



February 17, 2026

Catherine Lin, AICP, Senior Planner  
Community Development Department, Planning Division  
City of Claremont  
207 Harvard Avenue  
Claremont, CA 91711  
via email: [clin@claremontca.gov](mailto:clin@claremontca.gov)

**Subject: Proposal to Conduct Environmental Services: Foothill Country Day School, Claremont**

Dear Ms. Lin,

Thank you for discussing this project with us through ongoing coordination since October 2024; we understand the project applicant is ready to move forward with contracting to provide environmental services in accordance with the California Environmental Quality Act (CEQA). GPA Consulting (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. Based on current staff availability, we have identified GPA's Senior Environmental Planner Arya Moalemi for the role of Project Manager, and I will provide project oversight. 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 me at (310) 792-2690 or at [erinn@gpaconsulting-us.com](mailto:erinn@gpaconsulting-us.com) should you have any questions or would like additional information.

Sincerely,

A handwritten signature in blue ink that reads "E. Silva".

Erinn Silva  
Principal Environmental Planner



## I. PROJECT UNDERSTANDING AND APPROACH

The Foothill Country Day School (FCDS) has submitted a Master Plan application to the City of Claremont (City); the application includes a proposal to make improvements to the existing FCDS (project). The project is generally located on Harrison Avenue in an area identified in the City's Zoning Ordinance as Institutional Educational (IE). Two FCDS-owned parcels adjacent to the campus are currently zoned as RS8000 and are tied to the campus parcel through a voluntary merger approved by the City on October 22, 2009. The nearest cross streets are North Towne Avenue to the west and Rhodelia Avenue to the east.

The school currently operates a private elementary and middle school on a 6.1-acre (265,990 square feet) property located at 1035 West Harrison Avenue in the city of Claremont (Claremont). North Towne Avenue and Harrison Avenue both represent a boundary between Claremont and the City of Pomona. The school has been in operation on this site since 1956, when the property was within an unincorporated area of Los Angeles County.

The project would include construction of new academic buildings as well as various additional campus improvements and result in an increase in enrollment from 356 students to 396 students in grades K-8 and from 84 children to 100 children in Pre-School (Seedling School), for a total proposed enrollment of 496 students. The project would also result in an increase in employees from 106 employees to 110 employees. FCDS would incorporate the two adjacent residential properties into the campus, which would increase the site area by 14,899 square feet, from 265,990 square feet to 280,889 square feet. With the project, the campus open space would total 206,530 square feet, or approximately 74 percent of total site area. The project would include open space on and around the campus in the form of play yards, landscaped quadrangles, and courtyards. Landscaped side yard and front yard setbacks will be maintained and enhanced.

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 CEQA would be required and the City would be the CEQA Lead Agency. Based on correspondence with the City, the appropriate level of environmental documentation for this project is an Environmental Impact Report (EIR). 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.

An EIR was prepared for the School's Master Plan in 1995 and an Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the Conditional Use Permit to support a school expansion in 2007. Based on review of previous environmental documentation, public comments, and communication with the City and City of Pomona, it is clear that issues related to traffic have persisted at least since the school expansion around the early 2000s. The City has provided a Traffic Issue Log, Line-of-Sight Analysis, Collision Data, previous Staff Reports related to FCDS, a Traffic Report dated April 2006, and other documentation related to historic parking and traffic concerns. Based on the information provided, it is assumed the project will require a great deal of coordination as it relates to public controversy.

GPA has reviewed previous environmental documentation and determined, in coordination with the City, that an EIR would be the appropriate level of documentation to address the proposed expansion. To support conclusions in the EIR, technical studies will be required for the following resource areas: biological resources, air quality, greenhouse gas emissions, traffic, historic resource, cultural resources



tribal consultation, hazardous materials, and noise. GPA has coordinated with the City and received preliminary concurrence on this proposed scope of work. In addition, initial data collection to support the traffic studies was conducted by Fehr & Peers under a separate contract.

## **II. SCOPE OF WORK**

### **Task 1: Project Initiation and 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 1.5-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; environmental schedule*

#### **Task 1.2: Project Description**

Once all background information has been obtained and reviewed, GPA will work with the City 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 Draft and Final Project Description and ESL Map*

### **Task 2: Technical Studies**

#### **Task 2.1 Air Quality and Greenhouse Gas Impact Assessment**

Ambient Air Quality and Noise Consulting (AMBIENT), as a sub-consultant to GPA, will prepare an Air Quality and Greenhouse Gas Impact Assessment. Relevant background information, including ambient air quality conditions and applicable regulatory framework will be described. Nearby existing sensitive receptors and major emission sources will be identified and discussed.

