September 28, 2017| Initial Study

SAN PEDRO HIGH SCHOOL

Comprehensive Modernization Project

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Abbreviations and Acronyms

ACM	asbestos containing materials
BMP	best management practices
BOE	Board of Education
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CHPS	Collaborative for High Performance Schools
CNDDB	California Natural Diversity Database
CO2	carbon dioxide
CH4	methane
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gases
HASP	Health and Safety Plan
HCP	Habitat Conservation Plan
HS	High School
HSO	Health and Safety Officer
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAPD	City of Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
MND	mitigated negative declaration
NCCP	Natural Communities Conservation Plan
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System

Abbreviations and Acronyms

NOx	nitric oxides
OCP	organochlorine pesticide
OEHS	Office of Environmental Health and Safety
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PDF	project design features
PF	Public Facilities
PRC	Public Resources Code
RAW	Removal Action Workplan
RCRA	Resource Conservation and Recovery Act
RWQCB	regional water quality control board
SC	Standard Conditions
SCAQMD	South Coast Air Quality Management District
SCGC	Southern California Gas Company
SCS	sustainable communities strategy
SEA	Significant Ecological Area
SoCAB	South Coast Air Basin
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compounds

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD) is proposing a comprehensive modernization of San Pedro High School, at 1001 West 15th Street, San Pedro, Los Angeles County, California. Comprehensive Modernization Projects are designed to address the most critical physical needs of the building and grounds at the campus through building replacement, renovation, modernization, and reconfiguration. The proposed San Pedro High School Comprehensive Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This initial study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a $7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.[1]

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.[2] Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.[3]

On March 10, 2015, LAUSD's Board approved pre-design and due diligence activities necessary to develop a Project definition for a Comprehensive Modernization Project at San Pedro High School (San Pedro HS).[4] The Project is intended to provide facilities that are safe, secure, and aligned with the instructional program. On December 8, 2015, the Board approved the Project definition for San Pedro HS (Project site or campus).[5] This

1 LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: SUP.

2 LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: SUP.

3 LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

4 LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

5 LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

approval authorizes LAUSD's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory processes including those required under the CEQA.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[6] and the State CEQA Guidelines.[7] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project, and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…" In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[8]

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,[9] however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[10]

1.4 ENVIRONMENTAL PROCESS

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

6 California PRC Sections 21000 et seq.
7 CCR, Title 14, Sections 15000 et seq.
8 14 CCR Section 15063.
9 14 CCR Section 15064.
10 14 CCR Section 15070.

An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies (California Code of Regulations [CCR] Section 15378[a]).

The proposed actions by LAUSD constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.4.1 Initial Study

This Initial Study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that an EIR is the appropriate level of environmental documentation for this project.

Environmental Impact Report

The EIR includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the EIR when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the EIR is provided in the Initial Study Checklist (Chapter 4).

Following consideration of any public comments on the Initial Study, the Draft EIR will be completed and then circulated to the public and affected agencies for review and comment. One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. Additionally, LAUSD is required to consider comments from the scoping process in the preparation of the Draft EIR and to respond to Draft EIR public comments in the Final EIR.

1. Introduction

Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR (Program EIR) that was certified by the LAUSD BOE on November 10, 2015.[11] LAUSD's Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[12] The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[13]

The Program EIR is applicable to all projects implemented under the SUP . The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[14] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:[15]

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus
- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location, and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features (PDFs) and mitigation measures to incorporate, are provided in the Program EIR.

[11] LAUSD. 2015. Program EIR for the SUP. Available at: http://achieve.lausd.net/ceqa.
[12] LAUSD. 2015. Program EIR for the SUP . Available at: http://achieve.lausd.net/ceqa.
[13] CEQA Guidelines Section 15152(a).
[14] Ibid, at 4-8.
[15] Ibid, at 1-7.

The proposed Project is considered a site-specific project under the Program EIR; therefore, this EIR is tiered from the SUP Program EIR. The Program EIR is available for review online at http://achieve.lausd.net/ceqa and at LAUSD's Office of Environmental Health and Safety (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.2 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code,[16] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[17]

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design-build team would be responsible in incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. PDFs are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Standard Conditions of Approval. LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were adopted by the LAUSD Board in November 2015.[18] The SCs have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations and the LAUSD's standard policies, practices and specifications. The SCs were compiled from

[16] California Green Building Standards Code, Title 24, Part 11, of the CCR.

[17] The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS criteria to the extent possible.

[18] LAUSD. 2015. Program EIR for the SUP. Available at: http://achieve.lausd.net/ceqa. (see Table 4-1 and Appendix F of the Program EIR).

established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).[19] For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every SC is not required.

Mitigation Measures. If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations; PDFs; and SCs.

The specific CHPS prerequisite criteria and SCs are identified in the tables under each CEQA topic.[20] Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and LAUSD conditions are considered part of the project and are included in the environmental analysis.[21]

1.5 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.

[19] As of September 2016, an additional environmental topic has since been required by the State Office of Planning and Research (Tribal Cultural Resources). The LAUSD Environmental Checklist now has 19 topics.
[20] CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.
[21] Where the LAUSD Standard Conditions of Approval identifies actions to be taken, it is understood that the Project proponent would implement all LAUSD actions for this Project.

- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.

- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this initial study are that the proposed Project would have no significant impacts with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the ND and supporting Initial Study and the terminology used.

Chapter 2, *Environmental Setting* describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the proposed Project site and surrounding area.

Chapter 3, *Project Description* identifies the location, background, and describes the proposed Project in detail.

Chapter 4, *Environmental Checklist and Analysis* presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the CHPS criteria, PDFs, SCs, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore, a stand-alone bibliography section is not required.

Chapter 5, *List of Preparers* identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this CEQA Initial Study.

A. LAUSD Standard Conditions of Approval

B. Tree Inventory and Location

C. CDFW California Natural Diversity Database

D. Comprehensive Geotechnical Report

E. Preliminary Environmental Site Assessment Equivalent

F. Phase I Environmental Site Assessment

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

San Pedro High School is located on a 22.90-acre site in the community of San Pedro, approximately 22 miles southwest from downtown Los Angeles and approximately 1.45 miles north of the Pacific Ocean (*Figure 1, Project Vicinity*). Specifically, the campus is located at 1001 West 15th Street within the southwest portion of the City of Los Angeles. The campus comprises two city blocks and is bound by West 15th Street to the north, Dana Middle School immediately to the east, West 17th Street to the south, and South Leland Street to the west (*Figure 2, Project Location*). The Assessor's Parcel Number (APN) for the Project site is 7458-084-918. Project implementation would not occur across the entire school campus, but on selected areas undergoing renovation. *Figure 3, Existing Site Plan* shows the existing site plan and buildings. Various buildings and landscapes on the Project site are shown in *Figure 4, Character Defining Features*.

2.2 SURROUNDING LAND USES

San Pedro HS is located in the San Pedro Community Plan Area of the City of Los Angeles. Land uses north of the campus include primarily medium density residential uses and several commercial uses. Occupancies west and south of the campus are primarily low-density residential. The property to the east of the campus is occupied by Dana Middle School, with medium density residential uses beyond.

2.3 CAMPUS HISTORY

During the 1920s and early 1930s, San Pedro HS was located in the block bordered by South Gaffey to the north, 13th Street to the east, South Cabrillo to the south, and 12th Street to the east. However, likely due to the Long Beach Earthquake in 1933, San Pedro HS relocated to its present site circa 1935. The primary period of significance[22] for San Pedro HS is between 1935 and 1938 when the campus was rebuilt in the PWA Moderne style. The first buildings constructed were the Administration Building, Home Economics Building, and Industrial Arts Building. The Library is in the Administration Building and has several murals painted in 1937. By 1936, plans were complete for the Auditorium and Physical Education Buildings and they were constructed in 1937. Classroom Building 1 was constructed in 1938. In the lead up to America's entrance into World War II, the Shop Building (which is now demolished), was built specifically for national defense training on campus.

Postwar growth at San Pedro HS began in the 1960s, with the construction of what was then referred to as the Girls' Gymnasium in 1960, an additional Classroom Building and new Food Service Building in 1961, alterations to the Industrial Arts Building and Home Economics Building in 1965 and 1968, respectively, and a construction of a new Shop Building in 1969 as an addition to the Industrial Arts Building. Following the 1960s,

[22] Span of time in which a property attained the significance for which it meets the National Register criteria (or other state, local criteria).

no major new construction occurred on campus until 2005, with the addition of the new gymnasium. Several other buildings that were added to the campus include the portable buildings and modular structures.

The campus has been assigned a California Historic Resources status code of 2S2, noting that the campus appears individually eligible for the National Register of Historic Places (NRHP) by a consensus through the Section 106 process and is listed in the California Register. Figure 4 shows the campus and character-defining features that account for its eligibility as a historical resource.

2.4 EXISTING CONDITIONS

San Pedro HS is an operational high school serving students in grades 9 through 12. The campus sits on a multi-tiered hillside overlooking the Los Angeles harbor with the highest elevation on the west. The new Gymnasium completed in 2005, play areas and athletic fields dominate the lower level, and separate the San Pedro HS campus from adjacent Dana Middle School campus. West of the lower level is the main plateau which consists of three original permanent buildings: Administrative and Classroom Building, Home Economics Building, and Classroom Building #1. Also on the main level facing 17th Street is Classroom Building #2. The Administrative Building has side stair access on the north side from 15th Street, and a courtyard to the East.

West and uphill from the main Administrative Building is the upper level of the campus where the Food Service and the Auditorium Building are located. There are several portable classrooms located in the northwest end and in the central part of the campus. South of the Auditorium are two permanent buildings, the Industrial Arts Building and the Shop Building *(see Figure 3, Existing Site Plan)*.

2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities'. The land use element of the General Plan is comprised of 35 community plans; they are the official guide to the future development of the City of Los Angeles.

The zoning for the school property is [Q]PF-1XL. PF (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools. [Q] means additional restrictions on building design, landscape buffer, signs, etc.; '1' is Height District No. 1; and 'XL' is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building or structure exceed 30 feet in height.

LAUSD anticipates that it would comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project.

SOURCE: Los Angeles County GIS.

San Pedro High School. 211085.31

Figure 1

Project Vicinity

2. Environmental Setting

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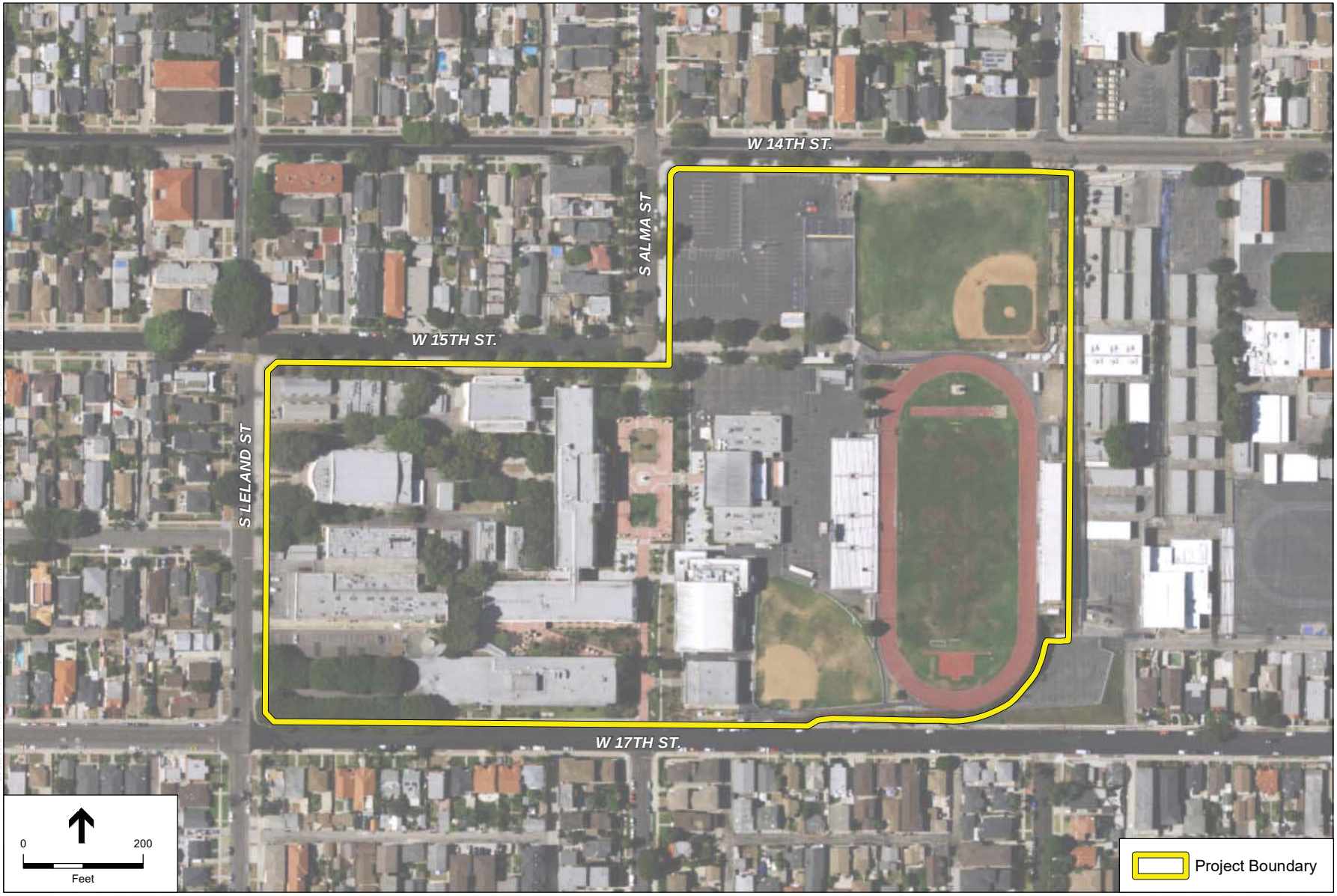

