



August 19, 2025

Catherine Lin, AICP, Senior Planner
Community Development Department | Planning Division
City of Claremont
207 Harvard Avenue,
Claremont, CA 91711
via email: clin@ci.claremont.ca.us

Subject: Revised Proposal to Conduct Environmental Services: Western Christian School, Claremont

Dear Ms. Lin,

Thank you for inviting us to provide a proposal to conduct environmental services in accordance with the California Environmental Quality Act (CEQA) for this project. GPA Consulting (GPA) submitted a proposal to the City of Claremont (City) to prepare and process environmental compliance studies in accordance with CEQA for the proposed project in March 2025. Since that time, there has been additional coordination with the City and the proposal has been revised.

GPA is available to initiate work immediately following a written Notice to Proceed from the City. We look forward to the opportunity of working with the City on this project. I am authorized to commit the firm, and GPA has no conflict of interest in providing the requested services. Please do not hesitate to contact Ms. Erinn Silva, Principal Environmental, at (310) 792-2690 or at erinn@gpaconsulting-us.com should you have any questions or would like additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Galvin".

Richard Galvin
Vice President, Chief Financial Officer



I. PROJECT UNDERSTANDING

The City of Claremont (City), in cooperation with the Western Christian School, proposes to construct seven portable classrooms and one portable restroom at the Western Christian School campus (project). Proposed improvements would also include expansion of the parking lot and associated landscaping and paving at the southwest corner of the campus. Western Christian is located at 3105 Padua Avenue (Assessor's Parcel Number [APN] 8671-005-053), north of East Baseline Road (State Route 30) and west of Padua Avenue in the City of Claremont. The campus is currently occupied by a 536-student private school (K-8) on 9.26 acres (project site). The proposed development consists of an 836-student private school (K-8).

The City's General Plan land use designation for the project site is Institutional and the City's Zoning designation is Institutional Educational. The project site, now known as the Western Christian School, was originally constructed as the Norton School for Boys, which began operations at this location in September 1931. The Norton School for Boys was founded in 1928 and operated at a residence at 137 West 7th Street, Claremont before moving to this campus. The Los Angeles County Assessor records indicate the project site contains at least five buildings which are more than 50 years old. An Initial Study was prepared in 2014 to support Western Christian School's planning efforts, which included the preparation of a Historic Structure Assessment Report (HSAR). GPA assumes that the project site contains buildings and possibly landscape features which may be potential historical resources as defined by the California Environmental Quality Act (CEQA).

It should be noted that the 2014 Initial Study can no longer be used as a baseline document due to the lapse in time since its preparation. Additionally, it is understood that a draft Traffic Impact Analysis report, dated February 22, 2024, has also been prepared for the project; it is assumed that the final report will be shared with GPA for inclusion into the environmental document.

II. PROJECT APPROACH

The City is not expected to use federal funding for this project and there is no other federal nexus; therefore, only environmental documentation related to the CEQA would be required and the City would be the CEQA Lead Agency. Based on correspondence with the City in November 2024, the appropriate level of environmental documentation for this project is an Initial Study (IS).

According to Section 15063 of the CEQA, a lead agency is required to prepare an IS to determine whether a project could have a significant impact on the environment. Once the IS has been completed, the agency may prepare a Mitigated Negative Declaration (MND) if potentially significant impacts are identified, but revisions are made to the project that would avoid or mitigate these impacts to a less than significant level (CEQA Section 15070). GPA will review the findings and conclusions of the technical studies to assist the City with determining whether a MND or Negative Declaration is required for the project. The following scope of work assumes preparation and processing of an MND, in the event there are impacts that could require mitigation.

The environmental documentation will be prepared in accordance with the criteria, standards, and provisions of CEQA (*California Public Resources Code* Section 21000 et seq.), CEQA Guidelines (*California Code of Regulations, Title 14, Section 15000 et seq.*), and the regulations, requirements, and procedures of any other responsible Public Agency with jurisdiction by law.

