitive uses (the rear and front yard areas of these residences) would not be covered by project-related shadows for more than the three-hour significance threshold.

**AIR QUALITY**

**Regional Emissions (Draft Subsequent EIR p. 4.2-15)**

*Operations*

LACCD finds that operation of proposed project would result in less-than-significant impacts related to regional emissions. As demonstrated in Table 4.2-7 of the Draft Subsequent EIR, during operation of the proposed project regional emissions generated primarily by vehicle trips would not exceed the regional significance thresholds established by the SCAQMD.

**Localized Emissions (Draft Subsequent EIR pp 4.2-13 and 4.2-15)**

*Construction*

LACCD finds that the proposed project would result in less-than-significant impacts related to localized emissions. As demonstrated in Table 4.2-5 of the Draft Subsequent EIR, construction-related daily maximum localized emissions would not exceed the SCAQMD thresholds. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod). As demonstrated in Table 4.2-5 of the Draft Subsequent EIR, construction-related daily maximum localized construction emissions would not exceed the SCAQMD thresholds. The model results indicate that maximum NOx, CO, PM2.5 and PM10 concentrations would be 76 pounds per day (ppd), 48 ppd, 5 ppd and 6 ppd. As a result, maximum daily O3, CO, PM2.5 and PM10 the Localized Significance Thresholds (LST) promulgated by the SCAQMD.

*Operations*

As demonstrated in Table 4.2-8 of the Draft Subsequent EIR, during operation of the proposed project, the State one-and eight-hour CO standards would not be exceeded at analyzed intersections. One-hour CO concentrations under existing plus proposed project conditions would range from approximately 6.4 to 6.9
ppm at worst-case sidewalk receptors. Eight-hour CO concentrations under existing plus proposed project conditions would range from approximately 5.0 to 5.3 ppm. Maximum one-hour CO concentrations under future plus proposed project conditions would range from 3.0 to 3.2 ppm at worst-case sidewalk receptors at each selected intersection; Eight-hour CO concentrations under future plus proposed project conditions would range from approximately 2.1 to 2.5 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Therefore, the proposed project would result in a less-than-significant impact related to localized CO concentrations.

**Toxic Air Contaminants (Draft Subsequent EIR pp. 4.2-13 and 4.2-16-17)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to toxic air contaminants (TAC). The greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy equipment operations. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the proposed project. Given the short-term construction schedule, the proposed project would not result in a long-term (i.e., 70 years) source of TAC emissions.

The majority of localized impacts related to PM10 and PM2.5 emissions during grading activity would be related to fugitive dust emissions. Fugitive dust is not toxic but high concentrations can irritate the eyes, noise, and throat and lead to respiratory distress. However, localized particulate matter concentrations would be typical for urban construction projects and do not represent a substantial health risk. In addition, the majority of grading activity would occur during weekday daytime hours when most people are away from their home and not heavily utilizing residential yards. Therefore, the proposed project would result in less-than-significant impacts related to community health.

**Operations**

The primary source of potential TACs associated with long-term operation of the proposed project is diesel particulates from delivery trucks. While the closest sensitive land uses is located approximately 100 feet to the east of the proposed project’s site, potential localized TAC impacts from on-site sources of diesel particulate emissions would be minimal since only a limited number of delivery trucks would access the project site and would not idle on the project site for extended periods of time. Based on the limited activity of these TAC sources and the CARB siting guidelines, the proposed project would not warrant the need for a health risk assessment associated with on-site activities. Regarding individuals that occupy the project site, college-age students typically over 18 years of age attending classes for a couple of hours per week do not represent a particularly sensitive group of receptors. Accordingly, the proposed project would not expose sensitive receptors to substantial pollutant concentrations.

**Odors (Draft Subsequent EIR pp. 4.2-14 and 4.2-17)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to odors. Potential sources that may emit odors during construction activities include equipment exhaust and asphalt paving. Odors resulting from construction of the proposed project would be localized, generally confined to the immediate area surrounding the project site and temporary in nature. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction
sites and temporary in nature. Therefore, the proposed project would result in less-than-significant impacts related to odors.

**Operations**

The project site would be developed with a community college campus, a use that is not typically associated with odor complaints. On-site trash receptacles which have the potential to create adverse odors would be located and maintained in a manner that promotes odor control. Therefore, the proposed project would result in a less-than-significant impact related to operational odors.
Consistency with the Air Quality Management Plan (Draft Subsequent EIR 4.2-17)

LACCD finds that the proposed project would result in less-than-significant impacts related to consistency with an air quality management plan (AQMP). The proposed project would not result in significant emissions during construction or operational activity. Therefore, the proposed project would not conflict or obstruct implementation of the AQMP.

GEOLOGY AND SOILS

Faults (Draft Subsequent EIR p. 4.4-8)

LACCD finds that the proposed project would result in no impacts related to faults. The proposed project site is not located in an Alquist-Priolo Zone, and no known active faults cross the project site. Therefore, the potential for surface ground rupture is considered null.

Ground Shaking (Draft Subsequent EIR p. 4.4-8)

LACCD finds that the proposed project would result in less-than-significant impacts related to ground shaking. Required compliance with seismic safety standards identified in the applicable building codes and requirements would reduce the likelihood that the proposed project would expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Approval of a site-specific geotechnical report by the Building Official, as required by Appendix J of the CBC, as well as review and approval of all construction and design plans by the Division of Stat Architect (DSA), as required by the Field Act, would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with seismic hazards to the greatest extent feasible. Therefore, the proposed project would result in less-than-significant impacts related to ground shaking.

Liquefaction (Draft Subsequent EIR p. 4.4-8)

LACCD finds that the proposed project would result in less-than-significant impacts related to liquefaction. The project site is susceptible to liquefaction. However, required compliance with all seismic safety standards identified in the applicable building codes and requirements would reduce the likelihood that the proposed project would expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. Approval of a site-specific geotechnical report and liquefaction study (if determined necessary) by the Building Official prior to issuance of a grading permit, as required by required by Appendix J of the CBC, as well as review and approval of all construction and design plans by the DSA, as required by the Field Act, would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with seismic hazards to the greatest extent feasible. Therefore, the proposed project would result in less-than-significant impacts related to liquefaction.

Landslides (Draft Subsequent EIR p. 4.4-8)

LACCD finds that the proposed project would result in no impacts related to landslides. As the project site and surrounding area are flat, there is no potential for landslides.

Unstable Soils (Draft Subsequent EIR p. 4.4-8)

LACCD finds that the proposed project would result in less-than-significant impacts related to unstable soils. The project site is underlain by soils that are potentially subject to soil settlement. Additionally, the project site is susceptible to liquefaction. Potential impacts associated with soils underlying the project
site, such as settlement and liquefaction, would be reduced through compliance with applicable building codes and requirements to address foundation design and structural engineering. Approval of a site-specific geotechnical report by the Building Official, as required by Appendix J of the CBC, as well as review and approval of all construction and design plans by the DSA, as required by the Field Act, would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with unstable soils to the greatest extent feasible. Therefore, the proposed project would result in less-than-significant impacts related to unstable soils.

Expansive Soils (Draft Subsequent EIR p. 4.4-9)

LACCD finds that the proposed project would result in less-than-significant impacts related to expansive soils. The proposed project would be constructed in an area underlain by Hanford Association soils, which are well drained and considered to have low expansion potential. Regardless, potential impacts associated with expansive soils would be reduced through compliance with all applicable building codes and requirements to address foundation design and structural engineering. Approval of a site-specific geotechnical report by the Building Official, as required by Appendix J of the CBC, as well as review and approval of all construction and design plans by the DSA, as required by the Field Act, would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with expansive soils to the greatest extent feasible. Therefore, the proposed project would result in less-than-significant impacts related to expansive soils.

Soil Erosion (Draft Subsequent EIR p. 4.4-9)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to soil erosion and loss of topsoil. During construction there would be the potential for the release of fugitive dust, resulting in a small, temporary, loss of topsoil. Implementation of Best Management Practices (BMPs) required as part of the National Pollutant Discharge Elimination System permit and application of Air Quality Management District Rule 403 to reduce air quality impacts during construction would reduce soil erosion to the maximum extent possible.

Operations

As soils will not be exposed during operation of the proposed project and the project site is flat, soil erosion or loss of topsoil would not occur.

GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions (Draft Subsequent EIR p. 4.5-8-9)

LACCD finds that the proposed project would result in less-than-significant impacts related to greenhouse gas emissions. GHG emissions would be generated by on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. As shown in Table 4.5-3 of the Draft Subsequent EIR, estimated GHG emissions would be less than the 10,000 metric tons of CO₂e per year quantitative significance threshold.
Applicable Plans, Policies or Regulations (Draft Subsequent EIR pp. 4.5-8 and 4.5-9)

LACCD finds that the proposed project would result in less-than-significant impacts related to consistency with applicable plans, policies, and regulations. The proposed project would be consistent with GHG reduction policies developed by the CARB and designed to reduce overall carbon emissions in California. The LACCD Board of Trustees mandates the use of sustainable building practices for its campuses, and all new buildings that are funded with Measure J Bond monies are required to be “green” buildings and built to Leader in Energy and Environmental Design (LEED) certification standards. Accordingly, the proposed project would be constructed in a manner such that GHG emissions are minimized, thus encouraging consistency with plans, policies, and regulations designed to control GHG emissions. As part of achieving LEED certification, the proposed project includes design strategies related to water and energy efficiency, indoor air quality, materials and resources, and site design. (See Tables 4.5-4 and 4.5-5 in the Draft Subsequent EIR.

HAZARDS AND HAZARDOUS MATERIALS

Hazardous Materials, Operations (Draft Subsequent EIR pp. 4.6-11 and 4.6-13)

LACCD finds that operation of the proposed project would result in less-than-significant impacts related to hazardous materials. Operation of the proposed project would not create a significant hazard to the public resulting from the transport, use, disposal, release, or emission of hazardous materials. Operation of the proposed project would not typically involve the transport, use and disposal of hazardous materials. No land uses or activities that would involve the use or discharge of unregulated hazardous materials and/or substances are proposed. In general the operation of the proposed project would involve very little, occasional use of hazardous materials. All hazardous materials would be contained, stored, used, transported and disposed of in accordance with manufacturers’ instructions and handled in compliance with applicable federal, State and local regulations. Any associated risk would be adequately reduced through compliance with these standards and regulations. If there were a release of hazardous materials related to the operation of proposed project, the amount would be small and localized.

Schools, Operation (Draft Subsequent EIR pp. 4.6-11 and 4.6-13)

LACCD finds that the proposed project would result in less-than-significant impacts related to schools. Operation of the proposed project would not emit hazardous materials, substances, or waste within one-quarter mile of a school. Limited quantities of hazardous materials are expected for occasional use during operation of the proposed project. Associated risk would be reduced through compliance with applicable standards and regulations.

Airport Hazards (Draft Subsequent EIR pp. 4.6-12 and 4.6-14)

LACCD finds that the proposed project would result in less-than-significant impacts related to airport hazards. The project site is not within an airport land use plan, or within two miles of an airport or airstrip. The nearest public airport or private airstrip, Long Beach Municipal Airport, is approximately ten miles to the south-southeast of the project site. The project site is not affected by air traffic or other hazards from this airport.

Emergency Response Plan, Operations (Draft Subsequent EIR p. 4.6-12)

LACCD finds that operation of the proposed project would result in less-than-significant impacts related to emergency response plans. Operation of the proposed project would not impair or interfere with any emergency response plans or emergency evacuation plans. Improvements to Firestone Boulevard, a
designated emergency evacuation route in the City of South Gate, would not interfere with emergency evacuation. The proposed project would incorporate the requirements of the LACFD and the LASD for emergency access. Fire truck access to within 150 feet of all building exterior walls would be provided via the roadways used by other vehicles plus additional dedicated fire lanes.

**Wildland Fires (Draft Subsequent EIR pp. 4.6-12 and 4.6-12)**

LACCD finds that the proposed project would result in no impacts related to wildland fires. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires as the project site is approximately 18 miles from the nearest wildland.

**HYDROLOGY AND WATER QUALITY**

**Water Quality (Draft Subsequent EIR pp. 4.7-8 and 4.7-9)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to water quality. Required compliance with the National Pollution Discharge Elimination System (NPDES) permit requirements, obtainment of the General Construction Activities Stormwater Permit (GCASP) and implementation of an approved Stormwater Pollution Prevention Plan (SWPPP) which would identify specific BMPs, would ensure that construction of the proposed project would not result in the violation of water quality standards or waste discharge requirements, or otherwise degrade water quality.

**Operations**

The proposed project would increase the amount of pervious surface area at the project site, increasing infiltration of stormwater at the project site and reducing the amount of stormwater runoff currently leaving the project site. Further, the LACCD has mandated that no stormwater shall leave the campus property; instead it will be collected and stored for re-use or infiltration on-site. Compliance with this mandate and NPDES requirements would reduce or eliminate surface water pollution off-site and ensure that operation of the proposed project does not violate any water quality standards or waste discharge requirements, or otherwise degrade water quality.

**Groundwater (Draft Subsequent EIR pp. 4.7-8 and 4.7-9)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to groundwater. Construction of the proposed project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Water usage associated with construction activities would be minimal. Accordingly, no net deficit in aquifer volume or lowering of the local groundwater table would occur from construction of the proposed project.