SOURCE: ESRI

San Pedro High School Comprehensive Modernization Project . 211085.31

Figure 2
Project Location

2. Environmental Setting

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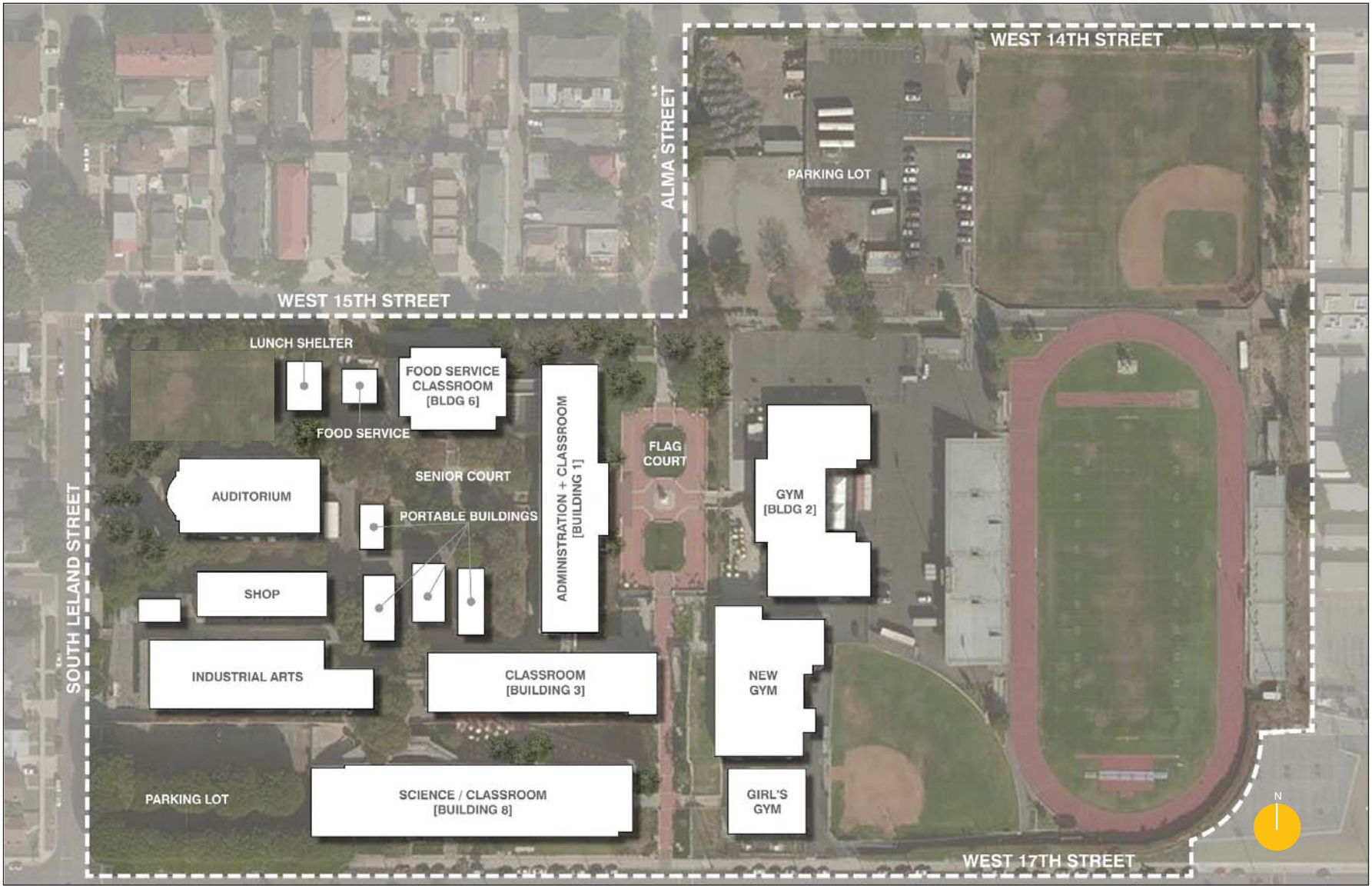

SOURCE: LPA, 2017

Figure 3
Existing Site Plan

2. Environmental Setting

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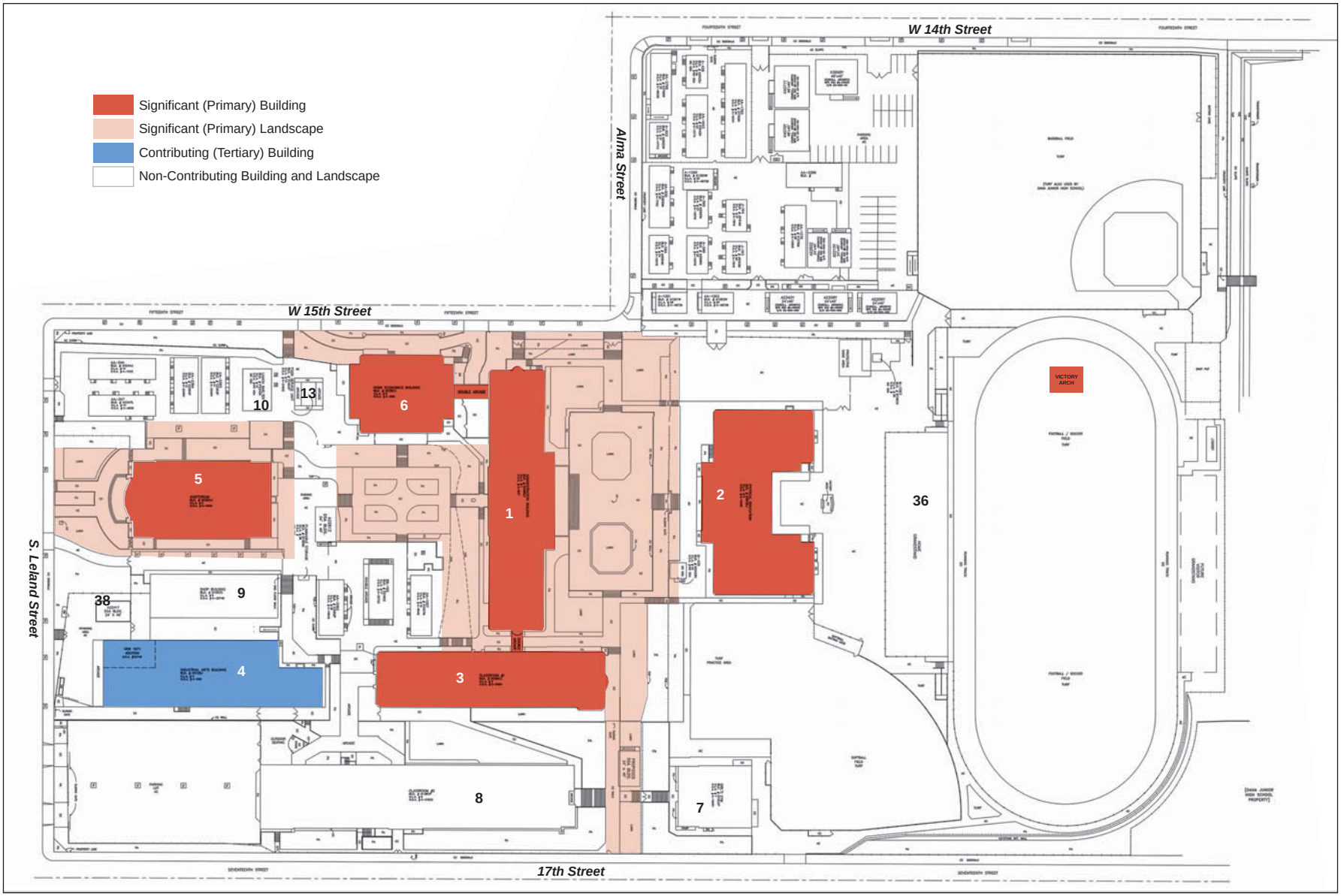

SOURCE: Los Angeles Unified School District, 2015

San Pedro High School Comprehensive Modernization Project . 211085.31

Figure 4
Character Defining Features

2. Environmental Setting

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2.6 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, the following:

Responsible Agencies

- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation
- City of Los Angeles, Department of Transportation. Approval of haul route

Reviewing Agencies

- South Coast Air Quality Management District (SCAQMD). Approval of Construction Emission/Dust Control Plan, architectural coatings
- Los Angeles Regional Water Quality Control Board (RWQCB). Approval of water quality management plan
- State Water Resources Control Board (SWRCB) Notice of Intent (NOI) to obtain permit coverage. General Construction Permit regulates stormwater and nonstormwater discharges associated with construction activities
- California Department of General Services, DSA. Approval of site-specific project construction drawings

2. Environmental Setting

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3. Project Description

The proposed Project would include renovations, modernizations, and new construction at San Pedro HS; including demolition of the Industrial Arts Building, Metal Shop, And Lunch Shelter/Food Service Building, and removal of approximately 10 classrooms located in five portable (relocatable) buildings. The Project would include construction of a new Band and Shop Building, Lunch Shelter, and an Administration, Food Service, and Classroom Building to house general and specialty classrooms, administration, kitchen, dining, and support spaces. The new buildings would house approximately 14 new general and specialty classrooms, and support spaces. The Project includes modifications and/or upgrades to the Administration Building, the Old Gymnasium (this includes voluntary seismic retrofit and new wood floor in the main court), the Home Economics Building (repurposed as classrooms), and Classroom Building 1. Upon completion of Project construction, San Pedro HS would have 74 classrooms, consisting of 25 existing classrooms, 35 remodeled classrooms, and 14 new classrooms.

The proposed Project would result in demolition of and/or modifications to existing buildings, potentially including historic buildings and resources. Table 3-1 shows details about the characteristics of the existing buildings to be demolished and/or renovated. The Project would be designed to preserve and enhance significant (primary) character-defining features associated with the campus. Additionally, the proposed Project would be designed and implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.[23]

As outlined in Table 3-1 and shown in *Figure 5*, *Demolition Plan*, the proposed Project would include demolition of the following facilities:

- Industrial Arts Building
- Metal Shop Building
- Lunch Shelter/Service Building
- Approximately 10 classrooms located in five relocatable or portable buildings

The proposed Project would include construction of the following facilities that would be designed, constructed, and furnished/equipped to current code requirements and District design standards:

- Band and Shop Building
- Lunch Shelters
- Administration, Food Service, and Classroom Building

[23] LAUSD. January 2015. LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Los Angeles, CA.

