5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301
(818) 597-3407
www.aspeneg.com

Project Memorandum

East Los Angeles College Northeast Drainage Area and City of Monterey Park Biofiltration Project

TO: John H. Holloway
Project Manager
Best, Best, and Krieger, LLP

FROM: Stephanie Khoury
Environmental Scientist

DATE: April 2, 2026

SUBJECT: Applicable California Environmental Quality Act (CEQA) Exemptions for the East Los Angeles College Northeast Drainage Area and City of Monterey Park Biofiltration Project, in the City of Monterey Park, Los Angeles County, California

Purpose and Intent of the Memorandum

Best, Best, and Krieger (BBK), acting on behalf of the Los Angeles Community College District (LACCD), requested an evaluation of the applicability of State CEQA Guidelines Article 19 (Categorical Exemptions) for the East Los Angeles College Northeast Drainage Area and City of Monterey Park Biofiltration Project (Proposed Project) at East Los Angeles College (ELAC). The California Secretary for Resources has found that the categorically exempt classes of projects do not have a significant effect on the environment, and do not require the preparation of environmental documents (State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15300).

The specific, applicable exemptions discussed in this memorandum are:

- Categorical Exemption, Class 1, Existing Facilities (State CEQA Guidelines Section 15301)
- Categorical Exemption, Class 4, Minor Alterations to Land (State CEQA Guidelines Section 15304)

This memorandum provides a brief background on the applicability of these CEQA exemptions and confirms and discusses how they apply to the Proposed Project.

Environmental Setting

Existing Setting. The Proposed Project is located within both ELAC and the City of Monterey Park at 1301 Avenida Cesar Chavez, Monterey Park, CA 91754 (Figure 1). ELAC was established in 1945 and has occupied its present 82-acre site since 1948. As is characteristic of developed, educational uses, minimal vegetation is present on campus outside of established landscape features. California State Route 60 and Interstate 710 are the primary transportation corridors closest to the Project site, and are located approximately 0.4 and 1.1 miles from the ELAC campus, respectively. According to the State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB, 2026) and Department of Toxic Substances Control (DTSC) Envirostor (DTSC, 2026) website, the ELAC campus does not contain any open or active hazardous waste site pursuant to Section 65962.5 of the Government Code.

Figure 1. Project Location

According to the City of Monterey Park zoning map, the entirety of the ELAC campus is zoned Single Family Residential (R-1) with a General Plan Land Use of Public Facilities (City of Monterey Park, 2025). Per the City of Monterey Park General Plan, Land Use and Urban Design Element, the Public Facilities designation encompasses government, civic, cultural, educational, and infrastructure uses that support community needs (City of Monterey Park, 2020). More specifically, this designation applies to public buildings, childcare centers for City programs, community gardens, public utility facilities, utility easements, reservoirs and wells, public schools, other similar public-serving uses; and, when within utility easements, private nurseries and open space uses.

Surrounding Residential zoning designations include Single-Family (R-1), which allows for one residential dwelling per lot; Medium-Density (R-2), which allows for up to 16 units per acre; and High-Density (R-3), which allows for up to 30 units per acre (City of Monterey Park, 2024, 2025). General Plan Land Uses of Low, Medium, and High Density Residential correspond with these zoning designations. Additional zoning designations in the immediate area include Shopping Center (S-C) with General Plan Land Use of Commercial, and Office Professional (O-P) with General Plan Land Use of Innovation/Technology (City of Monterey Park, 2025). The Project site is located at the northeastern edge of the ELAC campus near the intersection of West Floral Drive and Collegian Avenue, with proposed improvements to stormwater infrastructure located at the existing Parking Structure #4 and the ELAC Transit Center (Figure 1). The ELAC Transit Center is owned and operated by the City of Monterey Park. Like the rest of the ELAC campus, the Project site is zoned R-1 with a General Plan Land Use of Public Facilities. The Project site is immediately adjacent to S-C zoned areas to the east and southeast, and R-3 zoned areas to the north and northeast.

Proposed Project Description

Project Overview. The Proposed Project would install biofiltration planters in existing landscaped planters surrounding ELAC Parking Structure #4 and in the existing vegetated median of the ELAC Transit Center and the landscaped area located on the south side of the ELAC Transit Center to capture stormwater from the northeast portion of campus including from the roof of Parking Structure #4 (Figure 1). The ELAC Parking Structure #4 is within ELAC, while the ELAC Transit Center is within the City of Monterey Park right-of-way (Figure 2).

