Draft Initial Study / Mitigated Negative Declaration

Paramount UMC Mixed-use Senior Assisted Living Facility

Case Numbers:

General Plan Amendment No. 22-1 / Zone Change No. 239
Development Review Application No. 22:001

LEAD AGENCY:

City of Paramount
Planning Department,
Planning Division
16400 Colorado Avenue
Paramount, CA 90723
Contact: John Carver, Planning Director

APPLICANT:

ZT Architecture +
Land Development Inc.
5757 W. Century Blvd. Suite 700
Los Angeles, CA 90045

PREPARED BY:

ENVICOM CORPORATION
4165 E. Thousand Oaks Blvd., Suite 290
Westlake Village, CA 91362
Contact: Tim Rosenstein
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(818) 879-4700

November 2022

PARAMOUNT UMC MIXED-USE SENIOR ASSISTED LIVING FACILITY
DRAFT INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

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1.0 INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to disclose and evaluate the environmental impacts of the 60-unit Paramount UMC (United Methodist Church) Mixed-Use Senior Assisted Living Facility ("project"), to be located on an approximately 1.04-acre infill site at 16635-16683 Paramount Boulevard ("project site" or "site") in the Central Business District (CBD) in the City of Paramount (City).

PROJECT SUMMARY

The project proposes to redevelop three parcels totaling 1.04 acres (45,500 square-feet) which currently contain three vacant structures including a church complex, an auto repair garage, and a bar. The church complex consists of a chapel and community building with an approximately 21,200 square-foot footprint and 8,000 square-foot surface parking lot. The auto repair garage is approximately 2,200 square-feet with a 5,200 square-foot parking lot, and the bar is approximately 2,500 square-feet with a 1,900 square-foot parking lot. The project will demolish the existing buildings and associated hardscape and construct an approximately 100,000 gross square-foot, three-story senior living facility to house up to 105 residents within 60 units. Units consist of seven independent living units, six of which will be income-restricted, and 15 single-occupancy and 38 double-occupancy assisted-living units. The building will include a 67-space, approximately 25,500 square-foot parking garage, administrative offices, classrooms, activity and community rooms, a chapel, kitchens, dining rooms, exercise rooms, outdoor patio areas, and two retail suites. The density of the project will be 57.7 dwelling units per acre. The infill project site is located on a major arterial road within a commercial corridor, in a fully urbanized area surrounded on all sides by developed properties. A general plan amendment and zone change for the northern parcel will be necessary to develop the site. The two southern parcels were previously entitled for a senior living facility and have already had their zoning and plan designation changed for that purpose.

LEGAL AUTHORITY

This IS/MND has been prepared for the City of Paramount, the Lead Agency for the project, in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000–21189) and relevant provisions of the *CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000–15387), as amended.

Initial Study. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

(1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND);
(2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
(3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 states a public agency shall prepare a Negative Declaration or MND for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or

(b) The initial study identifies potentially significant effects, but:

1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

A MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

2.0 FINDINGS OF THIS INITIAL STUDY

The analysis in this IS/MND demonstrates that with the implementation of mitigation measures, the project would have a less than significant impact on the environment with regard to all CEQA Checklist issues. For each issue addressed in Section 4.0, the impacts associated with development of the project have been determined to be "Significant Unless Mitigation Incorporated," "Less than Significant," or "No Impact." For issues that were determined to be "Significant Unless Mitigation Incorporated," mitigation measures have been identified that would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

PROJECT LOCATION AND EXISTING USES

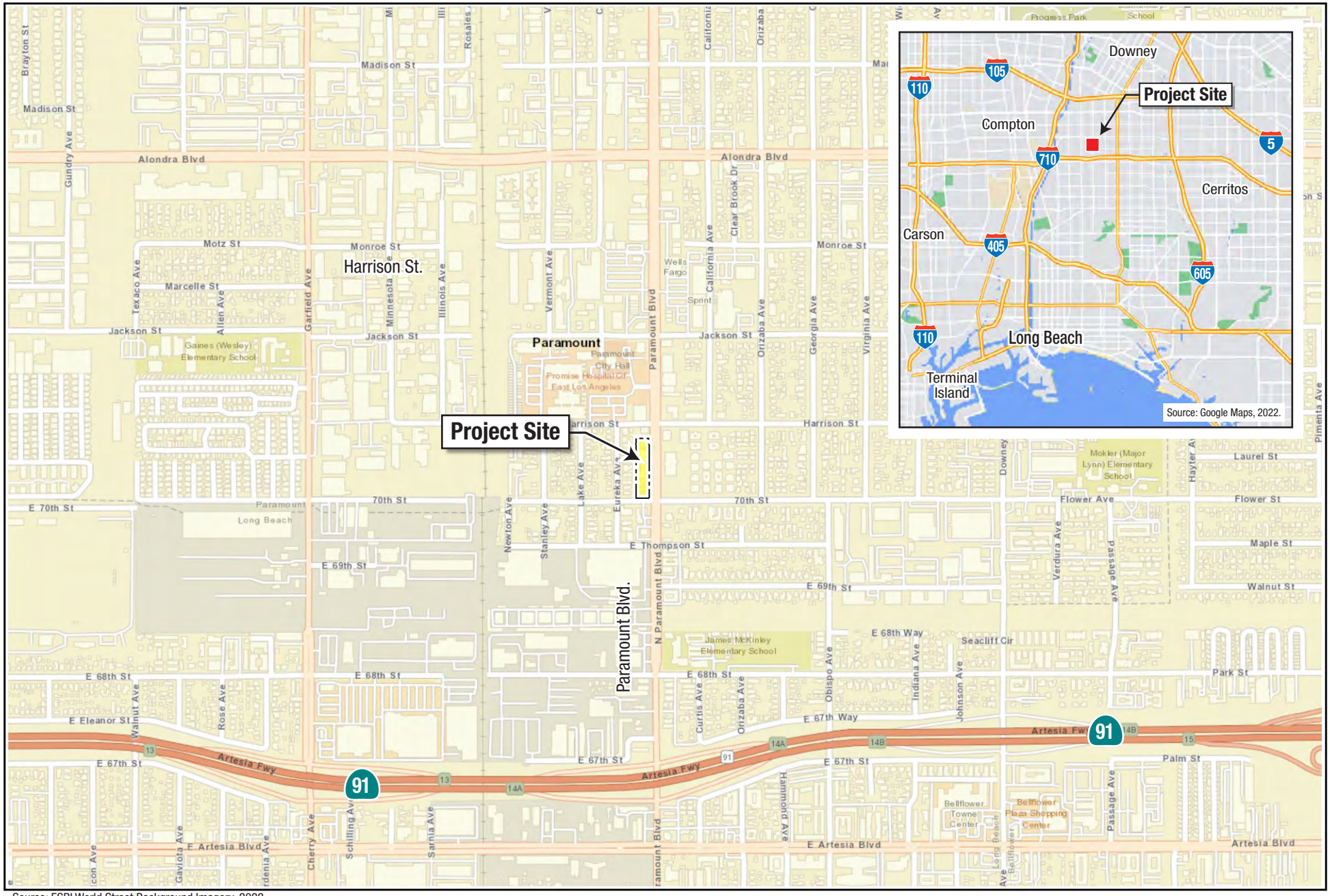
The project site consists of three parcels totaling approximately 1.04 acres (45,500 square-feet) located at the southwest corner of East 70th Street and Paramount Boulevard, extending north along the Boulevard, addressed as 16635 to 16683 Paramount Boulevard. The property is located between Harrison Street to the north and bordered by 70th Street to the south. Paramount Boulevard is a major arterial which bisects the City from north to south, and 70th Street serves as the southern limit of the City. The subject parcels take up roughly 80 percent of the block it occupies, with just one parcel above to the north. An alley serves the rear of the site and separates it from the buildings behind it to the west. The subject properties are developed with a chapel and community building circa 1956 and 1960 to the north, an auto repair garage dating to 1953 in the middle, and a bar originally constructed in the late 1920s in the southernmost parcel. The parcel containing the chapel is zoned C-3 General Commercial, and has a General Plan Designation of Area Plan, lying within the CBD Area Plan. The two parcels below it are zoned PD-PS, Planned Development-Performance Standards, with a land use designation of Mixed-Use Commercial Residential. The Assessor Parcel Numbers (APN) comprising the lots are 7102-031-020, 7102-031-021, 7102-031-022, and 7102-031-024.

The site is within an urbanized area surrounded by a mix of uses. The northernmost lot of the site is currently zoned for commercial activity, while the southern lots have been recently rezoned to allow residential use. All of the parcels are located within the CBD area. This district begins at 70th Street and runs north for roughly a mile, encompassing all of the parcels fronting Paramount Blvd., and includes all of the parcels fronting Alondra Blvd. as it runs east of Paramount Blvd. The southern parcels had their land use designation recently changed so they are no longer bound by Area Plan provisions, and the northern parcel's designation will change with the currently requested entitlement for the same purpose. East of the business district the majority of land is zoned for residential use, both single family and multi-family. West of the business district, occupying roughly 30 percent of the City, is a large area containing properties zoned for manufacturing. Directly adjacent to the west of the project site, beginning on the other side of the alley, is a 0.5 mile block of parcels zoned for medium density residential use. Roughly half of the land within city limits is zoned for manufacturing or commercial activity, and half for residential purposes.

On the next block above the site is the Paramount Civic Center containing City Hall, the Clearwater Building community building, the Kindred Hospital long-term care hospital, and the "Hay Tree" California Historic Landmark No. 1038. The next block to the north contains a large shopping center. The nearest public school is within the City of Long Beach .25 miles to the south. Less than 0.5 miles to the south is State Route 91, and a little under two miles to the east is the 710 freeway. Transit service is available on Paramount Boulevard via Long Beach Transit route 21 and Metro bus routes 265 and 258, and nearby is Metro route 128. Routes 265 and 258 both connect to the Metro Green Line approximately two miles to the north. The project location is shown in **Figure 3.1, Regional Location Map** and **Figure 3.2, Vicinity Map**.

PROJECT COMPONENTS AND OPERATIONS

The project proposes an infill development that would replace three existing buildings with a three-story senior living facility. The ground floor will contain a garage with 67 parking spaces, office and administrative spaces for staff, as well as facilities for public or commercial use/rental including two retail suites, classrooms, a chapel, community center/dining hall with full kitchen, and an outdoor patio. The second floor will contain 28 double-occupancy rooms and seven single-occupancy rooms along with facilities for residents including an outdoor deck, dining hall, living room, library, activity room, gymnasium, physical therapy suite, and administrative offices. The third floor will contain 12 double-

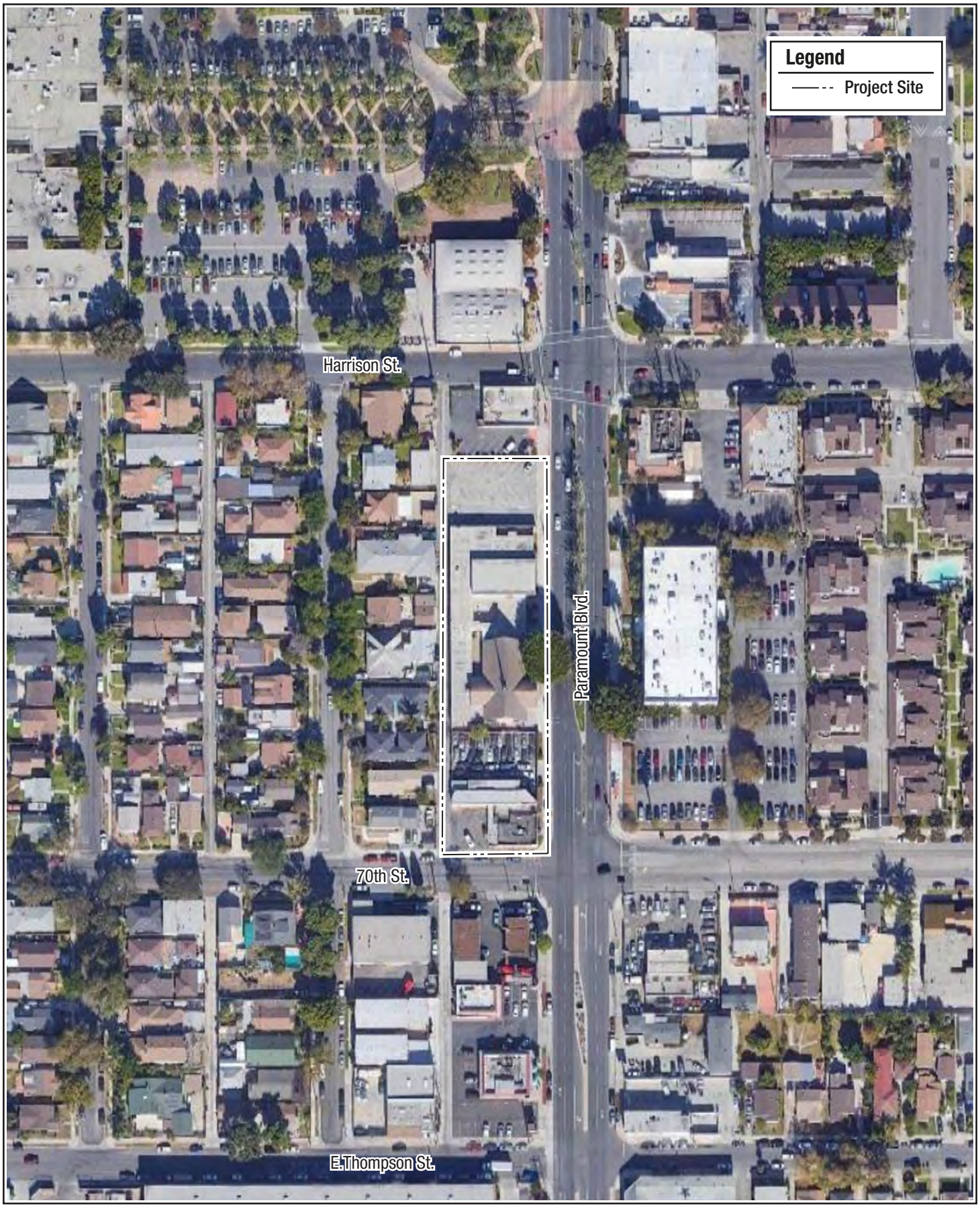


Source: ESRI World Street Background Imagery, 2022.

Regional Location Map

FEET 0 500 1,000

FIGURE 3.1



Aerial Source: Google Satellite Imagery, Feb. 6, 2020.

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Vicinity Map

FEET 0 150 300

FIGURE 3.2

occupancy rooms, six single-occupancy rooms, and seven independent living units, six of which will be income-restricted units, along with two outdoor decks and a lounge for resident use, and an administrative office. The project will provide housing for up to 105 residents in 60 units, with the option for independent living units to house two people each. The building will occupy nearly all of the space on the parcels, with just five-foot setbacks at the front, sides, and a portion of the rear. The building will have a contemporary modern design utilizing materials such as stucco, steel, and plate glass.

During operations the senior assisted living facilities will be classified as a Residential Care Facility for the Elderly, licensed and regulated by the California Department of Social Services, Community Care Licensing Division, providing non-medical care and supervision for persons 60 years or older who may need assistance with the activities of daily living.

The public facilities will be administered by the ownership and provided for rental or free of charge at the discretion of facility management. The chapel will host regular services, and classrooms may be used during the day and in the evening. The commercial suites will be available for lease to businesses. Facility staffing will consist of an estimated 20 full time staff for the senior living facility, and the uses on the ground floor are conservatively estimated to employ up to 15 people; 4-10 employees for the commercial suites and 3-5 for the public facilities (chapel, classrooms, and community center)

Figure 3.3, First & Second Floor Plans shows the proposed first and second floors, and **Figure 3.4, Front Elevation** shows the proposed front elevation.

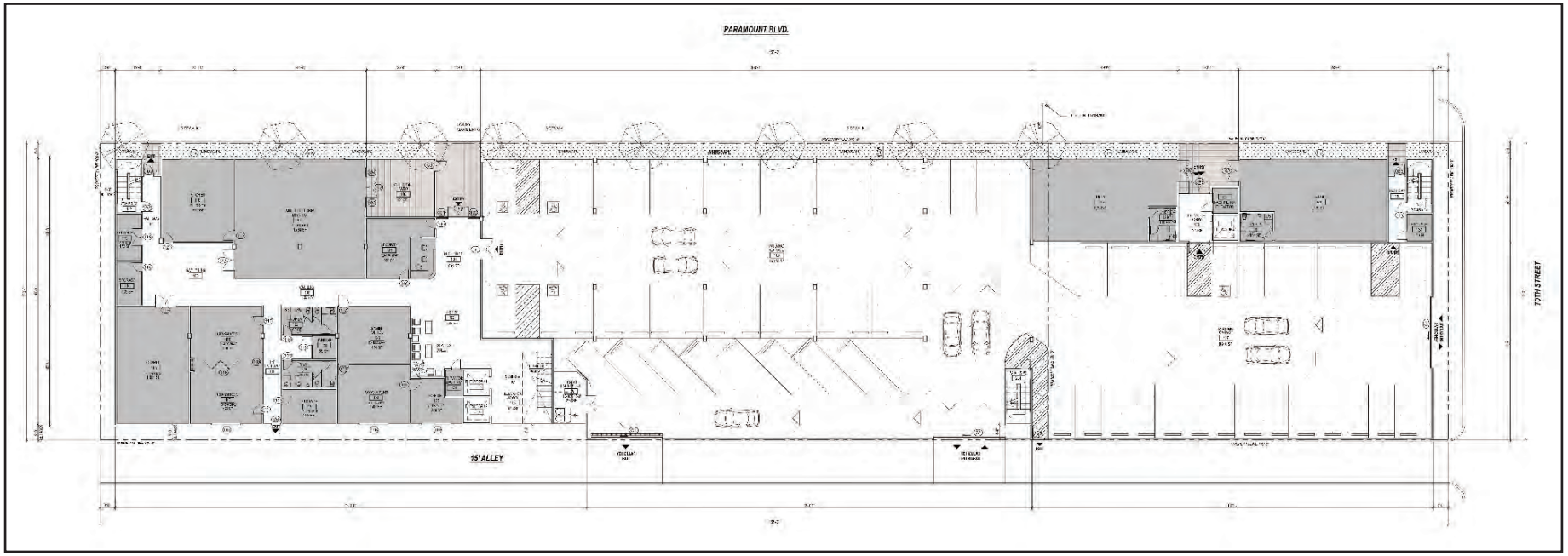
CONSTRUCTION AND EARTHWORK

The infill project would be constructed on a developed, flat property. Construction activities are anticipated to begin in late 2022 with demolition of the site, and the project is expected to be operational by the 4th quarter of 2023. The site is expected to be excavated to eight feet and existing soils recompacted for the base, with up to 2,847 cubic yards of dirt exported from the site.

