
Addendum to the **El Camino College Fire Academy Mitigated Negative Declaration**

JUNE 2026

Prepared for:

EL CAMINO COMMUNITY COLLEGE DISTRICT

16007 Crenshaw Boulevard

Torrance, CA 90506

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
C2	General Commercial
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of Torrance
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
dB	decibels
dBA	A-weighted decibel
District	El Camino Community College District
DTSC	California Department of Toxic Substances Control
FEMA	Federal Emergency Management Agency
GHGs	greenhouse gases
HVAC	heating, ventilation and air conditioning
Leq	Energy equivalent or energy average level
LID	Low Impact Development
MND	mitigated negative declaration
MS4	Municipal Separate Storm Sewer System
MT	metric tons
NAHC	Native American Heritage Commission
project or proposed project	El Camino College Fire Academy project
RCNM	Federal Highway Administration's Roadway Construction Noise Model
RWQCB	Los Angeles Regional Water Quality Control Board
SCCIC	South Central Coast Information Center
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SLF	Sacred Lands File
SWPPP	stormwater pollution prevention plan
VMT	vehicle miles traveled
WEAP	Worker Environmental Awareness Program
WQMP	water quality management plan

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1 Introduction

1.1 Project Overview

The El Camino Community College District (District) certified the Mitigated Negative Declaration (MND) for the Fire Academy Project in June 23, 2022. The MND evaluated the potential environmental impacts of the construction of the El Camino College Fire Training Facility, which includes new classrooms, locker rooms, a multipurpose room, an administrative office, fire apparatus storage building, a fire tower, a physical training area, a ventilation props storage area, and landscaped areas.

The project is the subject of analysis in this document pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the District is the lead agency with principal responsibility to consider the project for approval.

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law described in Public Resources Code Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an Environmental Impact Report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

Sections 15162 and 15164 of the CEQA Guidelines discuss a lead agency's responsibilities in handling new information that was not included in a project's final EIR.

Section 15162 of the CEQA Guidelines provides the following:

1. When an EIR has been certified or a negative declaration for a project has been prepared, no subsequent EIR or negative declaration shall be prepared for that project unless the District determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - a. Substantial changes are proposed in the project which will require major revisions of the EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - b. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
 - i. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

CEQA Guidelines Section 15164 provides the following:

1. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
2. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
3. The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
4. A brief explanation of the decisions not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's finding on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

1.3 Purpose and Need

The project would allow the District to construct and operate the proposed Fire Training Facility to support the Fire Training program.

1.4 Format and Content of this Addendum

The following components make up this addendum:

- Introduction (Chapter 1) and Project Description (Chapter 2)
- The completed Environmental Checklist and its associated analyses (Chapter 3), which conclude that the project would not result in any new significant environmental impacts or substantially increase the severity of environmental impacts beyond the levels disclosed in the MND

1.5 Preparation and Processing of this Addendum

The District directed the preparation of this addendum. This document was prepared by the consulting firm Dudek, however, the District is the CEQA lead agency and owner of the document.

This addendum will be forwarded to the District's decision-making body for review as part of its deliberations concerning the project. If approved, the decision-making body will adopt findings relative to the project's environmental impacts.

1.6 Initial Study Checklist

The District prepared the project's Environmental Checklist per CEQA Guidelines Sections 15063(d)(3) and 15168(c)(4). CEQA Guidelines Appendix G includes a suggested checklist to indicate whether the conditions set forth in Section 15162, which would require a subsequent or supplemental EIR, are met and whether there would be new significant impacts resulting from the project not examined in the MND. The checklist can be found in Chapter 3 of this document. Following the checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist.

For this addendum, the following four possible responses to each of the individual environmental issue areas are included in the checklist:

1. **New Significant Impact.** This response is used to indicate when the project has changed to such an extent that major revisions of the MND are required due to the presence of new significant environmental effects.
2. **More Severe Impacts.** This response is used to indicate when the circumstances under which the project is undertaken have changed to such an extent that major revisions of the MND are required because the severity of previously identified significant effects would substantially increase.
3. **New Ability to Substantially Reduce Significant Impact.** This response is used to show when new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the MND was certified; it indicates that there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the project.
4. **No Substantial Change from Previous Analysis.** This response is used to indicate that the project would not create a new impact or substantially increase the severity of the previously identified environmental impact disclosed in the MND.

The Environmental Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project in the context of environmental impacts addressed in the previously certified MND. In doing so, the District will determine the extent of additional environmental review, if any, required for the project.

1.7 Existing Documents to be Incorporated by Reference

CEQA Guidelines Sections 15150, 15168(c)(3), and 15168(d)(2) permit and encourage an environmental document to incorporate by reference other documents that provide relevant data. The El Camino College Fire Academy Mitigated Negative Declaration which is herein incorporated by reference pursuant to CEQA Guidelines Section 15150, is available for review at the following location:

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

1.8 Points of Contact

The lead agency for this environmental document is the District. Any questions about the preparation of this addendum, its assumptions, or its conclusions should be referred to the following:

Jessie Wang, Vice President of Administrative Services
El Camino Community College District
16007 Crenshaw Boulevard
Torrance, CA 90506
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2 Project Description

2.1 Project Location

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

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

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

2.2 Proposed Project

Originally Proposed Project

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

Four new classrooms would be constructed on the southern perimeter of the site, each would occupy a 24-foot by 40-foot area, and would be one-story tall. The locker room would be located on the southern perimeter, would include showers, restrooms, and lockers, and would occupy a 60-foot by 40-foot area and would be one-story tall. The modular multipurpose room would be located on the southern perimeter, occupy a 40-foot by 72-foot area and would be one-story tall. The administrative office would be located on the southern perimeter, occupy a 24-foot by 42-foot area and would be one-story tall. The fire apparatus storage building would be located in the western perimeter of the project site and would include three apparatus bays, which would occupy a 60-foot by 50-foot area, and a supply, maintenance, storage, and laundry area. The fire tower would be located in the center of the project site, would be four-stories tall with an open roof deck above the fourth story, and would support fire simulation activities. The physical training area would surround the fire tower on all four sides. The ventilation props storage area would occupy a 28,500 square foot area and would be located on the southern perimeter of the site.