3. Project Description

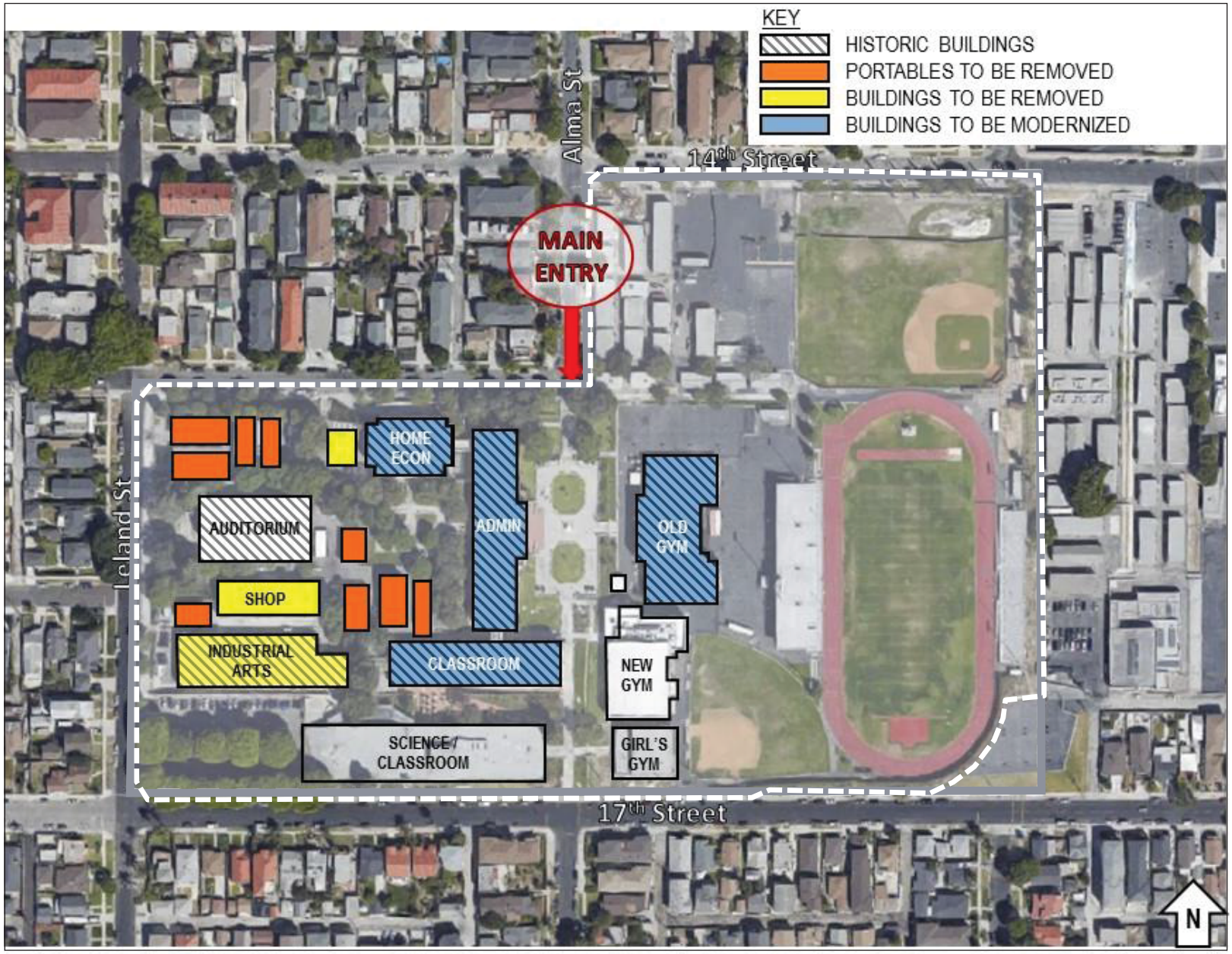
TABLE 3-1
CHARACTERISTICS OF EXISTING BUILDINGS

Building Number	Building Name	Year Built	Building Type
Buildings to be Demolished/Removed			
001CBJ	Industrial Arts Building	1936	Permanent
015DCS	Metal Shop	1971	Permanent
014DAP	Lunch Shelter/Food Service Building	1964	Permanent
Portable Buildings to be Removed			
DSA BLDG	A-2241	1999	Portable
DSA BLDG	A-2281	N/A	Portable
X2082P	AA-2082	1960	Portable
Z0182S	BB-182	1973	Portable
X1007M	AA-1007	1950	Portable
Buildings to be Renovated			
0038CJ	Home Economics Building	1937	Permanent
004BDJ	Administration Building	1937	Permanent
005BCJ	Classroom Building # 1	1939	Permanent
006CBJ	Physical Education Building	1937	Permanent
Buildings to undergo Seating Reconditioning and ADA Upgrades			
002BAJ	Auditorium	1937	Permanent
Source: LAUSD, 2016			

Figure 6 shows the proposed site plan.

Modernization and/or upgrades would be completed for the following buildings:

- Home Economics Building
- Administration Building
- Classroom Building 1
- Physical Education Building (Old Gymnasium)



SOURCE: Los Angeles Unified School District, 2002

San Pedro High School Comprehensive Modernization Project . 211085.31

Figure 5
Demolition Plan

3. Project Description

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SOURCE: LPA

Figure 6
Proposed Site Plan

3. Project Description

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Upgrades to the Home Economic Building, Administration Building (which includes the main classroom building), Classroom Building 1, and Physical Education (PE) Building (Old Gym) would entail seismic retrofits. Seismic retrofitting would be completed in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, California Building Code, Division of State Architect, and CDE.

The Project includes reconditioning of the existing seating and American with Disabilities Act (ADA) upgrades in the Auditorium. Auditorium ADA upgrades would include accessible seating in the Auditorium; as well as accessibility improvements to the main entry, restrooms, and possibly the ticket area. Badly damaged or missing seats may be replaced with matching seats in District storage.

The Classroom Building 2 (Science Building) would receive an exterior facelift to make the building compatible with the architectural features of the historic buildings and the designs for the new buildings.

Upgrades that would be completed throughout the campus include:

- Site-wide infrastructure, including electrical, storm drain, gas, sewer, and water improvements
- Site-wide upgrades to remove identified and prioritized barriers to program accessibility
- Student drop off area, landscape, hardscape, and exterior paint

Improvements required by the ADA, Division of the State Architect, CEQA, and the Office of the Independent Monitor for program accessibility, would ensure compliance with local, state, and/or federal facilities requirements.

3.1 DESIGN STRATEGY

The proposed Project would provide sturdy, durable finishes at the base of buildings, from materials that would endure maximum abuse, such as polymer-modified plaster (integral color) and cast-in place concrete. The proposed Project would also use elevated materials, which would allow for enriched materials in areas above that are out of reach, including panelized systems that would be refined and elegant, and suitable for a historic campus. The new buildings would take full advantage of natural daylight and harbor views, specifically in the entrance, dining and northern elevation areas, that would help emphasize shared experiences, community and gathering. A hallmark of historic Streamline Moderne buildings, the campus would emphasize interplay of overall horizontals with strong vertical forms at building entries and corridor ends.

The main pedestrian access to the campus would be located between the Auditorium Building and proposed Administration, Food Service, and Classroom Building in the southwestern portion of the site, fronting South Leland Street. It would include bench seating for 40 people, and table seating for 32 people. The Senior Courtyard, which would be located east of the Auditorium Building, would include a small outdoor dining area with landscaping and would include bench seating for 191 people and outdoor table seating for 152 people. A

secondary pedestrian entrance to the school would be located on the north side of campus, between the existing Administration and Old Gym Buildings off 15th Street.

3.2 CIRCULATION, ACCESS AND PARKING

Currently, the school's main entrance is located at the intersection of West 15th Street and South Alma Street. The campus entrance would be relocated to South Leland Street between 16th Street and 17th Street. Functionally, the main administration would be housed in a new building south of the Auditorium. The proposed Project is designed to increase circulation, access (including the path of travel), and improve parking at the campus with the addition of a accessible visitor on-site parking lot off Leland Street. Internal circulation routes would include emergency vehicle access and pedestrian access.

The campus currently includes a staff and visitor parking lot on the southwest corner of the campus off West 17th Street and a staff and student parking lot in the northeast portion of the campus off South Alma Street. The campus currently includes 248 parking stalls. The proposed Project would result in a decrease of onsite parking spaces from 248 parking stalls to 226 parking stalls (159 parking stalls in the northeast and 67 stalls in the southwest). The staff and visitor parking lot would be reconfigured, but would remain on the southwestern corner of the campus.

3.3 LANDSCAPE IMPROVEMENTS

LAUSD schools are developed with: 1) buildings; 2) paved areas including parking lots, hardcourts, and walkways; and 3) landscaped areas, including turf playfields (i.e., football field and baseball/softball field) and ornamental landscaping with trees, shrubs, and grass. The landscape on certain areas of the San Pedro HS campus is considered character-defining, which contributes to the eligibility of San Pedro HS as a historical resource. Significant (primary) landscape on the Project site is located as follows (*Figure 4, Character Defining Features*): the perimeter of the Auditorium, central courtyard in front of the Administration Building, on the eastern side of the Administration Building, walkway along 15th Street, and the concrete "Victory Arch" monument at the football field.[24] There are currently 149 trees within and along the boundaries of the Project site. There are no protected trees on the campus.

The proposed Project would include improvements to each of these areas. Landscape improvements may include repair or replacement of irrigation systems including lawn sprinklers and sprinkler controls, trees, shrubs and other vegetation; landscaping plant material; utilitarian landscape components, such as sprinkler piping; and fencing and freestanding exterior walls. Significant (primary) landscape would be preserved. A total of 121 trees on the Project site would be removed and two street trees would be removed. None of the trees on the Project site are protected. In addition, the proposed Project would include a small Japanese Garden, possibly located east of the new Administration, Food Service, and Classroom Building. The new Japanese Garden will

[24] PCR Services, Character Defining- Features Memorandum (CDFM) for San Pedro High School, 1001 West 15h Street, Los Angeles, California 90731, Prepared for LAUSD, June 30, 2015.

pay tribute to the Japanese Garden that was located on the San Pedro HS several decades ago, but is no longer in existence.

3.4 INFRASTRUCTURE

The Project site is currently served by existing utilities that are at the end of their service life and need replacement. Site-wide infrastructure improvements would be completed as part of the proposed Project for electrical, gas, sewer, water, and drainage.

Existing storm water runoff is collected by a system of building roof drains and catch basins throughout the site and conveyed by a private, onsite underground storm drain system to discharge to gutters through a series of parkway drains and curb scuppers along the public street adjacent to the perimeter of the campus. Storm water runoff from new construction would be intercepted by roof drains and catch basins and discharged through a combination of new and existing parkway drains and curb scuppers along the public streets adjacent to the perimeter of the campus. Storm water runoff would be conveyed through best management practices (BMPs) prior to discharge. New parkway drains may be constructed and existing parkway drains would be reconstructed and removed due to poor condition or relocation of storm drain discharge locations.

Based on the Comprehensive Geotechnical Report[25], infiltration into site subsoils is not feasible. Capture and Use would be implemented where feasible. These systems would consist of underground or above-ground storage tanks or cisterns that collect and store stormwater runoff for reuse as irrigation. This system would connect directly to conventional irrigation systems and only operate when storm water is present in the storage tanks or cisterns. The system would be implemented in areas where irrigation demand is adequate to support discharge of mitigated stormwater volumes.

Existing domestic water service connections are located along public streets adjacent to the perimeter of the campus at South Leland Street, West 15th Street, South Alma Street, 14th Street and 17th Street. Existing domestic water services, meters, backflow assemblies, pressure regulators (if needed) and onsite pipe systems would be upgraded as needed to meet additional demand from plumbing fixture counts at existing buildings. New onsite domestic water supply pipes would be installed to connect domestic water services to new buildings and structures.

3.5 UTILITY PROVIDERS

The City of Los Angeles Department of Water and Power (LADWP) provides electric and potable water service to the Project site. The Southern California Gas Company (SCGC) provides natural gas to the Project site. The City of Los Angeles Bureau of Sanitation is the sewer service provider for the Project site.

[25] Group Delta, 2016. Comprehensive Geotechnical Report, Campus Modernization and Retrofit, San Pedro High School, 1001 West 15th Street, Los Angeles, CA. November 4, 2016.