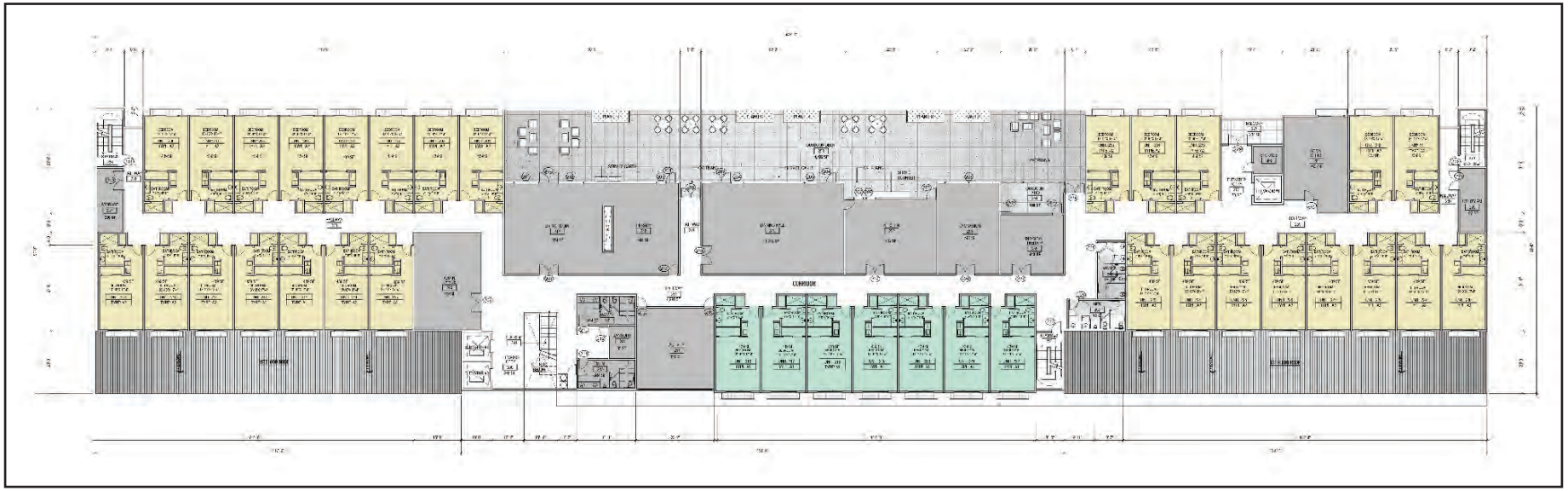
REQUIRED APPROVALS

This IS/MND will serve as the CEQA review document for project implementation, including required City approvals, which would include but may not be limited to of the following:

- General Plan Amendment – from Area Plan to Mixed-Use Commercial Residential
- Zone Change – from C-3 to PD-PS
- Lot Merger – Merger of APNs 7102-031-024, 7102-031-020, 7102-031-021 and 7102-031-022
- Development Review



First Floor Plan

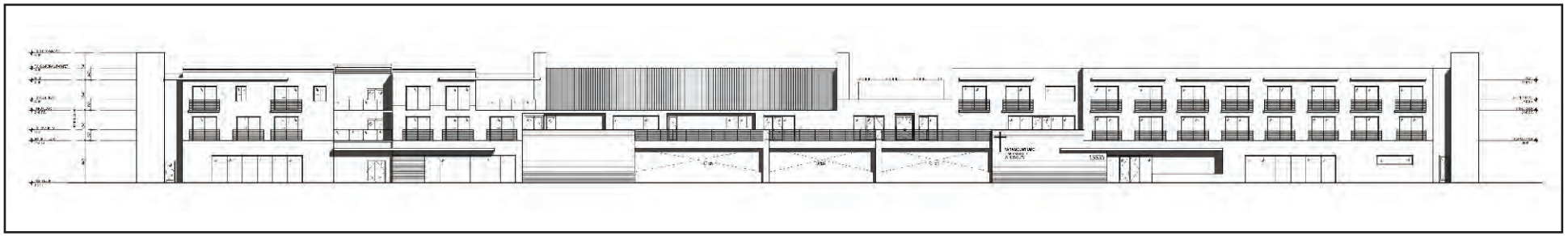


ZT Architecture + Land Development, Mar. 22, 2020.

Second Floor Plan

First & Second Floor Plans

Front Elevation (East)



Conceptual Rendering (Front Elevation)

Source: ZT Architecture + Land Development, Mar. 22, 2020.

Front Elevation

FIGURE 3.4

4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: Paramount UMC Mixed-Use Senior Assisted Living Facility	**ENVIRONMENTAL CASE NO:** N/A	**RELATED CASES:** DRA 20:015 & ZC 230
PROJECT LOCATION: 16635-16683 Paramount Boulevard, Paramount, CA 90723		
EXISTING ZONING: C-3 / PD-PS	**GENERAL PLAN LAND USE:** Area Plan / Mixed-Use Commercial Residential	
LEAD CITY AGENCY: City of Paramount	**ADDRESS:** 16400 Colorado Avenue, Paramount, CA 90723	
STAFF CONTACT: John Carver, Planning Director	**TELEPHONE:** (562) 220-2036	
APPLICANT NAME AND ADDRESS: ZT Architecture + Land Development Inc. 5757 W. Century Blvd. Suite 700 Los Angeles, CA 90045 Attention: Michael Zenon		
PROJECT DESCRIPTION: The project consists of the demolition of existing structures and hardscape on a 1.04 acre (45,500 square-foot) infill development site and construction of an approximately 100,000 gross square-foot, three-story senior living facility, accommodating up to 105 residents within seven independent living units, and 15 single-occupancy and 38 double-occupancy rooms, with a 67-space, approximately 25,500 square-foot parking garage on the ground floor, for a density of 57.7 du/acre. The project will include publicly accessible amenities including two retail suites and a chapel, classrooms, and a dining hall.		
ENVIRONMENTAL SETTING: The project site is located within an urbanized area on a commercial boulevard surrounded by commercial and residential land uses. The Paramount civic center is directly north, to the west on the opposite side of a public alley abutting the project site is a residential subdivision, which borders large manufacturing areas .25 miles to the west. The street at the south of the site is the southern limit of the City (adjacent to the City of Long Beach). Large residential areas lay to the east of the project site, with the mix of surrounding uses within 0.5 miles of the site roughly 45% manufacturing/commercial and 55% residential.		
OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED: N/A		
CALIFORNIA NATIVE AMERICAN CONSULTATION REQUESTED: Gabrieleño Band of Mission Indians-Kizh Nation		

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, an EIR Addendum will be prepared.

Name: John Carver
Title: Planning Director

Signature: _____ Date: _____

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

Impact Analysis

a. No Impact. A project may have a significant impact if the project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks public views of a scenic vista.

Scenic vistas are typically defined as broad sweeping views of a visual resource, such as a cityscape, or a focused view of a scenic element, such as a mountain peak. There are no scenic vistas visible from the project site or Paramount Blvd. adjacent to it. Therefore, the project would have no impact on public views of a scenic vista. The topography of the surrounding area for many miles is generally flat, and the project site is surrounded on all sides by development. This means there are no tall scenic elements to see from the vicinity of the project site, and no broad sweeping views to be had where the project site is within the field of view. Therefore, there would be no impacts on views of a scenic vista.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact would occur if scenic resources within a city-designated scenic highway would be damaged or removed by development of a project.

The project site is not located along a designated scenic highway or visible from a designated scenic highway, and therefore development of the site will not damage any scenic resources within a scenic highway. The nearest known scenic highway is a portion of the Pacific Coast Highway eligible for state

designation that begins in the City of Long Beach roughly 6.5 miles south of the site.[1] Therefore, the project would result in no impact to scenic resources within a city-designated scenic highway.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. Projects in urbanized areas could have a significant impact if they conflicted with local regulations governing scenic quality.

The project site is located within the CBD Area Plan area but only the north parcel is subject to the Area Plan's provisions, and it will have its general plan designation changed to Mixed-Use Commercial Residential as part of the requested entitlement. Architectural guidelines for the CBD were adopted in 1984, however, they are no longer currently in use and are not applicable to the project. There are no design-related overlay zones or citywide design guidelines applicable to the project, and the new land use designation does not have any specific aesthetic guidelines or standards. The land use element of the general plan has general policy concerned with the aesthetic quality of development that states:

> Land Use Element Policy 22. The City of Paramount will continue to promote quality design in the review of residential, commercial and industrial development.

The design of the project is scrutinized at the project level through the Development Review process, guided by the objective standards (height, setback, etc.) applied per the PD-PS zone, which is the current zoning of the two southern parcels and the zoning that the northern parcel will be changed to. Because the design of the project will be guided by City staff, and deemed appropriate through the entitlement process rather than according to set guidelines or standards, approval of the project will be the result, in part, of a design that has been found harmony with the community. Therefore, impacts to applicable zoning and other regulations governing scenic quality are less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if a project introduces new sources of light or glare that would be incompatible with the surrounding areas, or that pose a safety hazard to motorists on adjacent streets or freeways.

The proposed project has minimal exterior lighting that is commensurate with the use and urban infill location. Therefore, the project does not introduce new sources of lighting that are incompatible with the surrounding area or will pose a safety hazard to motorists and there is no impact.

Mitigation Measures: No mitigation measures are required.

[1] CalTrans California State Scenic Highway System Map, Accessed January 19, 2021 at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact Analysis

a-e. No Impact. The project site is located within an urbanized area of Paramount, which has been developed for decades. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) 2018 map of Los Angeles County Important Farmland[2] designates the project site and all of its surrounding properties as Urban and Built-Up Land. As such, the project would have no impact on agriculture or forestry resources, and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2016. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf (accessed June 17, 2020).

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

The proposed project would be located in an urban area in Paramount, situated within the South Coast Air Basin ("Air Basin"). The Air Basin is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and San Diego County to the south. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating stationary sources of emissions in the Air Basin.

In addition to being a highly developed metropolitan region with a large population that results in high pollutant emissions, the Air Basin's prevailing climate often includes light winds, shallow vertical mixing, and extensive sunlight, as well as the adjacent mountain ranges which hinder dispersion of air pollutants, can result in degraded air quality within the Air Basin.

The project's estimated construction emissions were modeled using the California Emissions estimator Model (CalEEMod.2020.4.0), a statewide land use emissions computer model developed for the California Air Pollution Officers Association in collaboration with the California Air Districts to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with a variety of land use projects. The output reports from CalEEMod are included as included as **Appendix A, CalEEMod Version 2020.4.0 Computer Model Output**.

a. Less Than Significant Impact. A significant air quality impact could occur if the project would conflict with or obstruct implementation of the applicable air quality plan.

In the Air Basin, the agency designated to develop the regional AQMP is the SCAQMD, which coordinates with the Southern California Association of Governments (SCAG). The SCAQMD 2016 Air Quality Management Plan (AQMP) is a regional blueprint for achieving federal air quality standards and healthful air, and includes integrated strategies and measures needed to meet the National Ambient Air Quality Standards within the Air Basin, within which the project site is located. The AQMP focuses on achieving clean air standards while accommodating population growth as forecast by SCAG.

The project's proposed 60 senior living units and community and retail components would not generate a substantial increase in regional population or employment growth, and it does not meet the criteria for statewide, regional, or areawide significance as defined in the CEQA Statute and Guidelines Section 15206.

The 2016 AQMP includes the following objectives:

- Eliminate reliance on future technologies measures (to show future attainment of air quality standards) to the maximum extent feasible.
- Calculate and take credit for co-benefits from other planning efforts.
- Develop a strategy with fair-share emission reductions at the federal, state, and local levels.
- Invest in strategies and technologies meeting multiple objectives regarding air quality, climate change, air toxics exposure, energy, and transportation.
- Identify and secure significant funding for incentives to implement early deployment and commercialization of zero and near-zero technologies.
- Enhance the socioeconomic analysis and pursue the most efficient and cost-effective path to achieve multi-pollutant and multi-deadline targets.
- Prioritize enforceable regulatory measures as well as non-regulatory, innovative and "win-win" approaches for emission reductions.

These objectives are not project-specific guidelines, and the project would not interfere with the SCAQMD efforts to achieve these stated objectives. The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in GHG and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.[3]

The 2016 overall control strategy is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with the California Air Resources Board (CARB) and United States Environmental Protection Agency (EPA).

SCAQMD has continued to adopt and implement regulatory measures in order to reduce air pollution emissions from a wide range of sources and to reduce public exposure to unhealthful air pollution. The 2016 AQMP proposes robust reductions for oxides of nitrogen (NO_X) from new regulations on Regional Clean Air Incentives Market facilities (e.g., refineries, power plants, etc.), non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_X emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives. The 2016 AQMP strategies also include development of incentive funding to advance deployment of new cleaner technologies at a pace that is not feasible through regulation alone. The project would be required to comply with all regulations regarding appliances and equipment that would be applicable to the proposed uses, including regulations that relate to energy conservation and/or emissions reduction of criteria pollutants.

The project does not meet the criteria for statewide, regional, or areawide significance as defined in the CEQA Statute and Guidelines Section 15206. Further, as discussed in the evaluation below, the project's construction or operations activities would not result in emissions of criteria pollutants that exceed the SCAQMD's thresholds of significance. Therefore, the project would not substantially affect conformance with the AQMP, nor would it obstruct its implementation; therefore, impacts would be less than significant.

[3] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A project may have a significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. SCAQMD provides significance thresholds for emissions of criteria pollutants, including: reactive organic gases (ROG), NO_X, carbon monoxide (CO), sulfur oxides (SO_X), and particulate matter (PM-10 and PM-2.5)[4]. Projects in the SCAQMD with daily emissions that exceed any of the following emission thresholds shown in **Table III-1, SCAQMD Daily Maximum Emissions Thresholds**, may be considered significant under CEQA guidelines.

Table III-1
SCAQMD Daily Maximum Emissions Thresholds

Pollutant	Construction (lbs./day)	Operations (lbs./day)
ROG	75	55
NO_X	100	55
CO	550	550
SO_X	150	150
PM-10	150	150
PM-2.5	55	55
Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, Revision April 2019.		

The SCAQMD guidance for evaluation of cumulative impacts under CEQA[5] states that "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR" (the Hazard Index (HI) significance threshold for toxic air contaminant emissions is an exception). Further, the SCAQMD guidance states that "Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant." SCAQMD recommends that public agencies perform cumulative impact analyses for air quality in the same manner as SCAQMD. As such, a project that does not exceed the emissions thresholds shown in Table III-1 would not have a cumulatively considerable net increase of any criteria pollutant.

Construction Emissions

The project's proposed construction activities would include demolition of all existing buildings on site, plus any asphalt or concrete hardscape, which is calculated to be approximately 1,457.2 tons of material. The entire 1.04 acre site will be prepped and graded, and approximately 2,847 cubic yard of soil may be removed from the site. The building will be an approximately 100,000 gross square-foot, three-story senior living facility with 60 units for a maximum of 105 residents, with an approximately 25,500 square-foot parking garage on the ground floor, and offices, classrooms, community rooms, a chapel, and two retail suites located on the ground floor. Project construction is anticipated to be completed and the building ready to be occupied in 2023.

During construction, emissions of air pollutants would be generated primarily from the use of heavy equipment on-site for construction of the new land uses, including exhaust from internal combustion

[4] PM-10 and PM 2.5 refer to particulate matter of less than 10 microns and less than 2.5 microns, respectively.
[5] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution Appendix D, August 2003.

engines and dust from earth moving activities. Dust emissions generated during construction are called "fugitive emissions," because such emissions are not amenable to collection and discharge through a controlled source. SCAQMD Rule 403 provides regulatory dust control measures that would apply to the grading related to the project, because of the non-attainment status of the Air Basin for PM-10. The following dust control measures would be implemented during construction as needed to comply with Rule 403 regulations:

- Apply soil stabilizers or moisten inactive areas.
- Prepare a high wind dust control plan.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces as needed to avoid visible dust leaving the construction area (typically three times/day).
- Minimize in-out traffic from construction zone.
- Sweep streets daily if visible soil material is carried out from the construction area.

The project's maximum daily construction emissions as calculated by CalEEMod are shown in **Table III-2**, **Construction Activity Maximum Daily Emissions**.

Table III-2
Construction Activity Maximum Daily Emissions

	Maximum Construction Emissions (lbs/day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2022	2.0	32.6	14.8	0.08	5.7	2.8
2023	57.0	9.3	13.1	0.02	1.0	0.6
Maximum[(a)]	**57.0**	**32.6**	**14.8**	**0.08**	**5.7**	**2.8**
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod 2020.4.0. Output sheets provided in Appendix A.
Maximum emissions reported for summer or winter season, whichever is greater.
[(a)] Construction emissions reflect required compliance with SCAQMD Rule 403 for applying water during grading to reduce dust.