**Operations**

Operation of the proposed FEC would increase water demand from the City’s water system. However, the proposed project’s water usage is not anticipated to exceed the City’s estimated available water supplies based on the City’s 2010 Urban Water Management Plan, and the proposed project would include water-efficient design elements to reduce potable water usage. Additionally, the proposed project would include an open space component that would increase the amount of pervious surface at the project site.
site, allowing for greater groundwater recharge. Further, the Central Basin Watermaster of the Department of Water Resources monitors groundwater supply and establishes maximum pumping limits for the City. This practice ensures the preservation of groundwater supplies. Accordingly, operation of the proposed project would not deplete groundwater supplies nor would it interfere with groundwater recharge.

**Stormwater Drainage (Draft Subsequent EIR pp. 4.7-8 and 4.7-10)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to stormwater drainage. Construction of the proposed project would include grading of the project site and would temporarily expose on-site soils to surface water runoff. However, compliance with construction BMPs would eliminate soil erosion and siltation, and grading activities would not substantially alter the existing drainage pattern of the site or surrounding area. Furthermore, proposed project would be subject to the requirements of NPDES. As a result, stormwater runoff contributed to drainage systems as a result of construction activities would not exceed drainage capacities or require the construction or expansion of drainage facilities.

**Operations**

The proposed project would increase the amount of impervious surface area at the project site, increasing infiltration of stormwater at the project site and reducing the amount of stormwater runoff currently leaving the project site. Further, the proposed project would be required to comply with the LACCD mandate that no stormwater shall leave the campus property; instead it will be collected and stored for reuse or infiltration on-site. Although the proposed project would result in the alteration of the existing drainage pattern on the project site, this alteration would not result in substantial erosion on- or off-site, nor would it increase the rate or amount of surface run off in a manner that would result in flooding on- or off-site, as no stormwater would leave the FEC campus. For this same reason, operation of the proposed project would not create or contribute runoff water that would exceed capacity of stormwater drainage systems, provide additional sources of polluted runoff, or necessitate the construction of new or expanded stormwater drainage systems.

**Flooding (Draft Subsequent EIR pp. 4.7-9 and 4.7-11)**

LACCD finds that the proposed project would result in no impacts related to flooding. The project site is not located within a 100-year or 500-year flood hazard area. In addition, the proposed project would not place housing or structures within the flow of a 100-year flood event, and would not expose people or structures to significant risks associated with flooding, including the failure of a levee or dam.

**Seiches and Tsunamis (Draft Subsequent EIR pp. 4.7-9 and 4.7-10)**

LACCD finds that the proposed project would result in less-than-significant impacts related to seiches and tsunamis. The project site is located approximately 12 miles from the Pacific Ocean and does not fall within a tsunami inundation area. Additionally, the project site does not contain, or reside in proximity to, any large bodies of surface water which would be susceptible to seiches or tsunamis. Accordingly, the proposed project would not expose people or structures to significant risks associated with inundation by seiche or tsunami.
LAND USE AND PLANNING

Land Use Compatibility/Physical Division of an Established Community (Draft Subsequent EIR p. 4.8-10)

LACCD finds that the proposed project would have less-than-significant impacts related to land use compatibility and the physical division of an established community. The proposed project would not introduce any new boundaries or barriers that would result in the division of the community. On the contrary, the proposed project would enhance the pedestrian accessibility of the project site, and provide a new area for community members to gather, work, and learn. The City of South Gate’s vision for the project area according to the General Plan is to transition it into a dense and vibrant institutional area. The proposed project, which would introduce a new LACCD satellite campus to replace the existing SGEC, would comply with the General Plan’s vision and could serve as an anchor to the revitalization of the surrounding community and future development. The proposed project would result in a land use that is compatible with the surrounding residences and commercial development along Santa Fe Avenue and Firestone Boulevard.

Land Use Consistency (Draft Subsequent EIR p. 4.8-10)

LACCD finds that the proposed project would result in less-than-significant impacts related to land use consistency. The proposed project would not conflict with any applicable land use plan, policies or regulations. The proposed project would redevelop an area targeted for revitalization, provide for expanded and improved educational facilities, and include several components intended to minimize vehicular trips and promote alternative transportation modes. While California Government Code Section 53094 includes provisions for school districts to exempt classroom facilities from local zoning regulations, the proposed project would be consistent with applicable zoning, local plans and policies. The project site’s zoning allows for institutional land uses. The proposed project is also consistent with the City of South Gate Municipal Code in relation to height. The proposed building and parking structure would not exceed the maximum building height permitted. Accordingly, the proposed project would be consistent with all applicable regional and local plans and policies.

Parking (Draft Subsequent EIR p. 4.8-11)

LACCD finds that the proposed project would result in less-than-significant impacts related to parking. A total of 1,648 parking spaces would be required to meet the demand of the college based on the Institute of Transportation Engineers (ITE) Parking Generation Manual. The proposed project includes the construction of a 1,600-space parking structure and a 60-space surface parking lot for a total of 1,660 parking spaces, providing a surplus of 12 parking spaces.

With regard to the existing warehouse uses that would continue to operate on-site, LACCD’s lease agreements stipulate the number of parking spaces assigned to a tenant. Per current lease agreements, LACCD is required to provide approximately 108 parking spaces to existing tenants. In total, there are 144 parking spaces on-site allocated to warehouse uses. Therefore, there are a sufficient number of parking spaces on-site to satisfy existing lease agreements between the LACCD and existing tenants and approximately 36 additional parking spaces that could be assigned to future tenants. In addition, there are an additional 89 parking spaces available for a future tenant in Building 2 which is currently vacant. Accordingly, with implementation of the proposed project, a sufficient number of parking spaces would be provided on-site to accommodate parking demand created by the proposed FEC, and existing and future warehouse tenants.
Habitat Conservation Plans (Draft Subsequent EIR p. 4.8-12)

LACCD finds that the proposed project would result in less-than-significant impacts related to habitat conservation plans or natural community conservation plans. The project site is not within any Habitat Conservation Plan or Natural Community Conservation Plan.

NOISE & VIBRATION

Noise, Operations (Draft Subsequent EIR p. 4.9-17)

LACCD finds that operation of the proposed project would result in less-than-significant impacts related to noise. The proposed project would generate new sources of noise associated with an increase in vehicle trips to and from the project site, the proposed parking structure, surface parking lot, and open space area, as well as building mechanical equipment. However, as shown in Table 4.9-11 in the Draft Subsequent EIR, increased traffic activity would not audibly increase noise levels in the area and that the increase in noise levels attributable to the operation of the proposed project would not exceed the significance threshold of 5 dBA L_eq at sensitive receptors. Compliance with the LACCD Baseline Design Guidelines and Standards would ensure that proposed classrooms are constructed such that interior noise levels do not exceed 35 dBA L_eq as is LACCD policy, and are acceptable for a learning environment.

Vibration (Draft Subsequent EIR pp. 4.9-13 and 4.9-16)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to vibration. Construction activities associated with the proposed project would generate varying degrees of vibration, as shown in Table 4.9-9 in the Draft Subsequent EIR. The primary concern regarding construction vibration relates to damage. Activities that can result in damage include demolition and drilling in close proximity to sensitive structures. Vibration levels resulting from construction of the proposed project would not exceed the Federal Transit Administration damage thresholds at any residential structure or historic structures on and adjacent to the project site. The nearest residential structure to the proposed project site would be approximately 100 feet to the north. As shown in Table 4.9-10, the maximum vibration level at this distance would be 0.011 inches per second PPV. Construction vibration would not exceed the 0.2 inches per second PPV damage threshold at any residential structure surrounding the proposed project site. Therefore, the proposed project would result in a less-than-significant impact related to construction vibration at nearby residences.

Operations

The primary sources of operational-related vibration would include passenger vehicle circulation within the proposed parking structure and surface parking lot, on-site delivery truck activity, and off-site traffic traveling on roadways in the vicinity of the proposed project site. Vehicular movements would generate similar vibration levels as existing traffic condition. The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. As a result, the proposed project operations would not increase the existing vibration levels at the new FEC building and sensitive receptors. Educational facilities may experience vibration generated by heavy-duty truck activity at nearby land uses. However, rubber-tired on-road vehicles rarely generate perceptible vibration at any distance.
POPULATION, HOUSING & EMPLOYMENT

Population and Housing Growth and Displacement (Draft Subsequent EIR p. 4.10-3)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to population and housing growth and displacement. Construction of the proposed project would create temporary construction-related jobs. Construction jobs created by the proposed project would not likely result in population growth in the project area as construction workers would not be likely to relocate their household’s place of residence.

Operations

The proposed project does not include a housing or residential component. Accordingly, the proposed project would not increase the residential population of the City of South Gate. No housing exists or has ever existed on the project site. As such, the proposed project would not result in the displacement of persons or housing.

Employment Growth and Displacement (Draft Subsequent EIR p. 4.10-3)

LACCD finds that the proposed project would result in less-than-significant impacts related to employment growth and displacement. Construction of the proposed project would create temporary construction-related jobs. Current employees at the existing SGEC would move to the new FEC. However, as student enrollment increases, the addition of new employees would ensure that the needs of future students are adequately met. LACCD estimates that when operating at maximum student capacity, the FEC would be staffed with 62 administrative and support staff members and 90 FTE faculty members, a net increase of 95 jobs in the City of South Gate compared to existing conditions. Jobs associated with existing warehousing uses on the project site would remain. The 95 new jobs created by the FEC would not likely cause individuals to relocate to the City of South Gate which could result in population growth, as these jobs can be filled by existing City of South Gate residents or residents of nearby communities.

PUBLIC SERVICES

Fire Protection and Emergency Services, Operations (Draft Subsequent EIR p. 4.11-5)

LACCD finds that the proposed project would result in less-than-significant impacts related to fire protection and emergency service during operations. The Los Angeles County Fire Department (LACFD) has indicated that the proposed project would not create a need for additional staffing or resources in order for the LACFD to continue to meet national response guidelines. Accordingly, operation of the proposed project would not result in unanticipated increases in demand such that the expansion of existing fire stations and/or construction of new fire stations would be necessary to maintain an adequate level of fire service to the project site.

Police Protection Services, Operations (Draft Subsequent EIR p. 4.11-9)

LACCD finds that operation of the proposed project would result in less-than-significant impacts related to police protection service. The proposed project would not increase resident population in the South Gate Police Department (SGPD) service area. Accordingly, the SGPD officer-to-resident ratio would not be reduced as a result of the proposed project. The proposed project would however result in a net increase in LACCD students and employees in the area, potentially increasing demand for police
2013 Firestone Education Center Master Plan

Protection services. With implementation of the proposed project, Los Angeles Sheriff’s Department (LASD) security officers staffed at the existing SGEC would be relocated to the project site and would serve the proposed project. The proposed project would comply with the contract between LASD and LACCD and provide an adequate amount of building space to accommodate LASD security personnel serving the proposed project. Although the LASD security personnel would provide protection services to the project site, operation of the proposed project and related increased activity in the area could create an increase demand for SGPD police protection services. However, the SGPD has indicated that the provision of private campus police/security at the FEC would ensure that SGPD service levels would not be impaired as a result of the proposed project. Since the LASD would provide security services to the proposed FEC, the expansion or construction of new SGPD facilities would not be necessary for the SGPD to provide an adequate level of service to the City.

Public Schools (Draft Subsequent EIR p. 4.11-12)

LACCD finds that the proposed project would result in less-than-significant impacts related to public schools. The proposed project is intended to accommodate existing and projected student enrollment at the SGEC campus, and would not generate a school-aged population. Accordingly, implementation of the proposed project would not create the need for new or expanded school facilities to be constructed; rather the proposed project would address the existing demand for higher education.

Parks and other Public Services (Draft Subsequent EIR p. 4.11-17)

LACCD finds that the proposed project would result in less-than-significant impacts related to parks and other public facilities. Because the proposed project would include an open space component and would not increase the population of the City, operation of the proposed project would not create additional demand for public parks or recreational facilities such that the City would need to expand existing or construct new park and recreation facilities to maintain an adequate level of service.

Since the proposed project would not increase the residential population in the City, the proposed project is also not anticipated to impair Los Angeles County Public Library service levels such that the City would need to expand existing or construct new libraries to maintain an adequate level of service.

TRANSPORTATION AND TRAFFIC

Circulation System (Draft Subsequent EIR p. 4.12-19 and p. 4.12-43)

Construction

LACCD finds that construction of the proposed project would result in less-than-significant impacts related to the circulation system. Construction activity may affect adjacent streets, including Firestone Boulevard and Santa Fe Avenue and may require the temporary closure of sidewalks adjacent to the project site. In addition, construction of the proposed project would result in truck trips along roadway segments near the project site. However, the majority of the construction workers are expected to arrive and depart the project site during off-peak hours. The effects of construction activity would be localized and temporary in nature. All construction activities, including new signalized intersections, would be coordinated with the City of South Gate affected City departments in advance of the start of work to minimize traffic impacts to the greatest extent practicable. Appropriate noticing would be implemented before and during the construction period.
Operations

Intersection No. 7 serves as one of three access points for students, faculty, staff and visitors of the FEC project. The driveway is currently 32 feet wide, is a shared access point for two entities (LACCD which owns the project site on the east side of the driveway and HON which owns the adjoining property to the west of the driveway) and is offset to the east of Calden Avenue.