Based on discussions held with the City on January 14, 2025, construction of the project is not anticipated to result in impacts on historical resources; further, it is assumed proposed improvements would not require excavation of potentially hazardous sites. At the request of the City, this scope of work assumes a



Preliminary Low Impact Design (LID) and Drainage Report and Cultural Resources Letter Report would be required to support the IS. Once more information is known about the project, including ground disturbing activities and details of project construction, GPA will meet with the City to determine whether additional technical studies are required to support the findings. GPA has included a Historical Resources Technical Memorandum, Environmental Site Assessment, Air Quality and Greenhouse Gas Technical Memorandum, and Construction Noise Memorandum as optional tasks. The project applicant is already under contract with a separate consulting firm to prepare a hydrology study and LID drainage report in support of the CEQA document. In the event additional technical studies may be required to support the IS, GPA will prepare an additional scope and fee.

III. SCOPE OF WORK

Task 1: Project Initiation & Project Description

Task 1.1: Project Initiation

Once a written Notice to Proceed has been issued, GPA will review all background documentation available for the project and/or project area, including existing environmental studies. GPA will participate in a 1-hour virtual kick-off meeting to discuss the anticipated project components, environmental tasks, and schedule. GPA will prepare an environmental schedule including milestones and approvals for City review and approval.

Deliverables: Attend one virtual kick-off meeting; project description; environmental schedule

Task 1.2: Project Description

Once all background information has been obtained and reviewed, GPA will work with the project team to prepare a detailed project description including project components, objectives, environmental study limits (ESL), and timing of construction. The project description will be appropriate for use in all technical studies and environmental documentation and will include maps of the regional area and project area.

Deliverables: Electronic copy of the Project Description and ESL Map

Task 2: Technical Studies

Task 2.1 Cultural Resources Letter Report

As a subconsultant to GPA, Duke Cultural Resources Management (DUKE CRM) will conduct a cultural resources records search, Native American consultation, and prepare a technical report to document the potential for cultural resources within the project site. It is assumed there are no cultural resources within or near the project site, and a field survey will not be necessary.

Research

The first task to be completed is the records search at the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton. The SCCIC is the state-designated repository for records concerning known archaeological and historic resources and prior cultural resource studies in Los Angeles County. The records search will include up to a 0.5-mile radius. In addition, DUKE CRM will contact the Native American Heritage Commission (NAHC). The NAHC will perform a Sacred Lands file search and provide a list of local Native American groups. Finally, limited on-line research will be conducted. The results of the SCCIC records search will be provided to the City.



Native American Consultation

DUKE CRM will provide consultation support for Assembly Bill 52 (AB-52) and CEQA. To do this, DUKE CRM will contact the City to discuss the specific methods of coordinating consultation. Based on recent experience, DUKE CRM will prepare letters to be reviewed and approved by the City. DUKE CRM will then send the letters to Native American groups via U.S. Certified Mail on behalf of the City. Four weeks after the letters are sent, DUKE CRM will make follow up emails/phone calls to Native American groups to determine which groups would like to consult with the City. From this point, consultation will take place between the City and each Native American group, if requested. DUKE CRM is available to assist the City in the process; however, it should be clear that the City, as the lead agency, has responsibility to consult with Tribes. Limited follow-up/consultation is anticipated and included herein; however, if any issues or concerns are raised, additional budget may be necessary to account for more extensive coordination and consultation support. Any meetings will be conducted by telephone or video call. The results of our efforts will be documented in a consultation matrix and will be attached to the letter report.

Letter Report

Upon completion of the tasks outlined above, DUKE CRM will prepare a cultural resource letter report. The report will include a project description, methods, results, and recommendations. DUKE CRM will prepare one draft of the letter for review by GPA and a draft and final report for the City, as necessary.