The assessment will include a quantitative assessment of project-generated emissions of criteria air pollutants of primary concern (e.g., reactive organic gases, nitrogen oxides, carbon monoxide, and particulate matter), as well as quantification of GHG emissions. Operational and construction-generated emissions will be quantified using the most current California Emissions Estimator Model (CalEEMod) computer program. Project-generated emissions will be evaluated in accordance with South Coast Air Quality Management District (SCAQMD)-recommended methodologies and guidance. Construction emissions will be quantified based on project-specific construction information, to be provided by FCDS. Operational emissions will be quantified based on maintenance vehicle trip-generation rates and estimated energy use for the project. Consistency of the project in comparison to the state's GHG-reduction plans and GHG-reduction targets will also be evaluated.

Localized air quality impacts will be evaluated in comparison to the SCAQMD's recommended Localized Significance Thresholds screening criteria for air pollutants. Because the school site is an existing school-use facility, evaluation of nearby existing sources of toxic air contaminants is not anticipated to be required. The preparation of dispersion modeling and health risk assessments are not anticipated to be required and are not included. Potential odor impacts associated with the project are anticipated to be negligible and will be qualitatively discussed.



Estimated construction and operational emissions will be compared to SCAQMD-recommended significance thresholds for determination of impact significance. SCAQMD-recommended mitigation measures will be identified and included in the report to reduce impacts found to be significant. The effectiveness of proposed mitigation measures will be quantified and included in the report. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final Air Quality and Greenhouse Gas Impact Assessment*

### **Task 2.2 Cultural Resources Technical Report**

Duke Cultural Resources Management, LLC (Duke CRM) as a sub-consultant to GPA, will prepare an Archaeological Resources Report for the project. Any available information from previous studies will be utilized to the extent feasible. Duke CRM will conduct a 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. At the same time, 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. Duke CRM will also contact the Los Angeles County Natural History Museum to conduct a search of their paleontological files. Limited on-line research will also be conducted. The results of the records search will be provided to GPA historians.

Duke CRM will coordinate with the City to discuss the specific methods of coordinating consultation under Assembly Bill (AB) 52. DUKE CRM will prepare AB 52 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 with each Native American group that requests consultation. DUKE CRM is available to assist the City in the process. The results of these efforts will be documented in a consultation matrix and will be attached to the Cultural Resources Technical Report.

Upon completion of these tasks, DUKE CRM will prepare a Cultural Resources Technical Report in letter format for the project. The report will discuss the results of the research efforts and make recommendations appropriate for CEQA. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final Cultural Resources Technical Report and AB 52 letters*

### **Task 2.3 Biological Resources Assessment**

GPA will prepare a Biological Resources Assessment for the project. Any available information from previous studies will be utilized to the extent feasible. GPA will review available data on biological resources recorded on and within the vicinity of the project area, including all plant and animal species with the potential to be in the area. This review will include conducting searches in databases such as the California Natural Diversity Database (CNDDB), United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, and the California Native Plant Society inventory. Additionally, a list of threatened and endangered species with the potential to be within the project area will be requested from the USFWS. GPA will delineate an appropriate Biological Study Area (BSA) that will cover the direct and indirect impact areas for the project.

GPA will survey the BSA for plant species and wildlife, their signs, and/or potential habitat. GPA will inventory botanical and wildlife resources observed in the BSA and will identify and record all existing



vegetation communities in this area. Project-level surveys will be conducted to assess the potential for special-status species and other sensitive resources to be in the BSA. Based on the location of the area and preliminary site investigations performed using Google Earth, wetlands and other jurisdictional waterways are not expected to be in the BSA.

As part of the development of this scope of work, GPA completed a preliminary CNDDDB search for protected and special-status species recorded within the vicinity of the BSA (Ontario Quad). The search identified multiple federally and/or state threatened, endangered, or special-status species that have been recorded within the Ontario Quad and in the surrounding quads; however, the existing habitat is mostly developed and appears marginal for the special-status species identified in the CNDDDB search.

Following completion of the background research, site investigations, and field surveys, GPA will summarize the results of these studies in a Biological Resources Assessment in memorandum format that will be used to support the CEQA documentation. The report will include a discussion of the existing biological resources in the BSA, applicable regulations, potential project impacts, and proposed avoidance, minimization, and/or mitigation measures to minimize and/or mitigate these impacts to the extent feasible. The BRA will also discuss any consultation required with other agencies to obtain project approvals and environmental permits, if necessary. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final Biological Resources Memorandum*

#### **Task 2.4 Phase I Environmental Site Assessment**

Crawford and Associates (Crawford), as a sub-consultant to GPA, will prepare a Phase I Environmental Site Assessment (ESA) that will evaluate the properties identified above and adjacent parcels for evidence of recognized environmental conditions (REC) and/or potential RECs that may significantly impact the project. The ESA will be prepared in accordance with ASTM E1527-21. Any available information from previous studies will be utilized to the extent feasible.