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

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

Proposed Project Changes

Changes to the originally proposed project (analyzed in the MND) include the following, and are shown in Figure 3, Proposed Site Plan:

- The location of the propane tank is now proposed to be next to the trash enclosure on the east side of the proposed Administration building.
- The trash enclosure would be relocated from its originally proposed location
- The buildings considered in the MND have now been consolidated into the Classroom and Administration buildings. These buildings have shifted slightly from their locations in the initial site plan.
- An 8-foot tall sound wall is being placed between the Classroom and Administration buildings.
- The proposed accessible parking area has been resized and updated
- New gates would be added to the project site
- Additional site improvements would be implemented on the east side of the project site
- Expansion of the ventilation props storage area by 14,280 square feet to the east

2.3 Project Approvals

The following discretionary approvals would be required prior to implementing the project:

- District Board of Trustees Approval

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3 Initial Study Checklist

1. Project title:

El Camino College Fire Academy Mitigated Negative Declaration

2. Lead agency name and address:

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

3. Contact person and phone number:

Jessie Wang, Vice President of Administrative Services
El Camino Community College District
16007 Crenshaw Boulevard
Torrance, CA 90506
Office: 310-660-3593 x3107
jwang@elcamino.edu

4. Project location:

16007 Crenshaw Boulevard
Torrance, California 90506

5. Project sponsor's name and address:

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

6. General plan designation:

Public/Quasi-Public/Open Space (PUB)

7. Zoning:

General Commercial (C2)

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

Refer to Section 2, Project Description, for a detailed description of the project.

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

Refer to Section 2, Project Description, for a detailed description of the project's surroundings.

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

Not applicable.

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 and Soils |
| ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials | ☐ Hydrology and Water Quality |
| ☐ Land Use and Planning | ☐ Mineral Resources | ☐ Noise |
| ☐ Population and Housing | ☐ Public Services | ☐ Recreation |
| ☐ Transportation and Traffic | ☐ Utilities and Service Systems | ☐ Mandatory Findings of Significance |

EVALUATION OF ENVIRONMENTAL IMPACTS

Pursuant to Section 21166 of CEQA and Section 15162 of the CEQA Guidelines, if the lead agency determines that one or more of the following conditions are met, a subsequent EIR or negative declaration shall be prepared for the project:

1. Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than identified in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
 - D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Where none of the conditions specified in Section 15162 are present, the lead agency can choose not to prepare a subsequent or supplemental EIR (CEQA Guidelines Section 15162(a)), but may prepare a negative declaration, an addendum, or no further CEQA documentation. Section 15164 of the CEQA Guidelines states that an addendum to an EIR or Negative Declaration shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

In accordance with the CEQA Guidelines, the District has determined that an Addendum to the El Camino College fire Academy MND is the appropriate environmental document for the project. This Addendum reviews the changes proposed by the project and any pertinent changes to the circumstances under which the project is undertaken that have occurred since the MND was certified. It also reviews any new information of substantial importance that was not known and could not have been known with exercise of reasonable due diligence at the time that the MND was certified.

3.1 Aesthetics

No Substantial Change from Previous Analysis. Similar to the originally proposed project, the project site is located in the City of Torrance in Los Angeles County. The City’s General Plan does not identify protected scenic vistas within the City. However, the General Plan identifies scenic view corridors, some of which are located south of the project site (City of Torrance 2010). Additionally, the City notes the hillsides along the City’s western and southern

boundaries provide views of the San Gabriel Mountains to the north and the hillsides in the Riviera neighborhood overlooking the Pacific Ocean. Neither of these examples are within the project site's vicinity. Under existing conditions, views of the project site are generally shielded by tall mature ornamental trees and in some cases not viewable due to a below grade underpass along Redondo Beach Boulevard. Moreover, views of the site from the south consist of the Dominguez Channel, ornamental trees, and the site's existing conditions as a surface parking lot as well as a parking structures north of Redondo Beach Boulevard. The project would redevelop an existing parking lot to construct a fire training facility on the campus of El Camino College. As such, the project would result in a change in the overall composition of existing views of the project site. However, similar to the originally proposed project, existing fencing and landscaping would provide screening to reduce visibility. Additionally, scenic vistas and other significant views identified in the City of Torrance's General Plan are not visible from the project site, and thus, would not be obstructed as a result of the project.

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

Similar to the originally proposed project, the project would not conflict with the City of Torrance's General Plan objectives or policies governing scenic quality. In addition to the City's General Plan, the City's Municipal Code contains regulations governing scenic quality. For example, Section 92.39.010 requires wireless telecommunication ("telecom") facilities on public and private property to reduce the visual effects of telecom equipment on public streetscapes and protecting scenic views by encouraging the location of antennas in non-residential areas. As stated previously, the project site does not contain above ground utilities on site. The closest above ground utilities are the electrical transmission lines which run along Redondo Beach Boulevard and traverse some of the parking lot adjacent to the project site. Therefore, the project would not conflict with this provision of the Municipal Code. Furthermore, Section 75.1 of the Municipal Code (also known as the City's Tree Ordinance) governs the placement of trees within public rights-of-way. As mentioned previously, vegetation on the project site includes landscaped areas with existing trees along the perimeter of the site; none of which would be removed as part of the project and would remain in place. Thus, similar to the originally proposed project, project implementation would follow local regulations governing trees within the public right-of-way, in accordance with the City's Municipal Code. Based on the analysis above, the project would be consistent with the Municipal Code.

As stated in the MND, existing light and glare conditions in the project area are typical of a suburban residential area adjacent to major transportation corridors, consisting of streetlights, external building and landscape lighting and internal building lighting emanating from windows in residential neighborhoods. Existing sources of light and glare on the project site consist of safety lighting and overhead lighting in parking areas and drive aisles. Similar to the originally proposed project, the project would introduce additional internal building lighting for new structures. Additionally, the project would include relocation of existing mounted light fixtures to accommodate the new construction. Once constructed, the project would be consistent with Section 3.10.3 of the City's Municipal Code, which governs artificial lighting standards. Compliance with the City's regulations would reduce potential adverse impacts associated with light and glare by incorporating designs which direct rays to the project site and adjacent properties are protected from glare. Further, fencing and landscaping would reduce potential light and glare impacts resulting from the project. Therefore, the project would not introduce new aesthetic impacts.

