

Exhibit B

Environmental Clearance – ENV-2020-5812-ND

CPC-2020-5811-CA

For consideration by the City Planning Commission
December 10, 2020



Private Detention Center Ordinance

Case Number: ENV-2020-5812-ND

Project Location: Citywide

Community Plan Area: Citywide

Council District: Citywide

Project Description: The Project is an ordinance that defines and prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The citywide prohibition applies to all zones with no variance, exception, or deviation granted or allowed. This prohibition is inclusive of prohibiting accessory uses and incidental activity to a permitted use if the use or activity is related to a Community Detention Facility for Unaccompanied Minors or a Private Detention Center.

PREPARED BY:
The City of Los Angeles
Department of City Planning

November 2020

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed **Private Detention Center Ordinance** (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study, and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	PRIVATE DETENTION CENTER ORDINANCE
ENVIRONMENTAL CASE NO.	ENV-2020-5812-ND
RELATED CASES	CPC-2020-5811-CA

PROJECT LOCATION	CITYWIDE
COMMUNITY PLAN AREA	CITYWIDE
GENERAL PLAN DESIGNATION	N/A
ZONING	N/A
COUNCIL DISTRICT	CITYWIDE

LEAD AGENCY	CITY OF LOS ANGELES
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APPLICANT	CITY OF LOS ANGELES
ADDRESS	N/A
PHONE NUMBER	N/A

PROJECT DESCRIPTION

The Project is an ordinance that defines and prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The citywide prohibition applies to all zones with no variance, exception, or deviation granted or allowed. This prohibition is inclusive of prohibiting accessory uses and incidental activity to a permitted use if the use or activity is related to a Community Detention Facility for Unaccompanied Minors or a Private Detention Center.

The Project is in alignment with Assembly Bill 32 (Bonta) adopted by the Legislature in 2019, now codified as California Penal Code Section 9500, which prohibited persons from operating private detention facilities within the state, with some exceptions. The State law exceptions are included within the Project definition of Private Detention Center. However, the Project excludes one exception from the State law specific to residential care facilities operating pursuant to Division 2 of the California Health and Safety Code by limiting it to facilities that are used to house persons in the custody of the federal government. The second definition, Community Detention Facility for Unaccompanied Minors, defines this limitation as a stand-alone use for a specific form of detention centers.

While the Project introduces new uses, it is an explicit prohibition of such uses and therefore does not authorize the development of any new projects. As a result, the Initial Study finds no potential impacts, and a Negative Declaration will be prepared.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| ☐ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agriculture & Forestry Resources | ☐ Hazards & Hazardous Materials | ☐ Recreation |
| ☐ Air Quality | ☐ Hydrology / Water Quality | ☐ Transportation |
| ☐ Biological Resources | ☐ Land Use / Planning | ☐ Tribal Cultural Resources |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Utilities / Service Systems |
| ☐ Energy | ☐ Noise | ☐ Wildfire |
| ☐ Geology / Soils | ☐ Population / Housing | ☐ Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Fabiola Inzunza

PRINTED NAME

City Planning Associate

TITLE

Fabiola Inzunza

SIGNATURE

11/23/2020

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project is an ordinance that defines and prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The citywide prohibition applies to all zones with no variance, exception, or deviation granted or allowed. This prohibition is inclusive of prohibiting accessory uses and incidental activity to a permitted use if the use or activity is related to a Community Detention Facility for Unaccompanied Minors or a Private Detention Center.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location Citywide

3.2.2 Existing Conditions

Private detention center activity in the State of California was prohibited by State law (Penal Code Section 9500 et seq.) beginning January 1, 2020, with any existing activity to be phased out by 2028. There is no language in Chapter I of the Los Angeles Municipal Code (Zoning Code) defining or regulating activity related to private detention centers and therefore no facilities with the defined use of Private Detention Center or Community Detention Facility for Unaccompanied Minors exists today. In addition, the City of Los Angeles enacted an Interim Control Ordinance on February 4, 2020 (Ordinance No. 186405) to temporarily prohibit private detention center activity while it prepares and presents permanent regulations to prohibit the operation and construction of private detention centers. The Interim Control Ordinance is in effect today and it is expected that it will continue to be in effect until the adoption of the Project which would enact permanent regulations to replace the interim regulations.

