

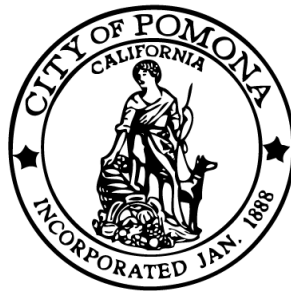
**CEQA INITIAL STUDY
PROPOSED NEGATIVE DECLARATION**

**PROPOSED BOARDING SCHOOL
2322 S. Garey Ave.
PLANNING APPLICATION CUP 9813-2018**

Prepared for:

**Grand Sierra Global Holding Corp.
2581 N. Lake Avenue, Altadena, CA 91001**

Prepared by:



**Planning Division
City of Pomona
505 South Garey Avenue
Pomona, CA 91766**

August 17, 2018

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Section 1: Introduction

This section conforms to and provides the content contained in Appendix G: Environmental Checklist of the CEQA Guidelines.

1.1 Project Title

Garey Boarding School

1.2 Lead Agency Name and Address

City of Pomona
Planning Division
505 S. Garey Avenue
Pomona, California 91766

1.3 Contact Person and Telephone Number

Mario Suarez
Development Services Director
Telephone: 909-620-2436

1.4 Project Location

2322 S. Garey Avenue
Refer to Figure 1: Location.

1.5 Project Sponsor Name and Address

Grand Sierra Global Holding Corp.
2581 N. Lake Ave., Altadena, CA 91001

1.6 General Plan Designations

Neighborhood Edge (westerly half of project) and Residential Neighborhood (easterly half of project)

1.7 Zoning Districts

Pomona Corridors Specific Plan, Neighborhood Parkway Segment

1.8 Project Description

The applicant is requesting a Conditional Use Permit (CUP 9813-2018) to allow the operation of a boarding school at 2322 S. Garey Avenue. The school will serve up to 250 students in grades 6-12 with a maximum of approximately 50 faculty and administrative staff. Tenant improvements are proposed to enable the conversion of buildings C and D, on the westerly portion of the site, from office to habitable spaces. Building A, on the easterly portion of the site, and B, near the center of the site, will be used for classrooms, a kitchen and cafeteria.

Refer to Section 2 for a comprehensive discussion of the proposed Project.

1.9 Environmental Setting

The 8.75 acre site, located at the southeast corner of Garey Avenue and East Olive Street, includes four existing buildings, constructed starting in 1964, totaling approximately 116,800 square feet. The

property consists of three parcels in the Neighborhood Parkway Segment of the Pomona Corridors Specific Plan.

Multi-family residences are to the east; a combination of commercial businesses and multi-family residences are to the north; single-family homes are west across Garey Avenue; a Pomona Unified School District school is to the south.

1.10 Public Agency Approvals and Recommendations

The proposed project is subject to the issuance of a Conditional Use Permit (CUP 9813-2018) by the Planning Commission. If approved, building and other permits will be required to perform the tenant improvements anticipated for the project.

1.11 California Native American Tribal Consultation

California Native American tribes traditionally and culturally affiliated with the project area were not consulted on the project. Since the site includes existing buildings that will be re-used, and no new construction is proposed, consultation was not deemed necessary.

1.12 Environmental Factors Potentially Affected

Table 1 below lists the environmental factors that are evaluated in Section 3 of this document. Environmental factors that are checked contain at least one impact has been determined to be a "Potentially Significant Impact." Environmental factors unchecked indicate that impacts were determined to have resulted in no impacts, less than significant impacts, or less than significant impacts with mitigation measures or County Standard Conditions of Approval incorporated into the Project.

Section numbers in parentheses following each environmental factor correspond to the environmental impact analysis in Section 3.

Table 1: Environmental Factors Potentially Affected

<input type="checkbox"/> Aesthetics (3.1)	<input type="checkbox"/> Mineral Resources (3.11)
<input type="checkbox"/> Agriculture & Forestry Resources (3.2)	<input type="checkbox"/> Noise (3.12)
<input type="checkbox"/> Air Quality (3.3)	<input type="checkbox"/> Population & Housing (3.13)
<input type="checkbox"/> Biological Resources (3.4)	<input type="checkbox"/> Public Services (3.14)
<input type="checkbox"/> Cultural Resources/Scientific Resources (3.5)	<input type="checkbox"/> Recreation (3.15)
<input type="checkbox"/> Geology and Soils (3.6)	<input type="checkbox"/> Transportation/Traffic (3.16)
<input type="checkbox"/> Greenhouse Gas Emissions (3.7)	<input type="checkbox"/> Tribal Cultural Resources (3.17)
<input type="checkbox"/> Hazards & Hazardous Materials (3.8)	<input type="checkbox"/> Utilities & Service Systems (3.18)
<input type="checkbox"/> Hydrology & Water Quality (3.9)	<input type="checkbox"/> Mandatory Findings (3.19)
<input type="checkbox"/> Land Use & Planning (3.10)	

1.13 Environmental Determination

Based on the analysis conducted in this Initial Study, the following has been determined:

Table 2: Environmental Determination

I find that there is no substantial evidence that the project will have a significant effect on the environment, and that the analysis and supplemental information provided demonstrates that the project qualifies for a CLASS 1 CATEGORICAL EXEMPTION (CEQA Guidelines §15301) .	<input checked="" type="checkbox"/>
I find that there is no substantial evidence that the project will have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, revisions to the project or proposals have been made by or agreed to by the project proponent, that will avoid the effects or mitigate the effects to where no significant effects on the environmental will occur. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
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.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>

Jeff Hamilton
Signature
Jeff Hamilton
Name

Aug. 17, 2018
Date

1.14 Evaluation of Environmental Impacts:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 5) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and

- b) the mitigation measure identified, if any, to reduce a significant or potentially significant impact to a less than significant level.