3.2 Agriculture and Forestry Resources

No Substantial Change from Previous Analysis. The project site is not located on, or in the vicinity of, agricultural or forestry resources. The project site is located in a developed, urban area and is surrounded by residential development. With implementation of the proposed project, no new or more severe impacts associated with agricultural lands, forestland, or timberland would occur, and the level of impact would not change from the level identified in the FEIR. No new mitigation measures are required.

3.3 Air Quality

No Substantial Change from Previous Analysis. Similar to the original project, because the proposed project is consistent with the current land use designation and zoning and is not anticipated to result in substantial growth that would conflict with existing employment-population projections, it would not conflict with or exceed the assumptions in the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan. Accordingly, the proposed project is consistent with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy forecasts used in the SCAQMD Air Quality Management Plan development (SCAQMD 2017) .

As part of the MND, the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 and emission factors from the EPA's Compilation of Air Pollutant Emission Factors (AP-42), were used to estimate emissions from construction and operation of the project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including residential development. As determined in the MND, the proposed project's maximum daily construction emissions would not exceed SCAQMD thresholds for any criteria pollutant. Because the revised project would only result in a slight reorientation of the location of certain project components, and would result in a minimal expansion of the project footprint, no significant changes to the construction emissions are anticipated. Similarly, the MND determined that the proposed project's maximum daily operational emissions would not exceed SCAQMD thresholds for any criteria pollutant. Because the revised project would only result in a slight reorientation of the location of certain project components, and would result in a minimal expansion of the project footprint, no significant changes to the operational emissions are anticipated.

As stated in the MND, project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. Trucks and worker trips associated with the proposed project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. As shown in the MND, proposed construction activities would not generate emissions in excess of site-specific Localized Significance Thresholds; and therefore, localized impacts of the proposed project would be less than significant. Because the revised project would only result in a slight reorientation of the location of certain project components, and would result in a minimal expansion of the project footprint, no significant changes to the construction emissions are anticipated. The revised project would be located the same distance from nearby sensitive receptors, as originally analyzed. Thus, no additional impacts would occur.

Similar to the original project, given the considerably low level of carbon monoxide (CO) concentrations in the project area, and the minimal increase in daily trips, project-related mobile emissions are not expected to contribute significantly to CO concentrations, and a CO hotspot is not anticipated to occur.

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

As stated in the MND, during operation the project would have periodic trainings involving fire simulations that would be either common combustible fires using 50-lb wood pallets, or propane with a pre-piped system. Per the applicant, trainings would occur 75 days per year with up to three tests per day, and the simulations would last no longer than 5 minutes. Additionally, the project proponent would be required to comply with SCAQMD Rule 444, which would minimize impacts and ensure that smoke is managed consistent with state and federal law in order to protect public health and safety. The revised project would also be subject to this rule. Given the brief nature of trainings and compliance with SCAQMD Rule 444, there would be no additional long-term operational impacts associated with odors.

3.4 Biological Resources

No Substantial Change from Previous Analysis. The proposed project site is located on an existing college campus and surrounded by urban residential development, which precludes the growth of biologically sensitive habitat and the use of existing vegetation by native and non-native species. However, if the relocation of the project components would require the removal of trees, this could result in impacts to nesting birds. With implementation of the proposed project, no new or more severe impacts associated with biological resources would occur, and the level of impact would not change from the level identified in the MND. No new mitigation measures are required; however, the following mitigation measures from the MND would apply to mitigate potential impacts to nesting birds:

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

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a qualified biologist. The buffer will be of a distance to ensure

avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests will be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned.

3.5 Cultural Resources

No Substantial Change from Previous Analysis. As part of the MND, a review of the California Historical Resources Information System (CHRIS) database records search for the project site did not identify any historical resources, including both archaeological and built environment resources, within the project site. Moreover, a pedestrian survey of the project site did not identify any extant structures within the project footprint. Although a slight expansion of the project area would occur as part of the project changes, the expansion area does not include extant structures. Therefore, impacts associated with historical resources would be less than significant, similar to what was determined in the MND.

A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an Archaeological Resources Assessment that was prepared as part of the MND. As determined in the MND, the potential to encounter unknown intact archaeological resources between current grade and 7.5 to 10 feet below ground surface along the western and southern perimeter of the project site is unlikely; however, the potential to encounter unknown intact archaeological resources within the paved parking lot between current grade to the proposed depths of disturbance within the paved parking lot is possible. The project would occur within the same paved parking lot identified in the MND, but with a slightly expanded footprint to the east. With implementation of the proposed project, no new or more severe impacts associated with archaeological resources would occur, and the level of impact would not change from the level identified in the MND. No new mitigation measures are required; however, the following mitigation measures from the MND would apply to mitigate potential impacts to archaeological resources:

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

MM-CUL-2 Retention of a Qualified Archaeologist for On-Call/Spot Monitoring - A qualified archaeologist shall be retained and on-call to conduct spot monitoring and respond to and address any inadvertent discoveries

identified during ground disturbing activities whether within disturbed, imported or native soils. In the event of an inadvertent discovery of archaeological or tribal cultural resources, a qualified archaeologist shall be retained to monitor all initial ground disturbance. Initial ground disturbance is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to archaeological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current project-related construction. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to further encounter cultural deposits or material. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance as previously defined in these mitigation measures causing monitoring to be hindered by the distance of the simultaneous activities. The need for an additional monitor shall be made by the qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards. The archaeological monitor shall be responsible for maintaining daily monitoring logs for those days monitoring occurs.

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

MM-CUL-3

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

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

of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains.

As discussed in the MND, no prehistoric or historic burials were identified within the project site as a result of the CHRIS records search or pedestrian survey. The proposed project would result in a slight expansion of the project footprint, but is not located in an area where prehistoric or historic burials were identified. Therefore, similar to the originally proposed project, the project would be subject to state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). No additional impacts would occur.

3.6 Energy

No Substantial Change from Previous Analysis. As determined in the MND, the implementation of the project would increase the demand for electricity and natural gas at the project site and petroleum consumption in the region during construction and operation. However, as the project would be consistent with current regulations and policies, the project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. The project's energy consumption demands during construction and operation would conform to the State's Title 24 standards such that the project would not be expected to wastefully use gas and electricity. Since the revisions to the proposed project would also comply with Title 24 conservation standards, the proposed project would not directly require the construction of new energy generation or supply facilities or result in wasteful, inefficient, or unnecessary consumption of energy. Moreover, vehicle usage associated with the project would use less petroleum due to advances in fuel economy and potential reduction in Vehicle Miles Traveled (VMT) over time. Therefore, no new impacts would occur.