As shown in Table III-2, peak daily construction activity emissions of criteria air pollutants are estimated to be below the SCAQMD thresholds of significance. Therefore, the project's potential to result in a cumulatively considerable net increase of any criteria pollutant during construction would be less than significant.

Although the project's fugitive dust emissions would be below SCAQMD thresholds during construction prior to implementation of SCAQMD Rule 403 - Fugitive Dust (see CalEEMod Output sheets in Appendix A), the project would be required to implement appropriate dust control measures during construction in compliance the Rule, which requires that all unpaved demolition and construction areas be wetted at least twice daily during excavation and construction, and that temporary dust covers would be used to reduce dust emissions.

Operational Emissions

Primary inputs used by CalEEMod for emissions modeling are the amount of debris to be demolished to make way for construction, the total grading area of the project, proposed uses, and the size of structures or paved areas to be built for those uses. The uses are based upon classifications found in the Institute of Transportation Engineers (ITE) Trip Generation Manual. CalEEMod uses ITE trip generation data to

calculate mobile emissions for the various uses, and uses its own proprietary models to calculate the emissions and energy consumption for the construction and operation of those uses.

CalEEMod does not have a suite of uses that precisely fit the proposed project, so the building has been broken into three components to create a conservative model. The proposed senior living facility has been identified in the model run as 65 units of Assisted Care use occupying 1.04 acres, in a 68,820 square-foot building, which would include all of the senior living facility plus the parking.[6] The retail suites are input as a Convenience Market (24 hour) use. This use was chosen because it is a relatively high energy use and generated trips should produce a high (conservative) estimate that would cover any potential future uses that might reasonably be expected to occupy the suites. The rest of the ground-floor publicly-accessible uses have been identified in the model run as General Office Building. The classrooms, community room, and chapel will likely not be occupied or used on a daily basis, but may experience more intense use on weekends (the chapel), or seasonally (the community room), so it would be difficult to predict the intensity of use of all of them combined. General Office Building is a use that is in operation every weekday but is mainly used by the people that work in that location (i.e., there is no customer traffic). This consistent and constant use was chosen to produce a conservative estimate of air emissions from the use of the chapel, classrooms, and community room would look like averaged out over time.

The project would generate emissions of criteria pollutants during the operations period, which would primarily be associated with mobile (vehicle) sources. The project's maximum daily emissions of criteria pollutants during operations, using the conservative assumptions noted above, are shown in **Table III-3, Daily Operational Emissions**.

Table III-3
Daily Operational Emissions

Source	Operational Emissions (lbs/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1.97	0.06	5.37	>0.01	0.03	0.03
Energy	0.03	0.25	0.12	>0.01	0.02	0.02
Mobile	8.48	6.58	57.36	0.09	9.42	2.56
Total	**10.48**	**6.89**	**62.84**	**0.09**	**9.47**	**2.61**
AQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod 2020.4.0. Output sheets provided in Appendix A. Totals may not add due to rounding.
Maximum emissions reported for summer or winter season, whichever is greater.
Totals may appear not to sum due to rounding.

As shown in Table III-3, the project's operational emissions would be far below the SCAQMD maximum daily emission thresholds for criteria pollutants. Therefore, the project's potential to result in a cumulatively considerable net increase of any criteria pollutant during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact may occur if a project would generate emissions that would expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are populations that are generally more susceptible to the effects of air pollution than the population at large. Land uses considered to be sensitive receptors include residences, long-term care facilities, schools,

[6] The model was based on a previous iteration of the project which had 65 units but was otherwise the same as the proposed. Consequently, operational emission and GHG projections are conservative.

playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the project would be residences that are located west of the project site.

Local Significance Thresholds Impacts

The SCAQMD developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs are only applicable to the following criteria pollutants: NO_X, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

Pursuant to SCAQMD LST Methodology for projects with boundaries located closer than 25 meters to the nearest receptor, LST screening levels for a 25-meter source-receptor distance were utilized for the project.[7] LST pollutant screening level concentration data is currently published for one, two and five-acre sites. For the project, thresholds for a one-acre site were used. This evaluation is based on the estimated on-site daily construction emissions for the phase and year representing the highest daily emissions. Daily averages would be lower than the reported maximum amounts.

Table III-4, LST - Maximum On-site Construction Emissions, shows the relevant thresholds and the estimated peak daily on-site emissions during the construction phases that would generate the highest level of on-site emissions for each pollutant evaluated for LST impacts. The emissions shown in Table III-4 include the application of water to exposed soils twice daily for dust suppression as required for compliance with SCAQMD Rule 403, Fugitive Dust.

Table III-4
LST - Maximum On-site Construction Emissions

LST 1 acre/25 meters South Coastal L.A. County (SRA No. 4)	**Project LST Emissions (pounds/day)**			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum On-Site Emissions[(a)]	16.98	13.96	3.96	2.23
LST Threshold	**57**	**585**	**4**	**3**
Exceeds Threshold?	No	No	No	No

Source: CalEEMod 2020.4.0. Output sheets provided in Appendix A. Totals may not add due to rounding.
Maximum emissions reported for any construction phase in summer or winter season, whichever is greater.
[(a)] Construction emissions reflect required compliance with SCAQMD Rule 403 for applying water during grading to reduce dust.

As seen in Table III-4, the peak on-site emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, the project's potential to generate emissions that would expose sensitive receptors to substantial pollutant concentrations would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact may occur if a project would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. In the urban environment, substantial odors are typically associated with industrial projects involving the use of

[7] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised July 2008, Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2 on September 20, 2021.

chemicals, solvents, petroleum products, and other strong-smelling materials used in manufacturing processes, as well as some sewage treatment facilities and landfills. As the proposed use will not be industrial in nature and will not involve activities that require strong-smelling materials, no significant odors would be produced during operations.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes, paving, or other construction activities may produce discernible odors typical of most construction sites. Such odors would be temporary, and of limited duration during construction. Additionally, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires a survey for asbestos prior to demolition of the structures to ensure asbestos is not released into the air during construction. As such, the project's potential to emit objectionable odors affecting a substantial number of people would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would result in a substantial adverse effect on any species identified as a candidate, sensitive or special-status species in local or regional plans.

The City and the areas surrounding it have been fully developed (effectively every parcel built upon or in use) for several decades. There are no substantial natural areas within five miles of the project site, and no large parks within a mile radius. The L.A. River borders the 710 Freeway 1.5 miles to the west, but is a concrete lined channel for four miles or more in each direction. The project site is nearly completely covered by structures or concrete, with only a landscaping strip adjacent to Paramount Blvd containing vegetation. The landscaping in the church complex was most recently maintained and consists of mulched planting beds, groundcover plants, and small shrubs and perennials, with one strip of turf and one shrub close to the

parking lot. Landscaping in front of the bar and auto repair garage is weedy with some small shrubbery. The landscaping plants used are exotic species that until recently were regularly maintained by mowing, clipping, etc., and there is no suitable habitat on the site for wildlife. A search of the California Department of Fish and Wildlife California Natural Biodiversity Database for the South Gate quadrangle reveals historic occurrences of special-status species within the quadrangle, but there have been no recordings of any species since 1956. A mature Ficus street tree adjacent to the church will be removed as part of the project and ten new street trees planted. Because there are no heavily vegetated areas near the project site, and the surrounding area is fully developed and exclusively urban in character, is highly unlikely any native or migratory bird species would choose the Ficus tree for nesting. However, migratory or other common nesting birds that are not special-status species are protected by the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA). Therefore, out of an abundance of caution to ensure no nesting birds protected under the CFGC or MBTA are harmed, Mitigation Measure BIO-1 will be implemented. This will ensure compliance with the CFGC Section 3503 and the MBTA with respect to nesting birds by reducing the impact through pre-construction nesting bird surveys and avoidance of active nests.

Given the urban context of the site which provides no suitable habitat for special status species, plus the incorporation of mitigation for nesting birds, impacts to special-status species or nesting birds would be less than significant.

Mitigation Measures:

MM BIO-1: Nesting Birds

- Removal of the mature street tree, or demolition of the subject property, should take place outside of the nesting bird season, which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the nesting bird season, beginning thirty days prior to the disturbance of the street tree, the applicant shall:
    1. Arrange for weekly bird surveys to detect any protected native birds in the tree to be removed. The surveys shall be conducted by a qualified biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
    2. If a nesting bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
    3. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Qualified Biological Monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Construction personnel shall be instructed on the sensitivity of the area.
    4. The Qualified Biologist shall record the results of the recommended protective measures described above to document compliance with applicable state and federal laws pertaining to the protection of nesting birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project

b. No Impact. A significant impact could occur if a project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service.

The project site is in an urban area that has been fully developed for decades. There are no natural habitat communities on or near the site. Therefore, the project would have no impact on sensitive natural communities.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A significant impact could occur if a project has a substantial adverse effect on federally protected wetlands or waters of the United States.

The project site is in an urban area that has been fully developed for decades and there are no wetlands or waters of the United States on or near the project site. The Los Angeles River is a protected watershed, but is 1.5 miles from the project site and is a concrete lined channel for the entire span adjacent to the City and the project will not have any substantial adverse effect upon it. As such there would be no impacts.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact could occur if a project would substantially interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

A wildlife corridor contains physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed landscapes and landscapes fragmented by urban development. The site is not near nor connected to any wildlife habitat area and itself does not provide any habitat for wildlife. The site is also not part of a regional-scale habitat linkage or a wildlife movement corridor.[8] Therefore, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as a protected tree ordinance.

The City does not have a protected tree ordinance, or any other similar regulations pertaining to biological resources. There are no trees on the property, and vegetation that is present is typical for urban landscaping. Therefore, the project would not conflict with local policies or ordinances protecting biological resources, no impacts would occur, and no mitigation measures are required.

Mitigation Measures: No mitigation measures are required.

f. No Impact. A significant impact could occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

[8] County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.2, Regional Habitat Linkages, Adopted October 6, 2015.

The project site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Thus, there would be no impact.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

On June 22, 2022, Envicom Corporation completed a Phase I Cultural Resource Assessment of the Project Site to identify any known cultural resources previously recorded within or immediately adjacent to the proposed project site. The study included a cultural resource record search conducted by the South Central Coastal Information Center (SCCIC), a request for the Native American Heritage Commission (NAHC) to conduct a record search for Native American cultural resources, and a request for the Natural History Museum of Los Angeles County to conduct a record search for paleontological resources, as well as a pedestrian survey of the site. These record searches examined the project site plus a 0.25-mile area ("study area") around the project Site, to assess the overall cultural resource sensitivity of the project region. Additional databases that were examined during the Phase I Cultural Resource Assessment included historic regional maps, historic United States Geological Survey maps, and historic Google Earth images. The Phase I Cultural Resource Assessment is provided in **Appendix B**. The record search findings obtained at the SCCIC were negative for cultural resources within the project property and found one non-archaeological cultural resource within the 0.25-mile surrounding study area. The cultural resource listed (P-19-186997) was originally the "Paramount Hay Tree" located at 16475 Paramount Blvd, which is roughly a block north of the north of the project site. The tree is nonextant and commemorated with a plaque at the site. It will not be affected by the project. The church, auto repair building, and bar are all over 50 years old and therefore must be evaluated as potential historic resources. The auto repair building and bar were previously evaluated in the 2020 IS/MND and it was determined there would be no impacts to historical resources. The Phase I assessment evaluated the church and determined the church would not constitute a significant historic resource.

a. Less Than Significant Impact. A project could have a significant impact if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5.

Section 15064.5 of the Guidelines for Implementation of CEQA, "Determining the Significance of Impacts to Archaeological and Historical Resources," details the circumstances in which the significance of an historical resource is materially impaired. This primarily entails material alterations to the physical characteristics of an historical resource that convey its historical significance and thereby justifies its eligibility for designation, or accounts for its designation as historic. Section 15064.5 also defines what constitutes a historic resource for the purposes of CEQA review. This includes properties already listed at the local, State, or Federal level, any properties that meet the criteria of the California Register of Historical Resources, which are adapted from the National Register of Historic Places criteria, or any property otherwise determined by the lead agency to be eligible for listing as a designated historic resource.

As mentioned above the auto repair building and bar were evaluated in the 2020 ISMND and the lead agency determined demolition of the structures would not impact historical resources. The church is over 50 years old as well and therefore requires evaluation as a potential historic resource. The City currently has no historic preservation ordinance and thus there is no local criteria to evaluate. The criteria of the California Register of Historical Resources is as follows:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The Phase I evaluation of the church determined that the property does not meet any of these criteria. The church is constructed in the mid-century modern style, but is of an average design and not a noteworthy representative of the style. There is no evidence the church is associated with significant events or important persons, the architect is not considered an important creative individual, and preservation of the church structure would not yield important information. As none of the existing structures have been found eligible for designation, demolition would not cause a substantial adverse change in the significance of a historical resource, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development.

The Phase I Cultural Resource Assessment of the project site included a search of SCCIC records to provide an inventory of all previously recorded archaeological and historic archaeological resources, as well as previously conducted archaeological investigations or studies, within the project site plus a 0.25-mile radius. The record search findings obtained at the SCCIC were negative for cultural resources within the site or the buffer ,save for the former Hay Tree discussed previously. The assessment also requested NAHC review of the Sacred Lands File to determine if any recorded Tribal Cultural Places or other sites of cultural importance were located within the project site or study area, which returned a negative result. The property is located in an area that experienced development in the late 1800s and early 1900s, including properties east of the site appearing as early as 1896. According to the Phase I, the late 1800s, early 1900s development is considered a time period of importance for Southern California archaeology as it pre-dates the post-World War II expansion of development in the state.

As the site and its nearby surroundings experienced successive development beginning in the late 1800s, there is the potential for older historical cultural resources (archeological resources) being located within the project development site. As such, there is the potential for impacts to archaeological resources. To reduce these impacts to a less than significant level, **Mitigation Measure CR-1** will be employed. The measure requires that if previously unknown archaeological resources are found during excavation, the project would follow procedures detailed in California Public Resources Code Section (PRC) 21083.2, and ensure that any found deposits would be treated in accordance with federal, state, and local guidelines.

Mitigation Measures:

MM CR-1: Archaeological Monitoring

- An archaeological monitor that meets the Secretary of Interior qualifications will be on site during grading of the project site from surface to the end of subsurface excavation. The purpose of having an archaeologist on site is to assess if any significant cultural resources are encountered during grading or trenching. If such features or artifact concentrations are identified, then the project "discovery" protocol will be followed:
    1. The archaeological monitor will collect any diagnostic older historical material uncovered through grading that is within a disturbed context, and can halt construction within 30-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily logs. However, if foundations, privies, or other older historical features are encountered, the project "discovery" protocol should be followed. A final Monitoring Report will be produced for the project that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the final Monitoring Report.
    2. All artifacts recovered that are important, with diagnostic or location information that may be of importance to California history, will be cleaned, analyzed, and described within the Monitoring Report. All materials determined important will be curated at an appropriate depository or returned to the landowner for public display. If important materials are found during monitoring, a Curation Plan may be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report. The costs of the Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all artifacts will be the responsibility of the applicant, within the cost parameters outlined under CEQA.

c. Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with a project would disturb previously interred human remains. No known human burials have been identified on the project site or its vicinity, and as explained above, excavation of the site is unlikely to involve significant amounts of native soil. If human remains are encountered unexpectedly during demolition, grading, and/or construction activities, State Health and Safety Code Section 7050.5 addresses such a scenario.

This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. The Coroner must be notified of the find immediately, together with the City and the property owner.

If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). 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 and an appropriate re-internment site. The Lead/Permitting Agency and a qualified archaeologist shall also establish additional appropriate mitigation measures for further site construction.

Adherence to these requirements will ensure potential impacts related to the disturbance of unknown human remains would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the Air Quality and GHG Impact Analysis and emissions estimates calculated using CalEEMod, prepared by Envicom Corporation, dated June 2022, (Appendix A), and the calculations included in the Construction Fuel Consumption Worksheet, provided in **Appendix C.**

a. Less than Significant Impact. A significant impact could occur if a project would result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Construction

During construction, the project would use heavy-duty equipment associated with demolition, site preparation, grading, paving, architectural coating and building. Construction equipment used on the site would include graders, dozers, air compressors, cement and mortar mixers, forklifts, generators, welders, rollers, pavers, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools, including concrete saws. The majority of the equipment would likely be diesel-fueled. However, smaller equipment such as welders and pumps may be electric-, gasoline-, or natural gas-fueled.

The CCR requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location.[9] Compliance with this regulation would also result in efficient use of construction-related energy and prevent unnecessary consumption of energy from diesel fuel.

According to carbon dioxide (CO_2) emission factors for transportation fuels published by the U.S. Energy Information Administration,[10] burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2 and burning one gallon of petroleum-based gasoline produces approximately 19.6 pounds of CO_2. Based on these emissions factors and the project's total construction-related CO_2 emissions, project consumption of diesel and petroleum-based gasoline during construction was calculated and is shown in **Table VI-1, Total Fuel Consumption During Project Construction**. The calculations are shown in a Construction Fuel Consumption Worksheet provided in Appendix C.

[9] California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.

[10] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

Table VI-1
Total Fuel Consumption During Project Construction

Energy Type	Total MT CO_2	Total CO_2 pounds [a]	CO_2 emission factors	Total Gallons Consumed
Total Diesel	200.8	442,594	22.4	19,759
Total Gasoline	45.0	99,171	19.6	5,060
Source: CalEEMod 2020.4.0, Construction Fuel Consumption Worksheet, Appendix C. [a] 1 MT = 2,204.62 lbs. (approx.)				