Physical Setting Review: The ESA will summarize of geologic conditions underlying the subject property based on readily available geologic mapping from the U.S. Geological Survey, U.S. Department of Agriculture, and the California Geological Survey; and will summarize hydrogeologic conditions (including depth to groundwater and regional groundwater flow, if readily available) based on information from websites maintained by FEMA and the State of California.

Historical Land Use Review: Environmental Risk Information Service will provide historical aerial photographs, USGS topographic maps, city directories, Sanborn fire insurance maps (where available), Activity and Use Limitations, and 1980 environmental lien search for the properties identified above. Crawford will review these data to develop a history of general property uses for the subject property and surrounding parcels back to the subject property's first development, or 1940, (subject to availability of information).

Records Review: ERIS will also conduct a computerized search of reasonably ascertainable federal, state, local, and tribal environmental agency database records for each of the parcels identified above and surrounding properties. These database records will be reviewed for information pertaining to the identified parcels, and properties within ASTM standard search radii applicable to each database. The databases searched will include, at a minimum, all databases specified in ASTM E1527-21.

Additional Federal, State, Tribal, and Local Environmental Record Sources: To enhance and supplement the standard environmental record sources, records requests for local records and/or additional federal, state, or tribal records shall be checked. Crawford will contact the local environmental health



department, local planning and building department(s), local fire department, the local air quality management district, the regional water quality control board, and the department of toxic substances control to inquire about department knowledge pertaining to the subject properties or other properties in the site vicinity.

Interviews: Crawford will make reasonable attempts to interview current and past property owners, tenants, and/or key site managers where additional information or clarification is required.

Site Reconnaissance: Crawford will perform a driving and walking reconnaissance of the subject properties and vicinity to observe current conditions. Conditions on adjacent parcels will be observed from the subject property and public right-of-way. The reconnaissance will include observations of geological, hydrogeologic, and topographic conditions; uses and storage of hazardous materials and wastes within and adjacent to the project site; and general conditions regarding the presence of underground and above ground storage tanks, drums, wells, electrical equipment, vegetation, odors, and sewage/waste disposal, as appropriate.

Report of Findings: Crawford will prepare one ESA report documenting the findings of our assessment. This report will include, but not necessarily be limited to, the following topics: description of the subject property and vicinity; summary of the physical setting, local geologic conditions, and hydrogeologic conditions; summary of the historical record review and historical site usage; findings from the records review; findings from public records requests; interview results from the parcel owners and/or user; site reconnaissance observations; photographs of significant items of environmental concern observed during the site reconnaissance (if any); findings, opinions, and conclusions on potential impacts including a summary of RECs, and a discussion of significant data gaps and data failures; and recommendations as warranted by the findings for additional investigation and/or sampling for potentially hazardous materials. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final Phase I ESA*

### **Task 2.5 Historic Resources Technical Report**

GPA will conduct a field survey of the project site to ascertain the physical condition of the buildings, structures, and features thereon, identify character-defining features, and define the study area. Access to the project site is required so all sides of the buildings can be inspected and digitally photographed. Access to the interiors will not be necessary.

GPA will review existing information and conduct research into the history of the two single-family residences of properties proposed to be incorporated into the project and the FCDS campus to identify any potential associations with significant historic trends, events, persons, and/or architecture. GPA will also review the State Office of Historic Preservation Built Environment Resource Directory to identify any potential historical resources in the vicinity of the project area.

GPA will evaluate the two single-family residences and FCDS campus under relevant federal, state, and local criteria to assess whether they are historical resources for the purposes of CEQA. GPA will assess the potential impact of implementing the FCDS Master Plan on up to three total historical resources identified on the project site and in the vicinity.



Following completion of the background research, field survey, historical resource evaluations, and impacts analysis, GPA will compile a Historical Resource Technical Report (HRTR) that will be used to support the EIR. The report will include a discussion of regulatory framework, methodology, and relevant historic contexts. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final HRTR*

### **Task 2.6 Noise and Groundborne Vibration Impact Assessment**

AMBIENT will prepare Noise and Groundborne Vibration Impact Assessment for the project. The existing noise environment on and in the vicinity of the project area will be discussed based on existing environmental documentation and onsite reconnaissance data. As part of the site reconnaissance, AMBIENT will conduct up to five short-term (e.g., 10-30 minute) noise measurement surveys at various locations within the project area to document current ambient daytime noise conditions. Nearby existing noise sources contributing to the ambient noise environment will be identified and discussed. Relevant background information, including noise fundamentals, descriptors, and applicable state and local regulatory framework, will be described.