3.7 Geology and Soils

No Substantial Change from Previous Analysis. As determined in the MND, there are no known active faults traversing the site. The closest known active or potentially active fault is the Newport-Inglewood Fault approximately 3.5 miles to the east of the project site. For the reasons described above, the project site is not located within an Alquist-Priolo Earthquake Fault Zone. Thus, the potential for surface rupture of an Alquist-Priolo Earthquake Fault on the project site is low. The slight expansion of the project site would not place the project closer to an existing fault.

The MND determined that no conditions are present on-site that would amplify or otherwise worsen the effects of ground shaking. Similar to the originally proposed project, design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize hazards associated with seismic ground shaking to the extent practicable. Slight changes to the proposed site plan would not increase the probability or exacerbate the potential for strong seismic ground shaking to occur.

The MND determined that the south/southwestern portion of project site is located within an area of susceptibility for liquefaction as mapped on state liquefaction hazards maps. Additionally, it was determined that groundwater was assumed to be at a depth of 20 feet below existing grade. It was determined that the potential for damaging liquefaction to occur at the project site's surface is considered low. The project revisions would not result in the project being relocated into an area with higher susceptibility of liquefaction. Therefore, similar to the originally

proposed project, design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize hazards associated with liquefaction and settlement to the extent practicable.

As determined in the MND, the project site is level without significant slopes. The project site is not considered susceptible to static slope instability or seismically induced landslides. The slight expansion of the originally proposed project site would not result in construction within a significant slope.

Similar to the originally proposed project, construction of the proposed project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. Because the project would result in more than 1 acre of ground disturbance, the project would be subject to the National Pollutant Discharge Elimination System stormwater program, which includes obtaining coverage under the State Water Resources Control Board's General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit; Order 2009-0009-DWQ). Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation. The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP). Among the required items that must be included within a SWPPP are project design features intended to protect against substantial soil erosion as a result of water and wind erosion, commonly known as BMPs. The project would also be subject to implementation of such BMPs, which would minimize erosion during ground disturbance to the extent feasible. Similar to the originally proposed project, during operation, the developed portion of the project site would be covered with buildings, hardscape, and landscaping, which would preclude erosion. Adherence to existing regulations and implementation of standard construction practices would ensure that no additional soil erosion impacts would occur.

Based on the analysis in the MND, the originally proposed project site is generally underlain by cohesive soils, and not by clean sands or sandy soils, which have the potential to produce lateral ground displacements as a result of liquefaction. Although the project would result in a slight expansion of the project footprint, the expanded footprint would not be underlain by clean sands or sandy soils. As such, similar to the originally proposed project, the potential for damaging lateral ground displacement is considered a negligible risk and incorporation of the geotechnical recommendations summarized in the MND, and compliance with the California Building Code, would ensure that the project is designed and constructed to minimize soil-related hazards, including the potential for settlement of compressible soils.

Similar to the originally proposed project, incorporation of the geotechnical recommendations summarized in the MND, and compliance with the California Building Code would reduce any risks associated with expansive soils. And implementation of the proposed project would not increase the probability or exacerbate the potential for soil expansion to occur.

As determined in the MND, no paleontological resources were identified within the original proposed project area as a result of the institutional records search, and desktop geological and paleontological review, and the proposed project site is not anticipated to be underlain by unique geologic features. However, the proposed project area is mapped as being underlain by older Quaternary alluvial deposits that have produced significant paleontological resources near the proposed project site. Similar to the original project, intact paleontological resources may be present within these deposits at the surface or at depth. Given the proximity of past fossil discoveries in the surrounding area, the proposed project is moderately to highly sensitive for supporting paleontological resources in areas underlain by Pleistocene alluvium. With implementation of the proposed project, no new or more severe impacts associated with paleontological resources would occur, and the level of impact would not change from the

level identified in the MND. No new mitigation measures are required; however, the following mitigation measures from the MND would apply to mitigate potential impacts to paleontological resources:

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

3.8 Greenhouse Gas Emissions

No Substantial Change from Previous Analysis. Project construction would not be intense or long-term, and as such, is not anticipated to significantly contribute to greenhouse gas (GHG) emissions. Because the project would result in a slight expansion and reorientation of the proposed project relative to what was analyzed in the MND, and the MND analysis captured the construction of the project, the project would not result in a change in impacts relative to the MND.

As discussed in the MND, CalEEMod Version 2020.4.0 was used to estimate potential project-generated operational GHG emissions from mobile sources, area sources (landscape maintenance equipment, and fire trainings), water use and wastewater generation, and solid waste (i.e., CO₂ equivalent [CO₂e] emissions associated with landfill off-gassing). Mobile source emissions were estimated based on project-specific trip generation estimates and CalEEMod default values for trip characteristics, and area source emissions were estimated using CalEEMod default values for the fire training facility. Regarding solid waste, to estimate potential GHG emissions associated with landfill off-gassing, CalEEMod default values were applied. Similarly, to estimate potential GHG emissions from supply, conveyance, treatment, and distribution of water and wastewater treatment, CalEEMod default values were applied. It was determined that the project would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year, and the project's GHG contribution would not be cumulatively considerable and is less than significant. Because no changes to operation of the project are proposed, emissions would be the same as estimated in the MND. No additional impacts would occur.

The proposed project is assumed to begin operation by 2025 after completion of construction. Table 11 shows the estimated annual GHG emissions from operation of the proposed project. As discussed above, total annual operational emissions were combined with amortized construction emissions and compared to SCAQMD's recommended threshold of 3,000 MT CO₂e per year for non-industrial projects.

The MND determined that the original project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Applicable plans for the proposed project site include the El Camino College Sustainability Plan, the Southern California Association of Government's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, and CARB's 2017 Scoping Plan. Because the project would result in a slight expansion and reorientation of the proposed project relative to what was analyzed in the MND, the revised project would not introduce new components that would result in conflicts to applicable plans. As such, no additional impacts would occur.

3.9 Hazards and Hazardous Materials

No Substantial Change from Previous Analysis. As discussed in the MND, construction of the proposed project would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered acutely hazardous and are used routinely throughout urban environments for construction projects and structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Because the revised project would require the use of the same materials as originally proposed, construction of the proposed project is not anticipated to release hazardous materials into the environment that such a significant hazard to the public or the environment would occur.