As shown in Table VI-1, based on the U.S. Energy Information Administration fuel consumption factors, and the project's estimated "total CO_2" emissions presented in the CalEEMod output sheets, it is estimated that the project's construction activities would consume a total of approximately 19,759 gallons of diesel fuel and approximately 5,060 gallons of gasoline. In 2019 an estimated 15.4 billion gallons of gasoline were sold in California (retail sales).[11] In 2015 approximately 4.2 billion gallons of diesel fuel (including off-road diesel) were sold.[12] As such, the use of construction equipment, transportation of materials, and workers necessary for project construction would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and CARB anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction projects, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Therefore, the project's potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operations – Electricity

The project would generate additional demand for electricity from the Southern California Edison (SCE). As estimated by CalEEMod, the project's total electricity demand would be approximately 437,042.5 kilowatt hours per year (kWh/year) or 437 megawatt hours per year (MWh/year). The SCE supplies more than more than 87 million MWh/year of electricity to customers.[13] The project would represent approximately 0.0005 percent of the yearly electricity demand, which is negligible in relation to the entire electricity demand of the SCE service area. Therefore, the project would not result in substantial increase in electricity demand.

In addition, the project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations and continued energy efficient programs implemented by SCE, the project's potential impacts regarding wasteful or inefficient use of electricity energy supplies would be less than significant.

[11] California Energy Commission, 2020 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division, 08-31-20.
[12] California Energy Commission, Diesel Fuel Data, Facts, and Statistics, Accessed May 9, 2022 at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics.
[13] Southern California Edison, About Us, Who We Are, Accessed on May 9, 2022 at: https://www.sce.com/about-us/who-we-are.

Operations - Natural Gas

The project would generate additional demand for natural gas from the Southern California Gas Company, though actual employment of natural gas appliances and facilities may be less than predicted by the CalEEMod model. Total project demand for natural gas would be approximately 969,765.8 thousand British thermal units per year (kBTU/year) as estimated by CalEEMod output data. According to the California_Energy Commission, the County consumed 2,936.68 million therms or 2,936,687,098 kBTU/year of natural gas in 2020.[14] The project would represent approximately 0.03 percent of the natural gas consumption in the County in 2020, a negligible amount relative to Countywide consumption.

In addition, the project is required to comply with applicable portions of the California Energy Code and CALGreen Code, which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations, the project's potential to result in impacts regarding wasteful or inefficient use of natural gas energy supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact could occur if a project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The City would review project site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, prior to permitting, the project plans would be reviewed by the City's Building and Safety Division for consistency with applicable state and local standards for renewable energy and efficiency, including CALGreen Code Title 24 standards. These codes mandate the incorporation of energy and water efficiency features in building design as well as energy and water efficient fixtures, appliances, lighting, and heating and air conditioning. The project facilities will also be inspected by the City during construction and prior to occupancy to ensure appropriate standards are met. Through regulatory compliance with state and local energy efficiency code requirements, the project's potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency would be less than significant.

Mitigation Measures: No mitigation measures are required.

[14] California Energy Commission, Gas Consumption by County, Los Angeles Total 2020.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological features?	☐	☒	☐	☐

Impact Analysis

The following section incorporates information for the project site provided by the Geotechnical Investigation, dated April 13, 2022, and prepared by Geotechnical Professionals, Inc., which is included as **Appendix D,** as well as the paleontological information contained in the project's Phase I Cultural Resource Assessment, prepared by Envicom Corporation, dated June 22, 2022, and included as Appendix B. The Geotechnical Investigation specifically studies the large northern parcel of the project site, however, the recommendations of the Investigation are appropriate for the other two parcels, and the

general conditions concerning earthquake hazards apply to the whole of the site. The two southern parcels were also separately assessed in 2020 and no potentially significant impacts were found.[15]

a. i. Less Than Significant Impact. A significant impact could occur if a project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone.

According to the Geotechnical Investigation, the project site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults are known to exist within the site. Therefore, ground rupture due to faulting is considered unlikely. The nearest fault is the Puente Hills fault (Santa Fe Springs segment) approximately 2.1 miles northeast of the site. The proximity of this fault may result in ground shaking at the premises but would not result in rupture at the project site. Therefore, impacts related to potential fault rupture are less than significant.

Mitigation Measures: No mitigation measures are required.

a. ii. Less Than Significant Impact. A significant impact could occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards.

The Geotechnical Investigation explains that the site will likely be subject to strong ground shaking in the future, which is a very common hazard in Southern California. The Investigation classifies the site as Seismic Design Category Class D, based on the 2019 California Building Code (CBC) and ASCE/SEI 7-16[16] and thus the project will be subject to the applicable structural regulations in the CBC that address that classification. Seismic Design Categories range from A to F, and the requirements for foundation and structural design will change according to the class in order to compensate for less or more anticipated ground-shaking. The Investigation explains that the project site will require remediation or replacement of undocumented fill soils present on site but will be able to employ standard mat or spread foundations to achieve structural stability. Because it has been determined that conformance with current building codes and engineering practices- including the specific requirements for Class D properties that address ground-shaking hazards- will ensure structural stability, potential impacts from ground shaking are less than significant.

Mitigation Measures: No mitigation measures are required.

a. iii. Less Than Significant Impact. A significant impact could occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction.

Liquefaction is a process by which sediments below the water table temporarily lose strength and behave as a viscous liquid rather than a solid. The types of sediments most susceptible are clay-free deposits of sand and silts, although liquefaction may occasionally occur in gravel deposits. Liquefaction can occur when seismic waves, primarily shear waves, pass through saturated granular layers and distort the granular structure, causing loosely packed groups of particles to collapse. These collapses increase the pore-water pressure between grains if drainage cannot occur. If the pore-water pressure rises to a level approaching the weight of the overlying soil, the granular layer temporarily behaves as a viscous liquid rather than a solid.

[15] City of Paramount, Initial Study & Mitigated Negative Declaration Paramount Senior Living 16675 & 16683 Paramount Boulevard, dated December 8, 2020.

[16] American Society of Civil Engineers, SEI 7-16 Minimum Design Loads and Associated Criteria for Buildings and Other Structures are standards using performance-based principles to determine dead, live, soil, flood, tsunami, snow, rain, atmospheric ice, earthquake, and wind loads, and their combinations for general structural design.

The site is located within a Seismic Hazard Zone for soil liquefaction. Because the project site is susceptible to liquefaction, a liquefaction analysis was performed for the project using 8 feet as a below ground surface (bgs) depth to groundwater, a magnitude 6.9 earthquake, and peak ground acceleration (PGA_M) of 0.76g. The results indicate that potential total seismic-induced settlement is estimated to be 2 to 3 inches. The Geotechnical Investigation provides recommendations for structural design to address this potential impact. Namely, undocumented fill on the site must be removed, or potentially remediated, and the upper portions of the native soils must be over-excavated and recompacted. The Investigation concludes that such soil preparation will allow the use of a mat foundation, and alternatively isolated and continuous spread foundations may be used with densification of the first 30 feet of soils. These recommendations are CBC standards reiterated by the Geotechnical Investigation. Therefore, with regulatory compliance to CBC requirements, substantial adverse effects related to liquefaction will be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iv. No Impact. A significant impact could occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including landslides.

Landslides are a mass wasting phenomenon in mountainous and hillside areas that include a wide range of movements and occur when the stability of the slopes change to an unstable condition resulting from a number of factors including physical and/or chemical weathering of earth materials, unfavorable geologic structures relative to the slope geometry, erosion at the toe of a slope, and precipitation. The project site is a flat infill property with little topographical variation on the site and in the surrounding vicinity, which precludes the potential for landslides and/or other hazards associated with hillside properties. In addition, the site is not located within an earthquake-induced landslide hazard zone on the California Earthquake Hazards Zone Application.[17] There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact may occur if a project would result in substantial soil erosion or the loss of topsoil.

Although the project site is relatively flat, development of the project has the potential to result in the erosion of exposed soils during site preparation and construction activities. However, the City of Paramount is a party to the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit requirements (Order No. R4-2012-0175), issued by the Los Angeles Regional Water Quality Control Board (RWQCB) in accordance with the County's National Pollutant Discharge Elimination System (NPDES) permit, CAS004001. These requirements regulate stormwater and non-stormwater discharges, and constitute the water quality standards and discharge requirements the project is subject to during construction and after.

Compliance with MS4 permit requirements includes demonstrating implementation of Best Management Practices (BMPs) sufficient to minimize erosion and discharge of soil during construction activities, per Chapter 8.20 of the Paramount Municipal Code. These requirements are a matter of regulatory compliance, and on a flat site such as the project site will be more than adequate to reduce potential on-site erosion to less than significant levels. Therefore, the potential for the project to substantially alter the existing drainage pattern of the area resulting in substantial on- or off-site erosion or siltation would be less than significant.

[17] CA Department of Conservation, California Earthquake Hazards Zone Application, accessed April 18, 2022 at https://maps.conservation.ca.gov/cgs/EQZApp/app/

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact may occur if a project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of a project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Lateral spreading is a term referring to landslides that form on gentle slopes and have a fluid-like flow movement. As discussed above, the project is located in a flat area, remote from steep slopes, and is not identified as an area susceptible to potential landslides. With replacement of fill and foundations designed to address the site's liquefaction potential, the site has been determined suitable for development, this includes the potential risk related to lateral spreads which should be less than significant with adherence to building standards. Risks related to liquefaction have already been discussed and are less than significant.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The site is not located within an area of known ground subsidence, and the Geotechnical Investigation has determined total potential ground settlement of 2 to 3 inches. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general Site vicinity. As there is little or no potential for ground subsidence due to withdrawal of fluids or gases at the site, therefore subsidence impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact could occur if a project is built on expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Based on the Geotechnical Investigation, expansion potential on the site is very low on a scale of very low to very high using the ASTM D-4829 test[18]. Results of such a test determine what kind of foundation requirements are necessary. The Investigation determines the requirements for replacement or remediation of fill for the chosen foundation system will suffice to reduce potential impacts associated with expansive soils to less than significant levels.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact may occur if a project site's soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The project site is located in a developed area of the City, which is served by an existing municipal wastewater collection, conveyance, and treatment system. No septic tanks or alternative disposal systems would be necessary, nor are they proposed. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

[18] ASTM International, FKA American Society for Testing and Materials.

f. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would directly or indirectly destroy a unique paleontological resource or site or unique geological features.

Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and the accompanying geologic strata. As discussed in the project's Phase I Cultural Resource Assessment (Appendix B), the Natural History Museum of Los Angeles County considers the entire project area to be of concern for sensitive fossil resources and recommends paleontological monitoring on any project with excavation. However, the Phase I determines that because excavation is unlikely to be deeper than 10-feet in depth and would remain within undocumented fill or recent alluvium material, there is a low likelihood any fossil resources will be encountered and therefore no need for paleontological monitoring.

Because there is still a chance, however unlikely, fossils could be encountered during excavation, **Mitigation Measure GEO-1 (Paleontological Resources)** will be employed to ensure that if any such resources are encountered during construction of the project, they would be handled according to the proper regulations and any potential impacts would be reduced to less than significant.

Mitigation Measures:

Mitigation Measure GEO-1 (Paleontological Resources)

If any paleontological materials are encountered during the course of project development, all further development activities within 30-feet of the discovery shall halt until a qualified senior paleontologist can evaluate the nature and/or significance of the find(s). If the senior paleontologist determines that the discovery is potentially significant, then the Lead Agency will be contacted and informed of the discovery. Construction will not resume in the locality of the discovery until consultation between the senior paleontologist, the owner's project manager, or the Lead Agency takes place and reaches a conclusion approved by the Lead Agency. The Lead Agency may also require the site to be monitored during the rest of the project excavation.

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

Impact Analysis

GHGs emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. According to California's 2017 Climate Change Scoping Plan, in California, as in the rest of the world, climate change is contributing to an escalation of serious problems, including raging wildfires, coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution. For purposes of planning and regulation, Section 15364.5 of the CCR defines GHGs as including CO_2, CO, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The primary GHG emitted in California is CO_2, which accounted for 84 percent of total GHG emissions in 2015. Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO_2 equivalents (CO_2e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO_2 ($MTCO_2e$).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO_2 emissions in California. Additionally, about 50 percent of the industrial source emissions of CO_2 are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of statewide GHG emissions.

The Global Warming Solutions Act of 2006 (Assembly Bill, or AB, 32) required that CARB determine the statewide 1990 GHG emission level and approve a statewide GHG emissions limit, equal to the 1990 level, to be achieved by 2020. As reported in the 2017 Climate Change Scoping Plan, California was on track to exceed its 2020 GHG reduction target. Executive Order B-30-15 and SB 32 extended the goals of AB 32 and set a 2030 goal of reducing emissions by 40 percent from 2020 levels.

The project's estimated emissions of GHGs during construction and operations were calculated using CalEEMod, which is discussed in Section III, Air Quality. The CalEEMod output sheets are included in Appendix A.

a. Less Than Significant Impact. A project could have a significant impact if would generate GHGs, either directly or indirectly, that may have a significant impact on the environment.

In determining the significance of impacts from GHG emissions, Section 15064.4 of CEQA specifies that a lead agency has the discretion to determine whether to quantify project-related GHG emissions or to rely on a qualitative analysis or performance-based standards. Section 15064.4 also states that a lead agency should consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis.

The California Supreme Court's decision in the *Center for Biological Diversity v. California Department of Fish and Wildlife* (62 Cal.4th 204), also known as the Newhall Ranch Case, reviewed the methodology used to analyze GHG emissions in CEQA. The Supreme Court suggested that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities as one pathway to determining the significance of a project's GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rely on compliance with previously adopted plans or regulations for the reduction of GHG emissions. The Court also suggested other pathways to compliance, including relying on existing numerical thresholds of significance for GHG emissions (if supported by substantial evidence).

In October 2008, SCAQMD staff proposed the use of a numerical threshold of 3,000 Metric tons (MT) of CO_2e per year for evaluating GHG impacts of commercial/residential projects, based on meeting the AB 32 emission reduction target. However, SCAQMD has not formally adopted a GHG significance threshold for land use development projects.

Pursuant to the CEQA Guidelines Section 15064.4(a), this evaluation quantifies GHG emissions resulting from the project. However, in the absence of an adopted numerical threshold by the City, state, or SCAQMD, this analysis relies on a combination of the quantification of GHG emissions as estimated for the project using CalEEMod and an evaluation of the project's consistency with relevant local GHG reduction plans to evaluate the project's GHG impacts.

Construction Impacts

During construction, the project would temporarily generate GHG emissions from use of construction equipment, and various construction materials (paint, asphalt, etc.) would also result in the short-term generation of GHG emissions. The project's construction-related GHG emissions were modeled using CalEEMod as discussed in Section III. As shown in the CalEEMod output for the project, construction activities would generate a total of 260.38 $MTCO_2e$ emissions. The SCAQMD's GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime, which results in a project amortized annual emissions of approximately 8.7 $MTCO_2e$ emissions.

Operations Impacts

Operation of the proposed project would result in GHG emissions from mobile sources, on-site use of natural gas and landscaping equipment, and off-site sources, such as electricity generation, water distribution and treatment, disposal of solid waste, and treatment of wastewater. The operational generation of GHG emissions were calculated using CalEEMod, as recommended by the SCAQMD, and shown in **Table VIII-1, Annual Greenhouse Gas Emissions**. As noted in Section III, CalEEMod was run using conservative land use assumptions, so actual GHG emissions would likely be lower.

Table VIII-1
Annual Greenhouse Gas Emissions

Consumption Source	$MTCO_2e$/year
Area Sources	3.6
Energy Utilization	130.0
Mobile Source	1,245.4
Solid Waste Generation	40.6
Water Consumption	31.9
Annualized Construction	8.7
Total	**1,460.2**

Source: CalEEMod.2020.4.0 output provided in Appendix A.
Totals may appear not to sum due to rounding.

As shown in Table VIII-1, with the addition of the amortized construction GHG emissions discussed above, the model estimates that the project would result in annual emissions of approximately 1,460.2 $MTCO_2e$. Based on this analysis, the project's conservatively quantified construction and operational period GHG emissions would be less than the SCAQMD-suggested screening level of 3,000 $MTCO_2e$. In addition, this analysis will use a qualitative discussion of plan consistency to determine the potential significance of the project's contribution to global GHG emissions and resulting environmental effects.

The project's ability to comply with various state, regional, and local planning efforts to reduce GHGs are summarized below.

Applicable Plans and Regulations

2020 RTP/SCS

The SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as Connect SoCal,[19] demonstrates the region's ability to attain and exceed the State's GHG emission reduction targets. The RTP/SCS is a regional plan for integrating the transportation network and related strategies with an overall land use pattern to accommodate projected growth, housing needs, and transportation demands.

The RTP/SCS focuses the majority of new housing and job growth in HQTAs and other opportunity areas such as commercial corridors, resulting in more opportunity for transit-oriented development. The project would be consistent with GHG reduction strategies in the RTP/SCS, which aim to reduce Vehicle Miles Traveled (VMT) by changing the region's land use and travel patterns, such as providing compact growth in areas accessible to transit, providing jobs closer to transit and in HQTAs, and providing biking and walking infrastructure to improve active transportation options, and transit access. **Table VIII-2, Project Consistency with the SCAG RTP/SCS**, provides a comparison of the project against the actions and strategies of the RTP/SCS.

[19] Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 3, 2020.