Deliverables: Electronic copies of the Draft and Final Cultural Resources Letter Report

Task 3: Initial Study

GPA will prepare an IS in accordance with the CEQA Guidelines. The IS will include detailed explanations of all checklist determinations and discussions of potential environmental impacts. The analysis will be in accordance with Public Resources Code Section 21080(c) and CEQA Guidelines Section 15070.

Task 3.1: Administrative Draft Initial Study

Following completion of the technical studies, GPA will reference the results of the analysis, as well as other background research, to prepare an Administrative Draft IS, consistent with CEQA Guidelines Appendix G and in a format acceptable to the City. The document will include all required sections for an IS and will address on-site and off-site impacts of the project. GPA will submit the Administrative Draft IS to the City. A meeting will be scheduled with City staff representatives to review the findings of the IS and Determination, which will confirm proceeding with a MND. GPA will submit one electronic copy of the Administrative Draft IS for review and comment by the City. GPA will also submit one electronic screencheck “check copy” of the final draft document, which will incorporate one complete set of comments received from the City. Changes to the draft document will be highlighted to assist the review.

Deliverables: Electronic copy of the Administrative IS; Electronic copy of the screencheck Administrative IS

Task 3.2: Public Review Draft Initial Study

With a conclusion in the IS that no significant environmental effects will occur as a result of implementation of the project, an MND will be prepared. GPA will prepare the CEQA Notice of Intent (NOI) to Adopt, publish and distribute the environmental document to agencies and interested parties, and post the Notice of Availability at the Los Angeles Registrar-Recorder County Clerk and the State Clearinghouse. It is assumed that the City would be responsible for any radius mailing and newspaper notices required for the project.



Deliverables: Electronic copy and two hard copies of the Public Review Draft MND; NOI posting with County Clerk and State Clearinghouse

Task 3.3: Final Initial Study with Mitigated Negative Declaration

To comply with the Public Resources Code Section 21081.6 (AB 32180), GPA will prepare a Mitigation Monitoring and Reporting Program to be defined through working with City staff to identify appropriate monitoring steps/procedures and to provide a basis for monitoring such measures during and upon project implementation.

GPA will respond to all comments received on the draft environmental document during the public review period. GPA will prepare thorough, reasoned, and sensitive responses to relevant environmental issues. This task includes written responses to both written comments received on the draft document. The draft responses will be prepared for review by City staff.

If required, GPA will prepare an Errata to the Public Review Draft IS/MND for City review and approval. The Errata will be a stand-alone document identifying any revised text in strikethrough and underline, as necessary to address comments received on the Draft document. The Final IS/MND will be comprised of the responses to comments (if applicable) and Errata, along with the Public Review Draft IS/MND, previously provided. GPA will prepare one electronic copy in Microsoft Word and PDF format of the MND and Notice of Determination (NOD) delivered to the City. GPA will prepare the NOD and will file the notice at the Los Angeles Registrar-Recorder County Clerk's Office and State Clearinghouse. The filing assumes payment of any required fees for the California Department of Fish and Wildlife (CDFW), if applicable, and Los Angeles Registrar-Recorder County Clerk's Office will be the responsibility of the City and/or Applicant.

Deliverables: Electronic copy of the Final IS; NOD filing with County Clerk and State Clearinghouse

Task 4: Project Management & Meetings

Task 4.1: Project Management

GPA understands the importance of following the project schedule and meeting design milestones. It is anticipated that coordination will be required between the GPA team, Western Christian school staff, and City staff. GPA will maintain a clear line of communication with the project team and conduct regular status checks to ensure all environmental tasks are on schedule and within budget. Monthly progress reports will be included with invoices identifying the tasks accomplished, deliverables submitted, anticipated tasks/progress for the next month, and any pending issues. Any modifications/ updates to the project schedule based on progress meetings and activities will also be provided. Monthly invoices will include total contract amount; all costs (by task) incurred for the period (actual and percentage); all costs (by task) incurred to date (actual and percentage); and estimated completion percentage for each task. It is assumed the period of performance is 12 months.