As shown in Table 4.12-10, application of the City of South Gate’s significant impact threshold criteria indicates that the proposed project is expected to result in incremental but not significant impacts at this intersection under the Existing With Project Conditions and the Year 2031 With Project Conditions. However, due to the City approved installation of a traffic signal at the Calden Avenue/Firestone Boulevard intersection as part of the Calden Court Apartments project, and the City’s requirement against restricting any vehicular turning movements, the City has directed that the shared access point (between LACCD and HON) at Firestone Boulevard also be signalized and integrated into the Calden Avenue/Firestone Boulevard traffic signal under a single signal controller.

The City and LACCD have agreed that LACCD’s fairshare contribution to the joint traffic signal design and installation is 50 percent. Near-term operation under the signalized offset configuration is anticipated to accommodate existing and future traffic, including the new FEC facility at maximum enrollment, the Calden Court Apartments project at buildout, the reuse of the HON site (as manufacturing/warehousing uses under interim conditions), other related development projects in the area, and regional traffic growth.

Even though this study intersection is not anticipated to be significantly impacted by the proposed project utilizing the City of South Gate’s significant impact threshold criteria, the City and LACCD have agreed to implement the joint traffic signal using one of three options, depending on the construction timing of the FEC project, the Calden Court Apartments, and the potential redevelopment of the HON site.

Congestion Management Plan, Construction (Draft Subsequent EIR p. 4.12-19)

LACCD finds that construction of the proposed project would result in less-than-significant impacts related to the Congestion Management Plan (CMP). Construction of the proposed project would result in an increase in truck trips along roadway segments near the project site. In general, the majority of the construction workers are expected to arrive and depart the project site during off-peak hours. As a result, construction activities are not expected to add more than 50 trips at CMP intersections within the vicinity of the project site during the AM and PM peak hours. Construction of the proposed project would not add 150 or more trips during either the weekday AM or PM peak hours to CMP freeway monitoring locations.

Vehicle and Pedestrian Site Access (Draft Subsequent EIR pp. 4.12-20 and 4.12-39)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to vehicle and pedestrian site access. Construction activity may affect adjacent streets, including Firestone Boulevard and Santa Fe Avenue. In addition, construction activities could require the temporary closure of the sidewalks adjacent to the project site. However, all construction activities would be coordinated with the City of South Gate and affected City departments in advance of start of work to ensure public safety. Appropriate noticing would be implemented before and during construction.
Operations

The proposed project would provide adequate emergency access. The proposed project would incorporate the requirements of the LACFD and the LASD for emergency access, and driveways will be constructed to City of South Gate design standards. Primary vehicular access to the project site will be provided via two proposed signalized access point: one along the west side of Santa Fe Avenue opposite Ardmore Avenue and one along the north side of Firestone Boulevard at the existing shared access driveway. The proposed project includes a new 28-foot-wide roadway to provide vehicular circulation within the campus. Fire truck access to within 150 feet of all building exterior walls would be provided via the internal roadway, designated fire lanes, and City streets in compliance with Los Angeles County Fire Department (LACFD) requirements. If required by the overall configuration of the FEC campus, fire truck turnarounds may be incorporated into campus open space.

The existing truck yard north of Building 3 will be eliminated to accommodate the proposed project. The loading docks located along the north and west sides of Building 3 and the loading docks and truck ramp along the west side of Building 1 will remain in place, but will not be utilized in order to create a suitable entry to the proposed FEC. Truck access will no longer be allowed. Loading docks along the south and east sides of Building 1 and east side of Building 3 will continue to be utilized. Loading docks along the south side of Building 1 would be accessed from the Firestone driveway. Trucks utilizing these loading docks would briefly share the driveway and proposed roadway with vehicles accessing the FEC campus. Loading docks along the east side of these buildings would be accessed from Santa Fe Avenue, immediately south of the proposed driveway on Santa Fe Avenue opposite Orchard Place. With the exception of the southerly end of the Firestone driveway, trucks utilizing the remaining loading docks would not interface with vehicles accessing the FEC campus via the proposed roadway. Trucks would utilize the remaining truck yards located south of Building 1 and along Santa Fe Avenue, east of Buildings 1 and 3 that directly accessible from City streets. As such, the proposed project would not substantially increase hazards due to a design feature or incompatible uses.

Public Transit, Bicycle or Pedestrian Facilities (Draft Subsequent EIR pp. 4.12-20 and 4-12-41)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to public transit, bicycle or pedestrian facilities. Construction of the proposed project would result in an increase in truck trips along roadway segments near the project site and may require the temporary closure of the sidewalks adjacent to the project site. However, all construction activities would be coordinated with the City of South Gate affected City departments and Metro in advance of start of work to ensure safety and minimize impacts to transit, bicycle, and pedestrian facilities to the greatest extent practicable.

Operations

The proposed project has been designed to encourage the use of public transit, and walking and bicycling as a transportation mode. The pedestrian walkways and the adjacent sidewalks are designed to provide a friendly walking environment. The FEC will provide bicycle racks and related amenities as required by the City. The project site is adjacent to and accessible from nearby commercial uses (e.g., retail, restaurant, etc.) and other amenities along the Santa Fe Avenue and Firestone Boulevard corridors, as well as adjacent public bus transit stops. Students, faculty and staff of the FEC project can utilize the Blue Line train service to access the site via a single transfer to existing bus/transit service along Firestone Boulevard. LACCD also provides a shuttle between the main ELAC campus and the Firestone Educational Center. While the student and employment population would increase due to the proposed project, potentially increasing demand for public transit, there is sufficient transit system capacity to
absorb the needs of the new population and increased use of public transit is desired by both the LACCD and the City of South Gate.\(^5\)

**UTILITIES & SERVICE SYSTEMS**

**Water Supply (Draft Subsequent EIR p. 4.13-5)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to water supply. The demand for water during the construction of the proposed project would be short-term. Overall, water demand for demolition and construction activities would be minimal, and construction activities would not have a significant impact on available water supplies.

**Operations**

Operation of the proposed project would increase the demand for water from the City’s water system. However, in accordance with LACCD directives, the FEC building will be designed and constructed using the LEED - New Construction rating system which would reduce potable water usage. Regardless, as shown in Table 4.13-4 of the Draft Subsequent EIR, the proposed project is not anticipated to cause the City to expand, or obtain, new water entitlements to serve the proposed project, as increased demand for water in the City has already been anticipated and planned for.

**Water Supply Treatment and Conveyance Infrastructure (Draft Subsequent EIR pp. 4.13-5 and 4.13-6)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to water supply treatment and conveyance infrastructure. Water demand for demolition and construction activities would be minimal and short-term in nature. Accordingly, construction of the proposed project would not cause the City to construct new or expand existing water supply treatment and/or conveyance infrastructure.

**Operations**

The net increase in water usage associated with operation of the proposed project would increase the amount of water that is treated by the Park Reservoir Spray Aeration Treatment Facility and conveyed through the City’s water distribution system to the project site. The increase in water usage could require the expansion of the City’s existing water treatment facility and conveyance infrastructure and/or could require the construction of new water conveyance infrastructure. However, prior to construction, the LACCD would provide the City of South Gate Public Works Department (SGPWD) building plans for review and approval. Any additional water service connections and on-site water distribution design features identified by the SGPWD would be incorporated in the final design plans to ensure water conveyance infrastructure has adequate capacity to sufficiently serve the proposed project. In addition, all necessary City water system improvements would comply with South Gate Municipal Code Chapter 9.46.

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Wastewater Treatment (Draft Subsequent EIR pp. 4.13-10 and 4.13-11)

LACCD finds that the proposed project would result in less-than-significant impacts related to wastewater treatment. Construction and operation of the proposed project would not cause the Joint Water Pollution Control Plant (JWPCP) where wastewater from the City of South Gate is treated to exceed applicable wastewater treatment requirements. Wastewater generated during the construction of the proposed project would be minimal and short-term in nature.

Operation of the proposed project would increase the volume of wastewater generated at the project site and treated at the JWPCP. However, in accordance with LACCD directives, the FEC will be designed and constructed using the USGBC LEED - New Construction rating system which would reduce the amount of potable water used and associated generation of wastewater at the proposed project. Wastewater generated by the proposed project represents about 0.01 percent of the estimated remaining treatment capacity of the JWPCP. Accordingly, as shown in Table 4.13-7 of the Draft Subsequent EIR, the proposed project is not anticipated to cause the LACSD to expand existing, or construct new, wastewater treatment facilities to serve the proposed project. In addition, the proposed project would not cause the JWPCP to exceed applicable wastewater treatment requirements because the JWPCP operates under a NPDES permit and is required to comply with all LARWQCB wastewater treatment requirements.

Wastewater Conveyance Infrastructure (Draft Subsequent EIR pp. 4.13-10 and 4.13-11)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to wastewater conveyance infrastructure during construction. Wastewater generated during construction of the proposed project would be short-term and is anticipated to be nominal. Accordingly, construction of the proposed project would not be expected to cause the LACSD or the City to construct new, or expand existing wastewater conveyance infrastructure.

Operations

The proposed project would increase the volume of wastewater conveyed by the Mountain View-Belle Vernon Relief Extension Trunk Sewer and the City’s sewer system, accounting for approximately 30 percent of the remaining conveyance capacity of the trunk sewer. This increase in wastewater could require the expansion of the Mountain View-Belle Vernon Relief Extension Trunk Sewer and/or additional connections to other Los Angeles County Sanitation Districts (LACSD) trunk sewers for the proposed project to be adequately served. However, since the proposed project would increase the quantity of wastewater conveyed by the LACSD sewerage system, it would be required to comply with the LACSD Connection Fee Program. Compliance with the LACSD Connection Fee Program would ensure that any necessary incremental expansion to LACSD wastewater conveyance infrastructure is made to accommodate the proposed project. LACSD wastewater conveyance infrastructure would, if necessary, be improved to accommodate the proposed project.

Solid Waste (Draft Subsequent EIR pp. 4.13-15 and 4.13-16)

Construction

LACCD finds that the proposed project would result in less-than-significant impacts related to solid waste. The net amount of solid waste generated during the construction of the proposed project would be 9,148 tons assuming that 50 percent of solid waste is diverted from landfills in compliance with AB 939.
The amount of solid waste that would be generated and disposed at area landfills is nominal, and it is anticipated that the landfills would have sufficient capacity to accommodate the solid waste disposal needs of the proposed project.

**Operations**

Operation of the proposed project at maximum student capacity would increase solid waste generated daily at the project site by 9,000 ppd (4.5 tons per day). As shown in Table 4.13-12 of the Draft Subsequent EIR, the estimated solid waste amount generated at the project site with operation of the proposed project represents about 0.001 percent of the daily intake capacity of landfills serving the City. The amount of solid waste that would be generated and disposed of at area landfills is nominal, and it is anticipated that the landfills would have sufficient capacity to accommodate the solid waste disposal needs of the proposed project.

**Energy (Draft Subsequent EIR pp. 4.13-20 and 4.13-21)**

**Construction**

LACCD finds that the proposed project would result in less-than-significant impacts related to energy consumption. Construction of the proposed project would result in energy consumption including consumption of petroleum, electricity and natural gas. However, energy consumption during construction would be temporary and would not result in long-term demand.

**Operations**

Operation of the proposed project would result in a reduction in petroleum consumption compared to existing conditions because students that currently attend classes at both SGEC and ELAC would be able to attend classes exclusively at the proposed FEC, reducing vehicle miles traveled. Operation of the proposed project would result in increased electricity and natural gas usage at the project site compared to existing conditions. However, in accordance with LACCD directives, the FEC building will be designed and constructed using the USGBC LEED - New Construction rating system and would therefore include energy conservation features. In addition, compliance with City and State energy codes would increase the energy efficiency of the proposed project and ensure that the proposed project would not result in the wasteful or inefficient use of energy. Regardless, the amount of electricity and natural gas demanded by the proposed project is not anticipated to require the expansion of existing, or construction of new facilities to accommodate the proposed project.

**ENVIRONMENTAL IMPACTS FOUND TO BE LESS-THAN-SIGNIFICANT AFTER MITIGATION**

The rationale for the conclusion that a significant impact would not occur after mitigation in each of these issue areas is summarized below.

**AIR QUALITY**

**Regional Emissions, Construction (Draft Subsequent EIR p. 4.2-13)**

a) Significant Environmental Effects

Construction-related daily maximum regional emissions would exceed the SCAQMD regional significance threshold for VOC as a result of architectural coating activity. The SCAQMD regional significance threshold for all other air quality pollutants would not be exceeded during construction.
b) Mitigation Measures

AQ1  The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter).

AQ2  Construction contractors shall utilize materials that do not require painting, as feasible.