Proposed Site Improvements. Site improvements would include installing biofiltration planters in three existing landscaped planters; demolishing and rerouting roof drains and stormwater conveyance pipes within Parking Structure #4; and installing curbs, inlets, and gutters associated with the stormwater conveyance infrastructure necessary to redirect stormwater to the proposed biofiltration planters. The three biofiltration planters to be installed are shown in Figure 2, and include the following:

- **Area BIO-1:** Existing landscape planter adjacent to Parking Structure #4 along Floral Drive (Area BIO-1A, 2,800 square feet [sf] of existing planted space) and Collegian Avenue (Area BIO-1B, 2,200 sf of existing planted space). This area is within the jurisdiction of ELAC.
- **Area BIO-2:** Existing landscape planter island located in the median of the ELAC Transit Center (6,300 sf of existing planted space). This area is within the City of Monterey Park right-of-way.
- **Area BIO-3:** Existing landscape planter located at the south edge of the ELAC Transit Center (3,300 sf of existing planted space). This area is within the City of Monterey Park right-of-way.

Construction of the Proposed Project would require the demolition of existing asphalt pavement, storm drains, curbs, gutters, and sidewalks at the four proposed stormwater drainages identified in Figure 2. In addition, the existing stormwater drainage infrastructure for Parking Structure #4 would be modified to redirect stormwater towards the proposed biofiltration basin locations. To achieve this, roof drain pipes would be demolished and rerouted to one of five proposed storm drain outlets on the first floor of the Parking Structure #4. Sections of the existing concrete wall would also be demolished at the outlets of these proposed drains to allow stormwater to flow directly into proposed biofiltration planters. Seven strawberry trees, three golden trumpets, six Chitalpa, one eastern redbud, and nine crape myrtles would be removed across the biofiltration planters; 11 crape myrtles would be protected in place. All 37 of these trees were planted within the last eight to fifteen years, and none of these species are native to Southern California (Arborgate Consulting, 2023). An existing traffic sign along West Floral Drive would be temporarily removed during construction and reinstalled with improved footing, and a metal picnic table located immediately northwest of Classroom Building K5 would be temporarily removed during construction and reinstalled following the completion of the Project.

Following the demolition stage, trenches would be dug in the locations where curbs were removed, and pipelines would be installed to direct stormwater into each of the biofiltration planters. The minimum cover (the smallest vertical distance required between the top of a buried utility and the ground surface above it) for trenches ranges from 12 inches to 36 inches, indicating relatively shallow trenching (Pacific Rim Architects, 2025). Stormwater from the west of the ELAC Transit Center would be conveyed to Area BIO-2 via a single concrete cross gutter, and stormwater from the south of the ELAC Transit Center would be conveyed across the existing access road to Area BIO-3 via two pipelines (Figure 2). Separately, stormwater from the area west of existing Classroom Buildings K5 and K7 would be conveyed to the area's existing storm drain line by one additional concrete cross gutter and pipeline (Figure 2). Rerouted stormwater conveyance pipes would feed directly from the roof of Parking Structure #4 into the biofiltration planters in Areas BIO-1A and BIO-1B.

Figure 2. Project Components

The proposed biofiltration planters would generally consist of 12-24 inches of washed gravel atop an impermeable liner, followed by 18-24 inches of engineered bioretention soil mix, plantings designed specifically for bioretention and biofiltration systems, 3 inches of mulch, and 6-12 inches of ponding area for water to collect before being filtered through the planter. An underdrain would be installed in the gravel layer to divert the filtered stormwater to the existing storm drain system. Overflow structures would be installed in the ponding area allowing stormwater volumes larger than the design volume for the biofiltration planters to be safely conveyed to the existing storm drain system without causing flooding. Following the rerouting of existing and construction of new stormwater conveyance infrastructure, pavement, curbs, gutters, and sidewalks would be reestablished.