The following information is provided to supplement the Evaluation of Environmental Impacts discussed above.

1.15 Thresholds of Significance

Thresholds of significance are identifiable quantitative, qualitative or a performance level of a particular environmental effect. Non-compliance with a threshold means the effect will normally be determined to be significant and, conversely, compliance with a threshold means the effect will normally be less than significant (Guidelines §15064.7).

1.16 Environmental Baseline

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. Guidelines Section 15125(a) states in pertinent part that the existing environmental setting will normally constitute the baseline physical conditions by which a lead agency will determine if an impact is significant.

In this case, since the property is already improved with buildings, landscaping and parking areas, and the site has been used as offices by private companies and the school district, the environmental baseline for this Project constitutes the existing physical conditions as they exist at the time that the environmental process commenced plus the permitted land uses allowed on the site under the zoning ordinance and the Pomona Corridors Specific Plan.

Figure 1: Location

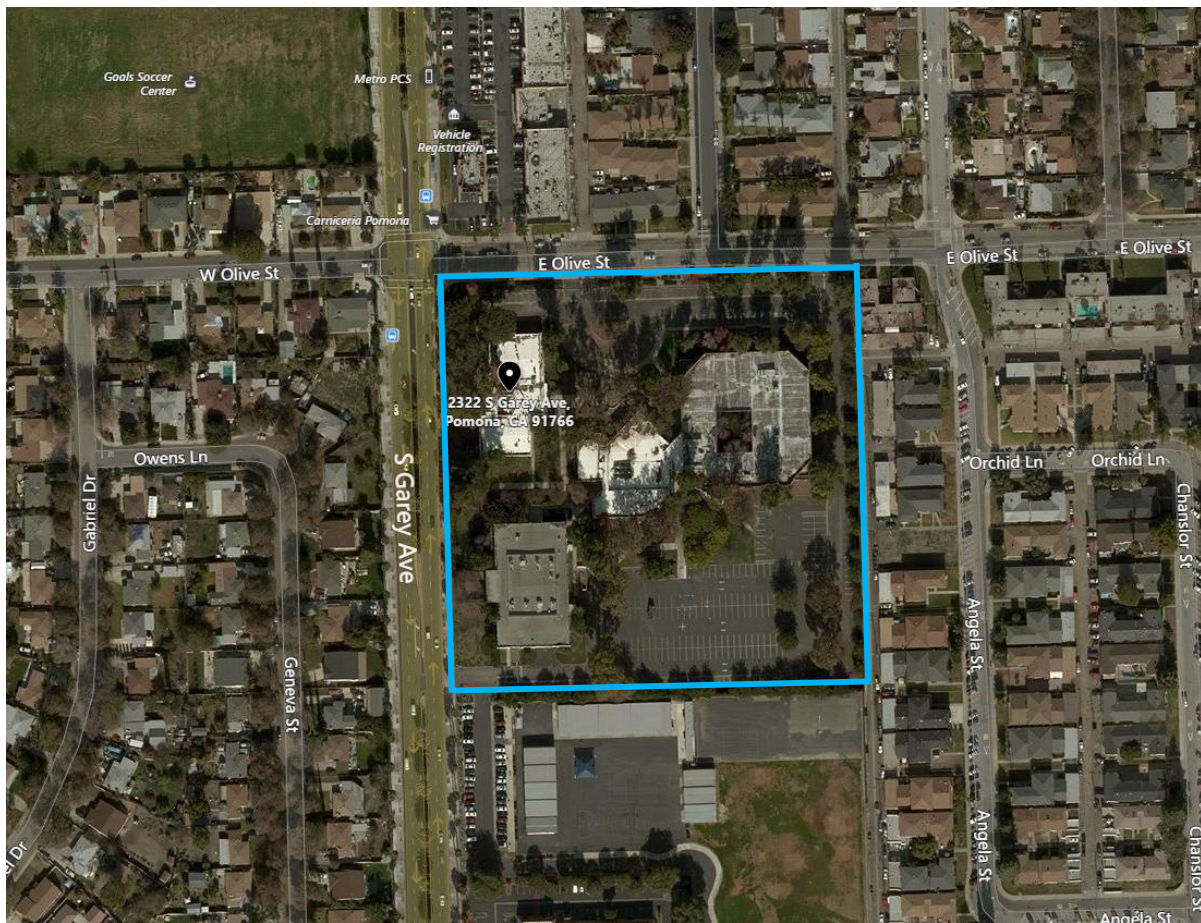
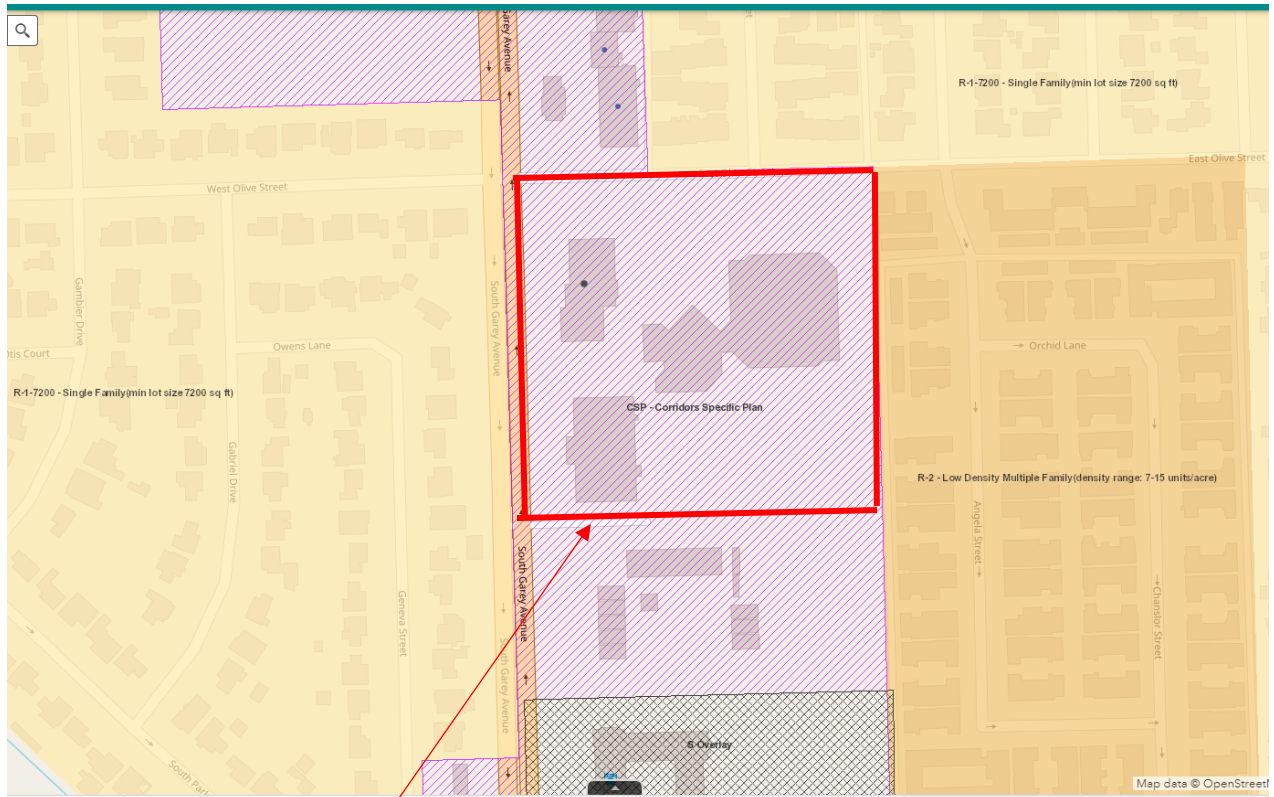