Operation of the proposed project would require a variety of materials, some of which may be potentially hazardous. These materials are described in the MND. In the event of an upset or accident condition involving hazardous materials used during operation, such materials could be released to the environment and could pose a hazard to the public or the environment. However, due to the types of materials that are expected to be used and the existing regulations that are in place to control the manner in which such substances are used, handled, stored, transported, and disposed, potential upset and accident conditions are unlikely to occur. Furthermore, on-site activities would be centered upon fire protection services training. Hazardous materials and/or wastes stored onsite for operation (including fire suppression chemicals) would be included in the existing hazardous material inventories, and appropriate permits and reports would be updated. Handling, storage, and disposal of these materials would continue to be conducted in accordance with applicable federal, state and local laws and regulations. Upon compliance with applicable local, state, and federal regulations, the likelihood of upset or accident conditions involving hazardous materials used at the project site would be reduced to the extent practicable. Because the revised project would require the use of the same materials as originally proposed, no additional impacts would occur.

As part of the MND, a search of regulatory database listings of hazardous materials sites was conducted by accessing the California Department of Toxic Substances Control (DTSC) EnviroStor Hazardous Waste and Substances List (Cortese) (DTSC 2021). The project site is not listed on database listings for hazardous materials (DTSC 2020). Additionally, the project site is not listed on the database listings prepared by the State Water Resources Control Board GeoTracker (SWRCB 2021). As such, the originally proposed project would not be located

on a site that is included on a list of hazardous materials sites. Although the revised project would result in a slight expansion of the project footprint, the expansion area would not occur in a hazardous material site, as none were located adjacent to the original project footprint. No additional impacts would occur.

As stated in the MND, the project site is not located within two miles of a public airport or public use airport. Hawthorne Municipal Airport is approximately 2.82 miles, Compton/Woodley Airport is approximately 4.58 miles, LAX is approximately 4.7 miles, and Torrance Airport is approximately 5.13 miles from the project site. As such, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. Because the revised project would be at the same location as originally proposed, no new impacts would occur.

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

3.10 Hydrology and Water Quality

No Substantial Change from Previous Analysis. As stated in the MND, compliance with the Construction General Permit and local regulations for proper management of construction sites would prevent construction activities associated with the proposed project from having substantial adverse impacts on water quality. The revised project would be subject to the same regulations. The MND also states that the project would be subject to the Municipal Separate Storm Sewer System (MS4) Permit, issued by the Los Angeles Regional Water Quality Control Board (RWQCB). The MS4 Permit requires implementation of Low Impact Development BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The Low Impact Development (LID) Ordinance is designed to reduce runoff from impervious surfaces, including new development, through landscape design that promotes water retention, permeable surface design, natural drainage systems, and on-site retention where feasible (RWQCB 2013). These project-specific designs would reduce impacts to water quality associated with redevelopment. Additionally, a project-specific water quality management plan (WQMP) would be prepared for operation of the proposed project. The WQMP would ensure appropriate BMPs are implemented for post-construction and operation of the project. The combination of Low Impact Development (LID) BMPs, source control BMPs, and other treatment control BMPs addressed within the WQMP would address identified pollutants and hydrologic concerns from new development that could result in impacts to water quality standards. Because the revised project would be subject to the same requirements, no new impacts would occur.

As stated in the MND, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Because the revised project would not result in any changes to water use, and would not result in changes that would interfere substantially with groundwater recharge, no new impacts would occur.

As stated in the MND, upon project buildout, the site would be covered with buildings, hardscape, and landscaping, which would largely preclude on-site erosion and siltation. Any long-term changes in drainage patterns are expected to be minor, highly localized changes. Compliance with the project-specific LID Report would reduce stormwater runoff from the project site and would require capture and treatment of all runoff before it is discharged into the public storm drain system, thereby reducing the potential for on-site and off-site erosion and siltation. Due to required compliance with existing regulations, any alterations to the existing drainage pattern at the project site would result in less than significant impacts relative to erosion, siltation, or flooding, or polluted runoff. Because the revised project would also be subject to existing regulations, no new impacts would occur.

According to the MND, the project site is mapped within Flood Zone X by the Federal Emergency Management Agency (FEMA). Flood Zone X is defined as an area of minimal flood hazard and, as such, the potential for flooding at the project site and surrounding area is unlikely. Additionally, based on separation of the site from the Alondra Aquatic Center pond by the Dominguez Channel, seiche impact at this site is highly unlikely. The revised project would result in a slight expansion, but this expanded footprint would not be located in a flood risk area. No new impacts would occur.

3.11 Land Use and Planning

No Substantial Change from Previous Analysis. As stated in the MND, the project site consists of an existing parking lot (Parking Lot L) used for El Camino College. Specifically, the proposed project site is located on the southern portion of the campus, south of West Redondo Beach Boulevard. The site is completely paved with several landscape features located throughout. Vehicular access is provided via driveways on Manhattan Beach Boulevard, Crenshaw Boulevard, West Redondo Beach Boulevard, and West 164th Street. Pedestrian access is available via sidewalk infrastructure adjacent to Crenshaw Boulevard and West Redondo Beach Boulevard. The proposed project would redevelop an existing parking lot to support a new fire training facility on the El Camino College campus. The project would not include new construction of on- or off-site infrastructure, such as buildings, roads, etc. that would physically divide the surrounding established community. Additionally, the project would not permanently affect or impede the movement of pedestrians or vehicles. Because the revised project would be located within the same site as considered in the MND, and would include the same uses as originally proposed, no new impacts would occur.

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

3.12 Mineral Resources

No Substantial Change from Previous Analysis. The project site is developed as a college campus and upon implementation of the project, will continue to operate as such. With implementation of the proposed project, no new or more severe impacts associated with the mineral resources would occur, and the level of impact would not change from the level identified in the MND. No new impacts would occur.

3.13 Noise

No Substantial Change from Previous Analysis. The MND included a construction noise analysis, which was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). The results of the analysis determined that although construction noise levels would not exceed applicable thresholds, the noise during project construction would be higher than existing ambient noise levels. Therefore, BMPs are recommended to reduce noise from construction. The revised project would result in a slight expansion of the project area. However, this expansion area would not be located closer to a sensitive noise receiver than was originally considered. The revised project would also implement the BMPs as provided in the MND. No additional construction impacts would occur.