AQ3  Construction contractors shall use pre-painted construction materials, as feasible.

c) Finding

Implementation of Mitigation Measures AQ1 through AQ3 would reduce impacts related to regional VOC construction emissions to a less-than-significant level. VOC emissions would be reduced to approximately 16 pounds per day, which would be less than the SCAQMD regional significance threshold of 75 pounds per day. Based on the foregoing, the LACCD finds that impacts related to regional emissions during construction would be mitigated to a less-than-significant level.

d) Reference

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., grading) activities. NOx emissions would primarily result from the use of construction equipment. During the finishing phase, the application of architectural coatings (e.g., paints) and other building materials would release VOC. The proposed project would have the potential to have a significant impact with regard to VOC emissions. However, the proposed project would result in less-than-significant impacts related to VOC emissions with implementation of mitigation measures. For a complete discussion of impacts associated with air quality resources, see Subsection 4.2 Air Quality, pp. 4.2-13 through 4.2-14 of the Draft Subsequent EIR.
CULTURAL RESOURCES

Archaeological Resources (Draft Subsequent EIR p. 4.3-11)

a) Significant Environmental Effects

Although unlikely based on the findings of a records search conducted for the project site, the possibility exists that archeological resources could be encountered during ground-disturbing activities, potentially creating a substantial adverse change in the significance of an archaeological resource.

b) Mitigation Measures

CR3 If evidence of archaeological resources (artifacts or features) are discovered during construction related earth-moving activities, all ground-disturbing activities (e.g., grading, grubbing, vegetation clearing) within 100 feet of the resource shall be halted and Los Angeles Community College District shall be notified. Los Angeles Community College District shall hire an archaeologist who meets the Secretary of the Interior’s professional qualification standards shall be retained to assess the significance of the resource. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by the archaeologist and Los Angeles Community College District and shall be consistent with the Secretary of the Interior's Standards for Archaeological Documentation. Any identified archaeological resources shall be recorded on the appropriate Department of Park and Recreation 523 (A-L) form and filed with the appropriate Information Center.

c) Finding

Implementation of Mitigation Measure CR3 would reduce potential impacts related to archaeological resources to a less-than-significant level by ensuring that, in the event archaeological resources are discovered, ground-disturbing activities which could further disturb the resource would be halted and mitigation and recovery activities would commence under the supervision of a qualified archaeologist. Based on the foregoing, the LACCD finds that impacts related to archaeological resources would less-than-significant with mitigation.

d) Reference

For a complete discussion of impacts associated with archaeological resources, see Subsection 4.3 Cultural Resources, p. 4.3-11 of the Draft Subsequent EIR.

Paleontological Resources (Draft Subsequent EIR p. 4.3-13)

a) Significant Environmental Effects

Because fossils recovered from excavations as shallow as 15 feet below ground surface have been documented in the vicinity of the project site, excavations ten feet deep or greater at the project site have the potential to encounter and possibly destroy fossils.

b) Mitigation Measures

CR4 All project-related ground disturbances that could potentially impact paleontologically sensitive Quaternary older alluvium shall be monitored by a qualified paleontological monitor on a full-time basis, as this geologic unit is considered to have a high paleontological sensitivity. Since Quaternary older alluvium is estimated to occur at depths of ten feet and greater, all excavations
deeper than ten feet will be monitored full-time. Additionally, any excavations that occur in surficial younger (Holocene age) Quaternary alluvial and fluvial deposits and/or topsoil (estimated to occur at less than ten feet in depth) shall be spot-checked on a part-time basis at the discretion of the Qualified Paleontologist to ensure that underlying paleontologically sensitive sediments are not being impacted.

**CR5** A Qualified Paleontologist shall be retained to supervise monitoring of construction excavations beyond ten feet in depth and inspect exposed rock units during active excavations within sensitive geologic sediments. The paleontologist shall implement a paleontological monitoring and mitigation plan for the proposed project to reduce impacts to paleontological resources to a less-than-significant level in the event that such resources are encountered. The qualified paleontologist shall have authority to temporarily divert grading away from exposed fossils in order to professionally and efficiently recover the fossil specimens and collect associated data. In the event that fossils are encountered, at each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections will be measured, and appropriate sediment samples will be collected and submitted for analysis.

c) Finding

Implementation of Mitigation Measures **CR4** and **CR5** would reduce potential impacts related to paleontological resources to a less than significant level by ensuring that ground-disturbing activities that could potentially impact paleontologically sensitive Quaternary older alluvium are monitored by a qualified paleontological monitor and that, if resources are discovered, activities which may disturb the resource further are halted and recovery and recordation activities are undertaken. Based on the foregoing, the LACCD finds that impacts related to paleontological resources would less-than-significant with mitigation.

d) Reference

The project site is a previously disturbed area where grading and excavation have already occurred. No paleontological resources are apparent at the ground surface. Superficial and/or very shallow excavations related to the construction of proposed project are unlikely to result in a significant impact to paleontological resources. However, the proposed parking structure which would include one partial level below grade would require deeper excavations. With implementation of mitigation measures, impacts would be less than significant. For a complete discussion of impacts associated with paleontological resources, see Subsection 4.3 Cultural Resources, pp. 4.3-11 through 4.3-12 of the Draft Subsequent EIR.

**Human Remains (Draft Subsequent EIR p. 4.3-13)**

a) Significant Environmental Effects

Because no Native American cultural resources are known to be present in the immediate project area and the project site is not part of a formal cemetery, it is unlikely that human remains underlie the project. Nonetheless, the possibility exists that human remains could be disturbed during ground-disturbing activities.

b) Mitigation Measures

**CR6** If human remains are discovered during any demolition/construction activities, all ground-disturbing activity within a 100 foot radius of the remains shall be halted immediately, and the Los Angeles County Coroner shall be notified immediately, according to Public Resources Code
Section 5097.98 and California Health and Safety Code Section 7050.5. If the human remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission, and the guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains. The Native American Heritage Commission will consult with the Most Likely Descendant (MLD), if any. The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The Los Angeles Community College District shall be responsible for the approval and implementation of the MLD recommendations as deemed appropriate, prior to resumption of ground-disturbing activities within 100 foot radius of where the remains were discovered.

c) Finding

Implementation of Mitigation Measure CR6 would reduce potential impacts related to human remains to a less than significant level by ensuring that the County Coroner is contacted in the event any remains are uncovered, who will then notify the Native American MLD in the event the remains are determined to be of Native American heritage. Based on the foregoing, the LACCD finds that impacts related to paleontological resources would less-than-significant with mitigation.

d) Reference

For a complete discussion of impacts associated with human remains, see Subsection 4.3 Cultural Resources, p. 4.3-12 of the Draft Subsequent EIR.

HAZARDS & HAZARDOUS MATERIALS

Hazardous Materials, Construction (Draft Subsequent EIR pp. 4.6-11 and 4.6-12)

a) Significant Environmental Effects

The project site was a generator of hazardous materials when occupied by the Firestone Tire and Rubber Plant. As a result, the project site is listed on a number of hazardous materials site. Previous contamination of the project site led to the DTSC issuing an Imminent or Substantial Endangerment Order and Remedial Action Order (the Order) in April 1994 that required the project site properly investigated, a clean-up plan be prepared and submitted, and, contaminated soil and groundwater be remediated. Since the DTSC issued their 1994 order, several environmental investigations have been conducted on the project site under the guidance of the DTSC. These environmental investigations identified recognized environmental conditions including soil and groundwater contamination, USTs, ACMs, and LBPs that must be remediated at the project site.

Although DTSC issued a “No Further Action” letter on September 3, 2009 deeming the project site suitable for unrestricted use based on the findings of a human health risk assessment (HHRA), additional investigations conducted per the recommendations of the Phase I Environmental Site Assessment (ESA) prepared subsequent to the HHRA necessitated further action related to the remediation of the project site. Specifically, soils containing elevated arsenic concentrations were removed and appropriately disposed of, two 13,000-gallon USTs and associated product pipes were excavated and removed, and contaminated materials and soils were disposed of. These activities have eliminated recognized environmental conditions at the project site, with the exception of ACMs and LBPs, as well as refrigerants, and Universal Waste Rule items that occur within Building 4. These materials have the potential to create a significant hazard to the public or the environment during construction when release, transport, and disposal of such hazardous materials could occur. Additionally, the potential exists that contaminated
soils not previously identified could be encountered during construction of the proposed project. The investigation and remediation of a release or threatened release of any hazardous substances at or from the project site in the future would be overseen by the DTSC in accordance with the Voluntary Cleanup Agreement between DTSC and LACCD, pursuant to the Health and Safety Code.⁶

Construction of the proposed project would involve the temporary use of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. However, construction activities would comply with applicable regulations and would not expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Similarly, while construction of the proposed project may include the transport of hazardous materials to a permitted facility for treatment and/or disposal, the handling of hazardous materials and wastes would occur in accordance with manufacturers’ instructions and handled in compliance with applicable federal, State and local regulations. Compliance with existing standards and regulations would ensure that construction of the proposed project not create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials.

b) Mitigation Measures

HM1 Should LACCD encounter any previously unidentified contaminants requiring remediation during construction, an action plan shall be developed, approved by Department of Toxic Substances Control (DTSC) as appropriate, and implemented, in conjunction with construction activities in the contaminated area. As needed, the investigation and remediation of a release or threatened release of any hazardous substances at or from the project site can be overseen by the DTSC in accordance with the Voluntary Cleanup Agreement between DTSC and LACCD.

HM2 Prior to the demolition of Building 4, asbestos containing materials shall be removed from Building 4 in accordance with the recommendations contained in the Limited Hazardous Materials Testing Report dated January 19, 2013, and California Code of Regulations (CCR) Title 8. Removal must be conducted by a California Occupation Safety and Health Administration (Cal/OSHA)-register and State-licensed asbestos removal contractor. Abatement operations shall be performed under the direct observation of a California Certified Asbestos Consultant or Certified Site Surveillance Technician. For all abatement activities which involve the removal of at least 100 square feet of hazardous materials, notifications must be made to the South Coast Air Quality Management and Cal/OSHA, 10 days and 24 hours, respectively, prior to initiation of such activities.

HM3 Prior to the demolition of Building 4, lead based paint and other hazardous materials shall be removed from Building 4 in accordance with the recommendations contained in the Limited Hazardous Materials Testing Report dated January 19, 2013, and CCR Title 22. For all abatement activities which involve the removal of at least 100 square feet of hazardous materials, notifications must be made to Cal/OSHA 24 hours prior to initiation of such activities.

c) Finding

Implementation of Mitigation Measures HM1 through HM3 would reduce the impacts related to hazardous materials during construction to a less-than-significant level by ensuring that proper clean-up and removal of hazardous materials occurs prior to the demolition of existing structures, thereby preventing release of the hazardous materials. Based on the foregoing, the LACCD finds that impacts related to hazardous materials would less than significant with mitigation.

⁶Department of Toxic Substances Control, Voluntary Cleanup Agreement with LACCD, Docket No. HAS VCA-12/13-055, executed January 22, 2013.
d) Reference

For a complete discussion of impacts associated with hazardous materials contamination, see Subsection 4.6 Hazards & Hazardous, pp. 4.6-11 and 4.6-12 of the Draft Subsequent EIR.

Emergency Response Plan (Draft Subsequent EIR p.4.6-13)

a) Significant Environmental Effects

Firestone Boulevard is a designated emergency evacuation route in the City of South Gate.\(^7\) Construction of the proposed project would require street and sidewalk improvements and the construction of two new traffic signals on Firestone Boulevard and Santa Fe Avenue. Although short-term, construction activities within the right-of-way could potentially impact the use of Firestone Boulevard and Santa Fe Avenue during an emergency response or evacuation, interfering with the implementation of the City’s emergency response plan.

b) Mitigation Measures

Refer to Mitigation Measures PS1 and PS2 below.

c) Finding

By requiring that fire protection and emergency services personnel be notified of any road or lane closures in advance, and that fire protection services are provided with all building plans prior to construction, implementation of Mitigation Measures PS1 and PS2 would reduce potential impacts related to emergency response during construction to a less-than-significant level. Based on the foregoing, the LACCD finds that impacts related to emergency response would less-than-significant with mitigation.

d) Reference

For a complete discussion of impacts associated with asbestos and lead-based paint, see Subsection 4.6 Hazards & Hazardous, p. 4.6-13 of the Draft Subsequent EIR.

PUBLIC SERVICES

Fire Protection and Emergency Services, Construction (Draft Subsequent EIR p. 4.11-5)

a) Significant Environmental Effects

Although short-term, construction activities within the Firestone Boulevard and Santa Fe Avenue right-of-ways could impact the use of these streets by emergency response vehicles, potentially delaying LACFD emergency response. Any lane closures, movement of heavy construction equipment, or any construction in, or use of, the Firestone Boulevard and Santa Fe Avenue right-of-ways would need to be coordinated with the LACFD to avoid such delays. While construction of the proposed project could temporarily reduce LACFD emergency response times, LACFD service levels would not be permanently impaired as a result of the proposed project such that the construction of new or expanded facilities would be required in order to maintain adequate service levels.

\(^7\)City of South Gate, SEMS Multihazard Functional Plan, March 1998.
b) Mitigation Measures

**PS1** Prior to the construction of the proposed project, LACCD shall provide to the LACFD all building plans, construction plans, construction schedules, and, if applicable, proposed construction and street or lane closures related to the proposed project for Los Angeles County Fire Department (LACFD) review and approval.

**PS2** At least three days in advance of any street or lane closure that may affect Fire and/or Paramedic responses in the area, LACCD shall notify the Los Angeles Sheriff’s Department, South Gate Police Department, LACFD, and Fire Stations 16, 147, and 54.

c) Finding

By requiring that fire protection and emergency services personnel be notified of any road or lane closures in advance, and that fire protection services are provided with all building plans prior to construction, implementation of Mitigation Measures **PS1** and **PS2** would reduce potential impacts related to fire protection services during construction to a less than significant level. Based on the foregoing, the LACCD finds that impacts related to fire protection services would less-than-significant with mitigation.

d) Reference

For a complete discussion of impacts associated with fire protection and emergency services, see Subsection 4.11 Public Services, p. 4.11-5 of the Draft Subsequent EIR.