Deliverables: Up to 12 monthly progress reports; schedule updates

Task 4.2: Meetings

Throughout the course of the project, GPA anticipates attendance at up to eight meetings with City staff, including an environmental kick-off meeting (included in Task 1) and progress meetings. Preparation and/or review of meeting minutes and agendas are not included in this scope of work. At the request of the City, GPA's Senior Associate Architectural Historian and/or GPA's Project Manager attendance would attend one public meeting/hearing. It is assumed that City staff and/or the applicant will prepare and make any required presentation. GPA staff will be present only to answer questions from the City Council



that are directly related to the historic documentation prepared for the project. As a time and cost savings measure, it is recommended that GPA staff attend the meeting virtually, if possible. If virtual meeting attendance is not possible, GPA staff will attend the meeting in person. The proposed budget includes the additional travel time and expense necessary for in-person meeting attendance, should it be required.

Deliverables: Attendance at up to eight one-hour virtual meetings; attendance at up to one public meeting/hearing

IV. OPTIONAL TECHNICAL STUDIES

Task 2.3: Historical Resources Technical Memorandum

The project site contains buildings and possibly landscape features which may be potential historical resources as defined by CEQA. GPA proposes to prepare a CEQA historical resources technical memorandum (memo) that will narrowly focus on the potential for historical resources to be present within and immediately adjacent to the proposed work areas, and to determine the potential for the project to result in a significant impact on those potential historical resources. A full evaluation of the campus or features thereon to determine eligibility for listing in the California Register of Historical Resources (CRHR) is not proposed as part of this memo. Instead, a site visit and research will be conducted to determine if features within and immediately adjacent to the work areas may be potential historical resources and should be presumed eligible for the CRHR for the purposes of determining impacts for CEQA only. The memo is anticipated to include an introduction, preparer's qualifications, regulatory framework, methodology for identifying potential historical resources, thresholds for determining impacts for CEQA, analysis of impacts to presumed historical resources, and recommended mitigation measures, if warranted.

Deliverables: Electronic copies of the Draft and Final Historical Resources Technical Memo

Task 2.4: Environmental Site Assessment

As a subconsultant to GPA, Crawford and Associates (Crawford) will prepare an Environmental Site Assessment (ESA) to identify potential or known hazardous materials, hazardous waste, and contamination within the project site. The ESA will be performed according to ASTM Standard Practice E1527-21 guidelines and would consist of the following four elements: records review, site reconnaissance, interviews, and report preparation, as outlined below.

Records Review

A records review to identify potential environmental liabilities associated with current and past uses of the property will be completed. The records review will consist of APN parcel maps, site geology, groundwater data, soil maps, and any owner provided information regarding past or present operations conducted on the property, including any environmental studies performed for the original construction of the school campus, or other construction project performed prior to this study. Applicable historical use information will also be assessed by a review of the following: historical aerial photographs, topographic maps, city directories, and fire insurance maps (where available) of the site and surrounding properties. Crawford will also perform a computerized search of reasonably ascertainable federal, state, local, and tribal environmental agency records for indications of the use, misuse, or storage of hazardous and/or potentially hazardous materials on or near the site. The computerized record search will be provided by a professional record check service.



Site Reconnaissance

A limited site reconnaissance will be conducted to observe current land use and site operations, observe indications of potential contamination at the site, and to view publicly accessible portions of the adjacent properties.

Interviews

Crawford will conduct interviews with key site managers, regulatory officials, and others as indicated by the research and reconnaissance knowledgeable of the property to identify obvious potential environmental liabilities.

Report

A report will be prepared documenting the information and findings of the review, site reconnaissance, property owner interviews, historical photograph evaluation, and regulatory records review. The report will address identified potential contamination and hazardous material impacts to provide recommendations and determine additional investigation and analysis, as warranted by the findings.