During operation of the project, the buildings would have rooftop-mounted heating, ventilation and air conditioning (HVAC) equipment which would create noise. Additionally, on-site training activities (including from the proposed training tower) would take place which would result in noise. The MND included an HVAC equipment noise analysis, which indicated that the project would comply with the City Municipal Code and would also be well below the measured ambient noise levels. The revised project would result in a slight shift and consolidation of the originally proposed project buildings. However, these changes would not result in changes to the operational parameters of the HVAC system, nor would this equipment be located closer to nearby sensitive noise receivers. Therefore, no new impacts would occur.

As stated in the MND, training activities conducted onsite would include periodic use of the following equipment: power tools including chain saws, rotary saws, vehicle extrication tools, ventilation fans, and cordless tools. In addition, hand tools would be used such as hammers, prybars, haligans, axes, and sledgehammers. These would all be used periodically (not more than a few hours per day), and generally on weekdays between the hours of 8 a.m. and 4 p.m. Once or twice a year, training activities would be conducted in the evening hours, before 10 p.m. It is also anticipated that training activities would also be conducted periodically (approximately every other month) on Saturdays. It is anticipated that the noisiest equipment would consist of power saws, which would be used for training for approximately 3 days every other month. Based upon information provided by the applicant, a realistic worst-case training scenario (in terms of noise levels) was modeled in the MND. The results of the combined on-site noise analysis indicated that the project would comply with the City Municipal Code Region 4 noise standard for daytime hours of 55 average noise level (dBA Leq). The on-site noise levels would also be less than the measured ambient noise levels, which ranged from approximately 57 to 66 dBA Leq. Therefore, noise from on-site operational activities of the original project would result in less than significant noise levels. The revised project would result in a slight expansion of the ventilation props area to the east. The training activities could occur in this area. However, the distance to the closest sensitive noise receivers from this expanded area is further than what was considered in the operational noise models (150 feet). Therefore, the worst-case operational noise scenario was considered in the MND. No new impacts would occur.

As stated in the MND, operation of the project would include mechanical equipment that would produce negligible levels of groundborne vibration. Groundborne vibration information related to construction activities (including demolition) has been collected by the California Department of Transportation (Caltrans 2020), which indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begins to annoy people. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet (FTA 2018). Groundborne vibration is typically attenuated over short distances. At the distance from the nearest vibration-sensitive receivers (residences located to the south and southwest) to where construction activity would be occurring on the project site (approximately 150 feet), and with the anticipated construction equipment, the peak particle velocity vibration level would be approximately 0.0061 inches per second. As determined in the MND, at the closest sensitive receptors, vibration levels would be well below the vibration threshold of potential annoyance of 0.1 inches per second. The revised project would result in a slight reorientation of project features from their original location. These changes would not result in a relocation that would introduce construction activities significantly closer to nearby vibration-sensitive receivers. Therefore, no new impacts would occur.

3.14 Population and Housing

No Substantial Change from Previous Analysis. The original project would not include a housing component and would not induce significant population growth or displace any residents or housing as a result of implementation. With implementation of the revised project, no new or more severe impacts associated with population and housing would occur, and the level of impact would not change from the level identified in the MND.

3.15 Public Services

No Substantial Change from Previous Analysis. The need for new public service facilities and personnel (e.g. fire protection services, police protection services, schools etc.) is usually associated with substantial population growth such that the existing facilities and personnel cannot meet acceptable service standards and response times. The revised project would not include a housing component and would not induce a direct or indirect increase in campus staffing, student enrollment or significant population growth in the surrounding area. With implementation of the revised project, no new or more severe impacts associated with public services would occur. The level of impact would not change from the level identified in the MND.

3.16 Recreation

No Substantial Change from Previous Analysis. The need for new recreational facilities (e.g. parks etc.) is usually associated with substantial population growth such that the existing recreational facilities cannot meet acceptable service standards and significant deterioration of the facilities results. The revised project would not induce an increase in campus staffing, student enrollment, or significant population growth in the surrounding area. As such, no existing recreational facilities would be adversely impacted as a result of project implementation, and no additional public recreational facilities would be warranted. With implementation of the revised project, no new or more severe impacts associated with recreation facilities would occur, and the level of impact would not change from the level identified in the MND.

3.17 Transportation

No Substantial Change from Previous Analysis. As stated in the MND, CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. The original project would result in the generation of approximately 45 new students and 7 new employees. Using the Junior/Community College trip rate per student per the Institute of Transportation Engineers (ITE 2021), Trip Generation Manual, 11 Edition, the proposed project was estimated to generate a total of 52 daily trips, with 5 AM peak hour trips and 5 PM peak hour trips. If a project generates a net increase of 110 or more daily vehicle trips¹, then further VMT analysis is required. Because the project would generate less than 110 daily trips, a less than significant transportation impact determination can be made. Because the revised project would not result in an increase in the generation of the number of students, employees, or vehicular trips, it is not anticipated to result in new impacts.

As stated in the MND, vehicular access to the project site would be via existing roadways of Redondo Beach Boulevard, Crenshaw Boulevard, and West 164th Street. The proposed project would add new classrooms to the existing campus (by removing some of the existing parking spaces) and use the existing internal roadways for access and circulation. During construction, no lane closures, sidewalk closures, or changes in campus vehicular and pedestrian circulation would occur. Therefore, the original project would not increase hazards due to a geometric design feature or incompatible use. Because the project revisions only involve a slight expansion of the project area, and a reorientation of proposed buildings and features, the revised project would not result in lane closures, sidewalk closures, or changes in campus vehicular and pedestrian circulation. Therefore, no new impacts would occur.