Figure 2: Building Identification

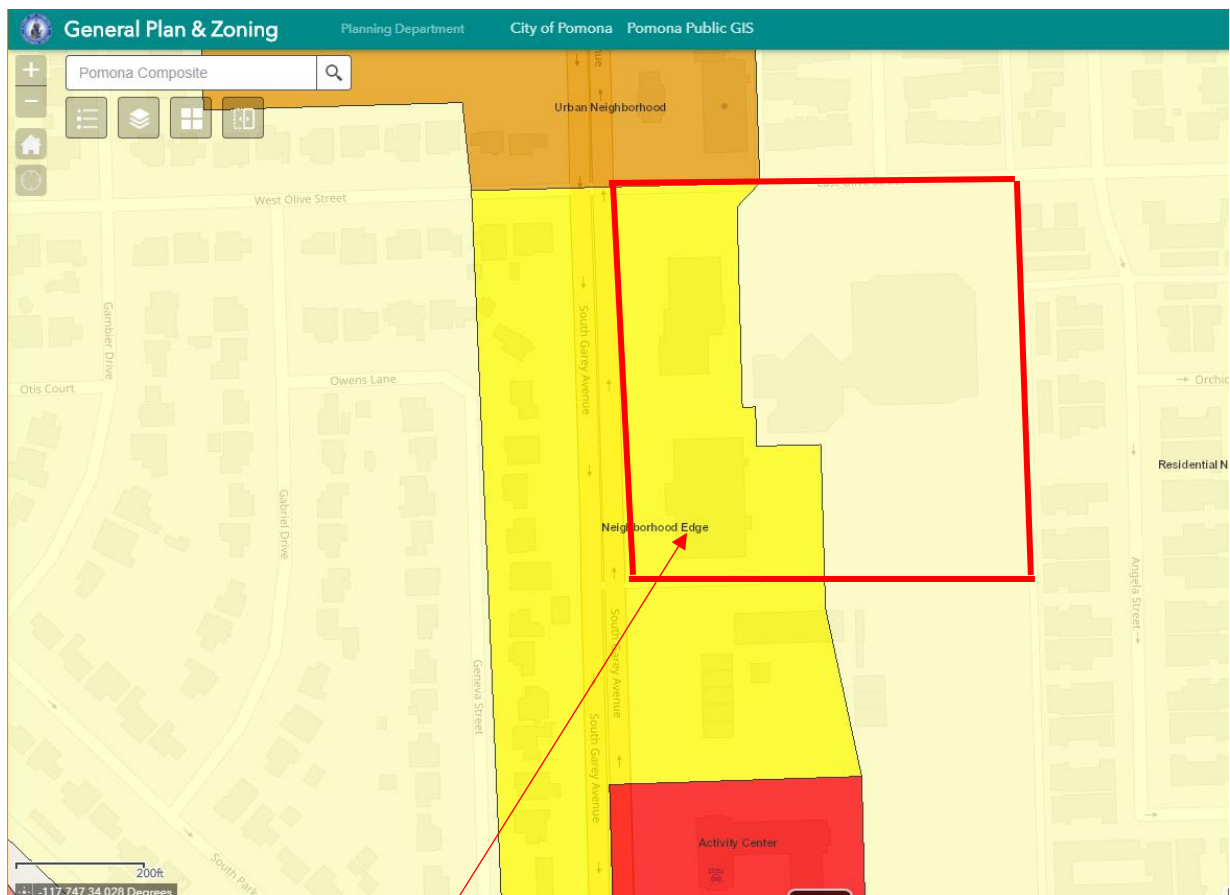


Figure 3: Zoning Map



Site

Figure 4: General Plan Map



Site

Figure 5: Site Photographs



Main Entrance facing Olive



Building A facing Olive

Figure 5: Site Photographs



Building A—east side



South side of building A

Figure 5: Site Photographs



Building B entrance facing Olive



Building B facing Garey

Figure 5: Site Photographs



South side Building B



Building C facing Garey

Figure 5: Site Photographs



East side building C facing center of campus



Building D facing Garey

Figure 5: Site Photographs



East side Building D

Section 2: Project Description

The following sections provide a detailed description of the proposed project.