**Police Protection Services, Construction (Draft Subsequent EIR p. 4.11-9)**

a) Significant Environmental Effects

Construction of the proposed project could temporarily affect LASD and SGPD service levels. Construction activities include street improvements within the Firestone Boulevard and Santa Fe Avenue right-of-ways that could potentially impact the use of these streets by emergency response vehicles, potentially delaying SGPD emergency response. Any lane closures, movement of heavy construction equipment, or any construction in, or use of, the Firestone Boulevard and Santa Fe Avenue right-of-ways would need to be coordinated with the LASD and SGPD in order to avoid response time delays. However, since the construction of the proposed project is temporary, the construction of new or expanded LASD and SGPD facilities would not be necessary to maintain an adequate level of police protection services to the project site and the City.

b) Mitigation Measures

Refer to Mitigation Measure **PS2** above.

c) Finding

By requiring that fire protection and emergency services personnel, including police, be notified of any road or lane closures in advance, and that fire protection services are provided with all building plans prior to construction, implementation of Mitigation Measures **PS1** and **PS2** would reduce potential impacts related to police protection services during construction to a less than significant level. Based on the foregoing, the LACCD finds that impacts related to police protection services would less-than-significant with mitigation.
d) Reference

For a complete discussion of impacts associated with police protection services, see Subsection 4.11 Public Services, p. 4.11-9 of the Draft Subsequent EIR.

ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

CULTURAL RESOURCES

Historic Resources, Construction (Draft Subsequent EIR p. 4.3-11)

a) Significant Environmental Effects

The project site is part of the California Register-eligible Historic District, Buildings 1, 2, and 3 on the project site are individually eligible for listing in the California Register, and Building 4, the pedestrian bridge connecting Buildings 2 and 3, and a concrete wall/wrought iron fence with gate posts contribute to the California Register-eligible District. Accordingly, under CEQA, these buildings are all considered historical resources. The demolition of Building 4 and its connections to Building 3, would result in a substantial adverse change in the significance of these historic resources, as well as the South Gate Historic District.

b) Mitigation Measures

CR1 Impacts resulting from the demolition of Building 4 and alteration of Building 3 shall be minimized through archival documentation of as-built and as-found condition. Prior to issuance of demolition permits, the Los Angeles Community College District shall ensure that documentation of the buildings and structures proposed for demolition is completed in the form of a Historic American Building Survey Level I documentation that shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation (National Park Service 1990). The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History (National Park Service 1983). The original archival-quality documentation shall be offered as donated material to the new campus library where it would be available for current and future generations. Archival copies of the documentation also would be submitted to the South Gate’s Leland R. Weaver Public Library where it would be available to local researchers. Completion of this mitigation measure shall be monitored and enforced by the Los Angeles Community College District.

CR2 Impacts related to the loss of Building 4 and its connections to Building 3 shall be reduced through the development of a retrospective display detailing the history of the historic district, its significance, and its important details and features. This display can be in the form of a physical exhibit, kiosk, a web page, or some combination of these media types. The display shall include images and details from the Historic American Building Survey documentation and any collected research pertaining to the historic district. The display content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History (National Park Service 1983).
The display shall be completed within two years of the date of completion of the proposed project. Completion of this mitigation measure shall be monitored and enforced by the Los Angeles Community College District.

c) Finding

Implementation of Mitigation Measures CR1 and CR2 would reduce significant project impacts to historical resources to the maximum extent feasible. However, the loss of Building 4 would still remain a significant adverse impact. These impacts would remain significant because the proposed project would not preserve, rehabilitate, restore, or reconstruct the historic building. As defined by the Secretary of the Interior’s Standards for the Treatment of Historic Properties (14 CCR Section 15126.4(b)(1)), a significant impact to an identified historical resource would be mitigated to a less-than-significant level if the mitigation measure requires preservation, rehabilitation, restoring, or reconstructing historic buildings. Based on the foregoing, LACCD finds that the proposed project would have significant and unavoidable impacts related to historic resources. These impacts are considered significant and unavoidable because no feasible mitigation measures beyond those identified exist to reduce the impacts related to historic resources. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures or project alternatives identified in the Draft Subsequent EIR.

d) Reference

For a complete discussion of impacts associated with historic resources, see Subsection 4.3 Cultural Resources, p. 4.3-11, 12 and 14 of the Draft Subsequent EIR.

NOISE AND VIBRATION

Noise, Construction (Draft Subsequent EIR p. 4.9-15)

a) Significant Environmental Effects

Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would occur during the approximate 32-month construction schedule. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction noise levels would exceed the 5 dBA significance threshold at residential land uses north and east of the project site. To more accurately characterized construction-period noise levels, the average noise level was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously. The noise levels shown in Table 4.9-7 of the Draft Subsequent EIR take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for construction. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA Leq at a reference distance of 50 feet. As shown in Table 4.9-8 of the Draft Subsequent EIR, typical construction activity using multiple pieces of equipment would increase in ambient noise levels of 18.1 dBA and 15.5 Leq at the single- and multi-family residences to the north and single-family residences to the east, respectively. Construction noise levels would exceed the 5-dBA significance threshold at residential land uses north and east of the project site. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise.
b) Mitigation Measures

N1  All construction equipment shall be equipped with muffler devices.

N2  Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

N3  Construction equipment shall be electric- and hydraulic-powered rather than diesel and pneumatic-powered, as feasible.

N4  The construction contractor shall locate construction staging areas away from noise-sensitive uses.

N5  Haul routes shall be located on major arterial roads within non-residential areas, as feasible.

N6  Prior to initiating construction activity, the construction contractor shall coordinate with the site administrators for the Firestone Education Center to discuss construction activities that generate high noise levels. Coordination between the site administrator and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to mitigate potential disruption of classroom activities.

N7  A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

c) Finding

Implementation of Mitigation Measure N1 would reduce construction noise levels by 3 dBA. Noise level reductions attributable to Mitigation Measures N2 through N7, although not easily quantifiable, would ensure that any construction noise complaints are remedied. Mitigated noise levels are shown in Table 4.9-12 of the Draft Subsequent EIR. As shown, regardless of mitigation, construction activity would still exceed the significance threshold at residential land uses north and east of the project site. Based on the foregoing, LACCD finds that the proposed project would have significant and unavoidable impacts related to construction noise. These impacts are considered significant and unavoidable because no feasible mitigation measures beyond those identified above exist to reduce construction noise below the 5 dBA significance threshold at residential land uses north and east of the project site. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures or project alternatives identified in the Draft Subsequent EIR.

d) Reference

For a complete discussion of impacts associated with construction noise, see Section 4.9 Noise, pp. 4.9-12 through 4.9-13 of the Draft Subsequent EIR.
TRANSPORTATION AND TRAFFIC

Circulation System, Operations (Draft Subsequent EIR pp. 4.12-20 through 4.12-38)

a) Significant Environmental Effects

The traffic analysis evaluated the potential for project-related impacts to occur at 31 key intersections in the vicinity of the project site. Under Existing With Project conditions the following three study intersections are expected to be significantly impacted during the AM and/or PM peak hours based on City of South Gate’s significant impact threshold criteria:

- Intersection No. 4: Alameda Street/Firestone Boulevard (PM peak hour)
- Intersection No. 8: Santa Fe Avenue/Project Driveway-Ardmore Avenue (AM and PM peak hours)
- Intersection No. 10: Santa Fe Avenue/Firestone Boulevard (AM peak hour)

Incremental but not significant impacts are noted at the remaining 28 study intersections.

Under Year 2031 With Project conditions the following four study intersections are expected to be significantly impacted during the AM and/or PM peak hours based on City of South Gate’s significant impact threshold criteria:

- Intersection No. 4: Alameda Street/Firestone Boulevard (PM peak hour)
- Intersection No. 8: Santa Fe Avenue/Project Driveway-Ardmore Avenue (AM and PM peak hours)
- Intersection No. 9: Santa Fe Avenue/Project Driveway-Orchard Place (PM peak hour)
- Intersection No. 10: Santa Fe Avenue/Firestone Boulevard (AM and PM peak hours)

Incremental but not significant impacts are noted at the remaining 27 study intersections.

An analysis was prepared using the County of Los Angeles ICU method for the seven study intersections located either partially or solely within the County of Los Angeles. Under Year 2031 With Project conditions the following intersection is expected to be significantly impacts during the AM and PM peak hours based on the application of the County impact criteria:

- Intersection No. 4: Alameda Street/Firestone Boulevard (AM and PM peak hours)

Incremental but not significant impacts are noted at the remaining six County of Los Angeles study intersections.

Under Year 2031 With Related Projects conditions the following four intersections are expected to experience a significant cumulative impact during the AM and/or PM peak hours based on the application of the County impact criteria:

- Intersection No. 3: Alameda Street/Nadeau Street (AM and PM peak hours)
- Intersection No. 4: Alameda Street/Firestone Boulevard (AM and PM peak hours)
- Intersection No. 5: Alameda Street/92nd Street-Southern Avenue (AM and PM peak hours)
- Intersection No. 12: Pacific Boulevard/Broadway (PM peak hour)

Incremental but not significant impacts are noted at the remaining three County of Los Angeles study intersections.
b) Mitigation Measures

Intersection No. 8: Santa Fe Avenue/Project Driveway-Ardmore Avenue

TT1 LACCD shall install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage. The outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided. Approvals will be obtained from the California Public Utilities Commission, Union Pacific Railroad and the City of South Gate as required.

Intersection No. 9: Santa Fe Avenue/Project Driveway-Orchard Place

TT2 LACCD shall restripe the northbound and southbound approaches on Santa Fe Avenue to provide a northbound left-turn lane and a southbound left-turn lane. This improvement can be accommodated within the existing Santa Fe Avenue roadway width.

Intersection No. 10: Santa Fe Avenue/Firestone Boulevard

TT3 LACCD shall install eastbound and westbound exclusive right-turn only lanes. The existing eastbound and westbound combination through-right turn lanes shall be restriped to provide a 10-foot through lane with a 12-foot wide right-turn only lane for both the eastbound and westbound approaches. Up to two on-street parking spaces shall also be removed along the north and south sides of Firestone Boulevard. Additionally, LACCD shall coordinate with the City of South Gate consider regarding the proposed relocation of the existing eastbound near-side bus stop to a far-side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.

On-Site Transportation Demand Management Measures

TT4 LACCD shall implement an enhanced Transportation Demand Management (TDM) program for the proposed project. The measures incorporated into the TDM project shall further decrease the number of vehicular trips generated by persons traveling to/from the site by offering specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, rail, walking, bicycling, etc.) and ridesharing. TDM measures may include the following:

- **TDM Web Site Information.** Transportation information shall be provided in a highly visible and accessible location on the school’s web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, students and visitors of available alternative transportation modes to access the campuses and travel in the area. The web site shall also highlight the environmental benefits of utilization of alternative transportation modes.

- **TDM Promotional Material.** ELAC shall provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes shall be made available to employees, students and visitors during typical business hours.

- **Transit Welcome Package (TWP).** All new students and employees of the college shall be provided with a TWP in addition to holding Transportation Fair each semester. The TWP at a minimum shall include information regarding ELAC’s arrangement for free or discounted use of the transit system, area bus/rail transit route information, bicycle facilities (including
routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the ELAC campuses.

- **Internet-Based/Independent Study Education.** ELAC shall offer internet-based and independent study classes which allows for a portion or all of the education activities to occur without students and faculty needing to be physically on-site at an ELAC facility.

- **Public Transit Passes.** To the extent feasible, ELAC shall offer free or discounted public transit coordination with various transit providers for all students and staff. The program shall allow students to be able to use their ELAC identification card for either free or substantially discounted transit passes.

- **Carpool Program for Employees.** ELAC shall provide preferential parking within the parking garage for employees who commute to work in ELAC registered carpools. An employee who drives to work with at least one other employee to the campus may register as a carpool entitled to preferential parking within the meaning of this provision.

- **Public Transit Stop Enhancements.** Working in cooperation with other transit agencies and the City of South Gate, ELAC shall seek to improve existing bus stops with enhanced shelters and transit information within the immediate vicinity of the Firestone Education Center campus. Enhancements may include weather protection, lighting, benches, telephones, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative.

- **Convenient Parking for Bicycle Riders.** ELAC shall provide locations at the site for convenient parking for bicycle commuters for working employees, students attending classes, and visitors. The bicycle parking shall be located within the Firestone Education Center campus and/or in the public right-of-way adjacent to the campus such that long-term and short-term parkers can be accommodated. Bicycle parking means bicycle racks, a locked cage, or other similar parking area. ELAC shall observe utilization of bicycles at the Firestone Education Center campus each semester and, if necessary, make arrangements for additional bicycle parking if the demand for bicycle parking spaces exceeds the supply.

- **Student Parking Pricing.** ELAC shall require that students pay for their own parking.

- **Student Hiring Policies.** ELAC shall provide preferential consideration to hiring current ELAC students for part-time employment based on satisfaction of other requirements of the available positions.

- **Local Hiring Program.** When hiring, ELAC shall conduct outreach to residents who live within one mile of the Firestone Education Center campus (or other facility to where the position of employment is offered), based on satisfaction of other requirements of the available positions.