Deliverables: Electronic copies of the Draft and Final ESA

Task 2.5: Air Quality and Greenhouse Gas Technical Memorandum

As a subconsultant to GPA, AMBIENT Air Quality & Noise Consulting will prepare an air quality/greenhouse gas (GHG) technical memorandum for the evaluation of short-term construction-related air quality and GHG impacts associated with the proposed project. The technical memorandum will include a summary description of the existing environment, based on existing environmental documentation. Short-term emissions of criteria air pollutants and GHGs will be quantified and summarized in the report. The significance of air quality and GHG impacts will be assessed in comparison to applicable South Coast Air Quality Management District (SCAQMD) recommended thresholds. Localized air quality impacts will be assessed using SCAQMD's localized screening methodologies. The preparation of health risk assessments and dispersion modeling are not anticipated to be required and is not included. SCAQMD-recommended mitigation measures will be identified for significant and potentially significant impacts. The assessment of long-term air quality/GHG impacts is not anticipated to be required and is not included.

Deliverables: Electronic copies of the Draft and Final AQ and GHG Memo

Task 2.6: Noise and Groundborne Vibration Technical Memorandum

The project site is a sensitive receptor and adjacent to residences. AMBIENT will prepare a technical noise memorandum to evaluate short-term construction noise and groundborne vibration impacts associated with the proposed project. The technical memorandum will include a description of the existing noise environment, based on existing environmental documentation and a review of site reconnaissance data. Up to five short-term (i.e., 10-15 minute) noise measurement surveys will be conducted. Predicted construction-generated noise and groundborne vibration levels will be quantified in accordance with Caltrans-recommended methodologies and guidance. The significance of noise and groundborne vibration impacts will be assessed in comparison to applicable standards and recommended thresholds. Construction noise levels will be quantified for the proposed improvements based, in part, on project-specific construction information. Mitigation measures will be identified for significant and potentially significant impacts. Analysis of long-term traffic noise and vibration impacts is not anticipated to be required and is not included.



Deliverables: Electronic copies of the Draft and Final Noise & Groundborne Vibration Memo

V. ASSUMPTIONS

This scope has been prepared based on the following assumptions:

- *This scope of work is based on the project information provided by the City: Design Review Submittal (April 2, 2024), Design Review Application (July 11, 2024) and Architectural & Site Plan Review brief project description. If the limits of the project area or scope of the project change substantially, GPA will provide an additional scope of work and budget to support this effort.*
- *An Initial Study would be the appropriate level of CEQA documentation. If the environmental analysis would require consideration of more than one build alternative, or if the project description changes, the environmental scope may need to be revised.*
- *Unless otherwise stated, all deliverables are subject to one round of comments from the City.*
- *The final Traffic Impact Analysis, Geotechnical Study, and preliminary Hydrology Study will be prepared by others and shared with GPA for inclusion in the environmental document.*
- *This proposal includes attendance at one public meeting/hearing. It is assumed others would prepare and make any required presentation.*
- *The filing assumes payment of any required fees for the California Department of Fish and Wildlife (CDFW), if applicable, and Los Angeles Registrar-Recorder County Clerk's Office will be the responsibility of the City and/or Applicant.*
- *Tree removal may be required for the project. It is assumed standard measures would be sufficient to avoid and/or minimize impacts on biological resources. If the potential for threatened and/or endangered species to be in the project area is identified, a biological resources analysis may be required. GPA will prepare an additional scope and fee to support this effort.*
- *Access to the school property for field surveys will be provided.*
- *All proposed work appears to be on exterior portions of the property; no existing buildings would be impacted by the proposed project.*
- *Property Owner will be responsible for coordination and returning of completed specialized knowledge questionnaires to Crawford from current tenants and/or owners of all parcels the ESA is being performed on. The Property Owner will also be responsible for filling out and returning the User Questionnaire regarding the properties to Crawford. Any non-returned questionnaire will be considered a Data Gap in the ESA.*
- *A full evaluation of the campus or features thereon to determine eligibility for listing in the California Register of Historical Resources is not included in this proposal; if requested, GPA will prepare a separate scope and fee. For the purposes of this proposal, it is assumed the project site contains buildings and possibly landscape features which may be potential historical resources as defined by CEQA.*