Introduction

The purpose of this section is to describe the characteristics of the proposed Project. This section includes the following:

- Section 2.1 Purpose and Intent
- Section 2.2 Building Characteristics
- Section 2.3 Project Phasing
- Section 2.4 Schedule

2.1 Purpose and Intent

From the applicant's project narrative, the intent is to "build a nationally accredited private international education center where students in grades 6-12 from all over the world can experience America through our exchange program, full junior high school US college preparatory, and multitude of enrichment electives and extracurricular activities where young adults can study and explore new technology, new idea incubators, science, film, arts, new media and communications."

No significant change to the architecture of the buildings is proposed. Minor alterations to windows and doors will occur to enable use of buildings C and D as dormitories. Buildings A and B may receive similar alterations to enable their use as classrooms and eating facilities.

Lighting: Building lighting is not proposed to change. Landscape lighting is not proposed to change. Parking lot lighting is not proposed to change. Way-Finding lighting is not proposed to change.

2.3 Site Characteristics

No alterations to the existing site plan are proposed. No significant alterations to the landscaping are proposed, but it will be maintained. Minor alterations to the irrigation system may be performed to reduce or avoid water damage to the buildings.

Signage has not been proposed. Typically this is addressed during the building permit process.

Walls and Fencing: The site is surrounded by existing block walls and chain link fencing. Temporary security chain link fence is installed along the Garey and Olive frontages. Since no new buildings, and no expansion of the existing buildings, are proposed, no new fencing is required around the perimeter of the site.

No alterations to the existing storm water system on the site are proposed.

A total of 338 parking spaces are provided on the property; the bulk of the parking is located in the southeast portion of the site. Vehicular access is provided by driveways from Olive Street to the north and Garey Avenue to the west. A concrete median in the easterly driveway approach to Olive Street will be removed, widening the driveway to meet current Fire standards. Drive aisles connect entrances at both streets. Existing parking areas will not be altered.

Offsite Improvements Necessary to Implement the Project: The Public Works Division has proposed two conditions to implement offsite improvements:

- New sidewalk, curb and gutter to replace all damaged, cracked and uplifted sidewalk sections along the Garey Avenue and Olive Street property frontages.
- Overlay paving of Garey Avenue along the property frontage in accordance with the City standards in the event that the project-related wet and/or dry utility pavement cuts occur and in the event that longitudinal pavement cuts associated with the driveway approach removal and construction occur.
- Overlay paving of Olive Street along the property frontage, at the minimum from gutter to street centerline, in the event that project-related wet and/or dry utility pavement cuts occur.

2.4 Utilities Characteristics

No changes to utilities are proposed other than what might be necessary to support the tenant improvements anticipated. The Fire Department requires that the fire hydrants in the vicinity meet certain size standards, that water flow is adequate to serve the hydrants, and that an automatic fire sprinkler system be provided. This may require upgrades to these facilities beyond what is currently in place. These requirements are conditions of approval for the project and must be fulfilled during the building permit process.

2.5 Project Phasing – N/A

2.6 Soil Balance

No grading is proposed.

2.7 Schedule

The applicant intends to submit plans for building permits within a few weeks of approval of the conditional use permit.

Section 3: Environmental Evaluation

3.1 Aesthetics

Would the project:

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Aesthetics that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to aesthetics are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site fully improved with existing buildings constructed for office use. The site is surrounded by existing residential, commercial and institutional structures. The site itself has significant mature trees and other landscaping. No new construction is proposed other than tenant improvements to enable the buildings to be used as a school and for the proposed dormitories. No designated scenic vistas are located on or adjacent to the site. As such, no impacts to scenic vistas are anticipated.

Response to Impact Question b): No Impact--The project is the proposed re-use of existing buildings as a boarding school. No new construction is proposed other than tenant improvements to enable the buildings to be used as a school and for the proposed dormitories. No designated scenic resources are located on or adjacent to the site. As such, no impacts to scenic resources are anticipated.

Response to Impact Question c): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school. No new construction is proposed other than tenant improvements to enable the buildings to be used as a school and for the proposed dormitories. The applicant has submitted plans showing the proposed window modifications. On building C (near the intersection of Garey Avenue and Olive Street), existing fixed windows are being replaced with operable windows (horizontal sliders and one vertical slider) on the west side facing Garey Avenue and the north side facing Olive Street (all vertical sliders). The openings are not being enlarged. On the sides of the building not facing a street (the east and south sides), new openings are being created for horizontal sliders. On building D (near Garey Avenue and south of building C), only the west side faces a street. On that side, some of the fixed windows are being replaced with vertical sliders. The openings are not being enlarged. On the north side, two large window panes are being replaced with a pane half as high and a horizontal slider filling in the space below. The openings are not being enlarged. On the other walls, openings are being created for new horizontal slider windows. No new windows are proposed on buildings A or B.

The windows are placed in a rhythmic pattern. The installation matches the contemporary architecture of the two buildings. The project will not significantly change the visual character of either the building or the neighborhood. As such, impacts to the existing visual character of the site or its surroundings are considered less than significant.

Response to Impact Question d): No Impact--The site is in a fully urbanized part of town currently subject to substantial light and glare. No new light sources are proposed, though small light sources for signs or wayfinding might be proposed during the building permit process. Therefore, the project is not anticipated to create significant new sources of light or glare.