Noise levels generated by various construction activities and equipment will be identified and discussed in the report. Predicted construction noise levels at nearby land uses will be calculated and discussed. Operational noise levels associated with the proposed on-site structures and facilities (e.g., air conditioning units, parking areas) will be quantitatively assessed. Predicted increases in off-site traffic noise levels attributable to the proposed project will be quantified and discussed.

Groundborne vibration levels commonly associated with onsite construction activities and equipment operations will be quantified and discussed. Groundborne vibration impacts associated with long-term operations are anticipated to be minor and will be qualitatively assessed.

The significance of short-term construction and long-term operational noise impacts will be evaluated in comparison to applicable City noise standards. Mitigation measures will be developed for significant impacts. The effectiveness of proposed mitigation measures will be quantified and included in the report. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copy of the Draft and Final Noise and Groundborne Vibration Impact Assessment*

### **Task 2.7 Traffic Studies**

#### Project Kick Off

Fehr & Peers, as a sub-consultant to GPA, will meet with the project team, including the City and City of Pomona, to discuss the approach to the project and overall timeline. Key areas of confirmation include the purpose of level of service (LOS) transportation study, scope for neighborhood traffic and safety study, previous transportation studies completed for the project, and travel patterns and safety concerns within the study area.

#### Transportation Study Scoping

Fehr & Peers will prepare a transportation study scoping memorandum that will document the approach to the transportation study. The scoping memorandum will include:

- A custom project trip generation estimate that will be based on traffic counts collected at FCDS and compared to published rates in the Institute of Transportation Engineers Trip Generation Handbook, 11<sup>th</sup> Edition.



- Project trip distribution and trip assignment to identify appropriate study locations for the LOS study.
- Recommended study scenarios consistent with the City’s transportation study guidelines:
  - AM Peak Hour (peak one hour between 7:00 am and 9:00 am, which includes the AM school drop-off period);
  - PM Peak Hour (peak one hour between 4:00 pm and 6:00 pm); and
  - An additional scenario for the Afternoon Dismissal Peak Hour (peak one hour between 2:00 pm and 4:00 pm).
- Analysis methodology consistent with City requirements and industry standard practice. Given the proximity to schools, Fehr & Peers recommends the use of a lower peak hour factor for future years (consistent with existing conditions data collected in the field). A peak hour factor lower than 0.95 is more appropriate for areas with schools due to the concentration of traffic during the 15-30 minutes before and after the school bell.
- The approach and assumptions for the on-site parking and access analysis including on-site queueing storage analysis.
- A review of the project and its applicability to screen from a Vehicle Miles of Travel (VMT) assessment based on the City of Claremont Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (2020). Due to the regional nature of private school attendance, the project is not expected to be screened and therefore a full VMT analysis will be conducted.
- The proposed approach to the neighborhood safety assessment including documentation of existing collisions and priority areas for the study to focus on.

#### VMT Assessment

Because the project is not expected to screen out of a VMT assessment, Fehr & Peers will utilize a combination of on- and off-model methods to conduct a project level and cumulative level VMT assessment for the project. This hybrid approach will capture the unique trip characteristics of private schools (e.g. students attending from outside the city) that may not be fully accounted for in the model. The latest version of the Southern California Association of Governments (SCAG) model and supplemental data will be used to forecast for the following scenarios as part of this effort:

- Baseline (2025) No Project;
- Baseline (2025) With Project;
- Cumulative (2050) No Project; and
- Cumulative (2050) With Project.

Due to the unique land use and regional enrollment patterns at FCDS, Fehr & Peers will prepare offmodel estimates for Project VMT by utilizing the custom trip generation rate developed and referencing data that can provide trip distance and distribution patterns including enrollment zip code data provided by FCDS. The average trip distance information will be leveraged from Streetlight, a big data vendor that uses connected vehicle technology to develop aggregated travel pattern data. The SCAG Streetlight Portal, which is free for SCAG member agencies, will be used.

For the project level assessment, Fehr & Peers will extract city-wide average VMT data from the model



and report it on a per service population and per student basis to use as the City's threshold of significance. They will also review the SCAG model and 2024 SCAG RTP/SCS land use assumptions to confirm consistency with the general plan and RTP land use. If the project is not assumed in the general plan and RTP buildout year land use, a cumulative model run will be required.