Fee Proposal

Western Christian School, City of Claremont
GPA Consulting

		Erinn Silva Principal Environmental Planner	Marecka Schrader Senior Associate Environmental Planner	Savannah Marburger Associate Environmental Planner	Kayla Fon Environmental Planner	Monica Cozella Environmental Planner	Martin Rose Senior GIS Analyst	Jennifer Johnson Senior Associate Biologist	Lizbeth Pilego Guzman Associate Biologist	Jenna Kachour Senior Associate Architectural Historian	Amanda Duane Senior Architectural Historian	Audrey von Ahrens Senior Architectural Historian	Total Hours	Subconsultants	Other Direct Costs	Total GPA Labor Costs	Grand Total (Labor, Subs, ODCs)
No.	Task Description	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$					
1	Project Initiation and Project Description																
1.1	Project Initiation		2	4		4							10			\$ 2,250.00	\$ 2,250.00
1.2	Project Description		1	4		6		4					15			\$ 2,855.00	\$ 2,855.00
2	Technical Studies																
2.1	Cultural Resources Letter Report			4									4	\$ 6,730.00	\$ 1,100.00	\$ 7,830.00	
3	CEQA Initial Study																
3.1	Admin Draft Initial Study		8	24	32	24	46	12	6	16	8		14	190		\$ 31,830.00	\$ 31,830.00
3.2	Public Review Draft Initial Study and Notice of Intent		4	8	8		8							28	\$ 850.00	\$ 5,620.00	\$ 6,470.00
3.3	Final Initial Study with Mitigated Negative Declaration		4	10	12	4	12		4		4			50		\$ 9,430.00	\$ 9,430.00
4	Project Management and Meetings																
4.1	Project Management		8	32										40		\$ 11,560.00	\$ 11,560.00
4.2	Meetings		4	16							8		2	30	\$ 60.00	\$ 7,810.00	\$ 7,870.00
	TOTAL HOURS		31	102	52	38	66	16	10	16	20	0	16	367			
	TOTAL COST	\$ 10,695.00	\$ 28,050.00	\$ 7,280.00	\$ 4,370.00	\$ 7,590.00	\$ 2,880.00	\$ 2,350.00	\$ 2,240.00	\$ 4,200.00	\$ -	\$ 2,800.00		\$ 6,730.00	\$ 910.00	\$ 72,455.00	\$ 80,095.00
2	OPTIONAL Technical Studies																
2.3	Historical Resources Technical Memorandum			4							14	12	68	98		\$ 18,040.00	\$ 18,040.00
2.4	Environmental Site Assessment			4										4	\$ 12,230.03	\$ 1,100.00	\$ 13,330.03
2.5	Air Quality and Greenhouse Gas Memorandum			4										4	\$ 4,500.00	\$ 1,100.00	\$ 5,600.00
2.6	Noise and Groundborne Vibration Memorandum			4										4	\$ 5,800.00	\$ 1,100.00	\$ 6,900.00
	(OPTIONAL) TOTAL HOURS		0	16	0	0	0	0	0	0	14	12	68	110			
	(OPTIONAL) TOTAL COST	\$ -	\$ 4,400.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,940.00	\$ 2,100.00	\$ 11,900.00		\$ 22,530.03	\$ -	\$ 21,340.00	\$ 43,870.03
	TOTAL HOURS (includes OPTIONAL)		31	118	52	38	66	16	10	16	34	12	84	477			
	TOTAL COST (includes OPTIONAL)	\$ 10,695.00	\$ 32,450.00	\$ 7,280.00	\$ 4,370.00	\$ 7,590.00	\$ 2,880.00	\$ 2,350.00	\$ 2,240.00	\$ 7,140.00	\$ 2,100.00	\$ 14,700.00		\$ 29,260.03	\$ 910.00	\$ 93,795.00	\$ 123,965.03