As required by the federal Clean Water Act, a Project-specific Stormwater Pollution Prevention Plan (SWPPP) would be implemented through the National Pollutant Discharge Elimination System during construction to prevent polluted runoff. This SWPPP would include 'housekeeping' measures to prevent contamination from stockpiled construction materials and chemicals, temporary sanitation facilities, potential leaks and spills, erodible landscape materials, and use of plastic; erosion control measures such as erosion control blankets for inactive disturbed areas during construction, and the application of water, soil, or dust palliatives to disturbed areas to prevent wind erosion; and sediment control measures such as the gravel-bag berms as perimeter controls to prevent discharge of sediment from the site, installation of gravel bag berms and sediment filters around stormwater inlets, and daily street sweeping and vacuuming (Q3 Consulting, 2023).

Following biofiltration planter installation and final repaving of associated curbs and gutters, the existing controllers, mainlines, master valves, gate valves, and couplers making up the irrigation system in the area would be modified to adapt to the new biofiltration planter layout. A combination of low and medium water use drip irrigation systems, tree bubblers, and spray irrigation systems would be used across the proposed biofiltration planters. No additional utility infrastructure would be needed as the Project site can be adequately served by existing utilities.

Proposed Facility Operations. The biofiltration systems would capture stormwater from the northeast portion of the ELAC campus and the roof of Parking Structure #4. Ongoing maintenance operations to ensure the proper functionality of captured stormwater lines and irrigation systems in the biofiltration planters would include manual cleaning of stormwater gutters and sprinkler heads, regular inspections for blockages or mineral buildup in stormwater or irrigation lines, and, when blockages or buildup are detected, flushing of stormwater or irrigation lines. Maintenance of the biofiltration systems would also include vegetation management and removal of trash, debris, and sediment from the systems. ELAC would be responsible for operations and maintenance, as well as any additional landscaping-related upkeep in Areas BIO-1A and BIO-1B, while the City of Monterey Park would conduct all operational duties at Areas BIO-2 and BIO-3.

Project Location. As shown in Figure 2, the Proposed Project would be located within the ELAC campus and in the City of Monterey Park ELAC Transit Center along Floral Drive and Collegian Avenue adjacent to Parking Structure #4 (Areas BIO-1A and BIO-1B), the island planter located at ELAC Transit Center (Area BIO-2), on the south edge of the ELAC Transit Center (Area BIO-3), and just east of ELAC buildings K5 (classrooms, Escalante Program, and Information Technology) and K7 (community services) (concrete swale and storm drain pipe). The Project area is bordered to the north by West Floral Drive; to the east by Collegian Avenue; to the south by an unnamed ELAC access road and ELAC Classroom Building S2, which houses the art, dance, and music departments; and to the west by an internal access road, and K9A and K9B (Facilities). The two transit center planters are located within the right-of-way of the City of Monterey Park.

Project Construction. Project construction would take approximately 13 months and is estimated to begin Fall 2026 and be completed in Fall 2027. Construction would occur on Mondays through Fridays from 7:00 a.m. to 5:00 p.m., and construction noise would follow all requirements outlined in the City of Monterey Park Municipal Code, which restrict construction noise outside of the 7:00 a.m. to 7:00 p.m. window on weekdays and outside of the 9:00 a.m. to 6:00 p.m. window on weekends and holidays, and require a temporary noise permit for construction activities lasting longer than three days (City of Monterey Park, 2026). Staging would be provided on the Project site on a rotating basis as the various Proposed Project stages are completed, and employee parking would be provided at the existing lot between Parking Structure #4 and Facilities buildings K9A and K9B. All construction workers would be trained on proper material delivery and storage practices. If construction materials are to be stored on site, storage areas would be located away from vehicular traffic to the extent feasible. All waste that cannot be recycled would be disposed of as hazardous waste. Application of erodible landscape materials would be temporarily halted at least two days before a forecasted rain event. If fertilizers or pesticides are applied to the landscape areas, recommended doses and usage instructions would be followed to avoid excess materials being carried offsite by runoff.

Project Approvals. Following approval of the Proposed Project, LACCD would proceed with filing the necessary Notice of Exemption (NOE) with the County Clerk and State Clearinghouse at the California Governor's Office of Land Use and Climate Innovation. Additionally, the Proposed Project would comply with all applicable Building Codes and General Plan standards.

Analysis

The following provides the categorical exemptions applicable to Project activities.