For the cumulative level assessment, Fehr & Peers will estimate the project-effect on VMT by extracting the total link-level VMT for both the no-project and plus-project condition and evaluating change in VMT within the city boundary and a to-be-determined radius from the project area (determined by the average trip length of trips to/from FCDS).

If the project is found to have a significant VMT impact, potential mitigation options will be recommended and discussed with the project team for their inclusion as mitigation. The mitigation strategies will be based on transportation demand management measures that have been found to be effective in reducing VMT in the San Gabriel Valley, consistent with the requirements in the San Gabriel Valley Council of Governments VMT Reduction Calculations attachment to the City's transportation study guidelines and the California Air Pollution Control Officers Association Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing health and Equity (2021).

Fehr & Peers will also support GPA with data needs for air quality and noise modeling required to complete those analyses. Data will be shared with GPA in Excel format, and is anticipated to include:

- Trip-generation rates for new land uses;
- Up to six additional roadway segment ADT and/or bidirectional peak hour traffic forecasts with and without project (for Noise Analysis);
- Project-level VMT forecasts (using the origin-destination method) for existing, opening year and cumulative year conditions, with and without the project (For Air Quality and Greenhouse Gas Analysis); and
- Data will be provided for the average school day and for the year (annualized).

#### Non-CEQA Transportation Assessment

The local transportation study will assess the project's effect on local transportation infrastructure (outside of CEQA), including an LOS assessment and on-site parking/access assessment consistent with City requirements.

LOS Assessment: Fehr & Peers will evaluate up to 11 intersections within the study area based on the list of proposed locations provided by the City. The transportation assessment will include:

- Data collection at nine public roadway intersections, two driveway intersections, and five roadway segments;
- Project trip generation, distribution, and assignment;
- Incorporation of cumulative projects within one mile of the project area;
- Documentation of analysis methodology, consistent with City standards and industry practice;
- Opening Year and Horizon Year traffic volume forecasts with and without the project;



- Existing conditions, Opening Year conditions, and Horizon Year conditions LOS assessment, with and without the project; and
- Infrastructure and operational improvement recommendations at deficient locations.

Due to the closely spaced intersections adjacent to the school, lower-than-typical peak hour factor, and congested conditions, Fehr & Peers recommends the use of SimTraffic microsimulation for the intersections and driveways immediately adjacent to FCDS (up to four intersections and two driveways). The remaining intersections will be analyzed using Synchro using Highway Capacity Manual (HCM) 7<sup>th</sup> Edition methodologies.

**Access and Circulation Assessment:** Fehr & Peers will analyze proposed on-site parking supply and compare the proposed supply with City code parking requirements. Fehr & Peers will also conduct a drop-off/pick-up stacking and queueing analysis using the proposed drop-off/pick-up loop configuration, an observed vehicle service rate, and project trip generation estimates. It is anticipated the queueing will peak during the afternoon pick-up period prior to the dismissal bell. The assessment will provide recommended on-site queueing capacity and strategies for eliminating queues along Towne Avenue, including potential peak-hour parking restrictions along northbound Towne Avenue.

#### Neighborhood Safety Assessment

The neighborhood safety assessment will evaluate multimodal circulation to/from FCDS and along adjacent roadways. Fehr & Peers assumes the review of the following concerns mentioned by City staff and residents, to be confirmed during scoping:

- Left turn phasing and U-turn analysis at Towne Avenue and Harrison Avenue;
- Queueing at Towne Avenue and Harrison Avenue;
- Vehicle/pedestrian conflicts at Towne Avenue and Harrison Avenue;
- All-way-stop warrant analysis at Harrison Avenue and Northwestern Drive;
- Traffic calming and pedestrian crossing improvements along Harrison Avenue, including evaluating the removal/relocation of the Harrison Avenue midblock crosswalk; and
- On-site drop-off/pick-up loop reconfiguration to reduce queueing on public streets.

**Data Collection:** Fehr & Peers will review 5-year historical collision data within the study area to identify collision trends and collision types and the Pomona and Claremont Local Road Safety Plans to document known deficiencies. Traffic/speed counts and field observations will also be referenced for this assessment.

**Counter Measures:** Fehr & Peers will develop roadway design and operational improvements to improve safety within the study area including changes to existing intersections, new traffic control devices, traffic calming features, pedestrian safety features, and on-site procedures for drop-off/pick-up. These changes will be analyzed with the plus project traffic volumes. The recommendations will be documented in a neighborhood safety assessment memorandum which will include a countermeasures table and planning level exhibits as necessary. This scope does not include preparation of Plans, Specifications, and Estimates (PS&E) drawings for these improvements.