Recently, the City was made aware of potential accessory or incidental private detention center activity for an already permitted use. The permitted use was a hotel, which, per Zoning Code definition, is already not permitted to operate as an institution in which human beings are housed or detained under legal restraint. However, in order to further clarify the use and intent to prohibit private detention center activity, the Project also contains specific provisions furthering the prohibition of private detention centers by explicitly restricting accessory or incidental activity related to an already permitted use. This clarification of the prohibition of private detention centers in comparison to existing regulations is a further restriction of activity.

The availability of data confirming a baseline level of activity is limited. Without a prior definition established by either State law or the existing Interim Control Ordinance it is reasonable to assume activity, if any, related to private detention centers as defined by

the aforementioned regulations in place may have been in operation as a different use. For instance, the conditions which led to the adoption of the Interim Control Ordinance stemmed from a service request form from a private organization known as a private detention center operator describing a use that was not enumerated in the Zoning Code but which led to an assessment of various entitlement options that included the examination of uses related to housing such as transitional housing, shelter, and dormitory. While no floor plans were submitted to substantiate the described use and no formal application was eventually submitted, the City was made aware of the potential of privately operated detention center operators inaccurately fitting into the description of an existing allowed use.

Additional details of the provisions of the Project and how the restrictions lead to no potential impacts associated with this Project compared to existing conditions are contained in the “Analysis” section of this report.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project is an ordinance that defines and prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The citywide prohibition applies to all zones with no variance, exception, or deviation granted or allowed. This prohibition is inclusive of prohibiting accessory uses and incidental activity to a permitted use if the use or activity is related to a Community Detention Facility for Unaccompanied Minors or a Private Detention Center.

The Project is in alignment with the regulations set forth in Assembly Bill 32 (Bonta) in 2019, now codified as California Penal Code Section 9500, which prohibited persons from operating private detention facilities within the state, with some exceptions. The State law exceptions are included within the Project definition of Private Detention Center. However, the Project excludes one exception from the State law specific to residential care facilities operating pursuant to Division 2 of the California Health and Safety Code by limiting it to facilities that are used to house persons in the custody of the federal government. The second definition, Community Detention Facility for Unaccompanied Minors, defines this limitation as a stand-alone use for a specific form of detention centers.

3.3.2 Analysis

The uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center are temporarily prohibited in the City by an Interim Control Ordinance (Ordinance No. 186405). However, as explained in the “Existing Conditions” section of this report, the City assumes that while the baseline level of activity related to private detention centers is small, it may potentially be occurring as an alternative use that is allowed under the LAMC or without the appropriate permits. The intention of this Project is to strengthen existing prohibitions by enumerating in the Zoning Code permanent regulations and further prohibiting accessory uses and incidental activity to a permitted use if the use or activity is related to a Community Detention Facility for Unaccompanied Minors and Private Detention Center.

The provisions of the Project include adding definitions and adding regulations to the Zoning Code to prohibit the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The adoption of local regulations allows the City to properly enforce and prevent the construction or operation of new private detention center related activity. Furthermore, the Project does not allow any variance, exception, or deviation to any provisions of the Zoning Code.

While there is potential for private operators to self-identify as an existing allowed use in the Zoning Code as explained in the “Existing Conditions” section of this report, the provisions of the Project allow for a proactive denial of projects seeking permits for the operation or construction of such uses. Therefore, given the provisions set forth by the Project, the potential for significant levels of circumvention is minimal or speculative.

The Project is not expected to result in any new development because it does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal.

Below, in Section 4 of this document, is a discussion of potential impacts under each environmental factor. In all cases, the environmental factors are not impacted. As a result, the Initial Study finds no potential significant impacts, and a Negative Declaration will be prepared.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

The Project is an ordinance amending Chapter I of the Los Angeles Municipal Code to define two new uses, Private Detention Centers and Community Detention Facility for Unaccompanied Minors including any accessory or incidental activity, and to subsequently prohibit their use with no allowance or granting of a deviation allowed. In order to implement the Project, adoption of the ordinance and this environmental document will be required.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