3.2 Agriculture and Forestry Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Agriculture and Forestry Resources that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

The State CEQA Guidelines provides the following guidance for this environmental factor:

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

Short-Term Construction: The project is not designated to agricultural use, designated as forest or timberland, nor adjacent to any lands so designated. As such, no construction-related impacts to agricultural resources are anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. No new construction is proposed other than tenant improvements to enable the buildings to be used as a school and for the proposed dormitories. The project will not convert farmland to other uses.

Response to Impact Question b): No Impact--The site is fully improved with existing buildings. The project is not designated for agricultural use.

Response to Impact Question c): No Impact--The project is the proposed re-use of existing buildings as a boarding school. The site is not designated as forest or timberland.

Response to Impact Question d): No Impact--The project is the proposed re-use of existing buildings as a boarding school. The site is not designated as forest land.

Response to Impact Question e): No Impact--The project is the proposed re-use of existing buildings as a boarding school. The site is not designated as farm land or forest land.

3.3 Air Quality	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Air Quality that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

The State CEQA Guidelines provides the following guidance for this environmental factor:

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

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school

and for the proposed dormitories. As such, construction impacts related to air quality are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. No new construction is proposed other than tenant improvements to enable the buildings to be used as a school and for the proposed dormitories.

The site is located within the South Coast Air Basin (Basin) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is locally responsible for administration and implementation of the Air Quality Management Plan (AQMP). Boarding schools are not land uses that generate air pollution other than indirectly through the operation of motor vehicles or onsite heating equipment. Re-use of the site as a boarding school will result in less traffic than the permitted use as an office complex since most if not all of the students will be from overseas and will not have cars. It is anticipated that only the roughly 50 faculty and administrative staff will drive to the property. A limited number of family members may visit the site from time to time. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, the project could not result in the production of additional criteria air pollutants which might interfere with, or obstruct, the SCAQMD's implementation of the AQMP.

Response to Impact Question b): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The proposed use will not generate air pollution other than as a result of the operation of motor vehicles. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, the project could not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Response to Impact Question c): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The proposed use will not generate air pollution other than as a result of the operation of motor vehicles. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, the project could not violate generate a net increase in any criteria air pollutant.

Response to Impact Question d): No Impact--Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The surrounding area is devoted to residential and commercial retail uses. There are no known facilities within the area that generate significant amounts of air pollution. The proposed use will not generate air pollution other than as a result of the operation of motor vehicles. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, the project could not expose sensitive receptors to substantial pollutant concentrations.

Response to Impact Question e): No Impact—The proposed use does not generate odors.

3.4 Biological Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Introduction

This section evaluates potential impacts to Biological Resources that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: The site does not have substantive natural habitat, sensitive or valuable biological resources, riparian habitat, wetlands and contains no protected trees. The site is not adjacent to such resources. As such, no construction impacts related to biological resources are anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. The subject site is devoid of any substantive natural habitat and evidences no sensitive or valuable biological resources. The site is not located within a Significant Ecological Area as demonstrated by the "Biological Resources" map of the General Plan (Fig. 7-E.2). The project does not propose uses or activities that would adversely affect biological resources.

Response to Impact Question b): No Impact--No riparian habitat or other sensitive natural community exists within the subject site or the surrounding area. As noted in the response to a above, the site is not located within a Significant Ecological Area. Urbanization of the area has replaced native vegetation with non-native landscaping, shrubs, and trees. Any existing vegetation serves as habitat for local common species.

Response to Impact Question c): No Impact--No federally-protected wetlands areas exist within the subject site or in surrounding areas.

Response to Impact Question d): No Impact--The Project site is urbanized and is bordered by roadways and other urban development. As such, the potential for native wildlife species to use the Project site as a migratory corridor or nursery site is unlikely.

Response to Impact Question e): No Impact--There are no protected tree species or other biologically significant resources on the subject site.

Response to Impact Question f): No Impact--There are no local or area-wide preservation or conservation plans or policies applicable to the subject site.

3.5 Cultural/Scientific Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Cultural/Scientific Resources that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to cultural or scientific resources are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact—A search of City records, including the local listing of historic resources, indicates that there are no historical resources associated with the site.

Response to Impact Question b): No Impact-- The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. No new construction is proposed. Therefore, there is no potential to impact archaeological resources on the site.

Response to Impact Question c): No Impact-- The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. No new construction is proposed. Therefore, there is no potential to impact paleontological resources or geologic features on the site.

Response to Impact Question d): No Impact-- The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. No new construction is proposed. Therefore, there is no potential to disturb human remains on the site.

3.6 Geology and Soils	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Geology and Soils that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to geology or soils are not anticipated.

Long-Term Operations

Response to Impact Question a-i): No Impact—As shown on the “Seismic Hazards and Vulnerabilities” map in the General Plan (Fig. 7-G.4), and as described in the portion of the General Plan titled “Seismic, Geologic and Soils Hazards”, the site is not in an Alquist-Priolo earthquake fault zone. Although there are faults that are located at least partially within the city, as the document states on page 163, “no fault rupture hazard is anticipated along the fault traces that pass through the City.” It is noted further that CEQA only requires an analysis of, and mitigation of, a given project’s impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving rupture of a known earthquake fault.

Response to Impact Question a-ii): No Impact—As noted in the response to a-i above, there are earthquake faults at least partially within the city. Pomona, like most of Southern California, could be subject to strong ground shaking from rupture of the one or more of the major earthquake faults in the

region, including the San Andreas. The project does not propose the construction of new buildings. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving strong seismic ground shaking.

Response to Impact Question a-iii): No Impact—As shown on the “Seismic Hazards and Vulnerabilities” map in the General Plan (Fig. 7-G.4), the site is located in an area potentially subject to liquefaction. The project does not propose the construction of new buildings. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving liquefaction.