#### Documentation and Meetings

The results of the VMT Assessment and Non-CEQA Transportation Assessment will be summarized in a



draft Transportation Study Report. The neighborhood safety assessment will be summarized in a draft technical memorandum. Fehr & Peers will attend up to 10 virtual calls with the City and up to five in-person public hearings (scoping meeting, Traffic and Transportation Commission, Planning Commission, and/or City Council) to describe methodologies, results, and conclusions as needed. The draft report will be submitted to the City for review, and results incorporated into the EIR.

*Deliverables: Electronic copies of the Draft and Final Transportation Study Report and Neighborhood Safety Assessment Memorandum*

### **Task 3: Environmental Impact Report**

GPA will prepare an EIR in accordance with the CEQA Guidelines, and in a format acceptable to the City. The EIR will include detailed explanations of all determinations and discussions of potential environmental impacts. The analysis will be in accordance with Public Resources Code Section 21083 and CEQA Guidelines Sections 15080 TO 15097.

#### **Task 3.1: Notice of Preparation**

GPA will draft a Notice of Preparation (NOP) stating that an EIR will be prepared. The NOP will include a project description, including location, and a summary of anticipated environmental impacts. GPA will provide a draft of the NOP for review by the City and will revise to address City comments. GPA will submit the NOP to the State Clearinghouse (SCH) and responsible and trustee agencies for the project to solicit information about the scope of information to be included in the EIR. The NOP will also be filed with the Los Angeles County Clerk. GPA will maintain a copy of any comments received during the comment period to support the EIR.

*Deliverables: Electronic copy of the NOP*

#### **Task 3.1: Administrative Draft Environmental Impact Report**

Following completion of the NOP review period and appropriate technical analysis, GPA will reference the results of the studies, as well as other background research, to prepare the Administrative Draft EIR. The document will be prepared in a format approved by the City and will contain all the required sections and contents required by CEQA. GPA will provide an Administrative Draft EIR for review by the City and will revise to address City comments.

*Deliverables: Electronic copy of the Administrative Draft EIR*

#### **Task 3.2: Public Review Draft Environmental Impact Report**

Once the Administrative Draft EIR has been approved by the City, GPA will prepare the Draft EIR for public circulation. GPA will also prepare the Notice of Completion (NOC) and Notice of Availability (NOA) for the EIR and coordinate with the City for any final reviews and approval to circulate the document. GPA will distribute the document to the appropriate agencies and public for review and comment. The EIR will be posted with the SCH under the most current electronic submittal requirements. GPA will maintain a file of any comments received during the circulation period for use in preparing the final document.

*Deliverables: Electronic copy of the Public Review Draft EIR, NOC, and NOA*

#### **Task 3.3: Final Environmental Impact Report**

Following circulation of the Draft EIR, GPA will coordinate with the City to prepare responses to any public comments received and incorporate the responses and any required revisions into the document.



GPA will then prepare a Final EIR and submit it to the City for review. GPA will coordinate as needed to make further revisions, obtain approval to finalize the document, and support adoption of the Final EIR by the City. Within five days of project approval, GPA will prepare and file a Notice of Determination (NOD) with the Los Angeles County Clerk.

*Deliverables: Electronic copy of the Final EIR and NOD*

#### **Task 4: Project Management and 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, FCDS staff, City staff, and sub-consultant team. 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 20 months.

*Deliverables: Up to 20 monthly progress reports; schedule updates*

##### **Task 4.2: Meetings**

###### Scoping Meeting

GPA's Project Manager will attend one in-person, 2-hour project scoping meeting with the project team. It is assumed that City staff and/or the applicant will prepare and make any required presentations. GPA will be present to answer questions from the City Council that are directly related to the EIR process. As outlined in Task 2.7, a senior consultant from Fehr & Peers, serving as a sub-consultant to GPA, will also attend this meeting.

###### Coordination Meetings

Throughout the course of the project, GPA anticipates attendance at up to 16 2-hour 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.

###### Public Meetings

GPA's Project Manager will attend up to five public meetings/hearings with the project team. It is assumed that City staff and/or the applicant will prepare and make any required presentations. GPA will be present to answer questions from the City Council that are directly related to the EIR. As outlined in Task 2.7, a senior consultant from Fehr & Peers, serving as a sub-consultant to GPA, will also be available to attend these meetings.