a) Have a substantial adverse effect on a scenic vista?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in changes to a structure's physical shape or size, nor would it create any physical changes to the environment. The Project is not anticipated to result in new development that could affect scenic vistas or that would have a substantial adverse effect on a scenic vista. Therefore, no impact related to this issue would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve scenic resources or likely to result in new development that would substantially damage scenic resources. Therefore, no impact related to this issue would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve development that would substantially degrade the existing visual character or quality of public views in non-urbanized areas or conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impact related to this issue would occur.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. Therefore, no impact related to this issue would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve farmland or the conversion of any farmland to non-agricultural use. Therefore, no impact related to this issue would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve farmland or agricultural uses nor would it conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, no impact related to this issue would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve or include forest land or timberland nor would it rezone or conflict with existing zoning for forest land or timberland. Therefore, no impact related to this issue would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve or include forest land that would result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact related to this issue would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project does not involve or include forest land or agricultural uses nor would it result in new development that would involve other changes in the existing environment which could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, no impact related to this issue would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in an increase in traffic, or a change in traffic patterns that would increase, or a change in traffic patterns that would increase or change vehicle emissions from existing conditions. The Project would not conflict with or obstruct implementation of an applicable air quality plan. Therefore, no impact related to this issue would occur.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal.

The Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard. Therefore, no impact related to this issue would occur.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve exposure to pollutants nor would it expose sensitive receptors to substantial pollutant concentrations. Therefore, no impact related to this issue would occur.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve emissions that would adversely affect a substantial number of people. Therefore, no impact related to this issue would occur.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve habitat modifications that would have a substantial adverse effect on any species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impact related to this issue would occur.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve any habitat modifications that would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impact related to this issue would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve habitat modifications that would have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, no impact related to this issue would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve habitat modifications that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, no impact related to this issue would occur.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would conflict with any policies protecting biological resources. Therefore, no impact related to this issue would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with the provisions of any habitat conservation plan or sustainability plan, including the General Plan Conservation Element. Therefore, no impact related to this issue would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

No Impact. State CEQA Guidelines Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project would to adversely affect a historical resource meeting one of the above definitions.

The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve historical resources and would not cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5. Therefore, no impact related to this issue would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already

prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading or excavation that would cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5. Therefore, no impact related to this issue would occur.

c) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading or excavation that would disturb any human remains, including those interred outside of formal cemeteries. Therefore, no impact related to this issue would occur.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, no impact related to this issue would occur.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no impact related to this issue would occur.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or other fault endangering activities that would cause potential substantial adverse effects involving a known earthquake fault nor exacerbate existing environmental conditions so as to potentially cause such rupture. Therefore, no impact related to this issue would occur.

ii) Strong seismic ground shaking?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or other activities associated with increasing strong seismic ground shaking that would cause potential substantial adverse effects. Therefore, no impact related to this issue would occur.

iii) Seismic-related ground failure, including liquefaction?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or other activities associated with seismic - related ground failure that would cause potential substantial adverse effects. Therefore, no impact related to this issue would occur.

iv) Landslides?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or other potential landslide inducing activities

that would cause potential substantial adverse effects. Therefore, no impact related to this issue would occur.

b) Result in substantial soil erosion or the loss of topsoil?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading or excavation activities associated with soil erosion and loss of topsoil that would cause substantial adverse effects. Therefore, no impact related to this issue would occur.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve ground destabilizing activities such as grading and excavation that would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project. Therefore, no impact related to this issue would occur.

d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading or excavation activities that would be located on expansive soil that would result in substantial risks to life or property. Therefore, no impact related to this issue would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal.

The Project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact related to this issue would occur.

f) . Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve ground disturbing activities that directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, no impact related to this issue would occur.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, no impact related to this issue would occur.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, no impact related to this issue would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve the transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. Therefore, no impact related to this issue would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve the release of hazardous materials into the environment that would create a significant hazard to the public or the environment. Therefore, no impact related to this issue would occur.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve the emission of hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impact related to this issue would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not be located on a hazardous materials site and create a significant hazard to the public or the environment. Therefore, no impact related to this issue would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not foreseeably result in development located within an airport land use plan or within distance of an airport. Therefore, no impact related to this issue would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Furthermore, no aspects of this Project would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Therefore, no impact related to this issue would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, no impact related to this issue would occur.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Therefore, no impact related to this issue would occur.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, no impact related to this issue would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or development activities that would substantially alter the existing drainage pattern or that would result in substantial erosion or siltation on- or off-site. Therefore, no impact related to this issue would occur.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not involve grading, excavation, or development activities that would result in

substantial erosion or siltation that would substantially increase surface runoff. Therefore, no impact related to this issue would occur.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not create or contribute runoff water or provide substantial additional sources of polluted runoff. Therefore, no impact related to this issue would occur.