Response to Impact Question a-iv): No Impact—As shown on the “Seismic Hazards and Vulnerabilities” map in the General Plan (Fig. 7-G.4), the site is not in an area subject to landslides and the site is flat. The project does not propose the construction of new buildings. Therefore, there are no significant risks due to landslides.

Response to Impact Question b): No Impact—The project does not propose the construction of new buildings and the site is flat. Therefore, the project does not have the potential to create substantial soil erosion or the loss of topsoil.

Response to Impact Question c): No Impact—As noted in the response to a-i and a-iv above, the site is not in an area subject to landslides or known soils hazards. The project does not propose the construction of new buildings and the site is flat. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving unstable soils.

Response to Impact Question d): No Impact—The project does not propose the construction of new buildings and the site is flat. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving expansive soils.

Response to Impact Question e): No Impact—The project is served by the sewer system.

3.7 Greenhouse Gas Emissions	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Greenhouse Gas Emissions that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to greenhouse gas emissions are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--Boarding schools are not land uses that generate greenhouse gas emissions other than indirectly through the operation of motor vehicles or onsite heating equipment. Re-use of the site as a boarding school will result in less traffic than the permitted use as an office complex since most if not all of the students will be from overseas and will not have cars. It is anticipated that only the roughly 50 faculty and administrative staff will drive to the property. A limited number of family members may visit the site from time to time. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, the project could not result in an increase in greenhouse gas emissions above what is permitted on the property.

Response to Impact Question b): No Impact—Since the project cannot generate greenhouse gas emissions above the level that is permitted on the property, the project has no potential to conflict with applicable plans, policies or regulations adopted related to greenhouse gases.

3.8 Hazards and Hazardous Materials	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Hazards and Hazardous Materials that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to hazards and hazardous materials are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact—The proposed use as a boarding school is not a use that generates hazardous materials.

Response to Impact Question b): No Impact-- The proposed use as a boarding school is not a use that generates hazardous materials.

Response to Impact Question c): No Impact-- The proposed use as a boarding school is not a use that generates hazardous materials or emissions.

Response to Impact Question d): No Impact—A search of federal Superfund sites on the internet disclosed no such sites within the City of Pomona. The previous use of the site was a credit union and administrative offices for the Pomona Unified School District. Neither of these land uses is associated with the generation or transport of hazardous materials.

Response to Impact Question e): No Impact—The project is not located within an airport land use plan. The closes airport is Bracket Field which is over 5 miles to the north.

Response to Impact Question f): No Impact—There are no private airstrips located within the City of Pomona.

Response to Impact Question g): No Impact—The project does not propose the construction of new buildings. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Response to Impact Question h): No Impact—The project does not propose the construction of new buildings. The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. It is not located within an area subject to wildland fires as shown on the "Areas Susceptible to Wildland Fires & Critical Facilities" map of the General Plan (Fig.7-G.3), nor are high fire threat areas adjacent to the site. It is not in, nor is it adjacent to, wildland areas.

3.9 Hydrology and Water Quality

Would the project:

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Result in inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Hydrology and Water Quality that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to hydrology and water quality are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact—The project does not propose the construction of new buildings. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving water quality or water discharge.

Response to Impact Question b): No Impact—The project does not propose the construction of new buildings. It is noted further that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects involving groundwater.

Response to Impact Questions c and d): No Impact—The project does not propose the construction of new buildings. Therefore, the project has no potential to alter drainage patterns or the course of streams or rivers.

Response to Impact Question e): No Impact—The project does not propose the construction of new buildings. Therefore, the project has no potential to alter stormwater runoff.

Response to Impact Question f): No Impact—The project does not propose the construction of new buildings. Therefore, the project has no potential to alter water quality.

Response to Impact Questions g and h): No Impact—A review of Federal Emergency Management Agency (FEMA) flood mapping for the site shows that it is not in a 100-year flood hazard zone.

Response to Impact Question i): Less Than Significant Impact—As shown on the “Flooding Hazards & Critical Facilities” map in the General Plan (Fig. 7-G.6), the site is within an area potentially subject to dam inundation in the event of the failure of the San Antonio Dam north of the city. The site is in the extreme southerly part of the potential dam inundation area where shallow sheet flows might occur. As noted in answers to questions g and h above, the site is not otherwise subject to significant flood hazard. It is further noted that CEQA only requires an analysis of, and mitigation of, a given project’s impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects related to flood hazards. Therefore, risks related to flood hazard, including dam inundation, are considered less than significant.

Response to Impact Question j): No Impact—The site is not in an area subject to tsunamis. There are no reservoirs within 5 miles of the site, so it is not subject to seiche. The site is flat and not located near the mouth of a canyon, so it is not subject to mudflows.

3.10 Land Use and Planning	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Land Use and Planning that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to land use and planning are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact—The project does not propose the construction of new buildings. The site is fully improved with buildings, parking areas and landscaping. The project has no potential to physically divide an established community.

Response to Impact Question b): Less Than Significant Impact—The project is a conditionally permitted use in the Neighborhood Edge zone of the Corridor Specific Plan. The westerly half of the property is designated Neighborhood Edge in the General Plan; the easterly half is designated Residential Neighborhood. School sites are generally found in the Residential Neighborhood category, such as Philadelphia School northeast of the site and Lexington Elementary northwest of the site. If the conditional use permit is approved by the city, the project will be consistent with the Corridor Specific Plan and the General Plan. The purpose of the conditional use permit requirement in this case is to

ensure the compatibility of land uses. There is no evidence in the record that the requirement was developed to avoid or mitigate an environmental effect. Therefore, conflicts with applicable land use plans, policies and regulations are considered less than significant.