- **Expanded Bicycle Routes.** ELAC shall coordinate with the City of South Gate in an effort to enhance and expand the current network of bicycle routes serving the campus.

c) **Finding**

Implementation of Mitigation Measures **TT1** through **TT4** would reduce potential intersection impacts at Intersection Nos. 8, 9, and 10. However, no feasible mitigation was identified to avoid significant project-level impact at Intersection No. 4 and significant cumulative impacts at Intersection Nos. 3, 5, and 12. Based on the foregoing, LACCD finds that the proposed project would have significant and unavoidable impacts at the intersection identified above. These impacts are considered significant and unavoidable because no feasible mitigation measures were identified to reduce the significant impact. In addition, specific economic, legal, social, technological, or other considerations, including considerations
identified in Section XI of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures or project alternatives identified in the Draft Subsequent EIR.

d) Reference

For a complete discussion of impacts associated with the circulation system, see Subsection 4.12 Transportation and Traffic, pp. 4.12-20 through 4.12-38 of the Draft Subsequent EIR.

**Congestion Management Plan, Operation (Draft Subsequent EIR p. 4.12-38)**

a) Significant Environmental Effects

Based on CMP threshold criteria, the proposed project is expected to result in a significant impact during the weekday PM peak hour to CMP Station 143: Alameda Street/Firestone Boulevard (study intersection No. 4). Incremental but not significant impacts are noted at CMP Station 144: Atlantic Avenue/Firestone Boulevard (study intersection No. 28) during both the weekday AM and PM peak hours. The proposed project would not impact CMP freeway monitoring locations.

b) Mitigation Measures

No feasible mitigation measures were identified to reduce the significant impact identified at the Alameda Street/Firestone Boulevard intersection (CMP Station No. 143/Intersection No. 4) during the PM peak hour to less than significant levels.

Intersection No. 4 is under joint jurisdiction between the City of South Gate and County of Los Angeles. Since the Alameda Corridor grade-separated rail line runs along the east side of the intersection and precludes options for roadway widening, the opportunities for potential physical measures are limited. While Firestone Boulevard is designated as a Boulevard (Primary Arterial) in the City’s General Plan 2035 and is planned to ultimately provide three travel lanes in each direction, the future widening and dedication that is planned within the City’s jurisdiction (i.e., along the east leg of the intersection) does not extend into the County’s jurisdiction (i.e., along the west leg of the intersection). This jurisdictional boundary and transition issue, the immediate proximity of the Alameda Corridor grade separated rail line, and the lack of additional available right-of-way all pose significant challenges to the formulation of any mitigation measure.

c) Finding

No feasible mitigation measures were identified to reduce impacts at the Alameda Street/Firestone Boulevard intersection (CMP Station No. 143/Intersection No. 4). Based on the foregoing, LACCD finds that the proposed project would have significant and unavoidable impacts at the at the Alameda Street/Firestone Boulevard intersection (CMP Station No. 143) during the PM peak hour. This impact is considered significant and unavoidable because no feasible mitigation measures were identified to reduce the significant impact. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures or project alternatives identified in the Draft Subsequent EIR.

d) Reference

For a complete discussion of impacts associated with the circulation system, see Subsection 4.12 Transportation and Traffic, p. 4.12-38 of the Draft Subsequent EIR.
CUMULATIVE ENVIRONMENTAL EFFECTS

Draft Subsequent EIR Section 4.14

CEQA defines cumulative impacts as two or more individual actions that when considered together compound environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis provides a reasonable forecast of future environmental conditions and gauges the effects of a series of projects. Table 4.14-1 in the Draft Subsequent EIR lists current planned and pending projects in the City of South Gate and surrounding communities.

AESTHETICS

Implementation of the proposed project in combination with the related projects would result in the infill of a densely developed urban area. While many of the related projects, including the proposed project, would be visible from public and private properties, the vast majority of the related projects are too distant from each other to have a combined aesthetic effect. Likewise, shadow impacts associated with individual buildings are isolated in nature and do not contribute to additive effects. The proposed project would result in less-than-significant impacts related to aesthetics. Review and approval of each of the related project’s plans by their respective jurisdictions would ensure that the related projects do not degrade the character of the surrounding area and are designed in accordance with adopted plans and regulations related to aesthetics. Therefore, impacts related to aesthetics would not be cumulatively considerable.

AIR QUALITY

Cumulative impacts for criteria air pollutants are first determined by assessing if the proposed project would result in a significant project-level impact related to regional air quality based on SCAQMD significance thresholds. If the project exceeds SCAQMD thresholds, is part of an ongoing regulatory program, or is contemplated in a Program EIR, and the related projects are located within approximately one mile of the project site, the additive effects of related projects are considered. As the proposed project is not part of an ongoing regulatory program, project-specific air quality impacts were used to determine the potential cumulative impacts to regional air quality. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions. As discussed in Section 4.2 Air Quality of the Draft Subsequent EIR, the proposed project would not result in significant air quality impacts. As a result, the proposed project would not affect SCAQMD's forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. Therefore, impacts related to air quality would not be cumulatively considerable.

CULTURAL RESOURCES

Impacts associated with historic resources are isolated in nature and typically do not contribute to additive effects on a particular geographic location. The geographic context of this cumulative historic resource analysis is the California Register-eligible South Gate Historic District. The South Gate Historic District is comprised of the project site and the adjacent HON site. The South Gate Shopping Center (Related Project No. 3), would be located on the HON site. Implementation of this shopping center would likely result in the removal of historical resources associated with the South Gate Historic District. As the
proposed project would also result in the removal of a historical resource associated with the South Gate Historic District, implementation of the proposed project, in combination with the South Gate Shopping Center project, would compound impacts to the South Gate Historic District. Therefore, impacts related to historical resources would be cumulatively considerable and a significant cumulative impact would occur. Potential impacts to cultural resources from related projects would be assessed on a case-by-case basis, and, if necessary, would be required to implement appropriate mitigation measures. Impacts related to archeological, paleontological, and human remains resulting from the proposed project have been mitigated to a less-than-significant level. Therefore, impacts related to archeological, paleontological resources, and human remains would not be cumulatively considerable.

GEOLOGY AND SOILS

Geotechnical hazards are site-specific, and there is little cumulative geological relationship between the proposed project and the related projects. Nonetheless, cumulative development would increase the population in the area, thus increasing the risk of exposure to seismically-induced hazards. The proposed project involves grading and excavation for the construction of buildings and a parking structure. However, similar to the proposed project, the related projects would be subject to local, State, and federal regulations, including California Building Code requirements. Therefore, with adherence to such regulations, impacts related to geology and soils would not be cumulatively considerable.

GREENHOUSE GAS EMISSIONS

The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA’s existing cumulative impacts analysis. Consequently, the project-level analysis, provided in Section 4.5 Greenhouse Gas Emissions in the Draft Subsequent EIR, also represents the cumulative GHG analysis. The GHG analysis determined that the proposed project would not result in significant impacts, and would be consistent with applicable GHG plans, policies, and regulations. Therefore, impacts related to greenhouse gas emissions would not be cumulatively considerable.

HAZARDS AND HAZARDOUS MATERIALS

Each of the related projects would be required to evaluate their respective public health and safety impact on a project-by-project basis. The geographic area affected by potential cumulative hazards and hazardous materials impacts would depend on the migration characteristics of the hazardous materials as they are released into the soil, air, or groundwater. Similar to the proposed project, which was determined to have less-than-significant impacts with the implementation of identified mitigation measures, the related projects would also be required to mitigate any potential hazards and hazardous materials concerns prior to implementation. Likewise, the related projects are expected to be constructed and operated in accordance with applicable hazardous materials laws, statutes, and regulations. Therefore, impacts related to hazards and hazardous materials would not be cumulatively considerable.

HYDROLOGY AND WATER QUALITY

Each of the related projects would be required to evaluate their respective hydrology and water quality impact on a project-by-project basis. Compliance with State and federal requirements, including development of a Storm Water Pollution Prevention Plan for project construction, and adherence to local regulations for construction and operation of new developments would be required for the related projects and the proposed project. This compliance would mitigate any potential cumulative impacts by requiring onsite detention, treatment, or other best management practices for controlling urban runoff. Therefore, impacts related to hydrology and water quality would not be cumulatively considerable.
LAND USE AND PLANNING

The cumulative growth in housing and development associated with the related projects would alter the composition of existing land uses in the area. Based on information available regarding the related projects, it is reasonable to assume that development of the related projects would implement and support local and regional planning goals and policies. It is expected that the related projects would be compatible with the zoning and land use designations for each of the related project sites and their surrounding properties.

However, potential land use and planning impacts would be evaluated on a project-by-project basis to ensure the related projects and any change in land uses would be consistent with the surrounding land uses and applicable goals and policies for the area. The proposed project is consistent with the existing zoning and General Plan designation of the project site and would not conflict with applicable land use plans and policies. Therefore, impacts related to land use and planning would not be cumulatively considerable.

NOISE AND VIBRATION

Construction

Cumulative construction noise impacts are a localized impact. Construction activities for the proposed project may overlap with the construction of nearby related projects (i.e., the South Gate Shopping Center development on the northeast corner of Firestone Boulevard and Alameda Street). Cumulative construction noise levels were estimated at sensitive receptors using the same methodology presented in Section 4.9 Noise and Vibration. As shown in Table 4.14-2 of the Draft Subsequent EIR, cumulative construction noise levels would exceed the 5-dBA significance threshold at the South Gate Educational Center and residential land uses north, east, and south of the project site. Therefore, without mitigation, impacts related to construction noise would be cumulatively considerable.

Implementation of Mitigation Measures N1 through N3, as described in Section 4.9 Noise and Vibration would assist in the reduction of construction noise levels. Table 4.14-3 presents the mitigated noise levels at the impacted noise-sensitive land uses. As shown in the table below, construction activity would still exceed the 5-dBA significance threshold at the SGEC and the residential land uses north and east of the project site. Therefore, impacts related to construction noise would be cumulatively considerable and a significant cumulative impact would occur.

Operations

When calculating future traffic impacts, the traffic consultant took all related projects into consideration. Thus, the future traffic results without and with the proposed project already account for the cumulative impacts of the proposed project in combination with the related projects. Since the noise impacts are generated directly from the traffic analysis results, future with project noise impacts described in Section 4.9 Noise and Vibration already reflect cumulative impacts. As discussed in Section 4.9, the proposed project would not result in significant operational noise impacts. Therefore, impacts related to operational noise would not be cumulatively considerable.
Vibration

Construction

Although there could be concurrent construction activities occurring at the related project sites and at the proposed project site, the vibration levels from each piece of construction equipment would not be additive due to the rapid rate that vibration levels attenuate. Furthermore, the likelihood of multiple pieces of equipment impacting the ground surface with the same vibration characteristics and operating simultaneously is low. Therefore, impacts related to construction vibration would not be cumulatively considerable.

Operations

The predominant vibration source near the project site is heavy trucks traveling on the local roadways. Neither the proposed project nor related projects would substantially increase heavy-duty vehicle traffic near the project site and would not cause a substantial increase in heavy-duty trucks on local roadways. Therefore, impacts related to operational vibration would not be cumulatively considerable.

POPULATION, HOUSING, AND EMPLOYMENT

There are 43 related projects in the vicinity of the project site. Of these 43 related projects, 9 include the construction of housing units. None of the residential related projects are located in the City of South Gate. Cumulative development would result in a total of 6,644 housing units, which could generate approximately 9,957 new residents (Table 4.14-4 in the Draft Subsequent EIR). The proposed project does not include a housing component. Therefore, impacts related to population and housing growth would not be cumulatively considerable.

Of the 43 related projects, 35 would generate employment. These 35 related projects would create approximately 13,809 new jobs. Including the estimated 105 net new jobs created by the proposed project, the cumulative job generation would be approximately 13,914 jobs. This cumulative employment growth would comprise approximately 4.7 percent of the employment growth for the County of Los Angeles (295,038 jobs) projected by SCAG. The cumulative job growth would not exceed the County of Los Angeles SCAG employment growth. Therefore, impacts related to employment growth would not be cumulatively considerable.

PUBLIC SERVICES

Fire Protection Services

The 43 related projects are all infill developments in a densely developed urban area that currently receives fire protection services. The project site is served by the Los Angeles County Fire Department; however, related projects located outside of the City of South Gate may be served by the City of Los Angeles Fire Department. Regardless, although cumulative development would result in an increase in building area, cumulative development would not expand the service area of the fire protection service provider.

Additionally, all related projects would be required to comply with the latest fire codes. Future impacts to fire protection services would be evaluated on a project-by-project basis to address potentially significant impacts to fire protection services. As disclosed in Section 4.11 Public Services in the Draft Subsequent EIR, the proposed project would result in a less-than-significant impact related to fire protection services. Accordingly, the proposed project in combination with the related projects would not reduce average
emergency responses time to below acceptable levels. Therefore, impacts related fire protection services would not be cumulatively considerable.

**Police Protection Services**

The 43 related projects are all infill developments in a densely developed urban area that currently receives police protection services. Currently, the project site is served by the South Gate Police Department (SGPD); however, with implementation of the proposed project, the FEC would be served by the Los Angeles Sheriff’s Department (LASD) which provides security protection to all LACCD campuses. Related projects located in the City of South Gate would be served by the SGPD. Related projects located outside of the City of South Gate receive police protection services from various providers. As the proposed project would be served by the LASD under contract with the LACCD, the proposed project would not contribute to impacts to police protection service providers serving the related projects. Therefore, impacts related to police protection services would not be cumulatively considerable.