*Deliverables: In-person attendance at one scoping meeting; virtual attendance at up to 16 2-hour virtual meetings; in-person attendance at up to five 2-hour public meetings/hearings*



### III. OPTIONAL TASKS

#### Task 2.8: Special Event Analysis

As an optional task, Fehr & Peers will analyze trip generation and on-street parking utilization within the project vicinity during recurring special events hosted at the school (e.g. Grandparents Day, graduation, etc.). The purpose of this assessment is to understand additional traffic generated by these events and to identify traffic and parking management strategies that can be used during special events. We will compare driveway traffic counts and queueing observations on days with special events to days without special events. Additionally, we will compare on-street parking occupancy on streets adjacent to the school on days with special events to days without special events. We will quantify the additional trip generation and parking demand for events. We will prepare a technical memorandum documenting our findings and recommendations for event traffic and parking management.

*Deliverables: Electronic copy of the Draft and Final Special Events Analysis*

#### Task 3.4: Findings and Statement of Overriding Considerations

If the EIR identifies that the project would have one or more significant environmental effects following mitigation, GPA will prepare written CEQA findings for each significant environmental effect identified in the EIR. The findings will explain whether mitigation measures and project alternatives have been accepted or rejected and will provide a rationale for the City's decision. The findings will also state whether any significant impacts remain after mitigation measures have been applied and will provide the basis for making a Statement of Overriding Considerations (SOC). If significant effects are unavoidable, GPA will prepare a SOC that will explain the justification for proceeding with the project despite significant adverse environmental impacts. The SOC will explain, as applicable, the economic, legal, social, technological, or other benefits of a project that outweigh the significant adverse environmental impacts and will be supported by substantial evidence to be included in the CEQA administrative record.

*Deliverables: Electronic copy of the Draft and Final Findings and Statement of Overriding Considerations*

### IV. 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, including the Master Plan Application and traffic background. 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.*
- *Any rights of entry required to conduct field surveys will be provided at no cost to GPA. If buildings are present on the subject parcels access to the building interiors will be required.*
- *The preparation of emissions inventories associated with existing operations is not anticipated to be required for this project and is not included.*
- *One field visit with two biologists is anticipated to be necessary for completion of the biological surveys.*
- *There are no jurisdictional features in the project area, and a jurisdictional delineation will not be required, and focused surveys for special-status species and/or agency consultation for listed species will not be needed.*
- *Two architectural historians will complete a field survey of all 12 buildings in one site visit.*



- *The City will provide digital copies of any available building permit records, plans, or other relevant documents that may aid the evaluation.*
- *The two single-family residences will be evaluated following statewide best practices for evaluating postwar tract homes and the eight buildings in the FCDS campus will be evaluated together as a potential historic district, for a maximum of five historical resource evaluations.*
- *No more than three historical resources will be identified on the project site and in the vicinity.*
- *Implementation of the Master Plan would result in a less-than-significant impact on historical resources and recommended mitigation measures will not be required.*
- *Contact information for current and former property owners, tenants, and/or key site managers will be provided.*
- *Samples to evaluate for the possible presence petroleum products or other hazardous materials are not included.*
- *Evaluation of up to 11 intersections within the study area for LOS will be sufficient based on the list of proposed locations provided by the City.*
- *The City will complete preparation of any necessary documentation needed to support adoption of the Final EIR, including staff reports, resolutions, and other documentation.*
- *Attendance at one scoping meeting and up to five public meetings/hearings will be sufficient to support the EIR process. It is assumed the staff planner would prepare the required staff reports and make any required presentations; however, GPA will be available to respond to questions regarding the technical analysis and EIR.*
- *Payment of any required noticing and filing fees for public circulation of the EIR, including the California Department of Fish and Wildlife (CDFW) filing fee, if applicable, and Los Angeles Registrar-Recorder County Clerk's Office fee, will be the responsibility of the City.*