State CEQA Guidelines Section 15301, "*Existing Facilities*," states:

> *Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:*
>
> *(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances.*
>
> *…*
>
> *(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities.*
>
> **Justification:** The Proposed Project would reroute stormwater infrastructure in Parking Structure #4 to discharge into three proposed biofiltration planters. Removal of existing trees for the Project constitutes minor alterations to the existing campus, and removed trees would be replaced in accordance with the Project consulting arborist's recommendations (Arborgate Consulting, 2023). The proposed biofiltration planters, associated shallow trenching, demolition and rerouting of stormwater piles and drainages, concrete work, and street signage reinstallation would be minor alterations to the existing stormwater system and landscaping at the Project site. After completion of construction, all disturbed areas such as removed signage and ground disturbance would be restored to preconstruction conditions in accordance with the construction specifications (Pacific Rim Architects, 2025). The Proposed Project would not expand the use of the ELAC campus as it is intended to capture and improve stormwater runoff quality.

State CEQA Guidelines Section 15304, "*Minor Alterations to Land*," states:

> *Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:*
>
> *…*
>
> *(b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.*
>
> *…*
>
> *(f) Minor trenching and backfilling where the surface is restored.*
>
> **Justification:** The Proposed Project would reroute stormwater infrastructure in Parking Structure #4 to discharge into three proposed biofiltration planters. Removal of the existing non-native ornamental trees would not conflict with Class 4 because the current planting spaces are not large enough to sustain the trees to their full potential lifespan, and some of the trees' life expectancy is reduced due to being planted in planters, thus preventing them from reaching full maturity. For example, the crape myrtles have a lifespan of several hundred years, but according to the Tree Assessment and Preservation Report, the remaining lifespan of these trees at the Project site varies from only 15-40 years due to their limited planting space (Arborgate Consulting, 2023). The trees, while ornamental, are not considered scenic given their small size and scale and are planted within a paved transit center and adjacent to a parking structure, as opposed to a scenic open space or park with prominent views.
>
> Additionally, the proposed replacement landscaping would integrate native drought-tolerant species that are more water efficient than the existing conventional landscaping. The new irrigation system would utilize more efficient drip irrigation that would replace conventional spray irrigation in some locations. During storm events, stormwater would be diverted from Parking Structure #4 to the biofiltration planters rather than the storm drain system, conserving water and providing irrigation. The engineered soil would retain moisture after storm events, reducing irrigation water needed for plants in the biofiltration system. The Proposed Project would involve new landscaping, would restore the surface after minor shallow trenching activities, and would not remove mature, scenic trees.

If the project is categorically exempt, then the lead agency must consider whether the categorical exemption is negated by an "*exception"* to the categorical exemption. These exceptions apply under the following circumstances described in State CEQA Guidelines Section 15300.2 (a)-(f):

(a) *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located — a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

Justification: The Proposed Project is not in a particularly sensitive environment due to its location in an existing developed college campus with existing stormwater infrastructure, and would not impact a designated environmental resource of hazardous or critical concern. Therefore, this exception does not apply to the Proposed Project.

(b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

Justification: Several ELAC projects have been identified that would occur on campus at the same time as the Proposed Project. However, these projects would all be campus projects such that coordination between them to reduce impacts would be implemented. Other projects that would occur on the ELAC campus at the same time as the Proposed Project include the Football Stadium Renovation Project, Facilities Maintenance and Operations (FMO) Building Replacement Project, and the Nursing, Allied Health and Public Service Building.

The FMO Building Replacement Project (construction anticipated to occur February 2027-October 2028) and Nursing, Allied Health and Public Service Building (construction began in November 2024 and is anticipated to be completed by March 2028) would be located just west of the Proposed Project, and construction activities would partially occur at the same time with varying construction durations. These projects are different types of projects involving construction of new buildings and renovation of existing structures. Air quality, greenhouse gas, noise and vibration, and traffic impacts would overlap spatially and temporally; however, these impacts would occur temporarily, as the Proposed Project would be completed by the end of 2027 prior to completion of the cumulative projects. Because these projects are located within the ELAC campus, coordination would ensure adequate and safe access for construction personnel, students, and the public. The City of Monterey Park's ministerial review of the construction plans at the ELAC Transit Center would also ensure that adequate circulation and access are maintained throughout construction. The ELAC Transit Center would remain open and operational during construction; a minimum of one travel lane would always remain open for buses. Construction staging would not obstruct public roads and would be located in the existing medians (LACCD, 2025). Unobstructed access to Parking Structure #4 would be maintained in accordance with the construction specifications (Pacific Rim Architects, 2025). Therefore, the Proposed Project's contribution to incremental effects would not be cumulatively considerable given the limited construction area and necessary coordination between projects. There would be no cumulatively considerable impacts, and therefore, this exception does not apply to the Proposed Project.