3.6 SECURITY AND SAFETY FEATURES

With the exception of the front lawn along 15th Street and in front of the Auditorium on Leland Street, the perimeter of the campus is surrounded by an approximately 8-foot metal security fence. The improvements to the Project site would include similar fencing. All new structures would be equipped with fire suppression sprinkler systems and lighting on the exterior walls. All entries would be illuminated to provide safe access. The new parking lots would have lighting that would be focused and shielded to reduce glare and light spill-over. PDFs would be incorporated to ensure that these new sources would not create light spill-over greater than 2-foot candles onto adjacent residences. Site lighting would be designed to have minimal offsite impact and contribution to sky glow. Outdoor lighting of architecture and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior.

3.7 SUSTAINABILITY FEATURES

LAUSD is committed to sustainable construction principles, and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are energy efficient, material efficient, easy to maintain and operate, environmentally responsive safe and secure, a community resource, and adaptable to changing needs.

School facilities seeking CHPS-certification complete a scorecard and must achieve a certain number of points to be certified. The proposed Project would exceed the minimum requirements to qualify as a CHPS-certified school, with 134 points targeted and a minimum of 110 points required. Some of the sustainable design features include easy access to public transportation, onsite treatment of stormwater runoff, "cool-roof" building materials, lighting that reduces light pollution, water and energy efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials. The proposed Project's new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficient standards.

3.8 REMOVAL ACTION WORKPLAN

A Preliminary Environmental Assessment - Equivalent (PEA-E) conducted by Clark Seif Clark, Inc. (CSC) in June of 2017 (Appendix E) for the proposed Project recommended soil sampling at San Pedro HS based on the possibility of historic uses of termiticides, herbicides (including arsenic), pesticides, PCBs (in caulking), and lead based paint (LBP). Soil sampling results indicated that arsenic, lead, and/or organochlorine pesticide (OCP) concentrations exceeded the health-based screening levels at 27 surficial soil locations. Of the 27 areas, 17 were impacted with arsenic, 10 were impacted with lead, and 5 were impacted with OCPs above screening levels. Further, there were four locations whew two or more compounds exceeded their respective screening levels.

CSC recommended that a Removal Action Workplan (RAW) be prepared prior to demolition or construction activities that would disturb areas of concern.[26]

LAUSD is currently overseeing preparation of the RAW for the proposed Project. The RAW includes a description of the contamination, excavation dimensions for the proposed Project, methodology, transportation and disposal, confirmation sampling plan, methods to ensure worker and public health and safety, and cleanup goals. Further, community notices will be distributed in accordance with LAUSD policy. All cleanup activities under the RAW would adhere to applicable state and local policies and regulations regarding excavation, removal and disposal of affected materials. The PEA-E estimates that the proposed Project would include removal of an estimated 225.6 cubic yards of soil. For the purposes of this IS, a conservative estimate of up to 500 cubic yards of soil is being used.

3.9 CONSTRUCTION PHASING

The proposed Project would be developed in a minimum of three phases over a 3 to 4-year construction phasing schedule. The construction schedule would have limited to no overlap between phases. All construction would occur during daytime hours, specifically 7:00 a.m. to 7:00 p.m. Monday through Friday. Construction is anticipated to begin in January 2019 and to be completed in March 2022.

[26] Clark Seif Clark, Inc., 2016. *Phase I Environmental Site Assessment, San Pedro High School, 1001 W. 15th Street, San Pedro, CA.* June 7, 2016.

3. Project Description

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4. Environmental Checklist

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. 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, or other locally recognized desirable aesthetic natural feature within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Discussion

The Program EIR includes Standard Conditions of Approval (SCs) for minimizing impacts to aesthetic resources of the existing environment in areas where future Projects would be implemented under the SUP. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided in **Table 4.1-1**.

TABLE 4.1-1
AESTHETIC RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-AE-1	**School Design Guide.** This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade Project. Architectural quality must consider compatibility with the surrounding community.
SC-AE-2	**School Design Guide** This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.

Applicable SCs	Description
SC-AE-3	LAUSD shall assess a proposed Project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-7	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.
SC-AE-8	Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior. International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to: • Limit the amount of light that can be used • Minimize glare by controlling the amount of light that tends to create glare • Minimize sky glow by controlling the amount of uplight • Minimize the amount of off-site impacts or light trespass
SC-CUL-1	**Design Build Team to Include Qualified Historic Architect** For campuses with qualifying historical resources under CEQA, the Design-Build team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as Project plans progress, with the Secretary of the Interior's Standards and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2). For Projects involving structural upgrades to historic resources, the Design-Build team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated Project-level experience in Historic Preservation. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the *LAUSD Design Guidelines and Treatment Approaches for Historic Schools*. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.
SC-CUL-2	**Role of Historic Architect on Design-Build Team** The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following: 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that Project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design-Builder throughout the design process to develop Project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. 3. For modernization and upgrade Projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications

Applicable SCs	Description
	for design and implementation of Projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the Project through 100 percent construction drawings, pre-construction, and construction phases. 5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal Project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the Project. 6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. 7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features. 8. The Design-Builder and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.

4.1.2 Impact Analysis

Would the Project:

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

No Impact. Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest. Based on the City of Los Angeles General Plan, the proposed Project is not considered a scenic vista.[27] The Project site is located in the San Pedro Community Plan Area, which has a pattern of low to medium density residential uses interspersed with open areas and coastal views. The Community Plan designates areas bordering coastal areas as "scenic".[28] The nearest scenic vista from the campus is the Pacific Ocean, located approximately 1.45 miles south of the campus. There are views of the Pacific Ocean from areas on the campus. The Project would not significantly alter the site topography and would not include structures that would obstruct the existing views of the Pacific Ocean from the campus. The proposed Project would demolish the existing Metal Shop Building and Industrial Arts Building and develop the new Administration, Food Service, and Classroom Building, Band and Shop Building in the area where the Shop and Industrial Arts Buildings were previously located. The residences across Leland Street from the Project site currently have direct views of the Auditorium Building, Shop Building and Industrial Arts Building. The residences along Leland Street do not have direct and unobstructed views of the Pacific Ocean. Construction of the new buildings would not substantially alter existing views of the Pacific Ocean for the viewers surrounding the campus. Therefore, the Project would have no impact on scenic vistas. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[27] City of Los Angeles, 2001. *City of Los Angeles General Plan, Conservation Element*. September 26, 2001.
[28] City of Los Angeles, 2012. *San Pedro Community Plan*. Available at: https://planning.lacity.org/cpu/SanPedro/Environmental_txt/SanPedroDraftCommunityPlan.pdf, accessed August 15, 2017.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from state highways. The Program EIR lists highways and corridors considered eligible for Scenic Highway Designation in Table 5.1-1. The Project site is not located within or immediately near a Scenic Highway, Byway, Route, or Corridor designated by the California Department of Transportation (Caltrans) or the Los Angeles County General Plan.[29] The nearest eligible State Scenic Highway is a segment of State Route 1 (Pacific Coast Highway) located approximately 11.1 miles east of the Project site. The nearest officially designated State Scenic Highway is State Route 2 (Angeles Crest Highway) located approximately 34.5 miles northeast of the Project site. The Project site is not observable from either of these highways. Impacts related to scenic resources within a state scenic highway would not occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. Given the historic character of the campus, incompatible architecture associated with new buildings could have an adverse impact on the visual character or quality of the Project site. While the proposed Project would not substantially alter the main views of the existing campus, specifically the historic buildings and landscapes, the construction of new buildings and open areas has the potential to conflict with the existing historic buildings and landscapes by disrupting the existing views or context of the historic buildings (through changes to the landscape or the scale, architecture, or height of the buildings) on the campus. Under the proposed Project, new and renovated buildings would be consistent with the general character of existing buildings on campus and the surrounding neighborhood in terms of architectural style, density, bulk, and setback. This consistency would be confirmed through incorporation of SC-CUL-1 and SC-CUL-2. The *Cultural Resources* section will further analyze impacts related to historical resources.

The Project site contains landscape and hardscape fronting South Leland Street and West 15th Street, that are considered significant contributors to a historic resource (San Pedro High School).[30] The character defining features of the significant (primary) landscapes would be preserved by the Project.

During Project construction, there would be standard construction equipment onsite, including small cranes, stockpiled materials, and construction-area barriers and fencing, that may negatively affect the existing visual character and quality of the Project site. However, the changes to the visual character and quality would be temporary, as the construction related equipment would be removed from the site after completion of construction activities. Further, during construction, work areas would be screened from public view and from the students of San Pedro HS through the use of temporary barriers.

[29] CalTrans, Scenic Highways, Los Angeles County. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 15 2017.

[30] PCR Services, Character Defining- Features Memorandum (CDFM) for San Pedro High School, 1001 West 15h Street, Los Angeles, California 90731, Prepared for LAUSD, June 30, 2015.

While the new buildings would be the tallest structures on campus, they would be fully integrated with San Pedro HS in terms of scale, materials, and landscaping. The proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. Implementation of SC-AE-1 requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for school upgrades. SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1, reuse rather than destruction of historic resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible. SC-AE-3 would also help minimize the likelihood of degraded visual character or quality during Project implementation. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school Project's building or site design. These design changes could include, but are not necessarily limited to, changes to the campus layout, height of buildings, and/or architectural style of buildings.

Shadow sensitive uses include all residential uses and routinely useable outdoor space associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants associated with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project vicinity are Dana Middle School to the east and residential uses located to the north, west and south across West 14th Street, West 15th Street, South Leland Street, and West 17th Street, respectively. The proposed new buildings would not cause shadows to extend offsite in such a manner as to significantly impact nearby significant school or residential uses. Implementation of SC-CUL-1, SC-CUL-2, SC-AE-1, and SC-AE-2 would ensure that impacts to visual character or quality would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts related to light and glare for the following reasons.

4.1.2.1 LIGHT

The campus contains two primary sources of light: light emanating from building interiors that passes through windows and light from exterior sources (e.g., parking lot lighting, building illumination, security lighting, and landscape lighting). Depending upon the location of the light source and its proximity to adjacent light-sensitive use, light introduction can be a nuisance, affecting adjacent areas and further diminishing the view of the clear night sky in an urban setting like the Project site. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties.

The Project site is located within a residential area. Existing lighting conditions in the Project area include light emanating from the existing campus building interiors, security lights and the surrounding residential land uses, as well as nearby street lighting. There are residential uses located north, south, and west of the Project site. Further, Dana Middle School is located just east of the Project site.

The perimeter of the proposed buildings would have new light fixtures attached to exterior walls. All entries would be illuminated to provide safe access. The parking lots to the southwest and northeast of the Project site would also have security lighting on poles, that would be focused and shielded downward to reduce glare and light spillover. The Project's proposed landscaping, parking and security lighting is expected to be similar to current conditions. Design features listed in SC-AE-7 and SC-AE-8 such as hoods and filtering louvers would be incorporated to ensure that these new sources would not create light spill over greater than 2 foot- candles onto adjacent residences and properties. Outdoor lighting of architectural and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior. Further, site lighting would be designed to have minimal off site impact and contribution to sky glow. Implementation of SC-AE-7 and SC-AE-8 would ensure that impacts from site lighting would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.1.2.2 GLARE

Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The proposed facilities would be constructed with limited high-glare materials. As described above, LAUSD Standard Conditions SC-AE-6 and SC-AE-7 provide measures and performance standards to reduce glare impacts to pedestrians, residences, drivers and sports teams. Given the minimal use of high-glare materials, impacts from reflective glare would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. -- Would the Project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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?	☐	☐	☐	☒

4.2.1 Impact Analysis

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?

No Impact. The Project site is currently developed and void of any agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles identified the Project site as urban and built-up land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Project site.[31] Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

No Impact. A Williamson Act Contract requires private landowners to voluntarily restrict their land to agriculture and compatible open-space uses. The Project site is void of agricultural uses and does not include land enrolled in a Williamson Act Contract.[32] Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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 proposed Project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The Project area is currently zoned as [Q]PF-1XL. The proposed Project does not involve any changes to current General Plan land use or zoning designations for forest land, or timberland. Additionally, there are no timberland-zoned production areas within the Project site or surrounding areas. Therefore, no impact to forest land or timberland would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[31] California Department of Conservation (CDC), 2017. California Important Farmland Finder. Available at: http://maps.conservation.ca.gov/ciff/ciff.html, accessed August 15, 2017.
[32] CDC, *2016.Los Angeles County Williamson Act FY 2016*/2016 Map. 2016.