Table VIII-2
Project Consistency with the SCAG RTP/SCS

Actions and Strategies	Consistency Analysis
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent.** The project would construct a senior living facility within an urbanized area and include commercial and community facilities. Urban infill mixed-use development is a land use pattern that maximized local connectivity by providing homes and jobs in areas where people already work and live. The project will introduce homes for senior citizens, jobs for employees of the facility, and community and commercial resources in an underutilized urban block.
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** Allowing the mixed-use development will create new jobs in an area close to single and multi-family residential areas.
Plan for growth near transit investments and support implementation of first/last mile strategies.	**Consistent.** Although the project is not within a high quality transit area, it is located on a center-focused main street near the Paramount CBD, increasing density which will encourage increased transit connections in the future.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**Consistent.** The project would redevelop a portion of an existing golf course with residences.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**Consistent.** The project would redevelop a poorly used church facility and two low-density, underutilized commercial parcels. The facility will provide community facilities and general commercial/retail suites in an area previously constrained by outdated land uses.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** The project would increase density on a center-focused main street and provide new facilities and employment opportunities for nearby residences.
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking).	**Consistent.** The proposed project significantly increases the intensity of use on the site with approximately four times the amount of floor space as the previous uses, without expanding the parking four-fold.
Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	**Not Applicable.** The project site would not remove existing residences, including affordable housing, or displace residences.
Identify funding opportunities for new workforce and affordable housing development.	**Compatible.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal, however, the project will produce six income-restricted independent living units.
Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.

Actions and Strategies	Consistency Analysis
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of GHG emissions.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments.	**Not Applicable.** This action does not directly apply to the project, as SCAG, the City, and various transit authorities are responsible for meeting this goal.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**Not Applicable**. This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts, Community Revitalization and Investment Authorities, or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.

Actions and Strategies	Consistency Analysis
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Not applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Integrate local food production into the regional landscape.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Promote more resource efficient development focused on conservation, recycling and reclamation.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.
Preserve, enhance and restore regional wildlife connectivity.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Reduce consumption of resource areas, including agricultural land.	**Not Applicable.** This action does not directly apply to the project, as SCAG is responsible for meeting this goal.
Identify ways to improve access to public park space.	**Not Applicable.** This action does not directly apply to the project, as SCAG and the City are responsible for meeting this goal.

Paramount Climate Action Plan

The City adopted a Climate Action Plan (CAP) in July of 2021 which: "outlines strategies, goals, and actions for reducing City of Paramount's municipal and community-wide GHG emissions and for preparing the community for the anticipated impacts of climate change."[20] The goals of the CAP are pursued through a list of measures which the project may be compared against for consistency. These measures are provided in **Table VIII-3, Project Consistency with CAP Measures.**

Table VIII-3
Project Consistency with CAP Measures

Measures	Consistency Analysis
ENERGY EFFICIENCY AND CONSERVATION	
E1: Improve Energy Efficiency of Existing Buildings E2: Promote Green Building E3: Improve Efficiency of Municipal Operations and Public Infrastructure	**Consistent.** As new construction the project will be required to meet Title 24 energy-efficiency standards and applicable Green Building standards.
RENEWABLE ENERGY	
R1: Increase Local Renewable Energy Generation R2: Promote Community Choice Energy (CCE) and Utility Renewable Energy R3: Promote Conversion from Natural Gas to Clean Energy	**Compatible.** The project will be reviewed by the City through the plan check process and will be subject to the City-imposed energy features, assuring compatibility with the goal of applicable measure R3.
SUSTAINABLE TRANSPORTATION	
TR1: Support the Transition to Electric and Zero-Emissions Vehicles	**Consistent.** The project will be required to comply with CALGreen codes which require a portion of parking spaces to be EV Capable, making it consistent with

[20] City of Paramount, Climate Action Plan, July 2021.

Measures	Consistency Analysis
TR2: Improve Pedestrian and Bicycle Infrastructure TR3: Expand Public Transit Options and "Last-Mile" Connectivity TR4: Expand Car Sharing, Bike Sharing, and Ride Sharing TR5: Improve Traffic Safety and Flow TR6: Support Transportation Demand Management	applicable measure TR1.
LAND USE & COMMUNITY DESIGN	
LU: Promote Smart Growth, TOD, and Complete Neighborhoods	**Consistent.** The project is an urban infill development which will increase residential density and provide neighborhood-sized community and commercial/retail facilities in an amenities-poor area.
WATER AND WASTEWATER SYSTEMS	
WA1: Promote Water Conservation WA2: Promote Water Recycling and Greywater Use	**Consistent.** As new construction the project will be required to meet State and County requirements for efficient appliances and water conservation.
WASTE REDUCTION AND RECYCLING	
WR1: Promote Solid Waste Diversion	**Consistent.** Although this measure is focused on City policy, as new construction the project will be required to meet State and County requirements to divert waste from landfills during both construction and operations stages.
GREEN INFRASTRUCTURE, PARKS, URBAN FORESTRY, AND AGRICULTURE	
GA1: Support Urban Tree-Planting, Park Access, and Green Infrastructure GA2: Support Local Agriculture and Food Production	**Consistent.** The project will be removing one existing street tree and replacing it with ten new trees, significantly expanding coverage on the block, consistent with applicable measure GA1.
GREEN BUSINESS AND INDUSTRY	
GB1: Engage with Partner and Local Industries and Businesses to Reduce Emissions GB2: Grow the Local Green Economy	**Not Applicable.** Although the project will create new jobs that do not rely upon polluting activities, these measures primarily concern the City's efforts to address existing businesses and growth of new clean technology businesses.

Plan Consistency Conclusion

In summary, the project's net increase in GHG emissions would be below the SCAQMD suggested draft screening threshold of 3,000 $MTCO_2e$, and as an infill development subject to current efficiency standards and code requirements, the project would not conflict with plans and regulations established for the purpose of reducing GHG, such as the RTP/SCS, CalGreen Building Code, or the CAP. Therefore, the project's potential impacts regarding GHG emissions would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

As described in the evaluation discussed in Section VIII.a., the project would be consistent with local and regional plans, policies, and regulations adopted for reducing GHG emissions. As such, the project's potential to result in impacts regarding conflicts with GHG reduction plans would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based in part on the project Phase I Environmental Site Assessment Report (Phase I ESA) dated April 22, 2022 prepared by Citadel EHS and provided as **Appendix E**. This Phase I ESA specifically targeted the large northern parcel of the project site, however, the Phase I evaluated the adjacent auto repair garage as part of its due diligence, as well as a cursory review of the final parcel to the south and nearby sites listed within relevant regulatory databases, and as such it is valid for the entire project site. Additionally, the two southern parcels were evaluated in the 2020 MND concerning those properties.

Impact Analysis

a. Less Than Significant Impact. A significant impact could occur if a project would create a significant hazard to the public or environment though the routine transport, use, or disposal of hazardous materials.

During operations standard cleansers and the like used for housekeeping and maintenance purposes will be used by residents, tenants, and staff. Some of these products in very large quantities may be considered hazardous on a technical basis (for example, chlorine bleach), but their use and storage will be commensurate with the need, and dangerous quantities will not be necessary for operation of the facility. Landscaping planters similarly may need occasional fertilizing but there will be no need to use or store large quantities. Otherwise, will be no use of hazardous materials during project operations, and therefore operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

During construction equipment will use diesel fuel, however, use and care of all diesel worksite equipment is regulated by provisions within Title 8 of the California Code of Regulations, known as the Cal/OSHA Title 8 regulations. Compliance with these regulations will ensure proper use of worksite fuels and chemicals, which will only be in use during the construction period. If a worksite accident involving release of hazardous materials should occur the project would be required to report it to the Los Angeles County Fire Department Health Hazardous Materials division, which would determine the proper response. As such, construction of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

According to the Phase I ESA there are no known recognized environmental conditions (REC) or historic RECs (HREC) at the site, and no reported release incidents that would represent RECs in connection with the site, or a source of a release that would be likely to contribute to a vapor encroachment conditions on the site. However, the ESA found that the parcel with the auto repair garage had two Underground Storage Tanks (USTs) on site in the past. According to Los Angeles Department of Public Works records there was an 8,000 gallon UST and 3,000 gallon UST that both once held gasoline, with the 3,000 gallon UST converted to hold waste oil at one point. Both USTs were abandoned by 2012 and the 8,000 gallon UST removed with the 3,000 gallon UST filled with concrete and closed in place. Soil and groundwater tests were performed at the site and there was no indication of leakage, subsequently the Los Angeles RWQCB issued a letter on March 25, 2016 that no further action was required.[21] The presence of the USTs therefore does not constitute an REC or HREC as there was no indication of contamination. In addition, the analysis of the property's history concluded there is not sufficient reason to suspect there is some unknown de minimis environmental condition present either. Therefore, the site is not expected to represent a significant environmental concern when excavated. Should excavation of the remaining UST be required during construction, consultation with the Los Angeles County Fire Department Health Hazardous Materials division would be required prior to removal, ensuring proper handling and disposal.

The Phase 1 ESA did conclude that because the church building was built prior to bans on the use of asbestos, lead-based paint, and polychlorinated biphenyls (PCBs) in building and finishing materials, the buildings should be tested for such materials. The auto repair building and bar are both older than the church complex and would be as likely to be constructed with such materials. SCAQMD Rule 1403 (Asbestos

[21] Los Angeles County Department of Public Works, Online File Review, Site No. 024614, File No. 055601, Document No. 000830100, Underground Storage Tank Program- Case Referral Response Auto Guadalajara Alignment 16675 Paramount Boulevard, Paramount (Case Number R-55601), Dated March 25, 2016, available at: https://dpw.lacounty.gov/epd/CleanLA/OpenFileReview.aspx

Emissions from Demolition/Renovation Activities) requires a survey for asbestos prior to demolition of the structures. The Cal/OSHA Lead in Construction Standard (SB 460) requires employers to protect workers at job sites from lead exposure, which avoids environmental exposure, and as the building is presumed to contain lead-based paint[22] provisions in Title 17 of the California Code of Regulations, Division 1, Chapter 8, Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards apply, including Section 36050, Lead-Safe Work Practices which requires containment of lead during activities.

PCBs were commercially manufactured from 1929 until production was banned in 1979 by the Toxic Substances Control Act (TSCA). PCBs are toxic to humans and animals and do not readily break down once in the environment, so they can persist for long periods cycling through the food chain or traveling through water and soil. Prior to 1979, PCBs were used in hundreds of industrial and commercial applications and in buildings used in such things as fluorescent light ballasts, caulks and sealants, insulating materials, adhesives, rubber window seals and gaskets, ceiling tiles, and acoustic boards.

To mitigate any potential PCB hazards **Mitigation Measure HAZ-1 (PCBs)** shall be employed to ensure proper care is taken and any potential impacts are reduced to less than significant levels.

Mitigation Measures:

Mitigation Measure HAZ-1 – Polychlorinated Biphenyls **(PCBs)**

Prior to demolition, concurrent with regulatory-required surveys for asbestos, the applicant shall have each premises evaluated for the presence of PCBs by a qualified consultant. If material testing is necessary materials targeted should be those installed or manufactured prior to 1979, such as fluorescent light ballasts, caulks and sealants, insulating materials, adhesives and mastics, rubber window seals and gaskets, ceiling tiles, and acoustic boards. If PCPs are found in concentrations of 50 ppm or greater handling and disposal of the material will be subject to both federal and state laws. This may include reporting to U.S. Environmental Protection Agency (USEPA), and/or the California Department of Toxic Substances Control (DTSC). The disposal of PCBs waste is regulated under the TSCA. Building materials containing PCBs at or above 50 ppm that were manufactured with PCBs fall under the category of PCBs bulk product wastes. Building materials such as concrete, brick, metal contaminated with PCBs are PCBs remediation wastes (e.g., concrete contaminated with PCBs from caulk that contains PCBs). Disposal is also regulated under CCR Title 22, Section Division 4.5, Chapter 12, Standards Applicable to Hazardous Waste Generators. Compliance with federal and state PCB disposal requirements shall be demonstrated to the City prior to and during demolition activities.

c. Less Than Significant Impact. A significant impact may occur if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The site is 0.25 miles from McKinley Elementary School located at 6822 Paramount Blvd. However, the project is a senior living facility and will not handle hazardous or acutely hazardous materials, substances, or waste as part of its operations, and will not produce hazardous emissions. As discussed above in IX.b, the Phase I ESA determined there is no significant risk of hazardous materials being released through ground-disturbing activities. Also, compliance with federal, state, and local laws regarding disposal of potential hazardous materials in the building (asbestos, lead-based paint, PCBs) will ensure that those materials are contained on site and disposed of correctly throughout the demolition process, and potential

[22] Buildings constructed prior to 1978 are presumed to contain led-based paint unless demonstrated otherwise through regulated testing.

impacts regarding release of hazardous materials within 0.25 miles of a school would remain less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact could occur if a project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A search of the California Environmental Protection Agency's (CalEPA's) Cortese List Data Resources databases in the Phase I ESA documents that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not result in the creation or exacerbation of a significant hazard to the public or the environment as a result of previous uses being included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact could occur if a project would be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport and would result in a safety hazard or excessive noise for people residing or working in the area.

The nearest airport to the project site is the Long Beach Airport approximately 3.8 miles to the south. The project is not located within an airport land use plan for the Long Beach Airport, and is not within two miles of another airport, therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. A significant impact could occur if a project would interfere with an emergency response plan or emergency evacuation plan.

Development of the project site may require temporary partial lane closures due to construction activities, but such closures would only cause temporary inconvenience, as they would only occur during the construction phase, and for short durations. Any lane closures would require review and approval from the City to ensure access remains adequate for emergency services. No complete street closures would occur, and the project would not substantially interfere with emergency response or evacuation plans that require travel on Paramount Blvd. The proposed project would not cause permanent alterations to vehicular circulation routes or impede public access or travel upon Paramount Blvd. or the public alley behind the complex. Therefore, the potential to interfere with any adopted emergency response plan or emergency evacuation plan would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. No Impact. A significant impact could occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire.

The project site is located in a highly urbanized area and is not located in, nor in proximity to, any undeveloped wildland area or Very High Fire Hazard Severity Zone (VHFHSZ).[23] Therefore, no impact related to wildland fire would occur.

Mitigation Measures: No mitigation measures are required.

[23] CalFire, FRAP, Fire Hazard Severity Zone Viewer, Accessed on January 20, 2022 at: https://egis.fire.ca.gov/FHSZ/.

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

Impact Analysis

a. Less than Significant Impact. A significant impact could occur if a project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

The City of Paramount is a party to the Los Angeles County MS4 permit requirements (Order No. R4-2012-0175), issued by the Los Angeles RWCQB in accordance with the County's NPDES permit, CAS004001. These requirements regulate stormwater and non-stormwater discharges, and constitute the water quality standards and discharge requirements the project is subject to. Compliance with the regulation ensures no standards or requirements are violated.

Compliance is achieved through implementation of BMPs that reduce pollutants in water runoff. Chapter 8.20.210 of the City's Municipal Code requires that projects comply with Order No. R4-2012-0175 through integration of low impact development (LID) strategies. Prior to issuance of a grading permit projects must produce an LID plan that demonstrates which BMPs or series of BMPs will be used during construction to prevent construction-related discharges from entering storm drains, and minimize sediment transport and erosion. The project must also be designed to retain stormwater runoff generated on site during a 0.75 inch 24-hour storm event, or an 85th percentile 24-hour storm event, whichever is greater. Stormwater is retained through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use. The project will not substantially change the amount of impervious surfaces on the site, but as the project is subject to MS4 permitting requirements and the previous use was not it will generate less stormwater runoff than the previous use, and what stormwater that leaves the site will be cleaner than previous runoff. Therefore, compliance with MS4 permit requirements would reduce potential impacts related to the violation of water quality standards or waste discharge requirements or the degradation of surface or ground water quality to less than significant levels.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would substantially decrease groundwater supplies or interfere with groundwater recharge such that it may impede sustainable groundwater management of the basin.

The project will obtain water services through connection to the City's Water Division. No groundwater extraction will occur on site, and the amount of water the proposed residences will use will not significantly impact the groundwater supplies the City utilizes. The project site has very little open ground area with the existing structures present so the site has not been a source of substantial groundwater infiltration. If infiltration on site is reduced from pre-construction levels it will not have a significant impact on the amount of infiltration reaching the groundwater basin. Therefore, the project's impact on groundwater supplies or sustainable management of groundwater would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.i. No Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial on- or off-site erosion or siltation.

There are no streams or rivers or significant hydrological features on the site, and the project will not substantially change the amount of impervious surfaces on the site. The project will be required to retain stormwater on site as explained in part X.a above, so the amount of stormwater runoff generated by the project will be less than what was generated pre-construction. A reduction in stormwater runoff would serve to reduce erosion or siltation, however there are no nearby natural drainages where erosion might occur due to excess runoff from the project site. Therefore, the project will not result in conditions that case substantial on- or off-site erosion or siltation and there would be no impacts.

Mitigation Measures: No mitigation measures are required.

c.ii. No Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

As explained above, upon buildout of the project the amount of stormwater runoff generated from the site will be less than during the previous use, and therefore the project represents a reduction in potential impacts involving excess runoff. The amount of impermeable surfaces on the site is not changing significantly, and the proposed project is subject to MS4 permit requirements that require retention of stormwater the previous use was not. Therefore, the project will reduce the rate or amount of surface runoff and there will be no impacts.

Mitigation Measures: No mitigation measures are required.

c.iii. No Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As discussed above, the project will be required to incorporate LID BMPs to manage and treat runoff in accordance with the City's LID requirements. The amount of stormwater runoff generated by the site will be reduced from existing conditions, and what stormwater that isn't retained on site will not be "first flush" stormwater and therefore cleaner than stormwater generated by the previous use. Therefore, the project will not create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and there would be no impacts.

Mitigation Measures: No mitigation measures are required.

c.iv. Less than Significant Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

The project site is located within a Federal Emergency Management Agency (FEMA) flood zone designation of "Zone X, Area with Reduced Flood Risk due to Levee".[24] This is an area of moderate flood risk where the levee provides protection from the 1 percent annual chance flood. If a flooding situation occurred waters would be conveyed through existing stormwater drain facilities in the streets. The project site is not close enough to a water source or drainage to impede or redirect flood flows in a significant manner. Therefore, the project would have a less than significant impact on flood flows.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact could potentially occur if a project would risk the release of pollutants from inundation due to location in a flood hazard, tsunami, or seiche zone.