# Fee Proposal

Foothill Country Day School, City of Claremont  
GPA Consulting

		Erinn Silva Principal Environmental Planner	Arya Moalemi Senior Environmental Planner	Marieka Schrader Senior Associate Environmental Planner	Logan Faltas Associate Environmental Planner	Savannah Marburger Associate Environmental Planner	Alison Kim Environmental Planner	Gabriel Barrera Environmental Planner	Martin Rose Senior GIS Analyst	Jennifer Johnson Senior Associate Biologist	Jeremy Rosenthal Senior Biologist	Victoria Masjuan Associate Biologist	Ramsey Cuellar de Lucio Biologist	Jenna Kachour Senior Associate Architectural Historian	Amanda Duane Senior Architectural Historian	Audrey von Ahrens Senior Architectural Historian	Phoebe Rayburn Architectural Historian	Total Hours	Subconsultants	Other Direct Costs	Total GPA Labor Costs	Grand Total (Labor, Subs, ODCs)
<b>No.</b>	<b>Task Description</b>	\$ 356.00	\$ 206.00	\$ 284.00	\$ 145.00	\$ 145.00	\$ 119.00	\$ 119.00	\$ 186.00	\$ 243.00	\$ 196.00	\$ 145.00	\$ 119.00	\$ 217.00	\$ 181.00	\$ 181.00	\$ 119.00					
<b>1</b>	<b>Project Initiation and Project Description</b>																					
1.1	Project Initiation	4	10															14	\$ -	\$ -	\$ 3,484.00	\$ 3,484.00
1.2	Project Description	2	8				16		2									28	\$ -	\$ -	\$ 4,636.00	\$ 4,636.00
<b>2</b>	<b>Technical Studies</b>																					
2.1	Air Quality and Greenhouse Gas Impact Assessment		4															4	\$ 7,800.00	\$ -	\$ 824.00	\$ 8,624.00
2.2	Archaeological and Paleontological Resources		4															4	\$ 7,300.00	\$ -	\$ 824.00	\$ 8,124.00
2.3	Biological Resources Assessment		2					8	8	4	12	20	44					98	\$ -	\$ 160.00	\$ 14,312.00	\$ 14,472.00
2.4	Phase I Environmental Site Assessment		4															4	\$ 11,920.00	\$ -	\$ 824.00	\$ 12,744.00
2.5	Historic Resources Technical Report		2											26	55	42	62	187	\$ -	\$ 105.00	\$ 30,989.00	\$ 31,094.00
2.6	Noise and Groundborne Vibration Impact Assessment		4															4	\$ 8,200.00	\$ -	\$ 824.00	\$ 9,024.00
2.7	Traffic Study	8	10															18	\$ 159,120.00	\$ -	\$ 4,908.00	\$ 164,028.00
<b>3</b>	<b>CEQA Initial Study</b>																					
3.1	Notice of Preparation	2	6				3	3										14	\$ -	\$ -	\$ 2,662.00	\$ 2,662.00
3.2	Administrative Draft Environmental Impact Report	12	24		90		100	20	8									254	\$ -	\$ -	\$ 38,034.00	\$ 38,034.00
3.3	Public Review Draft Environmental Impact Report	12	18		20		35	5	2									92	\$ -	\$ -	\$ 16,012.00	\$ 16,012.00
3.4	Final Environmental Impact Report	12	32		15	5	35	15	2									116	\$ -	\$ -	\$ 20,086.00	\$ 20,086.00
<b>4</b>	<b>Project Management and Meetings</b>																					
4.1	Project Management	32	88	8														128	\$ -	\$ -	\$ 31,792.00	\$ 31,792.00
4.2	Meetings	80	164	32														276	\$ -	\$ 2,180.00	\$ 71,352.00	\$ 73,532.00
	TOTAL HOURS	164	380			5	189	51	22	4	12	20	44	26	55	42	62	1076				
	TOTAL COST	\$ 58,384.00	\$ 78,280.00			\$ 725.00	\$ 22,491.00	\$ 6,069.00	\$ 4,092.00	\$ 972.00	\$ 2,352.00	\$ 2,900.00	\$ 5,236.00	\$ 5,642.00	\$ 9,955.00	\$ 7,602.00	\$ 7,378.00		\$ 194,340.00	\$ 2,445.00	\$ 254,107.00	\$ 438,348.00
<b>2</b>	<b>OPTIONAL TASKS</b>																					
2.8	Special Event Analysis		4															4	\$ 12,080.00	\$ -	\$ 824.00	\$ 12,904.00
3.5	Findings and Statement of Overriding Considerations	12	12		40													64	\$ -	\$ -	\$ 12,544.00	\$ 12,544.00
	(OPTIONAL) TOTAL HOURS	12	16			0	0	0	0	0	0	0	0	0	0	0	0	28				
	(OPTIONAL) TOTAL COST	\$ 4,272.00	\$ 3,296.00			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ 12,080.00	\$ -	\$ 13,368.00	\$ 25,448.00
	<b>TOTAL HOURS (includes OPTIONAL)</b>	176	396			5	189	51	22	4	12	20	44	26	55	42	62	1104				
	<b>TOTAL COST (includes OPTIONAL)</b>	\$ 62,656.00	\$ 81,576.00			\$ 725.00	\$ 22,491.00	\$ 6,069.00	\$ 4,092.00	\$ 972.00	\$ 2,352.00	\$ 2,900.00	\$ 5,236.00	\$ 5,642.00	\$ 9,955.00	\$ 7,602.00	\$ 7,378.00		\$ 206,420.00	\$ 2,445.00	\$ 267,475.00	\$ 463,796.00