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

No Impact. The Project site and surrounding areas contain no forest land. Thus, implementation of the proposed Project would result in no impacts related to the loss or conversion of forest land to non-forest use. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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. Refer to previous responses. The Project site is developed with school facilities and impervious surfaces. No changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Discussion

The Program EIR includes SCs for reducing impacts to air quality in areas where future Projects would be implemented under the SUP. Applicable SCs related to Project air quality impacts are provided in **Table 4.3-1**, below.

TABLE 4.3-1
AIR QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-AQ-2	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	LAUSD's construction contractor shall: • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into transportation trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.

	• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall prepare an air quality assessment: If site-specific review of a school construction Project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the SCAQMD regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following: <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <u>Fugitive Dust</u> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all construction access roads for at least 100 feet from the main road to the Project site. • Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. • Limit traffic speeds on unpaved road to 15 mph or less. • Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <u>General Construction</u> • Utilize ultra-low VOC or zero-VOC surface coatings.

- Phase construction activities to minimize maximum daily emissions.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).
- Develop a trip reduction plan for construction employees.
- Implement a shuttle service to and from retail services and food establishments during lunch hours.
- Increase distance between emission sources to reduce near-field emission impacts.
- Require construction contractors to document compliance with the identified mitigation measures.

4.3.2 Impact Analysis

Would the Project:

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

Potentially Significant Impact. The Project site is located within the South Coast Air Basin (SoCAB), which is under the jurisdiction of the SCAQMD. The SoCAB is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east.

Therefore, SCAQMD's 2016 AQMP[33] is the applicable air quality plan for the proposed Project. The Draft EIR will provide a more in depth consistency analysis related to the City's General Plan and applicable air quality plans and will describe potential effects associated with any inconsistencies.

b) Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?

Potentially Significant Impact. The Draft EIR will identify applicable air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, and will also include an analysis of cumulative impacts associated with emissions of criteria pollutants.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. A significant impact would occur if implementation of the proposed Project resulted in a cumulative net increase in any criteria pollutant above the SCAQMD significance threshold. The SCAQMD's approach for assessing cumulative air quality impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean

[33] SCAQMD, 2016. *Final Air Quality Management Plan.* Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, accessed August 10, 2017.

Air Acts. The Draft EIR will identify applicable air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, and will also include an analysis of cumulative impacts associated with emissions of criteria pollutants.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The Project site is an active school site surrounded by residential uses and Dana Middle School. Mitigation measures for diesel equipment and dust control that are recommended by SCAQMD will be evaluated as part of the Draft EIR to avoid or reduce the impacts to construction workers and occupants of nearby residents, if necessary.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project site. Development of the proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SC-AQ-2 through SC-AQ-4, and SCAQMD Rules 402 and 1113.15. Therefore, the proposed Project would result in less-than-significant impacts associated with odor nuisance.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[34] The proposed Project would not include any of these odor-producing uses; odors associated with Project operation will be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the on-site food service operations. Furthermore, all trash receptacles would be covered and properly maintained to minimize odors and would be emptied on a regular basis. Therefore, implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[34] SCAQMD, 2014. *CEQA Air Quality Handbook*. Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed August 10, 2017.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the Project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.4.1 Discussion

The analysis below is based in part on the Tree Inventory[35] prepared for the proposed Project (Appendix B).

The Program EIR includes SCs for minimizing project impacts to biological resources of the existing environment. Applicable SCs related to biological resource impacts associated with the proposed Project are provided in **Table 4.4-1**.

[35] Carlberg Associates, 2017. *Tree Inventory and Tree Location Exhibit at San Pedro High School.* Prepared for LPA, Inc. February 27, 2017.

TABLE 4.4-1
BIOLOGICAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-BIO-1	LAUSD qualified biologist shall identify sensitive species and their habitat within or near proposed Project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the Project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: • USFWS • National Marine Fisheries Services (NMFS) • CDFW • California Native Plant Society (CNPS) • County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases. • CNDDB • CNPS Rare Plant Inventory • Local Audubon Society • Los Angeles County Department of Regional Planning for information on Significant Ecological Areas • California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with Project sites. Biological Resources Report If the LAUSD qualified biologist determines that a school construction Project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific Project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following. • Information on regional setting that is critical to the assessment of rare or unique resources • A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect6 impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. • A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. • An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS. • A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address Project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

	• Discussions about direct and indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas. • Mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. • Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: - location of the mitigation site - plant species to be used, container sizes, and seeding rates - schematic depicting the mitigation area - planting schedule - irrigation method - measures to control exotic vegetation - specific success criteria - detailed monitoring program - contingency measures should the success criteria not be met - identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation.
SC-BIO-2	LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.
SC-BIO-3	LAUSD shall comply with the following: • Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates[36]) should occur outside of avian breading season to avoid take of birds or their eggs.[37] Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the Project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. If a protected native bird is found, LAUSD shall delay all Project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the Project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results

[36] Substrate is the surface on which a plant or animal lives.

[37] Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

	of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds. • If the qualified biologist determines that a narrower buffer between the Project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS Project manager. Construction contractors can then reduce the demarcated buffer. • No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer by impacted the construction. • A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS Project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if Project activities damage avian nests.
SC-BIO-4	LAUSD shall comply with the following: • Mitigation shall not include translocation of rare plants. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. • **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • **Creation of oak woodlands.** Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basil, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. - All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. - Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. - Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.
SC-BIO-5	LAUSD shall comply with CDFW recommendations as listed below:[38] • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage.

[38] Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.

- All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.
- A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition.

Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.

4.4.2 Description of Baseline Conditions

The Project site is an active high school campus that has been previously disturbed, cleared of native vegetation, and currently contains school buildings, facilities, and scattered landscaped vegetation. A tree inventory was completed for the proposed Project.[39] The survey inventoried 149 trees within and along the boundaries of the Project site. There are no protected trees on the campus. A total of 121 trees would be removed within the Project site and 2 street trees would be removed.

The trees (and buildings and structures) on the campus have the potential to serve as nesting sites for birds and bats; however, the Project site is located in a highly urbanized area of the City of Los Angeles. The campus has been fully developed and does not contain any habitat to support candidate, sensitive, or special-status species; riparian habitat; or other natural habitats such as wetlands. Special-status plant and wildlife species are those that are candidates, proposed or listed as threatened or endangered by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW), and plant species that are considered sensitive by the California Native Plant Society (CNPS). According to a CDFW California Natural Diversity Database (CNDDB) search of the San Pedro, California USGS 7.5-minute topographic quadrangle map, and surrounding 3 quads, there are 9 species in the vicinity of the Project site that are considered special-status by local, state, and federal agencies (Appendix C). However, the Project site does not contain suitable habitat necessary to support special-status wildlife species. To manage the preservation of these species, and the more than 180 species identified as threatened or endangered by the City of Los Angeles General Plan, Significant Ecological Areas (SEAs) have been identified throughout the City on the basis of existing known habitats of sensitive or endangered species. The Project site is not located within a SEA and the nearest SEA is Palos Verdes Peninsula and Coastline SEA, which is located approximately 1.65 miles west of the Project site.[40]

[39] Ibid.

[40] Los Angeles County Department of Regional Planning, 2017. Planning and Zoning Information, GIS-Net 3. SEA Layer. Available at: http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed August 16, 2017.

4.4.3 Impact Analysis

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 Game or U.S. Fish and Wildlife Service?

No Impact. The Project site is located on an active high school campus that contains no native vegetation capable of supporting any special-status plant or wildlife species. The Project site is entirely developed and surrounded by residential development to the north, west, and south and Dana Middle school to the east. The Project site and immediate area are not within a SEA. The Project site does not contain any species that are identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by the CDFW or USFWS (Appendix C).[41] The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Project site is extremely low. Therefore, the Project would have no impact on special-status species. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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 Game or U.S. Fish and Wildlife Service?

No Impact. The Project site does not contain any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. The Project site is entirely developed and does not contain any natural drainages or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. Therefore, there would be no impact. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Generally, the entire school campus is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including playfields. The Project site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal etc.). Additionally, no wetlands protected by CDFW and/or the RWQCB occur on the Project site. The Project site is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. Therefore, no impact to wetlands would occur through

[41] CDFW, California Natural Diversity Database. 2017.

direct removal, filling, hydrological interruption or other means. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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?

Less than Significant Impact. The Project site does not contain any water courses or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. The nearest identified habitat linkage occurs in the Palos Verdes Peninsula, 1.65 miles west of the Project site, outside the potential impact area for the proposed Project. Therefore, the proposed Project would have no impact on the movement of any wildlife species or impede the use of migratory wildlife corridors.

Tree removal and building demolition may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season (February 1 through August 31). Construction related noise and vibration also have the potential to disrupt birds during the avian breeding season. Additionally, the Project site contains buildings that may be used by bats as nursery sites during the bat maternity roosting season of March through August. Therefore, construction activities (including demolition) have the potential to impact nesting birds or maternity roosting bats. However, the proposed Project would implement SC-BIO-3 as necessary. Following the completion of a pre-construction clearance survey, implementation of SC-BIO-3 would reduce impacts to less than significant. These measures include commencing tree removal and demolition activities outside of avian nesting season and bat maternity roosting season. The proposed Project would result in less than significant impacts and this issue will not be further analyzed in the Draft EIR.

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

Less Than Significant Impact. The Project site is located within an entirely developed area surrounded by residential and public uses within the City of Los Angeles and is not located within any SEA protecting biological resources.[42] Further, there are no trees on the Project site that are protected by the City of Los Angeles Tree Preservation Ordinance. Therefore, no impacts regarding compliance with the City of Los Angeles Tree Preservation Ordinance would occur and this issue will not be further analyzed in the Draft EIR.

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 site is not located within a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or similar plan.[43] The closest area protected by a HCP or NCCP is the City of

[42] Ibid.
[43] CDFW, 2017. California Regional Conservation Plans. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed August 16, 2017.

Rancho Palos Verdes, located approximately 4.8 miles west of the Project site. The Project site is not located within or proximate to any SEA, Land Trust, or Conservation Plan. Therefore, no impact resulting from a conflict with an adopted conservation plan would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the Project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

4.5.1 Impact Analysis

Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Potentially Significant Impact. The Project site is developed and paved. During the 1994 FEMA Survey, San Pedro HS was assigned a California Historical Resource Status Code of 2S2, which means the campus is listed in the California Register and appears eligible for National Register through survey evaluation.[44] A historic resources technical report and cultural resources analysis will be prepared as part of the Draft EIR, which will identify any historic resources within the Project site and surrounding area. The Draft EIR will evaluate the potential for implementation of the Project to substantially change the significance of all on-site eligible historical resources, including the Historic District that exists when these resources are taken as a whole.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Potentially Significant Impact. While the Project is disturbed due to prior development, demolition, and redevelopment, ground disturbing activities associated with construction of the Project could result in the inadvertent discovery of unknown archaeological resources. A cultural resources analysis, including a records search, will be prepared as part of the Draft EIR. The Draft EIR will identify any known archaeological

[44] PCR Services, Character Defining- Features Memorandum (CDFM) for San Pedro High School, 1001 West 15h Street, Los Angeles, California 90731, Prepared for LAUSD, June 30, 2015.

resources within the Project site or within the surrounding area as well as evaluate potential impacts to these resources from development of the Project, if any.

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

Potentially Significant Impact. Ground disturbing activities, such as excavation or trenching, during construction of the Project could have the potential to encounter the undisturbed alluvium soils, which have the potential to contain unknown paleontological resources. The Draft EIR will describe in greater detail the paleontological setting of the Project area and will evaluate the potential for impacts to paleontological resources associated with construction of the Project.

d) Disturb any human remains, including those interred outside of dedicated cemeteries.