Response to Impact Question c): No Impact—The project does not propose the construction of new buildings. The site is fully improved with buildings, parking areas and landscaping. The site is not located within a Significant Ecological Area as demonstrated by the “Biological Resources” map of the General Plan (Fig. 7-E.2).

3.11 Mineral Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Mineral Resources that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: The site is not designated as having mineral resources. As such, no construction-related impacts to mineral resources are anticipated.

Long-Term Operations

Response to Impact Questions a and b): No Impact—The project does not propose the construction of new buildings. The project has no potential to alter the availability of mineral resources.

3.12 Noise	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Noise that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, significant construction-related noise impacts are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The proposed use will not generate significant noise other than as a result of the operation of motor vehicles. Since the site is permitted to have up to 338 cars, and the proposed use will have a small fraction of that number, noise related to vehicular traffic could not exceed what is permitted by right on the site.

As shown on the "Projected Noise Conditions" map of the General Plan (Fig. 7-G.2), the site is located within the 60-65 db noise contour. The map shows noise conditions in the future at General Plan buildout. The city is not at full buildout so noise levels at the site may be somewhat lower than depicted on the map. Residential uses, such as the proposed boarding school, are conditionally acceptable as depicted in the "Community Noise Exposure" graphic of the General Plan (Fig. 7-G.1).

Allowed exterior and interior noise levels are specified in Article VII of the Municipal Code. As noted previously, the proposed use is not associated with generating excessive noise and traffic is not anticipated to generate new noise levels in excess of what would be generated by the permitted office use of the site. Use of the existing buildings for a boarding school will require tenant improvements, including replacement of some windows. Changing the proposed use of buildings C and D from office use to student housing and changing the other buildings to enable use as a school with cafeteria and kitchen will require compliance with various portions of the Uniform Building and/or Fire Codes. Compliance with these Codes will ensure that the students and employees are not exposed to excessive noise levels. This will also ensure compliance with the interior noise standards of the Municipal Code.

Based on the foregoing, the project does not have the potential to expose people to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Response to Impact Question b): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The project does not have the potential to expose people to or generate excessive groundborne vibration or groundborne noise levels.

Response to Impact Question c): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The proposed use is not associated with excessive noise generation. In addition, a condition of approval requires that any public address system or school bell be restricted so as not to be audible at the property lines. Therefore, the project does not have the potential to generate a substantial permanent increase in ambient noise levels.

Response to Impact Question d): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be minimal,

limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. In addition, construction activities must conform to the noise levels established in the Municipal Code. Therefore, although there will be a temporary increase in ambient noise levels, the increase is not anticipated to be significant.

Response to Impact Questions e and f): No Impact--The project is not located within an airport land use plan. The closes airport is Bracket Field which is over 5 miles to the north. There are no private air strips within the city.

3.13 Population and Housing	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Population and Housing that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to population and housing are not anticipated.

Long-Term Operations

Response to Impact Question a): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. The existing buildings total approximately 116,800 square feet, with a parking requirement of 338 vehicles. Should an office use re-occupy the site, at most 338 parking spaces would be required since this is at least as many as were required when the site was improved in the 1960's. This essentially means that the site may be occupied by approximately 338 people (although this could be more based on Building Code or Fire Code standards). Since the proposed boarding school will have at most 250 students and approximately 50 faculty and staff, the proposed use will not substantially change the population permitted on the site. In addition, since no new construction is proposed, the project does not have the potential to induce growth indirectly.

Response to Impact Question b): No Impact—No housing exists on the site.

Response to Impact Question c): No Impact—Since no housing exists on the site, and no new construction is proposed, no people will be displaced by the project.

3.14 Public Services	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) 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-i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a-ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a-iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a-iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a-v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Public Services that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to public services are not anticipated.

Long-Term Operations

Response to Impact Questions a-i and a-ii): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Operation of the school will allow up to 250 students and roughly 50 faculty and staff to occupy the site. Approximately 10 faculty will live on the property along with the students. The resident staff will supervise the students and be responsible for the safety of the students. Therefore, although the site will be occupied 24 hours a day, it is not anticipated to create significant new demand for fire or police services. Therefore, the project does not have the potential to create a need for new or physically altered government facilities for fire or police services.

Response to Impact Questions a-iii, iv and v): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Recreational facilities, such as a small

recreation room and outdoor basketball hoops, will be provided on the property. The boarding school has also approached the city's school district to create opportunities for the boarding school students to participate in extracurricular activities. Occasional visits to cultural resources in the area are anticipated and will be supervised. Therefore, the project does not have the potential to significantly change the need for schools, parks or other public facilities.

3.15 Recreation	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Recreation that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to recreational resources are not anticipated.

Long-Term Operations

Response to Impact Question a): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Recreational facilities, such as a small recreation room and outdoor basketball hoops, will be provided on the property. The boarding school has also approached the city's school district to create opportunities for the boarding school students to participate in extracurricular activities. Occasional visits to recreational resources in the area are anticipated and will be supervised. Since the project will be largely self-contained in terms of recreational amenities, a significant increase in the use of parks or other recreational facilities is not anticipated.

Response to Impact Question b): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Recreational facilities, such as a small recreation room and outdoor basketball hoops, will be provided on the property. Since the recreational needs of the students

will largely be served on the property, there is no potential for the project to generate adverse physical effects on the environment related to the construction of new, or expansion of existing, recreational facilities.

3.16 Transportation/Traffic	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Introduction

This section evaluates potential impacts to Transportation/Traffic that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to transportation or traffic are not anticipated.