(c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

Justification: The Proposed Project is located in a developed area and involves improvements to stormwater infrastructure in the northeast portion of the ELAC campus. Project construction is anticipated to be short-term, as improvements would reconfigure the existing stormwater conveyance infrastructure in Parking Lot #4 and install three new biofiltration planters. Nothing regarding the Proposed Project's size, location, nature, or scope would be considered "unusual circumstances." As discussed in part (b) above, access to the ELAC Transit Center would be maintained throughout construction, and therefore, transportation impacts would not be significant. Therefore, this exception does not apply to the Proposed Project.

(d) *Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcropping, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

Justification: The nearest eligible state scenic highway is the segment of Interstate 210 north of its intersection with State Route 134, located approximately 7.5 miles north of the Project site (Caltrans, 2026). The Proposed Project would be located at an existing school and ELAC Transit Center (owned and operated by the City of Monterey Park), and Project activities would not be visible from Interstate 210. Therefore, this exception does not apply to the Proposed Project.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Justification: The Proposed Project would be located within the existing ELAC campus and ELAC Transit Center (within the City of Monterey Park's right-of-way). A search of the entire ELAC campus, including the ELAC Transit Center, was conducted on Envirostor and GeoTracker, and the campus and Project site were not identified as a hazardous waste site by the California Department of Toxic Substances Control or State Water Resources Control Board, nor would the Proposed Project be located near a hazardous waste generator (DTSC, 2026; SWRCB, 2026). This exception does not apply to the Proposed Project.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Justification: No historical resources would be affected by the Proposed Project. The Proposed Project would capture stormwater from the northeast portion of the ELAC campus and the roof of Parking Structure #4 to three new biofiltration planters, and construction activities would not occur in proximity to a historical resource identified in the City of Monterey Park General Plan Resource Element, National Register of Historic Places, or California Register of Historic Resources (City of Monterey Park, 2001; California State Parks, 2026). Therefore, this exception does not apply to the Proposed Project.

Summary of Analysis

Because the Proposed Project has been designed to avoid potential adverse effects and would use construction BMPs, a categorical exemption would apply, and the exceptions denoted in State CEQA Guidelines Section 15300.2 (a)-(f) as described above and supplemented below would not apply.

The Proposed Project would capture stormwater from the northeast portion of the ELAC campus and the roof of Parking Structure #4 and convey it to three new biofiltration planters, which is consistent with Class 1 and Class 4 categorical exemptions as listed in State CEQA Guidelines Sections 15301 and 15304. The Proposed Project would not impact adjacent land uses or sensitive natural resources. Project construction would also be subject to existing laws and standard construction BMPs to avoid impacts to nesting birds and cultural resources.

Campus projects that would occur at the same time as the Proposed Project would coordinate to reduce impacts. There would be no cumulatively considerable impacts; therefore, this exception does not apply to the Proposed Project.

Project construction would incorporate BMPs to control fugitive dust, which would ensure compliance with South Coast Air Quality Management District regulations such as Rule 403 (Fugitive Dust). Work areas would be fenced to ensure the safety of students and provide security for the construction site. Construction would not occur during evenings and weekends, thereby minimizing noise impacts to adjacent residential and educational land uses. Given the short-term and temporary nature of construction activities and the standard scope of work for stormwater infrastructure, nothing regarding the Proposed Project's size, location, nature, or scope would involve "unusual circumstances." The Proposed Project is located on the ELAC campus and within the City of Monterey Park ELAC Transit Center which is within a developed urban area surrounded by residential and educational land uses. There are no designated state scenic highways or hazardous waste sites near the Project site (Caltrans, 2026; DTSC, 2026; SWRCB, 2026).

There are no known historical resources in proximity to the Project site. The Proposed Project would not involve any construction activities or alteration of land outside of the Project site. The Proposed Project would not cause a substantial adverse change in the significance of a historical resource.

LACCD would adhere to existing state laws and regulations and would utilize the following BMPs when implementing the Proposed Project. These BMPs would minimize fugitive dust, address any unanticipated cultural resource discoveries, avoid impacts to nesting birds, and prevent any discharge or runoff of sediment or construction-related materials from the site.