**Public Schools**

Related projects that include a residential component would generate a school-aged population, increase demand for schools, and potentially result in impacts to local schools. These projects would be required to pay school impact fees under SB 50, mitigating potential impacts to a less-than-significant level. The proposed project is the construction and operation of a community college satellite campus and does not include a residential component. Therefore, impacts related to public schools would not be cumulatively considerable.

**Parks and Other Public Services**

**Parks and Recreation**

Cumulative development would result in an increased demand for parks and recreation facilities. As described in Section 4.11 Public Services, the City of South Gate does not meet its open space-to-residents ratio goal and is, therefore, deficient in parkland. Any increase in residents in the City would exacerbate the existing deficiency. None of the related projects located in the City of South Gate include a housing component that would increase the resident population in the City. However, future employees associated with the related projects may utilize parks in the City, increasing demand and potentially resulting in a cumulatively considerable impact. As the proposed project would include an open space component that would serve students and faculty, demand for public parks in the City created by the proposed project would be offset. Therefore, impacts related to parks would not be cumulatively considerable.

**Public Libraries**

The City of South Gate is served by the Los Angeles Public Library (LACPL) system. As a number of related projects include a residential component, demand for public library services provided by the LACPL could increase, potentially resulting in a cumulatively considerable impact. Because the proposed project does not include a residential component and includes the provision of a library that would serve students and faculty, demand for public libraries created by the proposed project would not be significant. Therefore, impacts related public libraries would not be cumulatively considerable.
TRANSPORTATION AND TRAFFIC

The traffic analysis conducted for the proposed project includes regional growth and the 43 related projects under future year conditions. Consequently, the project-level analysis, provided in Section 4.12 Transportation and Traffic in the Draft Subsequent EIR and set forth above, also represents the cumulative traffic analysis. The proposed project would result in significant and unavoidable cumulative impacts at four study intersections in the City of South Gate and two study intersections in the County of Los Angeles. Therefore, impacts related to traffic and transportation would be cumulatively considerable and a significant cumulative impact would occur.

UTILITIES AND SERVICE SYSTEMS

Water

Cumulative impacts related to wastewater treatment and conveyance infrastructure would be evaluated within the geographic context of the jurisdictional boundaries of the City of South Gate. The City of South Gate provides water service to residents, businesses, and other water users in most of the City. Of the 43 related projects, 8 are within the City of South Gate. The total estimated water usage of these related projects and the proposed project is listed in Table 4.14-5. The total water usage of the proposed project and the eight related projects is estimated to be approximately 480,465 gpd, accounting for approximately 0.07 percent of the City’s remaining water supply. Accordingly, water usage of the proposed projects in combination with the related projects would not exceed available City water supplies. Therefore, impacts related to water supply would not be cumulatively considerable.

Wastewater

Cumulative impacts related to wastewater treatment and conveyance infrastructure are evaluated within the geographic context of the jurisdictional boundaries of the City of South Gate and the Sanitation Districts of Los Angeles County (LACSD). Of the 43 related projects, 8 are within the City of South Gate and the service area of the LACSD. The total estimated wastewater generation of the eight related projects and the proposed project is listed in Table 4.14-6. The total wastewater generation of the proposed project in combination with the related projects is approximately 283,292 gpd, accounting for approximately 0.2 percent of the remaining treatment capacity of the LACSD Joint Water Pollution Control Plant (JWPCP).

Accordingly, wastewater generated by the proposed project in combination with the related projects would not exceed available treatment capacity of the JWPCP. In addition, the proposed project, and the related projects would not cause the JWPCP to exceed applicable wastewater treatment requirements because the JWPCP operates under a NPDES permit and is required to comply with all Los Angeles Regional Water Quality Control Board (LARWQCB) wastewater treatment requirements. Therefore, impacts related to wastewater would not be cumulatively considerable.

Solid Waste

Cumulative impacts related to solid waste is evaluated within the geographic context of the jurisdictional boundaries of the City of South Gate. Of these 43 related projects, 8 are within the City of South Gate. The total estimated solid waste generation of the eight related projects and the proposed project, is listed in Table 4.14-7. The total solid waste generation of the proposed project in combination with the eight related projects is approximately 26,542 pounds, or 12 tons, per day (ppd). Solid waste generated by the proposed project and related projects accounts approximately four percent of the maximum intake capacity of the landfills serving the City of South Gate. Accordingly, the disposal of solid waste generated
by the proposed project in combination with the eight related projects would not exceed intake capacity of the landfills serving the City. Therefore, impacts related to the solid waste would not be cumulatively considerable.

Electricity

Cumulative impacts related to electricity would be evaluated within the geographic context of the jurisdictional boundaries of the Southern California Edison (SCE) service area. Related projects within the Cities of South Gate, Lynwood, Downey, Huntington Park and unincorporated Los Angeles County are within the service area of SCE. The total estimated electricity usage of the related projects within these five jurisdictions and the proposed project is listed in Table 4.14-8. The total electricity usage of the proposed project in combination with all related projects is approximately 230 million kilowatt-hour per year, approximately 0.1 percent of the total electricity SCE supplied to its customers in 2010. The estimated electricity usage of the proposed project in combination with related projects represents a nominal amount of the electricity SCE is capable of generating and supplying to its customers. Accordingly, the proposed project and related projects is not anticipated to cause SCE to expand existing, or construct new electricity generating facilities. In addition, the proposed project and related projects are required to comply with all applicable local and State energy codes and conservation requirements. Compliance local and State energy codes and conservation requirements would ensure the proposed project and related projects would not result in the wasteful or inefficient use of energy. Therefore, impacts related to electricity would not be cumulatively considerable.

Natural Gas

Cumulative impacts related to wastewater treatment and conveyance infrastructure would be evaluated within the geographic context of the jurisdictional boundaries of the Southern California Gas Company (SoCalGas) service area. All 43 related projects and the proposed project are within the service area of SoCalGas. The total estimated natural gas usage of the related projects and the proposed project are within the service area of SoCalGas. The total estimated natural gas usage of the related project and the proposed project is listed in Table 4.14-9. The total natural gas usage of the proposed project in combination with the 43 related projects is approximately 33 million cubic feet per month of natural gas, accounting for less than one percent of the monthly interstate natural gas pipeline capacity. The estimated natural gas usage of the proposed project and related projects represents a nominal amount of natural gas that SoCalGas is capable of supplying to its customers. Accordingly, the proposed project and related projects are not anticipated to cause SoCalGas to expand existing, or construct new natural gas generating facilities. In addition, the proposed project and related projects is required to comply with all applicable local and State energy codes and conservation requirements. Compliance local and State energy codes and conservation requirements would ensure that the proposed project, and related projects would not result in the wasteful or inefficient use of energy. Therefore, the impacts related to natural gas would not be cumulatively considerable.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Draft Subsequent EIR p. 6-2

CEQA Guidelines Section 15126.2(c) requires a discussion of significant irreversible environmental effects that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a
previously inaccessible area) generally commit future generations to similar uses. Also irreversible
damage can result from environmental accidents associated with the project. Irreversible commitments of
resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental effects if any of the following
would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from potential environmental
  accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed project consists of the construction and operation of a new ELAC satellite campus; the
FEC. As discussed in Section 4.6 Hazards and Hazardous Materials in the Draft Subsequent EIR,
construction and operation of the proposed project would not create a significant hazard to the public.
Therefore, the proposed project would not result in irreversible damage resulting from an environmental
accident associated with the proposed project, but would generally commit future generations to similar
uses. Resources that will be permanently and continually consumed by operation of the proposed project
include water, electricity, natural gas, and fossil fuels. As discussed in Section 4.13 Utilities and Service
Systems, in accordance with LACCD directives, the FEC will be designed and constructed using the
USGBC LEED-NC rating system, with the goal of reaching the highest certification level feasible. As
part of achieving a LEED certification, the proposed project would implement energy and water
efficiency features. These features would reduce the proposed projects consumption of resources and
ensure that the proposed project would not result in the wasteful or inefficient use of resources. It is also
possible that new technologies or systems will emerge or will become more cost-effective or user-friendly
that will further reduce the project site’s reliance upon nonrenewable natural resources. Accordingly, the
use of energy on-site would occur in an efficient manner and is justified as it will be consumed by a new
community college satellite campus serving the community. Therefore, the proposed project would not
result in any significant irreversible effects.

GROWTH-INDUCING IMPACTS

Draft Subsequent EIR p. 6-3

CEQA Guidelines Section 15125.2(d) requires that growth inducing impacts of a proposed project be
considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster
economic or population growth or the construction of additional housing, either directly or indirectly, in
the surrounding environment. According to the CEQA Guidelines, such projects include those that would
remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In
addition, as set forth in the CEQA Guidelines, increases in population may tax existing community
service facilities, requiring construction of new facilities that could cause significant environmental
effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily
beneficial, detrimental or of little significance to the environment.

As analyzed in Section 4.10 Population, Housing and Employment in the Draft Subsequent EIR, the
proposed project would not directly induce population growth, but would create new jobs in the City. The
proposed project would accommodate up to 9,000 students. To serve the projected student population,
approximately 105 new jobs would be created by the proposed project. The existing 57 jobs associated
with the SGEC that would be retained and relocated to the FEC. New jobs on the project site are anticipated in the City of South Gate General Plan Community Design Element and desired by the City. It is not anticipated that these new jobs would cause individuals to relocate to the City of South Gate, resulting in population growth, as these jobs can be filled by existing City of South Gate residents or residents of nearby communities. Therefore, the proposed project would not indirectly induce population growth.

The proposed project would result in a net increase in LACCD students and employees in the area. This increase in activity in the area would increase demand for commercial goods and services and community facilities. These demands could be met by existing businesses and community facilities in the area, and the proposed open space areas and facilities including library and exercise rooms. However, as the student enrollment capacity is reached, the demand for commercial goods and services may increase resulting in the need for new businesses. Therefore, the proposed project could foster economic growth.

**ALTERNATIVES TO THE PROPOSED PROJECT**

**Draft Subsequent EIR pp. 5-1 through 5-10**

The lead agency need not consider every conceivable alternative. However, an EIR shall discuss the rationale for selection and elimination of alternatives. Among the factors that may eliminate alternatives from meriting a detailed discussion are “failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts (CEQA Section 15126.6 [c])”.

The following project objectives have been identified for the proposed project:

1. Provide a full-service education center to replace the existing SGEC and create a true campus environment for ELAC’s satellite campus;
2. Provide greater capacity to adequately serve the existing and future demand for higher education facilities in the southeast Los Angeles County region;
3. Develop and implement plans and procedures to enhance ELAC satellite campus’ visibility and reputation for quality;
4. Foster a culture of academic excellence by strengthening the educational programs offered at the ELAC satellite campus that will lead directly to greater student success;
5. Create community-oriented development that successfully serves students and the community; and
6. Provide economic benefits to the City of South Gate and its residents.

The following three alternatives were considered and eliminated from consideration in the Draft Subsequent EIR:

**Expansion of the Existing South Gate Educational Center (SGEC)**. This alternative was eliminated because unlike the project site, LACCD does not own the existing SGEC site. Additionally, there is not enough available land to expand the SGEC to accommodate up to 9,000 students. Other constraints including roadways and hazardous materials concerns also prevent the expansion of the SGEC onto adjacent sites. Therefore, this alternative was eliminated from consideration.

**Alternate Site**. The Ameron International Concrete Pipe Manufacturing Facility is located in an industrial area at Atlantic Avenue/Firestone Boulevard intersection in the City of South Gate. The approximately 35-acre site was previously considered and an EIR was initiated for this site. Ultimately,
this site was eliminated from consideration due to hazardous materials concerns with the property. This site has since been purchased and is no longer available for acquisition.

**Reduced Size Alternative.** Reducing the size of the proposed FEC may reduce or eliminate traffic impacts related to the proposed project; however, a reduced size alternative would not meet the proposed project’s objective of providing greater capacity to adequately serve the existing and future demand for higher education facilities in the southeast Los Angeles County region. Additionally, Alternative 5 would not eliminate the significant and unavoidable historical resource impact resulting from the removal of Building 4. Therefore, this alternative was eliminated from consideration.

In addition to the proposed project, the Draft Subsequent EIR evaluated a No Project Alternative, and a Historic Preservation Alternative.

**NO PROJECT ALTERNATIVE**

**Description of Alternative**

The No Project Alternative is required by CEQA Guidelines Section 15126.6 (e)(2) and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not necessarily mean that development on the project site will be prohibited. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]). In this case, the No Project Alternative assumes the project site would eventually be re-occupied with industrial uses, and the existing South Gate Education Center (SGEC) would continue to operate at its current location.

**Impact Summary for No Project Alternative**

The No Project Alternative is evaluated in Subsection 5.0 Project Alternatives of the Draft Subsequent EIR. Most of the project-related impacts described throughout the Draft Subsequent EIR would be less or similar to the proposed project. Impacts related to Air Quality, Greenhouse Gas Emissions, Land Use and Planning, and Noise and Vibration would be the exception.