Less than Significant Impact. No known cemeteries or other burial places are known to exist within the Project site and the proposed Project is unlikely to disturb human remains. However, because the proposed Project would involve ground disturbing activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. In the event that human remains are encountered, the District would comply with State Health and Safety Code Section 7050.5 and PRC Section 5097.98 resulting in a less than significant impact. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.6 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the Project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
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 or soil that is unstable, or that would become unstable as a result of the Project, and potential 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 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?	☐	☐	☐	☒

4.6.1 Discussion

The following evaluation of geology and soils is based, in part, on the Comprehensive Geotechnical Report prepared for the Project site in November 2016.[45] The Comprehensive Geotechnical Report evaluated geologic and soil conditions at and in the immediate vicinity of the proposed Project site. The report is presented as Appendix D of this IS.

The Program EIR includes SCs for minimizing impacts to geology and soils of the existing environment in areas where future Projects would be implemented under the SUP. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided in **Table 4.6-1**.

[45] Group Delta, 2016. Comprehensive Geotechnical Report, Campus Modernization and Retrofit, San Pedro High School, 1001 West 15th Street, Los Angeles, CA. November 4, 2016.

TABLE 4.6-1
GEOLOGY AND SOILS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-GEO-1	**OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work.** This document outlines the procedures and scope for LAUSD geohazard assessments.
SC-HWQ-1	**Stormwater Technical Manual** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements
SC-HWQ-2	**Compliance Checklist for Storm Water Requirements at Construction Sites.** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

4.6.2 Impact Analysis

Would the Project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. There are no active faults crossing the Project site, and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest historically active surface fault is the Cabrillo Fault offshore segment located two miles south of the Project site.[46] Therefore, there would be no impact associated with rupture of a known earthquake fault. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

ii) Strong seismic ground shaking?

Less than Significant Impact. The Project site is located in a seismically active region. The City, as with all of Southern California, is subject to strong ground shaking. The closest historically active surface faults are the

[46] Ibid.

northwest trending Cabrillo and Palos Verdes Faults, located less than two miles to the south and northwest, respectively. Additionally, the Newport-Inglewood Fault is located approximately 8.5 miles east of the Project site. These faults could have the potential to generate strong seismic ground shaking at the Project site during an earthquake event.[47] The proposed facilities would be required to comply with the geotechnical and seismic design requirements of the most recent version of the California Building Code (CBC) (Title 24), which requires structural design that can accommodate ground accelerations expected from known active faults. In addition, implementation of the proposed Project would seismically retrofit the Home Economic Building, Administration Building (which includes the main classroom building) and Classroom Building 1. Seismic retrofitting would be in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, CBC, Division of State Architect, and CDE, as required by SC-GEO-1. The retrofitting activities would include, but would not be limited to bracing and construction and reinforcing of walls. Therefore, implementation of the proposed Project would result in less than significant impacts associated with strong seismic ground shaking. No further analysis is required in the Draft EIR.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a seismic phenomenon where unconsolidated and/or near saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The geotechnical evaluation for the proposed Project determined that the site is not within an area zoned by the State as being susceptible to liquefaction.[48] In addition, groundwater was not encountered in borings drilled to a maximum depth of 36.5 feet on site; therefore, the potential for soil saturation to occur is low. Therefore, no impacts associated with liquefaction would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

iv) Landslides?

Less than Significant Impact. The site is not located within a California earthquake-induced landslide hazard zone.[49] Locally, the City of Los Angeles maps this area as potential for shallow surficial slope instability; however, the site is located outside the City's mapped landslide hazard areas.[50] Further, LAUSD policy dictates that schools will not be constructed in areas that are prone to landslides. LAUSD conducted a comprehensive site-specific geotechnical investigation, which also includes an assessment of existing landslide potential on and next to the Project site, as well as the potential for the Project to increase landslide hazards on or adjacent to the site. The surrounding topography of the site includes gentle slopes down to the east. The site is terraced down to the northeast with cut and fill pads. The engineered slopes are laid back or supported with retaining walls. The face of the slope was also protected with shotcrete and according to the findings of the geotechnical investigation the slope was evaluated and considered to be stable but recommended some of the areas of the shotcrete could benefit from maintenance.[51] Implementation of the Project would not expose people or

47 Ibid.
48 Ibid.
49 Ibid.
50 Ibid.
51 Ibid.

structures to substantial adverse hazards due to landslides, and there would be no impact in this regard. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

Less than Significant Impact The proposed Project would include grading and earthmoving activities at the Project site that could expose soils to erosion from heavy winds, rainfall, or runoff. As Project construction would disturb more than one acre of soil, the Project operator would be required to comply with SC-GEO-1 Geohazard Assessment Scope of Work, including the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In compliance with this permit and SC-HWQ-1 and SC-HWQ-2, a Stormwater Pollution Prevention Program (SWPPP) would be prepared and implemented, which would require erosion control, sediment control, and BMPs to minimize loss of topsoil or substantial erosion. Construction contractors are responsible for implementation of the SWPPP, which includes maintenance, inspection, and repair of erosion and sediment control measures and water quality BMPs throughout the construction period. Once constructed, disturbed areas would be protected by coverings such as structures, pavement, concrete, or vegetation, and the potential for long-term erosion or loss of topsoil would be reduced to less than significant. Therefore, with implementation of these requirements and associated BMPs, erosion related to construction activities and operation of the proposed Project would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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?

Less than Significant Impact. The Project site is developed and terraced down to the northeast with cut and fill pads. Engineered slopes are laid back or retained with wall structures. The surrounding topographic relief is gently sloping down to the east. The City of Los Angeles has mapped the Project area to have a potential for shallow surficial slope instability; however, the site is located outside the City's mapped landslide hazard areas.[52] Records documenting the placement and compaction of the existing fill soils are not available; therefore, the existing fill soils are not considered suitable for support of new structures on conventional spread/continuous footings. Therefore, Project development may result in potentially significant impacts regarding unstable soils. However, the Comprehensive Geotechnical Report prepared for the Project identified recommendations that, when implemented would ensure soil stability. The recommendations include removal and re-compaction of any existing fill, or replacement with engineered fill. All recommendations from the Comprehensive Geotechnical Report would be consistent with the most recent version of the California Building Code including compaction specifications consistent with ASTM D1557. Final design level geotechnical recommendations would be incorporated into the project design including site preparation specifications; therefore, potential impacts associated with unstable soils would be less than significant. No further analysis is required in the Draft EIR.

[52] Ibid.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. Expansive soils are predominantly comprised of clays, which expand in volume when water is absorbed and shrink when the soil dries. Expansion is measured by shrink-swell potential, which is the volume change in soil with a gain in moisture. Soils with a moderate to high shrink-swell potential can cause damage to buildings and infrastructure. The Project site's existing near surface soils in some areas were found to have medium to high expansion potential, and may shrink and swell with fluctuations in moisture content.[53] Future facilities within the Project area may be exposed to potential significant impacts regarding expansive soils. The Comprehensive Geotechnical Report provided recommendations that would avoid impacts related to expansive soils by removal of all soils found to have high expansion potential and replacement with engineered fill if re-use of onsite soils do not meet geotechnical minimum standards. The recommendations in the Comprehensive Geotechnical Report would be incorporated into Project design specifications. As noted above, design measures that could be used to address expansive soils may include replacement with engineered fill and apply to a minimum depth of 1 foot below grade as well as a minimum of 5 lateral feet outside building and pavement areas. Final limits of removals and fill placement would be determined by a state licensed geotechnical engineer during grading activities. Compliance with the CBC would be ensured through the implementation of the recommendations in the final design level Comprehensive Geotechnical Report. Therefore, the proposed Project would not expose people or structures to potential adverse effects involving expansive soils and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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 proposed Project would not include the installation or use of septic tanks or alternative wastewater disposal systems. The proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact associated related to alternative wastewater disposal systems would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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[53] Ibid.

4.7 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. 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?	☐	☐	☒	☐

4.7.1 Discussion

The SUP PEIR includes SCs for minimizing impacts related to greenhouse gas (GHG) emissions in areas where future Projects would be implemented under the SUP. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided in **Table 4.7-1**.

TABLE 4.7-1
GREENHOUSE GAS EMISSIONS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the time dependent valued energy of the proposed Project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the Project is submitted to the Division of the State Architect..

4.7.2 Impact Analysis

Would the Project:

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

Potentially Significant Impact. GHG emissions from human activity are implicated in global climate change or global warming. The principal GHGs are carbon dioxide (CO2), methane (CH4), nitrogen oxides (NO_x), ozone, water vapor, and fluorinated gases (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride). The Draft EIR will identify the GHG emissions associated with construction and operation of the proposed Project and the potential impact on the environment from GHG emissions.

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

Less than Significant Impact. As described in the Program EIR, implementation of the SUP would be consistent with plans adopted for the purpose of reducing GHG emissions, such as the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), California Assembly Bill 32, California Air Resources Board Scoping Plan, and other statewide strategies to reduce GHG emissions.[54] Development of the proposed Project would replace and modernize facilities at San Pedro HS, but it would not increase the number of students or faculty at the school and therefore, would not increase GHG emissions. As such, the proposed Project would not conflict with the goals of the RTP/SCS.

Additionally, SUP-related Projects, including the proposed Project, would comply with the District's GHG emission reduction measures. LAUSD's School Design Guide requires construction contractors to reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction, as materials recovery would minimize the need to produce and transport new materials, thereby reducing emissions from mobile sources and energy use.[55] With respect to all SUP Projects, implementation of SCs GHG-1 through GHG-5 would ensure that the proposed Project would not conflict with any plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, with Project implementation and adherence to SCs GHG-1 through GHG-5 and compliance with Title 24, the proposed Project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant and this issue will not be further analyzed in the Draft EIR.

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[54] LAUSD. 2015. SUP Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015. Pg. 5.7-18 to 5.7-19.

[55] Ibid.

4.8 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. 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 it 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 for people residing or working in the Project area?	☐	☐	☐	☒
f. For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code; or a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	☐	☐	☐	☒
j. Be located within one-fourth of a mile of any facilities which might be reasonably anticipated to emit hazardous or acutely hazardous substances or waste?	☐	☐	☐	☒
k. Be located on a site where the property line is less than the following distance from the edge of respective power line easements? 100 feet of a 50-133 kV line, 150 feet of a 220-230 kV line, or 350 feet of a 500-550 kV line.	☐	☐	☐	☒
l. Be located on a site that is within 1,500 feet of a railroad track easement?	☐	☐	☐	☒
m. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☒	☐
n. Be located on a site that is near a reservoir, water storage tanks, or high-pressure water pipelines?	☐	☐	☒	☐
o. Be located within 1,500 feet of a pipeline that may pose a safety hazard?	☐	☐	☒	☐
p. Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	☐	☐	☒	☐
q. Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and playfields that cannot be safely supervised?	☐	☐	☐	☒
r. Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?	☐	☐	☐	☒
s. Be located on a site with a traffic pattern for school buses that can pose a safety hazard?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
t. Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	☐	☐	☐	☒

4.8.1 Discussion

The following evaluation of hazards and hazardous materials is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project site in June 2016 and the Draft PEA-E prepared for the Project site in June 2017. The PEA (Appendix E) and Phase I ESA (Appendix F) of this IS provide an assessment concerning environmental conditions as they exist on the San Pedro HS property.

4.8.2 Impact Analysis

Would the Project:

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

Less than Significant Impact. Proposed Project construction activities would involve transport, use, and disposal of hazardous materials such as solvents, oils, grease, and cleaning fluids. In addition, hazardous materials may be needed for fueling and servicing construction equipment on the Project site. The use of these materials during Project construction would be short-term in nature, and would occur in accordance with standard construction practices. All transport, handling, use, and disposal of substances such as petroleum products related to construction would comply with all federal, State, and local laws regulating the management and use of hazardous materials. These laws include but are not limited to: the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), federal Clean Air Act that regulates asbestos as a hazardous air pollutant and the Occupational Safety and Health Administration (OSHA) that regulates asbestos as a potential worker safety hazard. Construction activities that involve hazardous materials would be governed by several agencies, including the California Environmental Protection Agency (CalEPA), Caltrans, California Division of Occupational Safety and Health (Cal/OSHA), Department of Toxic Substances Control (DTSC), and the Los Angeles Fire Department. BMPs would be in place to ensure the lawful and proper storage and use of these materials and as such, potential impact would be would be less than significant. As discussed in the PEIR, the types and amounts of hazardous materials that are now handled by LAUSD are not expected to substantially change upon construction of individual Projects or upon completion of the SUP in its entirety. The amounts of hazardous materials handled at a given campus would remain relatively small and would be subject to federal, state, and local health and safety requirements. LAUSD would continue to implement its existing programs, practices, and procedures for handling hazardous materials, which would be extended to all new facilities.