3.18 Tribal Cultural Resources

No Substantial Change from Previous Analysis. The MND complied with Assembly Bill (AB) 52 (PRC 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications. The District notified all applicable tribes of the project, of which, one tribe requested formal consultation. This consultation was conducted and concluded on February 22, 2022. As a result of tribal consultation efforts, no Tribal Cultural Resources (TCRs) were identified within the project site. Additionally, no archaeological resources of a Native American origin were identified as a result of the CHRIS or NAHC SLF records searches nor through extensive background research of documents, maps and aerial images. Therefore, the District has not identified any TCRs within the project site that would warrant discretionary designation of a resource as a TCR. However, in an abundance of caution, and through careful consideration of the consulting tribe's request, mitigation measures were proposed in the MND to ensure that impacts to unknown TCRs will be treated appropriately throughout project construction. Although the revised project would involve a slight expansion of the project area, and a reorientation of proposed buildings and features, the revised project would not be located within an area with TCRs, as none of these resources were identified in the

¹ Governor's Office of Planning and Research Technical Advisory, 2018: CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

areas adjacent to the original footprint. No new mitigation measures are required; however, the following mitigation measures from the MND would apply to mitigate potential impacts to TCRs:

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

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

The Native American monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the District upon written request to the Tribe.

3.19 Utilities and Service Systems

No Substantial Change from Previous Analysis. As stated in the MND, the proposed project would adhere to state and local legislation pertaining to the payment of impact fees to accommodate the project's fair-share contribution to increased demand for utility infrastructure and services. As such, the project would have a less than significant impact to the environment as a result of the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities. Similarly, the revised project would also be subject to state and local legislation pertaining to the payment of impact fees. The revised project would not result in a significant increase in demand of the utilities listed above, as it only involves a slight expansion in the project footprint, and a reorientation of buildings and features. No new impacts would occur.

3.20 Wildfire

No Substantial Change from Previous Analysis. The project site is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). Additionally, the project site is surrounded by urban development, which precludes both the risk and spread of wildfire. With implementation of the proposed project, no new or more severe impacts associated with wildfire would occur, and the level of impact would not change from the level identified in the MND.

3.21 Mandatory Findings of Significance

No Substantial Change from Previous Analysis. As discussed in the MND, through implementation of MM-BIO-1, the project would not result in significant impacts to biological resources. Through implementation of MM-CUL-1 through MM-CUL-3, the project would not result in significant impacts to cultural resources. In the event that intact paleontological resources are located on the project area, ground-disturbing activities associated with construction of the proposed project, such as grading during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of MM-GEO-1, impacts would be reduced to below a level of significance. The District determined that implementation of MM-TRC-1 and MM-TRC-2 would appropriately mitigate impacts to tribal cultural resources to less than significant levels. Therefore, with mitigation incorporated, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. As noted in the analysis above, the revised project would not result in increased impacts that would require additional mitigation. The revised project would be subject to the same mitigation measures described above. No new impacts would occur.

As stated in the MND, the proposed project would potentially result in project-related biological resources, cultural resources, geological resources, and tribal cultural resources impacts that could be potentially significant without the incorporation of mitigation. Thus, when coupled with biological resources, cultural resources, geological resources, and tribal cultural resources impacts related to the implementation of other related projects throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated. However, with the incorporation of mitigation identified herein, the project's biological

resources, cultural resources, geological resources, and tribal cultural resources impacts would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, these other related projects would presumably be bound by their applicable lead agency to (1) comply with the all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels. Although cumulative impacts are always possible, by incorporating all mitigation measures outlined herein, the project would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. As noted in the analysis above, the revised project would not result in increased impacts that would require additional mitigation. The revised project would be subject to the same mitigation measures described above. No new impacts would occur.

4 References and Preparers

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<https://geotracker.waterboards.ca.gov/map>

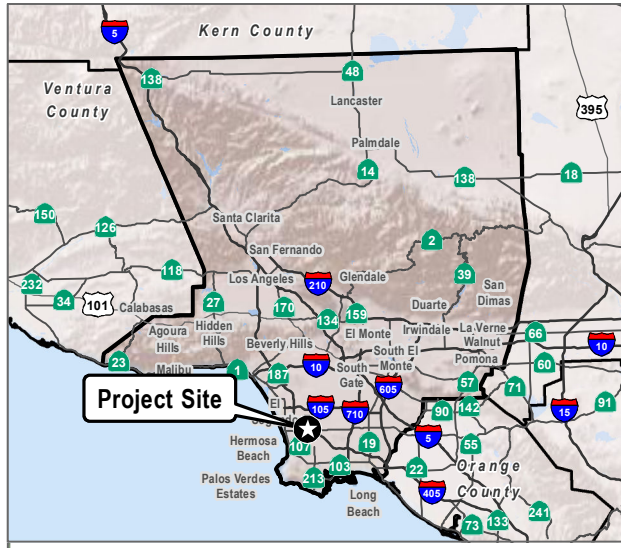
4.2 List of Preparers

El Camino Community College District

Tae Kim, Executive Director, Facilities Planning Services
Jessie Wang, Vice President of Administrative Services