As explained above the proposed project is an area with moderate flood risk due to the presence of a levee, which would be the L.A. River flood channel. A seiche, a wave created when a body of water is shaken such as by seismic events, is a concern at water storage facilities because inundation can occur if the wave overflows a containment wall. No major water retaining structures are near the project site. Also, the project site is not within a tsunami zone[25]. Risk of the project site being inundated with water is low as the river is 1.0 to 1.5 miles from the site and considering water depth and volume. Also, the proposed senior living

[24]Federal Emergency Management Agency, National Flood Hazard Layer FIRMette for project site, January 20, 2022.

[25] California Department of Conservation Los Angeles County Tsunami Hazard Area Maps accessed January 20, 2022 at: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles

facility would not utilize significant quantities of hazardous materials, and would have no storage of any such materials outside of closed rooms. Therefore, impacts pertaining to the risk of release of pollutants due to the site's location in flood hazard, tsunami, or seiche zones would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. A significant impact could potentially occur if a project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As explained previously, in compliance with the City's LID requirements the project would capture and treat stormwater consistent with MS4 permit requirements. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a. No Impact. A significant impact could occur if a project would physically divide an established community.

The proposed project is infill redevelopment that replaces a former church facility, auto repair garage, and bar, with a senior living facility with ground floor retail and publicly accessible components. The site fronts Paramount Blvd and is separated from adjacent residences to the west by a public alley. The project would redevelop a parcel that was previously occupied with urban development and would thus not disrupt, divide, or isolate any component of the existing community. There would be no impacts.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The existing zoning of the northern parcel is C-3, General Commercial, and it has a land use designation of Area Plan. According to the Paramount Municipal Code the C-3 zone serves to facilitate on-premise retail and service businesses, and regulate the form of buildings to maintain an intensity of land use that is commensurate with the City's ability to maintain adequate infrastructure and general environment. According to the Paramount General Plan the CBD was created to facilitate redevelopment and revitalization of the area covered by the Plan, and limited uses to only commercial or office within the plan area.

The project's northerly parcel will require an amendment to the general plan to change the land use designation from Area Plan to Mixed-Use Commercial Residential and a zone change from C-3 to PD-PS zone, which will match the two southern parcels, because the proposed use is not allowed by the C-3 zone or Area Plan designation. These changes will allow the project to proceed and the standards the project will meet will be determined by the requirements of the new designation and zoning. Meeting these new requirements will ensure that the project does not conflict with any land use plan, policy, or regulation.

The amendment and zone change are made to allow the use, they do not allow the project to create an impact that would otherwise not be allowed under the existing designations. That is, the change in designation and zoning merely allows a variation in use from what was originally designated on the site. However, the new land use designation and zoning classification are similar to those previously allowed and similar to surrounding uses. The proposed land uses are compatible with the site's surroundings and

due to the similarities, would not introduce any significant impacts the previous zoning may have intended to avoid.

The new land use designation will allow the project's proposed mixed-use to proceed, and the PD-PS zone will allow the City to appropriately regulate the project according to its context and unique mixed-use. Section 17.72.020 of the Paramount Municipal Code explains the purpose of the zone as such:

> [The purpose of the zone] is to insure [sic] a fuller realization of the general plan of the City than that which would result from the application of present zoning regulations. ... It is the intent of this zone classification to encourage development of superior design and quality through creative application of the City's zoning criteria and through the creation of performance standards applied to specific development and recorded as conditions and covenants against the land.

Compliance with the provisions of the new zoning means meeting specific performance standards the City created specifically for the project to ensure it is compatible with the goals and policies of the general plan. Therefore, the project would not cause a significant environmental impact due to conflicts with a zoning or land use regulation created with the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Regionally, the project site is located within the planning area of the SCAG, the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. The project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206; therefore, there would be no conflict with any SCAG policy adopted for the purpose of avoiding or mitigating an environmental effect, as explained in Section VIII. The project is also located within the planning area of the SCAQMD AQMP. As evaluated in Section III, Air Quality, the project is consistent with applicable regional plans, and no further analysis is required.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	☐	☐	☐	☒
b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, Specific Plan, or other land use plan?	☐	☐	☐	☒

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

The project is an infill development on a small lot in an urban area that has been fully developed for decades. There is no potential for access to a mineral resource at the project site, therefore there is no availability to any potential mineral resource. As such, there is no impact associated with the loss of availability of a mineral resource.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Impact Analysis

The following discussion assesses the potential noise impacts of the project and provides a brief description of the key terms and concepts used in the analysis of noise impacts. The construction impact analysis utilizes a construction equipment list based on CalEEMod defaults generated for Section III. CalEEMod outputs are attached as Appendix A.

Noise is unwanted sound. Sound is mechanical energy that is transmitted by pressure waves through a compressible medium such as air. The sound pressure level, expressed in decibels (dB), has become the most common descriptor used to characterize the loudness of an ambient sound level. Sound or noise can vary in intensity by over one million times within the range of human hearing so a logarithmic loudness scale similar to the Richter Scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum so noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called A-weighting written as dB(A) or dBA. Subsequent references to decibels written as dB should be understood as A weighted dB(A).

Time variations in noise exposure are typically expressed in Leq, a steady-state energy level equal to the energy content of the time varying period. Leq provides a statistical description of the sound level that is exceeded over some fraction of a given observation period. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL), a weighted average of noise levels over time.

a. Potentially Significant Unless Mitigation Incorporated. A project may have a significant noise impact if it would cause a substantial temporary or permanent increase in ambient noise levels in the vicinity in excess of standards established in the local general plan or noise ordinance.

Noise impacts are discussed in the context of construction-related noise and operational-related noise.

Regulatory Setting

California Building Code
The State defers to local jurisdictions for the regulation of construction noise.

Title 24 of the CCR for multiple family dwellings, hotel and motel rooms, requires an interior CNEL of 45 dBA. In 1988, the State Building Standards Commission expanded that standard to include all habitable rooms in residential use, including single-family dwelling units. Since typical noise attenuation within older, existing residential structures with closed windows is at least 20 dBA, an exterior noise exposure of 65 dBA CNEL is generally the noise land-use compatibility guideline for residential dwellings in California. However, newer construction practices with standard features such as mandatory double paned windows typically offer about 30 dB of noise attenuation, which would provide sufficient noise reduction to meet the residential interior noise requirement of 45 dBA CNEL for projects with an exterior noise exposure of up to 75 dBA. Projects that would require windows and doors to remain closed to achieve an acceptable interior noise level will typically necessitate the use of air conditioning and mechanical ventilation.

City General Plan
The City does not regulate noise levels for construction activities, provided a valid permit has been issued and the activity is confined between the hours of 7 a.m. to 8 p.m., per Section 9.12.060.B.4(a) of the Paramount Municipal Code.

The Safety Element of the City General Plan contains policies related to noise control. The element reiterates guidelines from the State Office of Planning and Research (OPR), Guidelines for the Preparation and Content of Noise Elements of General Plans, which has been updated since the publication of the General Plan. Guidelines from the OPR remain similar to the guidelines published in the General Plan, but with some refinements. The General Plan states that residential uses should not be located in areas exceeding 70 dB CNEL.[26] The OPR states that a CNEL between 65 and 70 dB CNEL should be considered *conditionally acceptable* for multifamily residential, in contrast to a CNEL below 65 dB which would be considered *normally acceptable.*[27]

Noise from facility operations are regulated according to the zoning of a property, according to the **Table XIII-1, Paramount Municipal Code Noise Standards**, reproduced from Section 9.12.040 of the Code:

Table XIII-1
Paramount Municipal Code Noise Standards

Noise Zone	Day (maximum) 6:00 a.m. to 10:00 p.m.	Night (maximum) 10:00 p.m. to 6:00 a.m.
Industrial and Commercial	82 decibels	77 decibels
R1 and R2	62 decibels	57 decibels
R3 and R4	67 decibels	62 decibels

The maximum levels listed in the table would be the noise as measured from any residential property adjoining the suspect property.

[26] Paramount General Plan, Safety Element, Noise and Land Use Compatibility, August 7, 2007.
[27] Governor's Office of Planning and Research, General Plan guidelines and Technical Advisories, Appendix D, Noise Elements Guidelines, updated 2017.

Existing Conditions

Paramount Boulevard is a major arterial and as such noise from traffic on the Boulevard will be the primary source of noise at the project site. Average noise levels at the project site are assumed to be between 60 dB and 70 dB. This is based upon models from the Federal Bureau of Transportation Statistics, and measurements published in a recent MND for the property directly south of the subject property. The Bureau of Transportation Statistics created the National Transportation Noise Mapping Tool, which calculates noise levels throughout the country for different modes of transportation for purposes of tracking trends over time. Noise levels on the Boulevard in the vicinity of the project site are calculated to be within a 60 dB Leq to 69.9 dB average range over a 24 hour period.[28] Measurements published in the IS/MND for the Paramount Senior Living project at 16675 & 16683 Paramount Boulevard recorded an average of 68.2 dB.[29] All of these cited estimates are within OPR's "normally acceptable" residential range of below 65 dB CNEL or "conditionally acceptable" residential range of 65dB CNEL to 70 dB CNEL.

Construction Noise

Provided the project is constructed between the hours of 7 a.m. to 8 p.m., the project would conform to the construction noise standards established in the Paramount Municipal Code. Because there are no noise standards of other agencies that are applicable to the project or the project site, conformance with construction hour restrictions would not exceed applicable standards of local agencies or other agencies. However, impacts could still occur despite conformance with the local noise ordinance, and therefore construction noise is analyzed.

The nearest sensitive receptors to construction noise would be the residences on the opposite side of the 15-foot alley behind the project site. A bungalow court between the church and auto repair garage has two residences oriented toward the alley, and these residences would be the properties most affected. Other residences adjacent to the project site have garages facing the alley and living quarters oriented toward Eureka Avenue. The distance of the living quarters of these residences to the project site range between approximately 40 to 50 feet. The two bungalows facing the alley are closer, at approximately 25 feet from the project site, so this distance is used to evaluate potential impacts.

A conservative estimate of anticipated construction noise has been determined utilizing The Construction Noise Handbook prepared by the Federal Highway Administration (FHWA), which includes a national database of construction equipment noise levels. The FHWA uses these reference noise emission levels in the Roadway Construction Noise Model (RCNM). **Table XIII-2, Construction Equipment Noise Levels,** identifies highest (Lmax) noise levels associated with quantity and type of construction equipment. The RCNM also provides an acoustical usage factor which estimates the fraction of time each piece of equipment is operating at full power during construction. The acoustical usage factor (U.F.), is a key input used to calculate sound levels averaged over time expressed as Leq. Table 5 adjusts the maximum noise levels (Lmax) using the U.F. published in the FHWA Construction Noise Handbook. The sound level prediction equation is expressed as follows for the hourly average sound level (Leq) at distance (D) between the source and receiver.

$$Leq = Lmax - 20 \bullet \log (D/50) + 10 \bullet \log (U.F./100) - I.L.$$

Where:

Lmax is the published reference noise level at 50 feet
U.F. is the acoustical usage factor for full power operation per hour
I.L. is the insertion loss for intervening barriers

[28] Bureau of Transportation Statistics, National Transportation Noise Map, 2018 road data.
[29] Initial Study & Mitigated Negative Declaration, Paramount Senior Living, 16675 & 16683 Paramount Boulevard, December 8, 2020.

Table XIII-2 lists equipment types and quantities similar to those anticipated to be used for the project. The table is organized by equipment and describes the noise level for each individual piece of equipment at a 25-foot distance between the equipment and receptor as provided in the RCNM. The levels are calculated to represent conditions outside on a calm day with a clean line of site between the receptor and the equipment (no intervening barriers).

As shown below in Table XIII-2, the construction equipment that could generate the highest noise level are the concrete/industrial saws which would generate a maximum noise level of 96 dBA Lmax at 25 ft and an average noise level of 89 dBA Leq at 25 ft. Construction proceeds in phases such as demolition, site preparation, grading, building construction, paving, and architectural coating. Therefore, at any particular phase of construction, contractors would use only the types of equipment needed as shown in Table XIII-2, rather than using all the equipment throughout all phases. Furthermore, decibels are logarithmic units; therefore, sound levels cannot be added by ordinary arithmetic means. When the sound pressure level of two sources is equal, the resulting noise level is 3 dB greater than the noise level of one source.

Table XIII-2
Construction Equipment Noise Levels

Phase	Equipment Type	Quantity	Lmax at 25 feet (dBA) [1, 2]	Usage Factor (U.F.) [3]	Leq at 25 feet (dBA)
Demolition	Concrete/Industrial Saws	1	96	20	89
	Rubber Tired Dozers	1	88	40	84
	Tractors/Loaders/Backhoes	3	85	40	81
Site Preparation	Graders	1	91	40	87
	Rubber Tired Dozers	1	88	40	84
	Tractors/Loaders/Backhoes	1	85	40	81
Grading	Graders	1	91	40	87
	Rubber Tired Dozers	1	88	40	84
	Tractors/Loaders/Backhoes	2	85	40	81
Building Construction	Forklifts	1	81	20	74
	Generator Sets	1	87	50	79
	Tractors/Loaders/Backhoes	1	85	40	81
	Welders	3	80	40	72
Paving	Cement and Mortar Mixers	1	86	20	79
	Pavers	1	83	50	80
	Paving Equipment	1	89	20	81
	Rollers	1	86	20	79
	Tractors/Loaders/Backhoes	1	85	40	81
Architectural Coating	Air Compressors	1	84	40	80

[1] Noise levels are for individual equipment pieces. Each piece of equipment would operate at a distance from other equipment.
[2] Source: Federal Highway Administration, Construction Noise Handbook, 2006, Ch. 9, Construction Equipment Noise Levels and Ranges.
[3] Usage Factor (U.F.) is the portion of time equipment is operating at full power.

Although neither the City nor the State have a set level of construction noise that is considered significant or harmful, reasonable guideposts can be established for the purpose of analysis based upon known impacts. According to the Centers for Disease Control and Prevention two hours of exposure to 80-85 dB can cause

damage to hearing, which would present a significant impact.[30] Based upon this, a target maximum of 80 dB for construction noise can be used a reasonable threshold of significance.

Although construction equipment will typically not operate for two hours uninterrupted, and noise inside a residence with windows closed would be reduced by at least 20 dB, high outside noise levels would nonetheless be burdensome when experienced by the nearby residents. As presented in Table XIII-2, several pieces of construction equipment would reach or exceed the 80 dB threshold. To reduce noise levels to less than 80 dB, the following Mitigation Measures **NOI-1** through MM **NOI- 5,** would be incorporated in the project to reduce temporary construction noise effects.

MM-NOI 1: All capable diesel-powered construction vehicles shall be equipped with exhaust mufflers, aftermarket dampening system or other suitable noise reduction devices.

MM-NOI-2: Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM-NOI-3: On-site power shall be used instead of generators or air compressors, when feasible.

MM-NOI-4: Grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment, when feasible.

MM-NOI-5: Temporary and impermeable noise barriers shall be placed at the west, north, and south property boundaries during construction of the project. The barriers shall be at least 12 feet in height and provide a transmission loss of at least 25 dB at 500 hertz (such as 3/4-inch plywood).

The results of implementing these measures is presented in **Table XIII-3, Reduced Construction Noise Levels at Sensitive Receptors**.

Table XIII-3
Reduced Construction Noise Levels at Sensitive Receptors

Phase	Equipment Type [1]	Unreduced Noise Level at 25' (dB Leq)	Noise Attenuation from Noise Barrier (dB) (NOI-MM-5)	Reduced Noise Level at 25' (dB Leq)
Demolition	Concrete/Industrial Saws	89	15	74
	Rubber Tired Dozers	84	15	69
	Tractors/Loaders/Backhoes	81	15	66
Site Preparation	Graders	87	15	72
	Rubber Tired Dozers	84	15	69
	Tractors/Loaders/Backhoes	81	15	66

[30] Centers for Disease Control and Prevention, What Noise Cause Hearing Loss? Accessed February 18, 2022 at: https://www.cdc.gov/nceh/hearing_loss/what_noises_cause_hearing_loss.html

Phase	Equipment Type [1]	Unreduced Noise Level at 25' (dB Leq)	Noise Attenuation from Noise Barrier (dB) (NOI-MM-5)	Reduced Noise Level at 25' (dB Leq)
Grading	Graders	87	15	72
	Rubber Tired Dozers	84	15	69
	Tractors/Loaders/Backhoes	81	15	66
Building Construction	Forklifts	74	15	59
	Generator Sets	79	15	64
	Tractors/Loaders/Backhoes	81	15	66
	Welders	72	15	57
Paving	Cement and Mortar Mixers	79	15	64
	Pavers	80	15	65
	Paving Equipment	81	15	66
	Rollers	79	15	64
	Tractors/Loaders/Backhoes	81	15	66
Architectural Coating	Air Compressors	80	15	65

As shown on Table XIII-3, by providing the construction noise barriers, temporary construction noise levels at this nearest residence would be reduced to approximately 74 dBA Leq (the highest value in Table XIII-3) during the site demolition phase, which would be the loudest phase of construction.[31] The addition of mufflers and shielding to equipment will also further reduce noise levels, but the amount will vary according to the equipment and is not quantified.