The No Project Alternative would involve less construction activity than the proposed project, and construction air quality impacts under Alternative 1 would be less than the proposed project. With regard to operational air quality emissions, it is not possible to know what type of industrial use would reoccupy the project site; however, it is likely that a future industrial use would generate more NOx emissions than the proposed project. Therefore, operational air quality impacts would be greater than the proposed project.

Under the No Project Alternative, the project site would be re-occupied with an industrial use. Again, while it is not possible to know what type of industrial use would reoccupy the project site, a future industrial use would include stationary sources and vehicular emissions. Daily and regional greenhouse gas emissions from an industrial use could exceed the SCAQMD significance thresholds. Therefore, impacts related to greenhouse gas emissions under the No Project Alternative would be greater than the proposed project.

The preservation of industrial land uses in the Los Angeles region is an increasing concern, and the No Project Alternative would result in industrial land uses being preserved. In addition, the No Project Alternative would maintain consistency with the existing land use designation and zoning for the project site. However, the City of South Gate’s General Plan states that the project site should be rehabilitated
and adaptively reused to create the South Gate College District. Therefore, the No Project Alternative would conflict with the City’s plans for the project site. Therefore, impacts related to land use and planning under the No Project Alternative would be greater than the proposed project.

Under the No Project Alternative, no new buildings would be constructed on the project site; however it is likely that some renovation activities associated with the re-occupation of Building 4 would occur resulting in temporary construction noise and vibration. However, the No Project Alternative would involve less construction activity than the proposed project, and construction noise and vibration impacts under the No Project Alternative would be less than the proposed project. With regard to operational noise and vibration, it is not possible to know what type of industrial use would reoccupy the project site; however, it is likely that a future industrial use would generate more noise and vibration than the proposed project. Therefore, operational noise and vibration impacts would be greater that the proposed project. Given that construction activities are temporary, impacts related to noise and vibration under the No Project Alternative would be greater than the proposed project.

Finding/Rationale

Under the No Project Alternative, new college facilities would not be constructed. Therefore, the higher education facilities needed to accommodate future enrollment levels in the in the East Los Angeles region would not be provided (objectives 2, 5, and 6), students would be required to continue to commute to the main ELAC campus to supplement their coursework (objectives 1, 2, 3, and 4) and, therefore, none of the project objectives would be met. The No Project Alternative assumes that the project site would eventually be re-occupied with industrial and warehouse uses. It is likely that an industrial use would generate more emissions than the proposed project stemming from the use of equipment and heavy trucks. Similarly, industrial operations are assumed to generate more noise than the proposed project. Therefore, impacts related to Air Quality, Greenhouse Gas and noise would be greater than the proposed project. In addition, while the No Project Alternative would maintain consistency with the existing land use designation and zoning for the project site, the City of South Gate’s General Plan states that the project site should be rehabilitated and adaptively reused to create the South Gate College District. The No Project Alternative would conflict with the City’s adopted plans for the project site.

It is found pursuant to PRC Section 21081 (a)(3) and State CEQA Guidelines Section 15126.6(c), that this alternative fails to meet any of the basic proposed project objectives, and LACCD finds that this alone is sufficient justification on its own to reject this alternative in favor of the proposed project. Additionally, the No Project Alternative would cause greater environmental effects in addition to those caused by the proposed project. This fact, although not sufficient on its own to reject the alternative, coupled with the failure to meet project objectives further supports rejection of this alternative in favor of the project. Therefore, LACCD rejects this alternative.

HISTORIC PRESERVATION ALTERNATIVE

Description of Alternative

Alternative 2 assumes that Building 4, which has been identified as a contributor to a California Register-eligible district, would not be demolished. The Historic Preservation Alternative assumes that Building 4 would be retained and rehabilitated for college programming. Alternative 2 would not require the construction of a new building for college uses; however, similar to the proposed project, a parking structure would be constructed on-site to provide parking for the college. Vehicular access to the FEC campus would be exclusively from Firestone Boulevard. Consistent with the proposed project, student enrollment would not exceed 9,000 students under Alternative 2.
Impact Summary for Historic Preservation Alternative

The Historic Preservation Alternative is evaluated in Subsection 5.0 Project Alternatives of the Draft Subsequent EIR. Under the Historic Preservation Alternative, the unavoidable significant impact related to the Circulation System and the Congestion Management System would still occur; however, the significant and unavoidable impact related to historical resources that has been identified as a result of the proposed project would be avoided. In addition, construction noise and vibration impacts under the Historic Preservation Alternative would be less than the proposed project as this alternative would involve less construction activity than the proposed project. All other impacts would be similar to the proposed project. Further detail concerning these impacts follows:

The retention and rehabilitation of Building 4 would reduce impacts to scenic resources under Alternative 2, compared to the proposed project. However, the new parking structure would create light and glare impacts and shade and shadow impacts, consistent with the proposed project. Visual improvements that would occur under the proposed project would also occur under Alternative 2 and the visual character of the project site would be similar.

Alternative 2 would involve less construction activity than the proposed project, and construction air quality impacts under Alternative 2 would be less than the proposed project. However, with regard to operational air quality emissions, Alternative 2 would result in the same emissions as the proposed project and the same number of students could be enrolled at the FEC.

A significant and unavoidable impact related to historical resources would be avoided unlike the proposed project. Renovations to the existing buildings would be required to conform to the Secretary of the Interior’s Standards, as the project site was determined to be eligible as a California Register Historic District. The construction of a new parking structure under Alternative 2 would result in earth moving activities that have the potential to impact cultural resources, similar to the proposed project. As the significant and unavoidable impact to historical resources would be avoided under, impacts related to cultural resources under Alternative 2 would be less than the proposed project.

During rehabilitation of Building 4, asbestos containing materials and lead based paint would be encountered, consistent with the proposed project. Therefore, impacts related to hazards and hazardous materials under Alternative 2 would be similar to the proposed project.

Alternative 2 would involve less construction activity than the proposed project, and construction noise and vibration impacts under Alternative 2 would be less than the proposed project. However, with regard to operational noise and vibration, Alternative 2 would generate the same noise and vibration as the proposed project, as the same number of students would be enrolled. Therefore, impacts related to noise and vibration under Alternative 2 would be less than the proposed project.

Similar to the proposed project, student enrollment would not exceed 9,000 students, and the same number of daily trips would be generated as the proposed project. Therefore, impacts related to traffic under Alternative 2 would be similar to the proposed project.

The demand for utilities would also be the same as the proposed project. Therefore, impacts related to utilities and service systems under Alternative 2 would be similar to the proposed project.

Finding/Rationale

Retaining Building 4 would have a negative impact on utilization of the site, as Building 4 blocks access to the project site from Santa Fe Avenue and limits the location to where the parking structure could be
located. Constructed later than the others, Building 4 has no special architectural character and is purely utilitarian. Structural evaluation of its steel frame indicates major strengthening would be required to bring the building up to current seismic codes, and renovating it would likely be as costly as new construction and would still result in a building poorly suited to the college’s needs. Therefore, although the alternative would, upon extensive renovation, provide greater capacity for student enrollment (objective 1), this alternative would not enhance the visibility and reputation of the ELAC campus for quality (objective 2), would not create a true campus environment for the ELAC campus (objective 1), and, without major renovation, would not create a community-oriented development (objective 5).

From an environmental standpoint (excluding project objectives), the Historic Preservation Alternative is environmentally superior to the proposed project because it avoids the impact to historical resources and does not create additional adverse environmental impacts. However, this alternative would not avoid the significant and unavoidable traffic impacts to the circulation system and consistency with the CMP.

Therefore, it is found pursuant to PRC Section 21081 (a)(3) and State CEQA Guidelines Section 15126.6(c), that this alternative fails to meet basic proposed project objectives, and that this is sufficient justification to reject this alternative in favor of the project. Therefore, LACCD rejects this alternative.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives. A summary of the two alternatives’ impacts relative to the proposed project are shown Table 5-1.

Alternative 1 would eliminate the significant and unavoidable impacts related to cultural resources and likely eliminate the transportation and traffic impacts that would occur under the proposed project. However, as the No Project Alternative assumes that the project site would eventually be re-occupied with industrial uses, it is likely that a future industrial use would generate greater air quality, greenhouse gas, and noise impacts than the proposed project. In addition, while the No Project Alternative would maintain consistency with the existing land use designation and zoning for the project site, the City of South Gate’s General Plan states that the project site should be rehabilitated and adaptively reused to create the South Gate College District. Therefore, the No Project Alternative would prevent the City of South Gate from achieving its vision of the South Gate College District and impacts related to land use would be greater than the proposed project.

Alternative 2 would have lesser impacts related to the cultural resources than the proposed project as the significant and unavoidable impact related to historical resources as a result of the proposed project would be avoided. All other impacts would similar to the proposed project. Of the two alternatives, Alternative 2 would be considered the environmentally superior alternative because it avoids the impact to historical resources and does not create additional adverse environmental impacts.

FINDINGS REGARDING OTHER CEQA CONSIDERATIONS

Findings

The Subsequent EIR evaluated the following environmental potential project and cumulative impacts: Aesthetics; Air Quality; Cultural Resources; Geology & Soils, Greenhouse Gas Emissions, Hazards &
Hazardous Materials, Land Use & Planning; Noise & Vibration; Population, Housing & Employment, Public Services, Transportation & Traffic and Utilities and Service Systems. The significant environmental impacts of the proposed project and the alternatives were identified in the text and summary of the Draft Subsequent EIR. The significant environmental impacts which cannot be mitigated to a less than significant level include: Cultural Resources (Historical Resources), Noise (Construction), and Transportation and Traffic (Circulation and Congestion Management Plan).

Conclusions

All significant environmental impacts from the implementation of the project have been identified in the Subsequent EIR and, with implementation of the Mitigation Measures identified, will be mitigated to a less than significant level, except for the impacts listed in subsection A above.

Other reasonable alternatives to the project which could feasibly achieve the basic objectives of the Project have been considered and rejected in favor of the project. Environmental, economic, social and other considerations and benefits derived from the development of the Project override the significant and unavoidable impact of the project identified in subsection A.

STATEMENT OF OVERRIDING CONSIDERATIONS

The Subsequent EIR has identified significant and unavoidable impacts that will result from implementation of the proposed project. Section 15093(b) of the CEQA Guidelines provides that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record.

The following impacts were not mitigated to a less-than-significant level:

- **Cultural Resources (Historical Resources).** Due to the removal of Building 4 and its connections to Building 3, the proposed project would create significant and unavoidable impacts related to historical resources. Mitigation measures are proposed to address these impacts; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Noise (Construction).** Noise generated by construction of the proposed project would exceed the City’s significance threshold at residential land uses north and east of the proposed project site resulting in significant and unavoidable impacts related to noise. Mitigation measures are proposed to address this impact; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Transportation and Traffic (Circulation System and Congestion Management Plan).** New vehicle trips resulting from the proposed project would create significant and unavoidable impacts related to the circulation system (i.e., intersection operations and Congestion Management Plan [CMP]). Mitigation measures are proposed to address impacts related to the circulation system; however, no feasible mitigation measures were identified to reduce all of the significant impacts to a less-than-significant level. No feasible mitigation measures were identified to reduce the significant impact related to the CMP (i.e., intersection) to a less-than-significant level.

The project alternatives would not satisfy the project objectives as effectively as the proposed project. As discussed above, the Historic Preservation Alternative is not practical in terms of function, economic value, and the needs of the college, and the No Project Alternative would not satisfy LACCD or City of
South Gate objectives for the project site. Accordingly, the LACCD adopts the following Statement of Overriding Considerations. The LACCD recognizes that significant and unavoidable impacts will result from implementation of the proposed project.

Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible alternatives to the proposed project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the proposed project against the proposed project’s significant and unavoidable impacts, LACCD hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

- The proposed project would replace the existing South Gate Educational Center (SGEC), which lacks adequate facilities and curriculum offerings, and the proposed project would provide facilities for a full range of curriculum offerings and other student related services.

- The proposed project would result in the replacement of a dated structure with a LEED certified green building structure that will promote sustainability.

- The proposed project will fill a demonstrated existing and growing educational need in the East and Southeast Los Angeles low income areas which are currently underserved by full service community college facilities.

- The proposed project would contribute to the socioeconomic mobility of these communities by providing training and re-training in a wide variety of careers.

- The proposed project would provide additional and improved outdoor amenities and open spaces for student and faculty enjoyment, and would also enhance the visual character of the campus.

- The proposed project would include active and passive recreation space, amenities for performances and ceremonies, public art, and greenery and shade to enhance the college campus community experience for students.

- The proposed project would reduce unnecessary vehicular trips and/or result in shorter vehicle trips by eliminating the need for students to commute between the main East Los Angeles College campus in Monterey Park and the satellite educational center in South Gate to attend a full range of courses and student services. These changes in trips would contribute to improved air quality.

- The proposed project would retain most of the Firestone Rubber Plant historic buildings, important visual landmarks in the City of South Gate.

- The proposed project would help achieve a key element of the City of South Gate General Plan in providing an "anchor" to the City's envisioned "College District", which includes the project site.

- The expanded development and operation of the proposed project with a substantial increase in student enrollment over time will provide economic benefits to the City of South Gate as students would support surrounding local businesses and seek other nearby commercial services.

These overriding considerations of economic, social, aesthetic, and environmental benefits for the proposed project justify adoption of the proposed project and certification of the completed Subsequent EIR. Each of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the proposed project.