Dudek

Caitlin Munson, Project Manager and Preparer



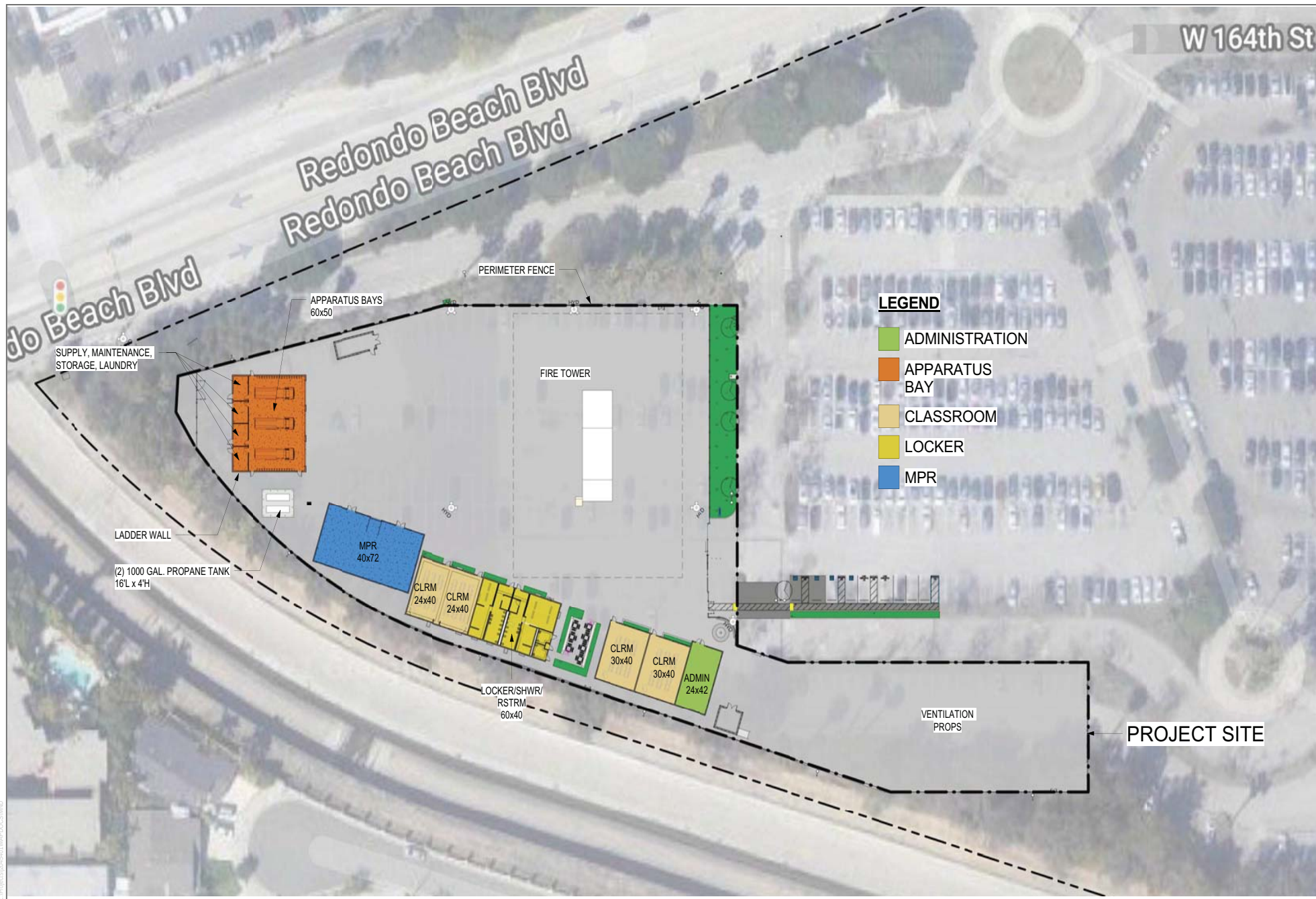
SOURCE: County of Orange; Open Stree Map; ESRI World Imagery



FIGURE 1

Project Location

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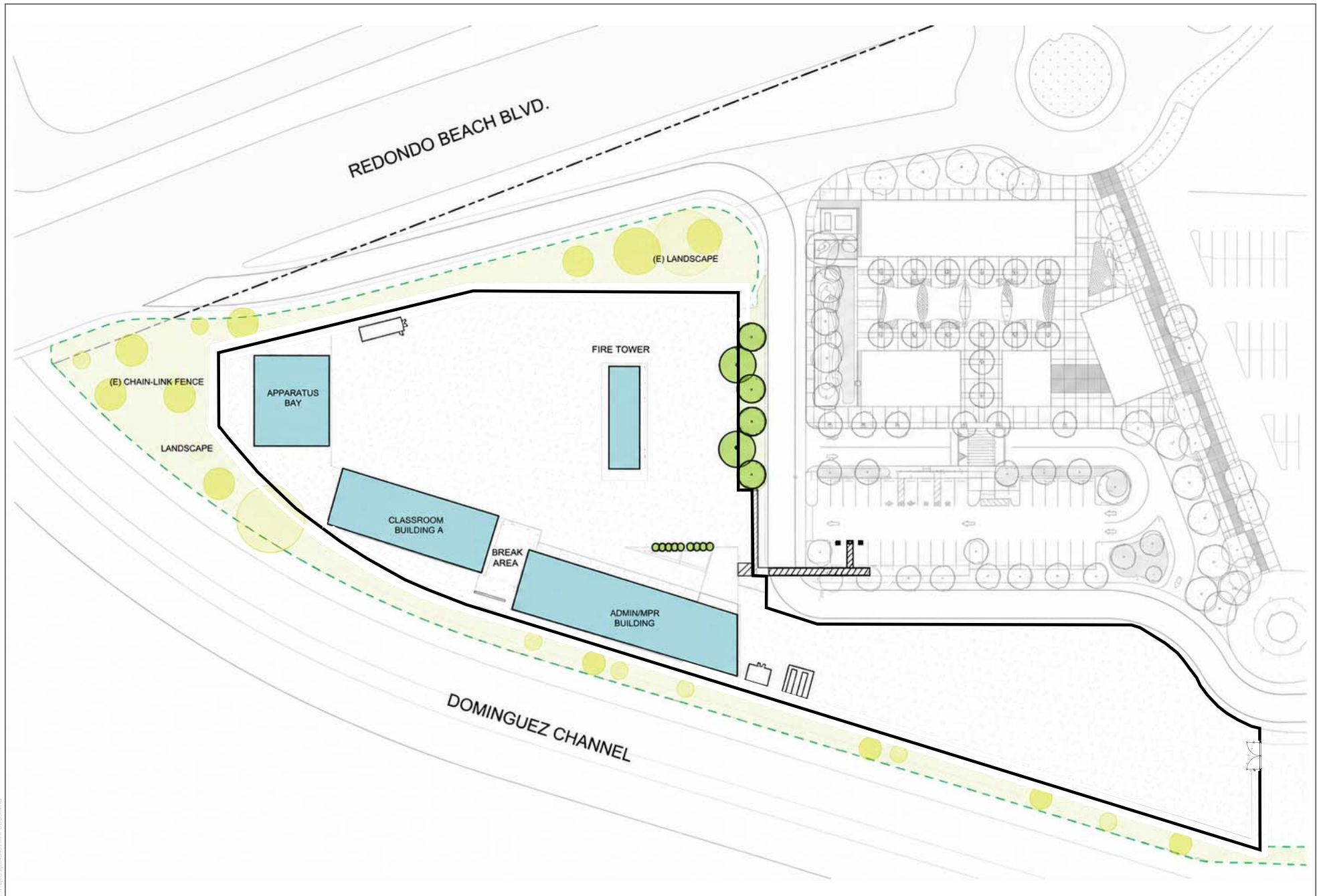


SOURCE: Perkins Eastman, 2022

FIGURE 2

Original Site Plan

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SOURCE: Perkins Eastman, 3/30/2026

FIGURE 3

Proposed Site Plan

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