- **Fugitive Dust Control.** As required by SCAQMD Rule 403 (Fugitive Dust), LACCD would implement the best available dust control measures during activities generating fugitive dust. BMPs outlined in Rule 403 that may be utilized during construction, as applicable, are provided below in Table 1.

Table 1. Best Available Control Measures

Source Category	Control Measure	Guidance
Clearing and grubbing	▪ Maintain stability of soil through pre-watering of site prior to clearing and grubbing ▪ Stabilize soil during and immediately after clearing and grubbing activities	▪ Maintain live perennial vegetation where possible ▪ Apply water in sufficient quantity to prevent generation of dust plumes
Disturbed soil	▪ Stabilize disturbed soil throughout the construction site ▪ Stabilize disturbed soil between structures	▪ Limit vehicular traffic and disturbances on soils where possible ▪ If interior block walls are planned, install as early as possible ▪ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
Landscaping	▪ Stabilize soils, materials, and slopes	▪ Apply water to materials to stabilize ▪ Maintain materials in a crusted condition ▪ Maintain effective cover over materials ▪ Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes ▪ Hydroseed prior to rain season
Stockpiles/Bulk Material Handling	▪ Stabilize stockpiled materials ▪ Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage	▪ Add or remove material from the downwind portion of the storage pile ▪ Maintain storage piles to avoid steep sides or faces

Source Category	Control Measure	Guidance
Trenching	■ Stabilize surface soils where trencher or excavator and support equipment will operate ■ Stabilize soils at the completion of trenching activities.	■ Pre-watering of soils prior to trenching is an effective preventive measure. For deep trenching activities, pre-trench to 18 inches soak soils via the pre-trench and resuming trenching ■ Washing mud and soils from equipment at the conclusion of trenching activities can prevent crusting and drying of soil on equipment

Source: SCAQMD, 2005.

- **Worker Environmental Awareness Program (WEAP).** As part of standard construction practices, a Worker Environmental Awareness Program (WEAP) shall be provided to construction personnel prior to the start of ground-disturbing activities. The WEAP shall consist of a brief environmental awareness training incorporated into the construction contractor's pre-construction meetings. Training shall include an overview of the cultural sensitivity of the Project site and the surrounding area; examples of cultural resources that could potentially be identified during earthmoving activities; and standard procedures to follow in the event that unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. Representative photographs of objects considered cultural resources with the potential to occur during construction will be presented in the WEAP training.

- **Inadvertent Discovery of Cultural Resources.** As part of standard construction procedures, if a previously unidentified cultural resource is discovered during construction activities, work in the immediate vicinity of the discovery (generally within 50 feet of the find) shall be temporarily paused until a Secretary of the Interior-qualified archaeologist assesses the nature of the resource, consistent with California Public Resources Code Section 5097.98, State CEQA Guidelines Section 15064.5, and the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61). If the archaeologist determines that the finds warrant further consideration, the archaeologist shall consult with the appropriate responsible public agency regarding recommended plans for treatment of the find(s), which may include documentation, avoidance, or other treatment measures consistent with applicable laws and regulations. Construction activities may resume in the area following completion of the evaluation and implementation of any applicable procedures.

- **Inadvertent Discovery of Human Remains.** In the event that human remains, or potential human remains are discovered, construction activities shall be immediately halted. Compliance with California Health and Safety Code Section 7050.5 and Public Resource Code section 5097 is required by law. Under California Health and Safety Code Section 8100, six or more human burials at a single location constitute a cemetery, and willful disturbance of human remains is a felony under Section 7052.

- **Nesting Bird Avoidance and Protection.** As required by the Migratory Bird Treaty Act and California Fish and Game Code, LACCD will implement the following best management practices during construction to avoid impacts to protected nesting birds. A qualified biologist shall conduct pre-construction nesting bird surveys within all suitable habitat in the Project Area and within a 300-foot buffer for passerines and a 500-foot buffer for raptors. Surveys shall be completed within 72 hours prior to the start of construction activities. If active nests (nests containing eggs, nestlings, or fledglings) are detected, the biologist shall establish a no-disturbance buffer to be maintained until the young have fledged and the nest is no longer active. Standard buffers include

100 feet for passerines and 500 feet for raptors or special-status birds, unless the biologist determines—based on species, nest location, site conditions, and proposed activities—that an adjusted buffer would still avoid disturbance. A qualified biologist shall monitor all active nests within or near the established buffers to ensure compliance and to document nesting status until nesting activity has concluded. All Project personnel shall receive environmental awareness training prior to construction, including instruction on applicable wildlife laws, sensitive bird species, avoidance requirements, and procedures for reporting wildlife incidents. The qualified biologist shall have the authority to halt work if nesting birds may be adversely affected and shall determine when work may safely resume.