As explained above, maximum noise increases would be experienced at the nearest sensitive receptor temporarily only within the limited duration of particular construction activities. During the building construction phase, which is the majority of the construction duration, the calculated average noise level would be reduced to 66 dB Leq at the nearest sensitive receptor with use of the construction noise barriers. As discussed previously, because the City does not have a numerical threshold for construction noise, but regulates construction noise by setting the allowable hours for construction in the vicinity of residential land uses, the project would comply with the City's noise requirements. Use of noise barriers will reduce construction noise to levels below 80 dB and would not be potentially harmful to nearby residents, and as such, construction noise impacts would be less than significant.

Operational Noise

Noise generated by the facility while in operation will be minimal. There are no proposed uses within or outside the building that would be expected to generate noise significant enough to create an annoyance outside of the property. Buildings on their own are not significant generators of noise. Generally, the most significant source of noise from a building will be its HVAC systems. The HVAC units of the proposed building will be located on the roof. Due to the elevation of the units and placement behind solid barriers, their operation would not result in significant operational noise impacts. Noise is most audible where there is a direct line-of-sight. Any solid barrier that breaks the line-of-sight between the source and the receiver greatly reduces the noise levels from the source since the sound must travel over, around, or through the barrier to be heard. The project's roof-mounted equipment would be 34 feet above grade, in which case the building itself acts as a barrier since the equipment would not be visible from the ground or from within

[31] Based on equations for barrier insertion loss from Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018. A material with a transmission loss of at least 25 dB would be sufficient provide a reduction of 15 dB according to California Department of Transportation. Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

any building in the immediate vicinity. In addition, there are four-foot-tall solid parapets around the perimeter of the roof which will further help attenuate noise from the HVAC units. Only structures that have residential units at the same height or higher than the roof of the proposed building would have direct line-of-site to the HVAC units, and there are no such structures in the vicinity.

Traffic Noise

Upon completion, project-generated vehicle trips would cause an incremental increase in traffic noise in the immediate vicinity. As stated above, when the sound pressure level of two sources is equal, the resulting noise level is 3 dB greater than the noise level of one source. Thusly, to increase ambient noise levels by 3 dB, the project would have to double the amount of traffic on nearby roadways.

Noise from Paramount Boulevard would be the loudest noise source in the vicinity due to its high volume of traffic. Although the City does not have traffic counts available for the Boulevard, traffics counts dating from 2014 from the City of Long Beach place the Average Daily Traffic Volume of Paramount Boulevard at 70th Street (just below the project site) at 23,400 vehicles.[32] Although there may have been a drop in traffic levels in the recent past due to the most severe periods of COVID restrictions, current and future traffic levels would be expected to be similar or greater to the recorded 2014 levels. The project is projected to generate approximately 441 Average Daily Trips (see Section XVII, Transportation) and thus would not approach doubling that number. Therefore the project would not increase the traffic noise level by more than a fraction of a decibel. Noise level increases of less than one decibel are not perceptible to the human ear even in a controlled laboratory environment. Traffic in the alley will likely be increased by presence of the project but would not be frequent enough to reach levels that would produce significant impacts resulting in more than 62 dB Leq between 7:00 a.m. and 10:00 p.m. Therefore, all project operational impacts would be less than significant and no operational mitigation measures are required.

Mitigation Measures:

Construction: Mitigation Measures MM NOI-1 through NOI-5 (above) are required.
Operational: No mitigation measures are required.

b. Less Than Significant Impact. A significant vibration impact could occur if a project would expose people to or generate excessive groundborne vibration or groundborne noise levels.

Construction Vibration

Caltrans Groundborne Vibration Criteria

When construction equipment travels over unpaved surfaces or engages in soil movement, construction activities generate groundborne vibration. The effects of groundborne vibration include the discernible movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Vibration related problems generally occur due to resonances in the structural components of a building, because structures amplify groundborne vibration. The "soft" sedimentary conditions of much of southern California dampen groundborne vibration over a relatively short distance.

Groundborne vibration from construction activities rarely reach levels that can damage structures. Although there are no officially adopted regulatory standards for the point at which ground-borne vibration levels could cause structural damage. Caltrans provides vibration guidelines for structural damage, found in **Table XIII-4, Vibration Damage Criteria Guidelines**.

[32] City of Long Beach, Engineering Bureau, Traffic Engineering Division, 2014 Citywide Traffic Flow map.

Table XIII-4
Vibration Damage Criteria Guidelines

Structure and Condition	Maximum PPV (in/sec)	
	Transient [1]	Intermittent [2]
Extremely fragile historic buildings	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.
[1] Sources create a single isolated vibration event, such as blasting or drop balls.
[2] Frequent or intermittent sources include impact or vibratory pile drivers, pogo-stick compactors, crack-and-seat equipment, and vibratory compaction equipment.

As shown in Table XIII-4, the criterion for structural vibration damage for new residential structures is 0.5 PPV in/sec for intermittent sources such as impact or vibratory pile drivers, pogo-stick compactors, and vibratory compaction equipment. Based on the type of adjacent buildings and the type of equipment expected to be used in construction, a structural damage criterion of 0.5 PPV in/sec for new residential structures and 0.3 PPV in/sec for older residential structures for intermittent sources is the standard used in this analysis. The commercial building at the corner of Harrison Street and Paramount Boulevard was constructed in 1963 according to L.A. County Assessor records, as a conservative measure a structural damage criterion of 0.3 PPV in/sec would be used for this building as well.

In terms of human response, groundborne vibration can range from severe to barely perceptible depending on whether the source is transient or intermittent, the distance between the source and receptor, and the composition of the ground material. The Caltrans criteria for assessing human response is provided in **Table XIII-5, Human Response to Groundborne Vibration Criteria**.

Table XIII-5
Human Response to Groundborne Vibration Criteria

Human Response	Maximum PPV (in/sec)	
	Transient [1]	Intermittent [2]
Severe	2.00	0.40
Strongly perceptible	0.90	0.10
Distinctly perceptible	0.25	0.04
Barely perceptible	0.04	0.01

Source: Caltrans, Transportation and Construction Vibration Guidance Manual, 2013.
[1] Sources of transient vibration create a single isolated vibration event, such as blasting or drop balls.
[2] Frequent or intermittent sources include impact or vibratory pile drivers, pogo-stick compactors, crack-and-seat equipment, and vibratory compaction equipment.

As shown in Table XIII-5 human responses to ground-borne vibration vary from severe at 2.0 PPV in/sec for transient sources to barely perceptible at 0.01 PPV in/sec for intermittent sources. The Caltrans vibration criteria suggests the thresholds for human perception and annoyance are higher for transient vibration than for continuous or intermittent vibration. For this analysis, intermittent levels that could cause a strongly perceptible human response (i.e., 0.1 PPV in/sec) are the applicable standard.

The predicted vibration levels generated by construction equipment and potential associated impacts are provided in terms of PPV in/sec in **Table XIII-6, Groundborne Vibration from Project Construction Equipment at Nearest Buildings**.

The greatest vibration levels would be generated by loaded construction trucks operating on unpaved surfaces, which would generate vibration levels of 0.076 PPV in/sec 25 feet, according to the Federal Transit Administration.[33] The surfaces around the project site are paved and will remain so, but during construction the site will be unpaved for a time after demolition.

As the nearest residential structure (occupied structure, not garage) is within 25 feet, vibration levels would potentially be felt at the 0.076 PPV in/sec level by persons in the occupied, which would not exceed the Caltrans guidelines for vibration damage to newer structures or the Caltrans guidelines for distinct perceptibility. Persons at all other structures, would experience similar or lower vibration levels because those structures are further away from the project construction boundary.

As shown in the preceding analysis, project construction would result in groundborne vibration levels below the applicable thresholds of significance for potential structural damage from construction vibration. In addition, due to the temporary and intermittent occurrence of vibration levels from construction, structural and human annoyance vibration impacts would be less than significant.

Table XIII-6
Groundborne Vibration from Project Construction Equipment at Nearest Buildings

Construction Equipment	Vibration Levels at 25 ft	Vibration Damage Impact Assessment		Vibration Annoyance Impact Assessment	
	PPV in/sec at 25 ft [1]	Potential Damage Threshold (PPV in/sec)	Exceedance?	Potential Annoyance Threshold (PPV in/sec) [2]	Exceedance?
Loaded trucks	0.076	0.5	No	0.1	No
Small bulldozer	0.003	0.5	No	0.1	No

Source: Calculations from Envicom Corporation, September 2021 based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[1] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[2] Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.

Operational Vibration

The City does not regulate operational vibrations, though nuisance vibrations from any individual operation could be potentially found unacceptable according to general nuisance laws. Nonetheless, the project would not house any activities that routinely produced significant vibrations in adjoining properties, and there is no equipment proposed for operation of the building that would produce significant vibrations in adjoining properties, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No impact. A significant noise impact could occur if a project would be located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport, such that the project would expose people residing or working in the area to excessive noise levels. The nearest airports to the project site are the Long Beach Airport, a commercial airport located approximately 3.8 miles to the south,

[33] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

and the Compton Woodley Airport, a small public airport, located 4.5 miles to the west. According to the Los Angeles County Airport Land Use Commission, the project site is outside the 65 dBA CNEL Noise Impact Zone of Long Beach airport,[34] and aircraft noise on the project site would therefore be within levels that are considered conditionally or normally acceptable by the California Office of Planning and Research.[35] Therefore, the project would not result in the exposure of residents or those working in the project area to excessive noise levels from a private airstrip or public airport. The project is also not an air travel-related use and would thus not add to air travel noise in the surrounding area. Therefore, the project would have no impact with regard to this issue.

Mitigation Measures: No mitigation measures are required.

[34] Los Angeles County, Airport Land Use Commission, Long Beach Airport, Airport Influence Area, May 13, 2003, accessed on August 12, 2021 at https://planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf.

[35] Quoted in City of Long Beach, Development Services, Noise Element: City of Long Beach General Plan Draft, December 2019.

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

Impact Analysis

a. Less than Significant Impact. A project could have a significant environmental impact if it would induce substantial unplanned population growth in an area, either directly or indirectly.

The proposed project is an infill development that will not result in new or expanded infrastructure. The project would add 60 units and an estimated 20 jobs according to the applicant, with the potential to add perhaps up to 15 more depending on the uses located on the ground floor (estimated at 4-10 employees for the commercial suites and 3-5 for the public facilities). The number of jobs available is not large enough to induce substantial numbers of new people to move to the City or region. Paramount is a small city surrounded by many other cities, part of the Greater Los Angeles metro region that has a combined population of 18.7 million people. The jobs created by the project are not on a scale that could substantially influence economic or demographic trends in the area. The City is currently in the process of updating the housing element of its general plan as required every eight years by state law. The process requires the City to plan for the accommodation of new housing in an amount determined in the Regional Housing Needs Assessment (RHNA) process. The City has been allocated 364 housing units and the City must prove that it has adequate capacity for that number units or substantive plans to accommodate them. According to the City's draft 2021-2029 Housing Element accounting for approved and proposed projects, plus available capacity under current zoning, the City misses the unit goal by 138 units. By adding 60 units of housing the project will significantly help the City meet its required housing needs, and therefore would not have a negative impact regarding population growth. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A project could have a significant environmental impact if it would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere.

The project site does not currently contain any housing and development of the site will not displace any housing units or people. There would be no impacts.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Impact Analysis

a-b. Less Than Significant Impact. A project could have a significant environmental impact if it would require the addition of a new fire or police stations, or the expansion, consolidation, or relocation of an existing facility to maintain acceptable service ratios, the construction of which could cause significant environmental impacts.

The City is served by the Los Angeles County Fire Department and Sheriff's Department. Fire Station 31 is less than 1.5 driving miles northwest of the project site. The Paramount Sheriff Station is one mile north of the project site. The site is currently occupied by structures built between 1928 and 1960. The project will replace the existing structures with a single new structure. The proposed building will be larger than the combined previous buildings, but must meet existing fire safety codes, which are much stricter and more comprehensive than the codes under which the previous structures were built. The current standards will require the proposed building will to have fire sprinklers throughout. The result will be the new structure will be significantly more fire safe than the previous structures and therefore will not be more of a burden on fire services relative to the previous uses. The project will create homes for senior people which could increase the need for paramedic services, however with only 60 units the potential need would be incremental and intermittent, and as the added units are within the RHNA projections for the City, would be within the City's population projections and thus not require new personnel or new facilities. The project also will not introduce a significant new locus for crime as the number of residential units is small and the senior living facility will not be accessible to the general public.

Therefore, the redevelopment of the project site would present a minimal increase in demand for fire and police protection services and would not place an unanticipated burden such that new or expanded fire or police facilities would be needed. Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A project could have a significant environmental impact if it would require new or expanded school facilities, the construction of which could cause significant environmental impacts, to maintain acceptable performance levels.

The project would provide homes for senior citizens and there will be no children living in it. Also, the scale of the project is such that it would not induce substantial population growth that could result in a significant amount of new children in the area. There would be no impacts.

Mitigation Measures: No mitigation measures are required.

d-e. Less Than Significant Impact. A project could have a significant environmental impact if it would require new or expanded parks or other public facilities, the construction of which could cause significant environmental impacts, in order to accommodate a population increase resulting from the project.

The scale of the project would represent a minor increase in population, assuming all of the residents of the project came from outside of the City or area, which is unlikely. Nonetheless, such a minor increase in the local population of senior people would not require the expansion of public facilities to accommodate them. In addition, the project will be required to pay impact fees assessed by the City that address incremental increases in housing units. What incremental impacts the project may have on public services can be addressed by such fees and would not require the construction of new facilities or the expansion of existing facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a-b. Less Than Significant Impact. A significant impact could occur if a project increased the use of recreational facilities to the point of damaging them, or included the construction or expansion of recreational facilities, the activities of which had an adverse effect on the environment.

As discussed above under Section XIV, Population and Housing, the project would not generate a significant increase in population growth. Also, the project would provide housing to senior citizens who would be more likely to pursue low-impact recreational activities. Given the small number of senior residents and likely low-impact nature of park use by these residents, it would not be reasonable to suggest the project could increase the use of recreational facilities to the point that substantial physical deterioration of the facility would occur or be accelerated. In addition, the project does not include any recreational facilities or require the construction of facilities that would have an adverse physical effect on the environment. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a. Less Than Significant Impact. A significant impact could occur if a project would conflict with an applicable plan, ordinance or policy addressing the circulation system, including mass transit roadway, bicycle and pedestrian facilities.

The City's General Plan, Transportation Element has four stated objectives:

- The maintenance and improvement of the roadway system in the City to accommodate future traffic;
- The use of innovative circulation strategies designed to create a transportation system that is sensitive to the City's aims for continued economic development;
- The development of a roadway and circulation network that promotes pedestrian activity in selected areas of the City; and
- The efficient use of alternative forms of transportation that serve the City.

Policies serving those objectives primarily focus on actions to be taken by the City. Policies that are applicable to individual projects restate regulatory requirements such as the payment of impact fees and provision of parking, which the proposed project will be required to abide to. The Element notes that new development should be required to produce a traffic study if it is expected to generate more than 500 new trips a day. The project's estimated trip generation is detailed in **Table XVII-1, Estimated Trip Generation**. The trip estimate for the senior living facility includes all of the components that make up the facility, this includes office space for employees and resident-only amenities. The public facilities - chapel, first floor kitchen/dining area, classrooms - are unlikely to be consistently used on a daily basis, but are assessed as such to calculate a worst-case scenario in terms of daily traffic. The trip generation rate calculated for the retail suites is likely conservative as well, regardless of the future uses the suites will host. The estimates below do not include a credit for prior traffic generation.

Table XVII-1
Estimated Trip Generation

Use	Units	Rate	Daily Trips
Assisted Living Facility[1]	91 beds	2.6 per bed	237
Independent Living Units[2]	7 units	2.02 per unit	14
Chapel[3]	1,014 sf	6.95 per 1,000 sf	7
Public Facilities[4]	2,752 sf	28.82 per 1,000 sf	81
Retail Suites[5]	2,657 sf	37.75 per 1,000 sf	102
		Total	**441**

[1] Institute of Transportation Engineers (ITE), Trip Generation 10th Edition, 2017 – Code 254 Assisted Living: 2.6 trips/bed.
[2] Institute of Transportation Engineers (ITE), Trip Generation 10th Edition, 2017 – Code 253 Congregate Care Facility: 2.02 trips/bed.
[3] ITE Trip Generation 10th Edition, 2017 - Code 560 Church: 6.95 trips/1,000 sf.
[4] ITE Trip Generation 10th Edition, 2017 - Code 495 Recreational Community Center: 28.82 trips/1,000 sf. Kitchen not included as it would only be used to serve the multi-purpose room, classrooms, or chapel, and would not be a source of trip generation itself.
[5] ITE Trip Generation 10th Edition, 2017 - Code 820 Shopping Center: 37.75 trips/1,000 sf.

The previous uses, the church and facilities, auto repair garage, and bar, all generated auto trips while in operation. Those trips serve as the baseline for the changes in traffic generation that will result from the proposed project. However, as the table illustrates daily trips generated by the project fall below the 500 trip threshold for a traffic study even without factoring in credit for the previous uses. The projected number of trips can easily be accommodated by the existing roadway network, and because the project will be required to abide by zoning requirements regarding auto and bicycle parking, and requirements for any necessary improvements in the public right-of-way to accommodate the facility, the project would not conflict with a program, plan, ordinance or policy addressing the circulation system, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would conflict or be inconsistent with CEQA Section 15064.3 subdivision (b). SB 743 was enacted in September 2013 and fully implemented July 1, 2020, changing the way transportation impact analysis is conducted under CEQA. These changes include that auto delay, Level of Service, and similar measurements of vehicular roadway capacity and traffic congestion, be replaced with an analysis of VMT as the basis for determining significant traffic impacts under CEQA.