An important component of the SUP is to eliminate hazards associated with asbestos and lead-based paint in existing buildings to be demolished, as would be the case with the proposed Project. With respect to asbestos containing materials (ACM), the Program EIR provides a complete protocol for the handing of ACM, including required procedures whenever ACM would be disturbed, in compliance with federal and state regulations.[56]

The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763) requires local education agencies to inspect their school buildings for asbestos-containing building materials, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit.

The Phase I Environmental Site Assessment Report (Phase I ESA) for the proposed Project indicates that based on the age of the existing site buildings it is possible that ACM is present in building materials.[57] All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using specific handling procedures. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance" during any Project where ACM may be disturbed. Compliance with federal and state regulations and the District guidelines and procedures would ensure the reduced risk of release of hazardous building materials into the environment. Therefore, impacts associated with the handling and disposal of ACM would be less than significant.

The Phase I ESA for the proposed Project indicates that based on the age of the existing site buildings, it is possible that LBP has been applied to the exterior finishes of the buildings. As such, it is possible that LBP residue is present in soils around the perimeters of the existing and former buildings.[58] Specific procedures for handling building materials that may contain lead include, but are not limited to, lead abatement performed by contractors certified by the California Department of Public Health, review of assessment reports addressing the impact to lead-based materials, written approval by the District's environmental representative of the abatement work plan, and transportation of lead-related waste under a Uniform Hazardous Waste Manifest. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work" during any Project where lead-containing materials may be disturbed. Compliance with federal and State regulations and the District guidelines and procedures would ensure that impacts associated with the handling and disposal of LBP would be less than significant.

Long-term operation of the proposed Project would involve very little transport, storage, use, or disposal of hazardous materials and substances. LAUSD's OEHS developed and implemented a Chemical Hygiene Plan

[56] LAUSD OEHS. "SUP Final Environmental Impact Report," http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.
[57] Clark Seif Clark, Inc., 2016. *Phase I Environmental Site Assessment, San Pedro High School, 1001 W. 15th Street, San Pedro, CA.* June 7, 2016.
[58] Ibid.

to minimize employee and student exposure to hazardous chemicals in schools with laboratories. Site Administrators are required to appoint a Chemical Safety Coordinator to implement the Chemical Hygiene Plan and to assist the Site Administrator in complying with hazardous material management, conducting employee trainings, and established laboratory safety protocols. The types of hazardous materials associated with operation of a school would generally be limited to those associated with janitorial, maintenance, and repair activities, such as commercial cleansers, paints, aerosol cans, lubricants, and automotive supplies (by-products), etc. The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Such requirements would be incorporated into the design and operation of the Project, such as providing for and maintaining safety data sheets, appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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?

Less Than Significant Impact. A significant impact would occur if the proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials.

San Pedro HS campus is located within a moderate potential radon zone.[59] Radon gas sampling was conducted for the Project site. These hazard categories correspond to the percentage of homes that are likely to be equal to or greater than the U.S. Environmental Protection Agency (EPA) Radon Action Level of 4.0 picocuries per liter (pCi/L). Radon samples were collected from four locations including the Administration Building, Classroom Building 1, PE Building, and Home Economics Building. The radon testing locations and evaluation are independent of the soil testing activities. Radon testing results reported concentrations ranging from below the reporting limit of 0.2 pCi/L up to 3.9 pCi/L in the subject building. The highest radon concentration of 3.9 pCi/L was found in Room 231 of Classroom Building 1.

Results of radon analysis of samples collected from the subject buildings were below the EPA action level of 4.0 pCi/L.[60] Therefore, the impact is less than significant and no mitigation is required. However, a passive radon reduction system would be installed in the new buildings to ensure that radon levels in the new buildings would be below 4.0 pCi/L.

According to the Phase I ESA, there is a clarifier associated with the operation of the auto shop scheduled for demolition. Investigation of the soil in the location of the clarifier was conducted in August 2016. The clarifier was identified as having the potential to impact soil with petroleum hydrocarbons, volatile organic compounds

[59] Ensafe Inc., June 30, 2017, *The Draft Preliminary Environmental Assessment Equivalent for the San Pedro High School Comprehensive Modernization Project at 1001 W. 15th Street, Los Angeles, California 920731.*

[60] Ibid.

(VOCs), and polychlorinated biphenyls (PCBs). Total petroleum hydrocarbons (TPH)-gasoline and TPH-diesel were not detected in any of the samples analyzed from the clarifier area. TPH-motor oil was detected in three of the seven samples at concentration below the RWQCB Maximum Soil Screening Level of 1,000 mg/kg for TPH-motor oil. Therefore, TPH is eliminated as a contaminant of potential concern (COPCs) and no further action is warranted at the clarifier area.[61]

Surficial soils were tested for termiticides, herbicides including arsenic, pesticides, PCBs in caulking and LBPs. Use organochlorine pesticides (OCPs) as a termiticide has been known to result in significant concentrations around structures with wood components built prior to January 1, 1989. Arsenic may also be associated with direct application of pesticides. Weathering, scraping, chipping, and abrasion of potential PCB caulking or lead-based paint surfaces may cause these contaminants to be released and accumulate in soil around Project area structures. Leaking dielectric fluid from pad-mounted electrical transformers is a potential source of PCBs in soil near the girls' gymnasium. Arsenic was detected in each of the 48 primary surficial samples. Lead was detected in each of the 48 primary surficial. Thirty-five of the 48 primary soil surficial samples contained detectable concentrations of OCPs that included one or more of the following: dichlorodiphenyldichloroethane (4-4'-DDD), dichlorodiphenyldichloroethylene (4-4'-DDE), dichlorodiphenyltrichloroethane (4-4'-DDT), alpha-hexachlorocyclohexane (alpha-BHC), chlordane, and dieldrin. None of the other OCP concentrations exceeded their respective regional screening levels (RLSs).[62]

PCBs were not detected in the 12 primary samples analyzed. VOCs were not detected in the seven samples analyzed from the clarifier area.[63]

Implementation of the proposed RAW would mitigate the potential threat to human health and the environment posed by affected soils at the Project site. The PEA-E estimates that the proposed Project would include removal and off-site disposal of an estimated 225.6 cubic yards of contaminated soil. For the purposes of this IS, a conservative estimate of removal of up to 500 cubic yards of contaminated soil is being used.

Due to the historic use of hazardous materials onsite, there is the potential for the release of hazardous material or exposure of the public to hazardous materials. However, because the affected soils onsite would be removed, implementation of the RAW would ensure the safety of construction workers, employees, students, and staff during construction and operation of the proposed Project. The proposed Project would result in excavation and removal of up to 500 cubic yards of impacted soils and replacement with clean, engineered fill. The soil would be removed using backhoes and/or excavators equipped with bladed buckets and would be either directly loaded to open end dump trucks for immediate offsite transport or staged in temporary stockpiles on plastic liners next to the excavation. All RAW contractors and subcontractors would be responsible for operating in accordance with the most current requirements of Title 8, CCR (i.e., General Industry and Construction Safety Orders) ([Section 5129]), Title 29 of the Code of Federal Regulations (i.e., Standards for Hazardous Waste Operations and Emergency Response [Section 1910.120] and Construction Industry

61 Ibid.
62 Ibid.
63 Ibid.

Standards [Section 1926]), and other applicable Federal, state and local laws and regulations. All personnel shall operate in compliance with all California OSHA requirements.

A site-specific Health and Safety Plan (HASP) shall be prepared for this Project in accordance with current health and safety standards. The Remediation Contractor, Environmental Consultant, and any subcontractors doing field work in association with this RAW would either abide by the HASP or would develop their own safety plan that, at a minimum, would meet the requirements of this HASP. The designated Project Health and Safety Officer (HSO) would be responsible for maintaining compliance with the HASP. Daily tailgate health and safety meetings would be held and meeting participation would be documented in field forms that would be maintained with Project records.

Compliance with regulatory requirements would ensure that the proposed Project would result in less than significant impacts. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

Less Than Significant Impact. The proposed Project would be implemented on a school site surrounded by residential uses. Further, the Dana Middle School is located adjacent to the Project site to the east. The proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. As discussed in Item (b) above, a site-specific HASP shall be prepared for the proposed Project in accordance with current health and safety standards to reduce the potential for accident conditions involving the release of hazardous materials into the environment. The onsite HSO would ensure compliance with the dust control measures and HASP. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations. Compliance with regulatory requirements and with the HASP would ensure that the proposed Project would not result in hazardous emissions, materials or substances within 0.25 miles of an existing school and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992, and information regarding the Cortese List is now compiled on the websites of DTSC, the State Water Board, and CalEPA. DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as removal action) or extensive investigations are planned or have occurred. Review of the EnviroStor

database showed that the Project site is not identified on any of the above database lists. According to both the EnviroStor and GeoTracker databases, there are no documented hazardous materials at the Project site.[64][65] The proposed Project would not be located on a site that is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5, and therefore no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

No Impact. The nearest airport to the Project site is the Torrance Municipal Airport, located approximately 7 miles northwest of the Project site. The proposed Project is not located within the Los Angeles International Airport Influence Area.[66] Therefore, the proposed Project would not create a safety hazard from proximity to a public airport and no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

f) For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?

No Impact. The Project site is not located within two miles of an operating airport.[67] There are 54 private-use heliports within the City of Los Angeles.[68] The Project site does not include a private-use heliport. The nearest private helipad, the Ports O'Call Heliport is located approximately 1.4 miles east of the Project site.[69] Demolition and new construction on the existing school site would not create any new safety hazards associated with a private airstrip or heliport operations. Therefore, the proposed Project would not create a safety hazard from proximity to a private airstrip and no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

Less than Significant Impact. The Project site is an existing school campus that would adhere to LAUSD's emergency response plans. During construction, emergency response procedures would be governed by the District's emergency response protocol and the contractor's emergency response plan. Construction of the proposed Project would involve the transport of equipment and materials on public roadways. Other than delivery of materials and supplies to the Project site and the hauling of debris and soil from the Project site, construction of the proposed Project would be confined within the campus boundaries.

64 DTSC, 2017. EnviroStor Database. Available at: https://www.envirostor.dtsc.ca.gov/public/, accessed August 16, 2017.
65 SWRCB, 2017. GeoTracker Map. Available at: https://geotracker.waterboards.ca.gov/, accessed August 28, 2017.
66 Los Angeles County Airport Land Use Commission. *2003. Torrance Municipal Airport: Airport Influence Area Map.*
67 ZIMAS. 2017. http://zimas.lacity.org
68 Airnav.com. 2017. Airports in Los Angeles. Available at: http://www.airnav.com/airports/get, accessed August 16, 2017.
69 Available at: http://www.airnav.com/cgi-bin/airport-search, accessed August 16, 2017.

Upon completion of the proposed Project, District-wide emergency response plans, policies, and guidance developed by LAUSD would be extended to the new facilities. In addition, LAUSD developed a district-wide Emergency Operations Plan (EOP) that assigns responsibilities and provides a framework for coordination of response and recovery efforts in the event of an emergency. District schools are also required to comply with California Code Sections 32281-32289, dealing with the preparation of Safe School Plans (SSPs), which must be reviewed and updated every year. As noted in the PEIR, the proposed Project would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan(s); for the City of Los Angeles, these plans include but are not limited to: City's Emergency Operations Master Plan, Local Hazard Mitigation Plan, the Los Angeles County Operational Area Emergency Response Plan, and the County All-Hazards Mitigation Plan. Construction work would not impede emergency access in the surrounding community.

Public schools are considered critical community facilities and are often used as evacuation centers during disasters. Project construction would be completed in phases which would allow partial use of the campus in the event of an emergency. Implementation of the proposed Project includes seismic retrofits to the Home Economics Building, Administration Building and Auditorium Building, PE Building, and Classroom Building I resulting favorably on emergency response by making improvements that would comply with current seismic standards and making buildings that could be used as evacuation points in the event of a disaster. Therefore, impacts associated with implementation of or interference with adopted emergency evacuation and response plans would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

h) Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?