Long-Term Operations

Response to Impact Question a): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. It is anticipated that only the roughly 50 faculty and administrative staff will drive to the property. A limited number of family members may visit the site from time to time. The applicant has submitted a traffic impact study which demonstrates that the intersection closest to the site, Garey Avenue and Olive Street, currently operates at Level of Service A and will operate at Level of Service B with implementation of the project. According to the Motor Vehicle Level of Service Guidelines contained within the Mobility and Access chapter of the General Plan, Minor Collectors such as Garey Avenue do not require modification until the street operates at Level of Service E. Therefore, the project will not conflict with an applicable congestion management plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.

Response to Impact Question b): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. It is anticipated that only the roughly 50 faculty and administrative staff will drive to the property. A limited number of family members may visit the site from time to time. The applicant has submitted a traffic impact study which demonstrates that the intersection closest to the site, Garey Avenue and Olive Street, currently operates at Level of Service A and will operate at Level of Service B with implementation of the project. According to the Motor Vehicle Level of Service Guidelines contained within the Mobility and Access chapter of the General Plan, Minor Collectors such as Garey Avenue do not require modification until the street operates at Level of Service E. Therefore, the project will not conflict with an applicable congestion management plan.

Response to Impact Question c): No Impact—As noted previously, the project is not located within an airport land use plan area, and no airport or air strip is located within 5 miles of the site.

Response to Impact Question d): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. It is surrounded by fully improved sites with a mix of commercial, residential and institutional uses. Construction will be limited to tenant improvements to enable use of the buildings as a school. Therefore, the project has no potential to create hazards related to design or incompatible uses.

Response to Impact Question e): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. It is surrounded by fully improved sites with a mix of commercial, residential and institutional uses. Construction will be limited to tenant improvements to enable use of the buildings as a school. Tenant improvements will be performed to enable the use of the site as a boarding school. One such improvement is the removal of a concrete median in the middle of the easterly driveway to Olive Street, enabling easier access by emergency vehicles. Therefore, the project has no potential to create hazards related to inadequate emergency access.

Response to Impact Question f): No Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Therefore, the project has no potential to create conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities.

3.17 Tribal Cultural Resources	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>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:</i>				
a-i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a-ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Introduction

This section evaluates potential impacts to Tribal Cultural Resources that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to tribal cultural resources are not anticipated.

Long-Term Operations

Response to Impact Questions a-i and a-ii): No Impact-- The subject site is extensively disturbed by human activities and has been substantially altered from its natural state. Construction will be limited to tenant improvements to enable use of the buildings as a school. Therefore, the project has no potential to impact tribal or cultural resources on the site.

3.18 Utilities and Service Systems	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Introduction

This section evaluates potential impacts to Utilities and Service Systems that could result from Project implementation. Analysis in this section is based on the existing environmental setting conditions, information provided by the Project Applicant, and information sources identified in this section. Responses to the impact questions listed above are provided below.

Short-Term Construction: Construction will be minimal, limited to replacing certain fixed windows with operable windows, creating new window openings on the walls of the buildings not facing the public streets, and other minor tenant improvements necessary to enable the buildings to be used as a school and for the proposed dormitories. As such, construction impacts related to utility and service systems are not anticipated.

Long-Term Operations

Response to Impact Questions a through e): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. No significant alterations to the water, wastewater or stormwater systems are required. Use of water will increase above the current condition, since the site is unoccupied, but is not anticipated to be significantly different than the permitted re-use of the site as commercial offices. Therefore, the project does not propose uses or activities that would potentially contribute to or exacerbate effects related water, wastewater or stormwater systems.

Response to Impact Questions f and g): Less Than Significant Impact--The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. The proposed use as a boarding school is not considered a significant generator of solid waste. Generation of solid waste will increase above the current condition, since the site is unoccupied, but is not anticipated to be significantly different than the permitted re-use of the site as commercial offices. Therefore, the project does not propose uses or activities that would potentially contribute to or exacerbate effects related to solid waste.

3.19 Mandatory Findings of Significance	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Does the project have the potential to 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Response to Impact Question a): Less Than Significant Impact-- The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Analysis of the project in this document establishes that the project has no potential impacts to the majority of the topics and no mitigation measures are necessary for any topic. It is further noted that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects on the

environment. Therefore, the project does not have the potential to 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.

Response to Impact Question b): No Impact-- The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Analysis of the project in this document establishes that the project has no potential impacts to the majority of the topics and no mitigation measures are necessary. It is further noted that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects on the environment. Therefore, the project does not have the potential to contribute to cumulatively considerable impacts.

Response to Impact Question c): Less Than Significant Impact-- The project is the proposed re-use of existing buildings as a boarding school on a site that is fully improved. Construction will be limited to tenant improvements to enable use of the buildings as a school. Analysis of the project in this document establishes that the project has no potential impacts to the majority of the topics and no mitigation measures are necessary for any topic. It is further noted that CEQA only requires an analysis of, and mitigation of, a given project's impacts on the environment, and of project effects that could exacerbate existing conditions, thereby resulting in potentially significant environmental impacts. The project does not propose uses or activities that would potentially contribute to or exacerbate effects on the environment. Therefore, the project does not have the potential to create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Section 4: References

City of Pomona Zoning Ordinance

<https://library.municode.com/ca/pomona/codes/zoning?nodeId=APXIZOOR>

City of Pomona Zoning and General Plan Maps

<http://pomona-utilities.maps.arcgis.com/apps/webappviewer/index.html?id=13bf54e995f74891bdf5b3bddf90522a>

City of Pomona General Plan

http://www.ci.pomona.ca.us/mm/comdev/plan/pdf/General_Plan.pdf

City of Pomona Corridors Specific Plan

<http://www.ci.pomona.ca.us/index.php/component/phocadownload/category/65-specific-area-plans?download=620:corridors-specific-plan>

South Coast Air Quality Management District *2016 Air Quality Management Plan*

<https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

Traffic Impact Analysis, August 6, 2018, by RBI Traffic, Inc.