- **Erosion, Sediment Control, and Compliance with the Statewide Construction General Permit.** Prior to the issuance of a Notice to Proceed (NTP) for the Proposed Project, the construction contractor shall abide by the BMPs identified in the SWPPP prepared for the Proposed Project (Q3 Consulting, 2023). The construction contractor shall retain a Qualified SWPPP Developer (QSD), licensed and certified in the State of California, to oversee the implementation of the SWPPP throughout construction activities. BMPs may include, but are not limited to, the housekeeping, erosion control, and sediment control BMPs as identified in the Project-specific SWPPP. All construction activities shall comply with the terms and requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit for stormwater discharges associated with construction activities.

Conclusion

LACCD is a public service provider, and ELAC is an educational use. The purpose of the Proposed Project is to improve stormwater infrastructure to enhance stormwater quality runoff. Therefore, the categorical exemptions described in State CEQA Guidelines Sections 15301 and 15304 would apply to the Proposed Project. The applicable Class 1 and Class 4 categorical exemptions would not be negated by any of the exceptions listed in State CEQA Guidelines Section 15300.2. The Proposed Project would not have a significant effect on the environment and is considered exempt from the requirement for the preparation of environmental documents.

We recommend the filing of an NOE based on this analysis within five days of agency approval of the Proposed Project and categorical exemption.

References

Arborgate Consulting. 2023. Tree Assessment and Preservation Report: NE Storm Water Drainage Implementation for East Los Angeles College. Accessed March 9, 2026.

California State Parks. 2026. California Historical Resources. https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19. Accessed February 27, 2026.

Caltrans (California Department of Transportation). 2026. California Scenic Highways Map. https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774#data_s=id%3AdataSource_2-199ba603ee3-layer-4%3A193. Accessed January 26, 2026.

City of Monterey Park. 2001. City of Monterey Park General Plan, Resource Element. https://www.montereypark.ca.gov/DocumentCenter/View/14211/Resources-Element?bidId=. Accessed February 27, 2026.

_____. 2020. City of Monterey Park General Plan, Land Use and Urban Design Element. https://www.montereypark.ca.gov/DocumentCenter/View/14206/Land-Use-and-Urban-Design-Element-?bidId=. Accessed February 26, 2026.

_____. 2024. Residential Development Guidelines (R-2 and R-3). https://www.montereypark.ca.gov/DocumentCenter/View/18349/R2-and-R3-DEV-STANDARDS---Revised-updated. Accessed February 26, 2026.

_____. 2025. City of Monterey Park Zoning Map. https://experience.arcgis.com/experience/90a0d56471f74bd0af834ad01c3c0ade#data_s=id%3AdataSource_1-198e2830250-layer-14-198e28302c8-layer-15%3A15960. Accessed February 26, 2026.

_____. 2026. City of Monterey Park Municipal Code. https://ecode360.com/44155497. Accessed March 5, 2026.

DTSC (Department of Toxic Substances Control). 2026. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/. Accessed January 19, 2026.

LACCD (Los Angeles Community College District). 2025. Northeast Drainage Area & City of Monterey Park Biofiltration Project, 100% Construction Document Set.

Pacific Rim Architects. 2025. Northeast Drainage Area and City of Monterey Park Biofiltration Project Specifications. Accessed March 5, 2026.

Q3 Consulting. 2023. Stormwater Pollution Prevention Plan for the ELAC Northeast Drainage Area & City of Monterey Park Biofiltration Project. Accessed March 9, 2026.

SCAQMD (South Coast Air Quality Management District). 2005. Rule 403 – Fugitive Dust. https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf. Accessed February 17, 2026.

SWRCB (State Water Resources Control Board). 2026. GeoTracker. https://geotracker.waterboards.ca.gov/ Accessed January 19, 2026.