The project would add 60 housing units to an urban infill site, and as a senior living facility the residents will not be commuting for employment. Employees of the facility will commute to the site for employment, but the number of employees is fairly small (up to 20 staff for the senior living facility and up to 15 additional employees for the commercial and public uses). Further, CEQA Section 15064.3(b)1 states that projects within 0.5 miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. The project site is adjacent to a bus stop for Metro route 265, and within 0.5 miles of Metro bus route 258 and 128, as well as Long Beach Transit routes 21A and 21B. Routes 265 and 258 both connect to the Metro Green Line approximately two miles to the north, which connects to multiple other Metro facilities. Given the relatively low number of commuters that will be associated with the project, and its close proximity to active Metro lines, the Project's impact to VMT would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact could occur if a project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or introduce incompatible uses (e.g., farm equipment) on the site.

The placement of the curb on Paramount Blvd and 70th Street will remain unchanged, though the existing curb aprons on Paramount Blvd will be removed, and the apron on 70th Street replaced. Ingress and egress for the facility will be accommodated by one entrance on the alley and one on 70th Street, all of which will be designed in accordance with Public Works standards. There will be no other changes to the public rights-of-way, and the project does not introduce any unusual design elements that violate City standards. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact could occur if a project would result in inadequate emergency access.

The project will be accessible to emergency crews from the parking lot in the parcel to the north, Paramount Blvd, 70th Street, and the public alley at the rear of the site. The five foot wide setback at the north property line will ensure there is access to the north side of the building should the northern parcel be redeveloped. The proposed building will not encroach into Paramount Blvd or the alley nor interfere with them in any manner. Therefore, the project would not result in inadequate emergency access to itself or inadequate access to adjacent public rights-of-way for emergency purposes, and there would be no impacts.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a. Less Than Significant Impact. Would the project cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

As discussed above in Section V, Cultural Resources, the Phase I Cultural Resource Assessment of the project site found no record of cultural resources within the site or surrounding buffer area. The assessment also requested NAHC review of the Sacred Lands File which returned a negative result.

As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The City has provided such notice in conformance with the tribal consultation requirements of AB 52 by letter dated July 29, 2022. Representatives of the following Tribal Groups responded to request consultation pursuant to AB 52:

- Gabrieleño Band of Mission Indians-Kizh Nation

As Lead Agency for the Project, the City must determine whether substantial evidence exists, from the documents provided as part of AB 52 consultation, for a tribal cultural resource to be located on the project site. Following consultation the City concluded there is insufficient site-specific evidence of known tribal

cultural resources occurring within the project site and therefore, based upon the lack of evidence of project impacts on a landscape, sacred place, or object with cultural value to a California Native American tribe that is listed or eligible for listing, impacts would be less than significant.

This does not preclude the possibility that unknown resources may exist on the Project Site and be uncovered during ground-disturbing activities, and that potential is addressed below in XVIII.b, below.

b. Less Than Significant With Mitigation Incorporated. Would the project cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

As discussed above, there is insufficient evidence to suggest the project site may contain known tribal resources, however, there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. Consultation with the Gabrieleño Band of Mission Indians-Kizh Nation concluded with both parties in agreement to include a mitigation measure to avoid or mitigate any potential significant effects to any unknown tribal cultural resources the tribe believes may be present on the site.

As such, a Mitigation Measure TCR-1 is applied to the project which will require a monitor on site during excavation activities. Incorporation of the mitigation measure will reduce the project's potential to cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the PRC, Section 5024.1, to a less than significant level.

Mitigation Measures:

MM TCR-1: Tribal Cultural Resource Monitoring

1. Retain a Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal Monitor/Consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the Project location. This list is provided by the NAHC. The Tribal Monitor/Consultant will only be present on-site during ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project area. The Tribal Monitor/Consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. Work will be allowed to continue with monitoring provided by a qualified Kizh Nation Resource Management (KNRM) archaeologist if the Tribal Monitor/Consultant is unavailable and as approved by the Tribal Government. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

2. Unanticipated Discovery of Tribal Cultural or Archaeological Resources Procedures**:** Upon discovery of any tribal cultural or archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and Tribal Monitor/Consultant approved by the Gabrieleño Band of Mission Indians-

Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A project could have a significant impact if it would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

As a small-scale infill development in an area already served by all utilities and facilities, the project would not require nor result in the relocation or substantial expansion of service infrastructure. As urban infill, the project would generate at most a marginal net increase in the demand for electric power, natural gas, and telecommunications facilities relative to existing demand. These demands can be met from existing facilities and existing utility rights-of-way and will not require the relocation or construction of new facilities beyond the new site connections that will be required. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project could have a significant impact if there were not sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The City's Water Division provides water services to the site. The City procures water from groundwater wells withdrawing from the Central Subbasin, and water (both potable and recycled) imported from the Central Basin Municipal Water District (CBMWD), which receives the majority of its water from the Metropolitan Water District of Southern California (MWD), which obtains its water from the State Water Project and the Colorado River Aqueduct. The Central Subbasin is adjudicated, meaning the amount that can be extracted is fixed among those entities that have extraction rights, and the amount allocated to each user will likely never increase.

The City's 2020 Urban Water Management Plan (UWMP) analyzes the reliability of its water sources over 25 years including multiple dry year scenarios. The amount of water available from the Subbasin is fixed and is considered reliable for future projections, the amount of water obtained from the CBMWD is considered reliable as well, as the MWD has projected demand and availability over the next 25 years (including multiple dry years) and determined reliability over that time frame. The City estimates that demand is projected to be less than total available supply from existing sources through to the year 2040 in a 4 year multiple dry year scenario, but encounter minor shortfalls in a 5 year multiple dry year scenario in 2035 and 2040.[36] These shortfalls are anticipated to be manageable through conservation measures allowed per City Ordinance 1050 should they be necessary.

The UWMP assumes a population growth of 0.47 percent a year for a population of 61,266 in the year 2040 (the UWMP uses 55,461 as the population for 2020, the 2020 census counts 53,733 persons[37]). The proposed project will add 60 units which may house up to 105 people. Although occupants may come from the local population and would be within the RHNA and population projections for the City (see XIV, Population and Housing), if all 105 came from elsewhere the increase in population would be within growth estimates made in the UWMP.

The total estimated increase in water demand per day of 7,325.9 gallons is somewhat conservative because the community room will likely only be used intermittently. The estimated increase amounts to 8.2 acre-feet of water a year. According to the UWMP the City consumed 5,427 acre-feet of water in 2020. The increase in demand then would be a small fraction of one percent (0.15) increase over total water deliveries in 2020, and just 0.14 percent of the projected 2025 demand of 5,955 acre-feet. This increase in water usage is well within the City's projected water availability estimates. Because the increase is factored into the City's water planning, the project's potential to result in a substantial environmental impact due to insufficient water supplies would be less than significant.

[36] City of Paramount 2020 Urban Water Management Plan
[37] U.S. Census Bureau, 2020 Census of Population and Housing, Paramount city, California, April 1, 2020.

The estimated increase in water use at the site is detailed in **Table XIX-1, Project Water Demand**.

Table XIX-1
Project Water Demand

Previous Use	Units or Size	Demand Rate per Day*	Prior Water Demand per Day
Chapel	168 seats (28 pews, 6 people per pew)	3.6 gal per fixed seat	604.8 gal
Preschool	30 students (estimated)	10.8 gal per student	324 gal
Auto Repair Garage	2,200 sf	60 gal per 1,000 sf[1]	132 gal
Bar	2,500 sf	864 gal per 1,000 sf[2]	2,160 gal
		Total prior water demand per day	3,220.8 gallons

Proposed Use	Units or Size	Demand Rate per Day	Proposed Water Demand per Day
Single unit	15 units	84 gal per unit[3]	1,260 gal
Double unit/Independent unit	45 units	168 gal per unit[3]	7,560 gal
Community Dining	1,764 sf	420 gal per 1,000[4]	741 gal
Classrooms	49 Students[(a)]	13.2 gal per student	646.8 gal
Chapel	72 seats	3.6 gal per fixed seat[5]	259.2 gal
Retail suites	2,657 sf	30 gal per 1,000 sf[6]	79.7 gal
		Total proposed water demand per day	**10,546.7 gallons**
		Estimated increase in water demand per day	**7,325.9 gallons**

*All rates derived from the City of L.A. Bureau of Engineering Sewage Generation Factor chart, April 6, 2012. Water consumption figured at 120% of sewage generation rate.
[(a)] Max capacity at 20 sf per person
[1] Calculated at Machine Shop rate
[2] Calculated at Bar: Cocktail, Public Table Area
[3] Calculated at Rest Home rate, includes water use of entire facility
[4] Calculated at Banquet Room rate and includes use of kitchen
[5] Calculated at Chapel rate, assuming 14 square-feet per person for occupancy (twice the 7 sf minimum for assembly use without fixed seats in the International Building Code).
[6] Calculated at Retail Area < 100,000 sf rate.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. The project may have a significant impact if it would result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the project in addition to the provider's existing commitments.

The City relies on sewer service from the Los Angeles County Sanitation Districts and is within District No. 2, which participates in the Joint Outfall System that serves 73 cities in the County. According to the Districts the City's wastewater is directed to the Joint Water Pollution Control Plant (JWPCP) in the City of Carson[38] The JWPCP currently treats approximately 260 million gallons of wastewater per day (mgd), with a total capacity of 400 mgd.[39] **Table XIX-2, Project Wastewater Generation per Day,** illustrates estimated wastewater generation for the project.

[38] L.A. County Sanitation Districts, Facilities map, accessed January 25, 2022
[39] L.A. County Sanitation Districts, Joint Water Pollution Control Plant information page, accessed January 25, 2022 at: https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant

Table XIX-2
Project Wastewater Generation per Day

Previous Use	Units or Size	Generation Rate per Day*	Prior Wastewater Generation per Day
Chapel	168 seats (28 pews, 6 people per pew)	3 gal per fixed seat	504 gal
Preschool	30 students (estimated)	9 gal per student	270 gal
Auto Repair Garage	2,200 sf	50 gal per 1,000 sf	110 gal
Bar	2,500 sf	720 gal per 1,000 sf	1,800 gal
Total prior wastewater generation per day			2,684 gallons
Proposed Use	**Units or Size**	**Generation Rate per Day**	**Proposed Wastewater Generation per Day**
Single unit	15 units	70 gal per unit	1,050 gal
Double unit/Independent unit	45 units	140 gal per unit	6,300 gal
Community Dining	1,764 sf	350 gal per 1,000	617.4 gal
Classrooms	49 Students	11 gal per student	539 gal
Chapel	72 seats	3 gal per fixed seat	216 gal
Retail suites	2,657 sf	25 gal per 1,000 sf	66.4 gal
Total proposed wastewater generation per day			8,788.8 gallons
Estimated increase in wastewater generation per day			6,104.8 gallons
*All rates derived from the City of L.A. Bureau of Engineering Sewage Generation Factor chart, April 6, 2012.			

The total conservatively estimated increase in wastewater generation per day of 6,104.8 gallons would be 0.004 percent of the unused daily treatment capacity (140 mgd) of the JWPCP. Therefore**,** there would be adequate treatment capacity for the project and impacts to capacity would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. The project may have a significant impact if would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Waste collection services in the City are provided by CalMet Services, Inc. Solid waste generated by the project is subject to certain State requirements for waste diversion and separation. The California Integrated Waste Management Act of 1989 has been followed by a series of assembly bills including AB 341, AB 1826, and AB 876, which results in the facility being required to separate recyclables and organic waste, such as food waste, compostable paper, and landscape waste, so that they will be diverted from landfills and directed to recycling or composting facilities. This is to meet the State requirement to divert 50 percent of solid waste away from landfills. Waste service providers either provide various bins for separation at the source, or direct waste to sorting facilities, or a combination of both depending on circumstances. Waste that isn't diverted is directed to one or more landfills. The estimated solid waste generation rates for the project are detailed below in **Table XIX-3, Operational Solid Waste Generation.**

Table XIX-3
Operational Solid Waste Generation

Previous Use	Units or Size	Generation Rate per Day	Previous Solid Waste Generation per Day
Chapel	4,600 sf	0.007 lbs per sf	32.2 lbs
Preschool	30 students (estimated)	1 lbs per student	30 lbs
Auto Repair Garage	2,200 sf	0.9 lbs per 100 sf	19.8 lbs
Bar	143 people[1]	1 lbs per person	143 lbs
Total prior solid waste generation per day			**225 lbs**
Proposed Use	**Units or Size**	**Generation Rate per Day**	**Proposed Solid Waste Generation per Day**
Single units	15 units	5 lbs per unit	75 lbs
Double unit/Independent unit	45 units	10 lbs per unit	450 lbs
Community Dining	130 people	1 lbs per person	130 lbs
Classrooms	49 Students	1 lbs per student	49 lbs
Chapel	1,014 sf	0.007 lbs per sf	7.1 lbs
Retail suites	2,657 sf	2.5 lbs per 1,000 sf	6.6 lbs
Total Operations Solid Waste Generation per day			**718 lbs**
Total increase in solid waste generation per day			**493 lbs**

Source: Rates used reflect an average or best match of sample rates available from the CalRecycle Estimated Solid Waste Generation Rates, located at: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates
[1] Assuming 2,000 square-feet for patrons at 14 square-feet per person.

The total estimated solid waste generated per day is 718 pounds, which is 493 pounds more than the previous uses. This is a conservative estimate as the community dining facility, classrooms, and chapel would not be used to capacity on a daily basis. Assuming a 50 percent diversion rate, a total of 246.5 pounds per day of solid waste would be destined for landfills, an increase of 134 pounds over the previous uses. This waste could potentially be directed to the Southeast Resource Recovery Facility (SERRF) for incineration in Long Beach, the Sunshine Canyon landfill in Sylmar, or possibly the Olinda Alpha landfill in Brea. According to the County, the SERRF has a daily permitted capacity of 2,240 tons and currently receives approximately 1,218 tons a day. [40] Sunshine Canyon has the capacity to accept 12,100 tons a day but receives 7,420 tons, and is projected to remain operational for 17 more years. According to Orange County Waste and Recycling the Olinda Alpha landfill is permitted to receive 8,000 tons per day, but only receives on average 7,000 tons per day, and is projected to remain operational until 2030.[41] The project is located on an existing collection route and no changes to local service would be necessary to accommodate it. The refuse that will be generated by the project would amount to a small fraction of a percent increase to the waste accepted at any of the available disposal facilities, and therefore would not overwhelm the capacity of available facilities. Each available facility has more than enough capacity to accept the extra waste generated by the project.

The California Green Building Standards code requires that 65 percent of refuse generated from construction activities is diverted from landfills. To comply with this requirement Chapter 33 of the Paramount Municipal code requires projects to complete a Construction and Demolition Waste Diversion Plan which details the means and methods by which the project will achieve waste diversion goals. Compliance is monitored by the City, and waste that is ultimately directed to landfills would not be enough to overwhelm available facilities, as demonstrated above. Therefore, the project's impact on solid waste facilities, infrastructure, standards or goals, would be less than significant with regulatory compliance.

[40] Los Angeles County Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021.
[41] Orange County, Waste and Recycling, accessed June 10, 2022 at: https://oclandfills.com/landfills/olinda-landfill.

Mitigation Measures: No mitigation measures would be required.

e. Less Than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

The proposed project would generate solid waste that is typical of residential and office uses, and disposal through a professional waste collection service such as CalMet Services would routinely comply with all Federal, State, and local laws, statutes, and ordinances regarding the proper disposal of solid waste. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factor, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Impact Analysis

a-d. No Impact.

Wildfire is fire associated with undeveloped spaces and wild growing vegetation. The project site is located within an urbanized area that has been fully developed for decades, and there are no large undeveloped wildland areas near the it. The project site is not located within or near an existing or proposed State Responsibility Area (SRA)[42] or land classified as a VHFHSZ.[43] The nearest such areas are a VHFHSZ on the Palos Verdes peninsula and another just west of the City of Whittier, both roughly 11 miles away. Because the project site is not located in or near any SRAs or land classified as VHFHSZ, and not near any expanses of open space or wildlands, there would be no impacts in relation to wildfire.

Mitigation Measures: No mitigation measures are required.

[42] Board of Forestry and Fire Protection, State Responsibility Area Viewer, Accessed on July 6, 2021 at: https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/.
[43] CalFire, FRAP, FHSZ Viewer, Accessed on July 6, 2021 at: https://egis.fire.ca.gov/FHSZ/.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Analysis

a. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory, beyond the impacts identified in earlier sections of this analysis.

As discussed above in Section IV. Biological Resources, the project site is located within an urbanized area that has been fully developed for decades. The project would not eliminate a plant or animal community or restrict the range of any plant or animal. As discussed in Section V, Cultural Resources, the project development would not eliminate any known important examples of the major periods of California history or prehistory, and it would not eliminate any unknown important examples of California prehistory through required compliance with regulatory requirements. Impacts would be less than significant and no additional mitigation measures are required.

Mitigation Measures: No additional mitigation measures are required.

b. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project, in conjunction with other projects in the vicinity, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

The project is within an urbanized area of the City and would construct an eldercare facility on an infill site occupied by previous uses. As discussed in Section XIV, the scale of the Project is such that it would not significantly impact projected growth of the City, and as such it would not be anticipated to result in a cumulatively considerable contribution to regional impacts that could cause an adverse physical change in the environment. As concluded in this analysis, the project's incremental contribution to each evaluated issue would be less than significant, mitigated to less than significant, or would have no impact. As such, the project's contribution to cumulative impacts would be less than significant and no additional mitigation measures are required.

Mitigation Measures: No additional mitigation measures are required.

c. Less Than Significant Impact. A significant impact could occur if a project would have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly.

As discussed in the preceding analysis, the project would create 60 senior living housing units and commercial and public ground floor uses in a developed urban area and would not produce any significant impacts upon the environment that cannot be mitigated. All relevant aspects of the project have been analyzed and there is no substantial evidence that the project would have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly, therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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