iv. Impede or redirect flood flows?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not impede or redirect flood flows. Therefore, no impact related to this issue would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not risk release of pollutants due to project inundation. Therefore, no impact related to this issue would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, no impact related to this issue would occur.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) Physically divide an established community?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not physically divide an established community. Therefore, no impact related to this issue would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with any land use plan, policy, or regulation adopted that would cause a significant environmental impact due to a conflict. Therefore, no impact related to this issue would occur.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact related to this issue would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impact related to this issue would occur.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not generate a substantial increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, no impact related to this issue would occur.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not generate excessive groundborne vibration or groundborne noise levels. Therefore, no impact related to this issue would occur.

c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not expose people residing or working within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use airport to excessive noise levels. Therefore, no impact related to this issue would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not induce population growth. Therefore, no impact related to this issue would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not necessitate the construction of replacement housing due to displacement of existing people or housing. Therefore, no impact related to this issue would occur.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a) Fire protection?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase demands on fire protection services so as to require the construction of new or expanded facilities. Therefore, no impact related to this issue would occur.

b) Police protection?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase demands on police protection services so as to require the construction of new or expanded facilities. Therefore, no impact related to this issue would occur.

c) Schools?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The

prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase demands on school services so as to require the construction of new or expanded facilities. Therefore, no impact related to this issue would occur.

d) Parks?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase demands on parks services so as to require the construction of new or expanded facilities. Therefore, no impact related to this issue would occur.

e) Other public facilities?

Libraries

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase demands on library services so as to require the construction of new or expanded facilities. Therefore, no impact related to this issue would occur.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, no impact related to this issue would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact related to this issue would occur.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system. Therefore, no impact related to this issue would occur.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact. State CEQA Guidelines Section 15064.5 defines a criteria for analyzing transportation impacts for land use projects where 1) vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact; 2) projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact; and 3) projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative

to identify potential displacement of development as a result of its appeal. The Project would not substantially increase vehicle miles traveled. Therefore, no impact related to this issue would occur.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, no impact related to this issue would occur.

d) Result in inadequate emergency access?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in inadequate emergency access. Therefore, no impact related to this issue would occur.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. No grading or excavation activities that will result in ground disturbance is proposed as part of the Project. The Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, no impact related to this issue would occur.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. No grading or excavation activities that will result in ground disturbance is proposed as part of the Project. The Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, no impact related to this issue would occur.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed ordinance if the Tribe has submitted a request in writing to be notified of Proposed Ordinances. The Tribe must respond in writing within 30 days of the City's AB52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the project site. In accordance with AB 52, notice of the Project was provided on October 21, 2020 to tribes who have requested such notice in the City of Los Angeles, and no tribes requested consultation.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, no impact related to this issue would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in significant increases in water usage over current conditions. Therefore, no impact related to this issue would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in the generation of wastewater over existing conditions. Therefore, no impact related to this issue would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in the generation of solid waste over existing conditions. Therefore, no impact related to this issue would occur.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not result in the generation of solid waste in excess of federal, state, or local standards. Therefore, no impact related to this issue would occur.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impact related to this issue would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal.

The Project would not exacerbate wildfire risks. Therefore, no impact related to this issue would occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impact related to this issue would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project does not expressly authorize new development and is not expected to induce growth or development because the Project defines and subsequently prohibits the uses of Community Detention Facility for Unaccompanied Minors and Private Detention Center. The prohibition of the use of Private Detention Center is in alignment with State law which already prohibits the activity throughout California. While the State Law could face a legal challenge, it would be speculative to identify potential displacement of development as a result of its appeal. The Project would not increase the risk of exposure to people or structures to landslides or flooding. Therefore, no impact related to this issue would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. For the reasons stated in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The Project does not expressly authorize new development, and no new development is expected to occur for the reasons set forth above.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No Impact. For the reasons stated in this Initial Study, the Project would not potentially result in any significant impacts and would not have the potential to contribute to cumulative impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. For the reasons stated in this Initial Study, the Project would not potentially cause substantial effects on human beings, either directly or indirectly.

CONCLUSION

Based upon the information set forth above, in the staff report related to this Project and the substantial evidence contained in the whole of the record of proceedings, the City has determined that the adoption of this ordinance could not have a significant effect on the environment and a Negative Declaration may be adopted.