No Impact. The Project site is located within a highly urbanized area of the City and does not contain dense vegetation (flammable brush) considered to be wildlands. In addition, the Project site is not located within or adjacent to a California Department of Forestry and Fire (CalFire) Fire Hazard Severity Zone.[70,71] Therefore, the risk for wildland fire is low and implementation of the proposed Project would not expose people of structures to a significant risk involving wildland fires and no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[70] CalFire, Very High Fire Hazard Severity Zones in LRA: Los Angeles, http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf, 2011.

[71] California Department of Forestry and Fire (CalFire), Fire Hazard Severity Zones in SRA: Los Angeles, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, 2007.

i) Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code; or a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?

No Impact. The Project site has operated as a high school campus since the 1920s. According to both EnviroStor and GeoTracker databases, the Project site is not located on any documented current or former hazardous waste disposal site or solid waste disposal site. The proposed Project location is also not listed as a hazardous substance release site as identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code. Based on the National Pipeline Mapping System data, there are not pipelines near the Project site.[72] No impact is anticipated to occur as a result of the proposed Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

j) Be located within one-fourth of a mile of any facilities which might be reasonably anticipated to emit hazardous or acutely hazardous substances or waste?

No Impact. According to the EnviroStor and GeoTracker databases, the Project site is not located within one-quarter mile of a facility that might emit hazardous or acutely hazardous substances or waste. Therefore, no impact would occur. No mitigation is required and this issue will not be further analyzed in the EIR.

k) Be located on a site where the property line is less than the following distance from the edge of respective power line easements? 100 feet of a 50-133 kV line, 150 feet of a 220-230 kV line, or 350 feet of a 500-550 kV line.

No Impact. Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall not be the following minimum distances from the edge of a high-voltage power line easement: 100 feet for 50-133 kV lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. Local utility lines are located along the streets surrounding the Project site, including West 17th Street, South Leland Street, and West 14th Street. The proposed Project is located on an existing school site. Further, the new facilities would be constructed within the existing campus and would not place any new buildings or structures closer to existing utility lines. No impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[72] National Pipeline Mapping System (NPMS). NPMS Public Map Viewer. Available at https://www.npms.phmsa.dot.gov/default.aspx. Accessed August 17, 2017.

l) Be located on a site that is within 1,500 feet of a railroad track easement?

No Impact. The Project site is not located within 1,500 feet of a railroad track[73] and no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

m) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

Less than Significant Impact. The closest major roadway is I-110, located approximately 1.5-miles northeast of the Project site. The Project site is located south of West 14th Street, north of West 17th Street, east of South Leland Street, and west of South Cabrillo Street. All four streets are two-lane, two-way roads. The intersections on South Leland Street along the campus frontage (West 15th, West 16th, and West 17th streets) are all-way stop-controlled intersections, with school crosswalk pavement markings across South Leland Street at West 15th and West 16th streets. In addition, the intersection of West 17th Street / South Alma Street is an all-way stop-controlled intersection with school crosswalk pavement markings across West 17th Street. The Project site is located in a low to medium density residential area, and the surrounding streets and roadways are not considered major arterial roadways or freeways.[74] Therefore, the proposed Project would not place facilities on a site near a roadway or freeway that may pose a safety hazard and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

n, o) Be located on a site that is near a reservoir, water storage tanks, or high-pressure water pipelines? Be located within 1,500 feet of a pipeline that may pose a safety hazard.

Less than Significant Impact. According to the Phase I Environmental Site Assessment conducted for the proposed Project, LADWP was contacted to obtain information regarding the presence of high pressure water pipelines and utilities within 1,500 feet of the Project site.[75] No infrastructure, including water storage tanks, high-pressure water lines, and/or hazardous pipelines are located on the Project site. Further, the nearest reservoir to the Project site is the Palos Verdes Reservoir, located approximately 4.0 miles northwest of the Project site. Therefore, impacts related to water storage and hazardous pipelines would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

p) Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?

Less than Significant Impact. No propane tanks are known to be present within the Project site. However, propane tanks could be located at residential properties to the north, west, and south of the Project site, across West 15th Street, South Leland Street, and West 17th Street, respectively. Local regulations pertaining to the storage, transportation, and use of propane would require proper storage, transportation, and use of propane

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73 Clark Seif Clark, Inc., 2016. *Phase I Environmental Site Assessment, San Pedro High School, 1001 W. 15th Street, San Pedro, CA.* June 7, 2016.

74 City of Los Angeles, Mobility Plan 2035, An Element of the General Plan, http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf, 2016, accessed August 17, 2017.

75 Clark Seif Clark, Inc., 2016. *Phase I Environmental Site Assessment, San Pedro High School, 1001 W. 15th Street, San Pedro, CA.* June 7, 2016.

tanks. Compliance with existing regulations would reduce the potential safety hazards to individuals on the Project site and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

q) Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and playfields that cannot be safely supervised?

No Impact. The Project site is an existing school campus with adequate length to width ratio to accommodate the building layout, parking and playfields that can be safely supervised. No impacts would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

r) Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?

No Impact. The Project site is located within an existing school campus. The Project site is surrounded primarily by residential designations and Dana Middle School. Because the campus is currently in operation and the proposed Project would not include any offsite modifications, the surrounding land uses would not generate or create any additional health or safety risks to students. No impacts would occur from the proposed Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

s) Be located on a site with a traffic pattern for school buses that can pose a safety hazard?

Less Than Significant Impact. The proposed Project would be implemented at an existing school site. Vehicular/bus drop-off and pickup zones would be located in the curb lane adjacent to the campus on Leland Street and 17th Street. The student drop-off and pickup operations would minimize vehicular queuing in traffic lanes on the local street system (and to reduce queuing that currently occurs on Alma Street and 15th Street). Changes to existing roadways are not part of the proposed Project. In addition, traffic generated during Project construction would be generally compatible with the mix of vehicle types (autos and trucks) currently using the regional and local roadways surrounding the campus. As such, impacts from the Project would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

t) Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?

No Impact. The Project site is located within an existing operating school campus. Surrounding land uses include residential land uses and Dana Middle School. According to a search of DTSC Hazardous Waste and Substances Site (Cortese List), the Project site is not within 2,000 feet of a significant disposal of hazardous waste.[76] Therefore, no impact would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[76] DTSC, Hazardous Waste and Substances Site List (Cortese List), https://www.envirostor.dtsc.ca.gov/public/, accessed August 17, 2017.

4.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the Project result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

4.9.1 Discussion

The Program EIR includes SCs for minimizing impacts related to hydrology and water quality of the existing environment in areas where future Projects would be implemented under the SUP. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided in **Table 4.9-1**.

TABLE 4.9-1
HYDROLOGY AND WATER QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-HWQ-1	**Stormwater Technical Manual** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	**Compliance Checklist for Storm Water Requirements at Construction Sites.** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

4.9.2 Impact Analysis

Would the Project:

a) Violate any water quality standards or waste discharge requirements?

Less than Significant Impact. The Project site is located within a dense urban area of the City of Los Angeles, and is currently connected to the City's network of stormwater drainage facilities which ultimately convey surface water runoff to the Pacific Ocean. Construction of the proposed Project would include site grading. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities; hydrocarbons from leaks or spills of fuels, oils, and other fluids associated with construction equipment; and paints, concrete slurries, asphalt materials, and other hazardous materials. Storm water and non-storm water runoff could potentially carry these pollutants offsite and into the City's drainage system. However, all earthwork activities would be completed in accordance with LAUSD Standards and applicable regulations pertaining to stormwater runoff. The Program EIR requires all new SUP construction projects to comply with regulatory requirements if they would disturb greater than 1 acre, as would occur for the proposed Project.

LAUSD would implement SC-HWQ-1 and SC-HWQ-2, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit. All new construction Projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by

the SWRCB to comply with a Construction General Permit, including development of a SWPPP, as a required by the (RWQCBNPDES . The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants, including, but not limited to, the following:

- Proper storage, use, and disposal of construction materials;
- Removal of sediment from surface runoff before it leaves the Project site by silt fences or other similar devices around the site perimeter;
- Protection of all storm drain inlets on site or downstream of the Project site to eliminate entry of sediment;
- Prevention of tracking soil offsite through use of a gravel strip or wash facilities at exits from the Project site;
- Protection or stabilization of stockpiled soils.

LAUSD developed a program-wide SWPPP in 2005, with updates completed in 2007 and 2009. LAUSD's construction contracting protocol for new and existing sites that would undergo land disturbance provides BMPs designed to prevent or minimize stormwater pollution, including submission of a SWPPP.

Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Construction General Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Construction General Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, construction-related impacts to water quality would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

b) Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less than Significant Impact. LADWP supplies water to the Project site. According to its Urban Water Management Plan (UWMP), LADWP's three main sources of water are the Los Angeles Aqueducts, local groundwater, and imported supplemental water purchased from the Metropolitan Water District of Southern California. In 2009/2010, the City relied on approximately 75,000 acre-feet of groundwater, meeting approximately 14 percent of the City's total annual demand.[77]

Although overall square footage of buildings would increase, it is assumed that water demand would remain the same as the existing conditions due to no increase in capacity, landscaping and associated irrigation systems. Therefore, there would be no net deficit in aquifer volume or lowering of the groundwater table near the Project site as the proposed Project would result in water demands that are similar to existing conditions. SUP-related

[77] LADWP. 2015. *Urban Water Management Plan.* April, 27, 2016.

Projects would not result any substantial changes in the quantity of groundwater supplies. Furthermore, no groundwater extraction activities would occur under the proposed Project, nor would any wells be constructed. The proposed Project would replace the existing impervious surfaces with other impervious surfaces. As such, compliance with applicable laws, regulations, and LAUSD standards during Project construction and operation would ensure impacts associated with groundwater supply and groundwater recharge would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on or off-site?

Less than Significant Impact. Construction of the proposed Project would temporarily alter the localized drainage pattern at the Project site due to ground-disturbing activities, such as grading and excavation, construction of new building foundations, and trenching for utility improvements. Such alterations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. However, compliance with the NPDES Construction General Permit, which requires the development of a SWPPP, would minimize the potential for erosion or siltation and flooding through the implementation of BMPs. Therefore, impacts associated with substantial erosion or siltation and temporary drainage alterations during construction would be less than significant.

The Project site is located within a dense urban area within the City of Los Angeles with an existing network of stormwater drainage facilities, which ultimately convey surface water to the Pacific Ocean. Currently, the Project site is developed with buildings, landscaping, and paved parking areas. Implementation of the proposed Project would not significantly change surface drainage at the Project site, as similar uses would be constructed compared to existing uses.

The proposed Project would employ CHPS criteria which are intended to avoid water quality impacts and velocity increases where possible. Implementation of the CHPS criteria and LAUSD standard BMPs, requiring the collection of surface runoff in stormwater collection system designed for 25-year peak runoff rates, would reduce siltation or erosion impacts to a less-than-significant level. SUP Projects, including the proposed Project, would employ features outlined in the LAUSD Technical Manual to reduce the impacts of erosion and siltation, including incorporation of CHPS standards and BMPs relating to the use of native and drought-tolerant landscaping.

Compliance with applicable laws, regulations, and SC-HWQ-2 during Project construction and operation would ensure that impacts associated with drainage and erosion are less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

Less than Significant Impact. As stated previously in Response 4.9 (c), the proposed Project would not substantially alter the local drainage pattern. The proposed Project would use minimal water during construction and operation and would thereby not generate a large amount of runoff as a result of site activities. No stream or river traverses the Project site. BMPs discussed above would control drainage onsite, thereby reducing its potential to cause flooding from occurring on or offsite. Therefore, flooding impacts resulting from drainage pattern alteration would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. Construction of the proposed Project would temporarily alter flow at the Project site due to ground-disturbing activities, such as grading and excavation, construction of new building foundations, and trenching for new utilities. However, compliance with the NPDES Construction General Permit, which requires development of a SWPPP, would minimize the potential for onsite and offsite flooding as the result of changes to the existing drainage patterns through implementation of BMPs. Therefore, impacts associated with onsite and offsite flooding due to temporary drainage alterations during construction would be less than significant.

Implementation of the proposed Project would not substantially change pervious and impervious surface area ratios, as similar uses would be constructed compared to existing uses. In addition, in accordance with NPDES requirements, the proposed Project would be required to control the rate of surface runoff, and ensure that runoff would not exceed the capacity of the existing or planned stormwater drainage system on site. Thus, no long-term runoff would be created that would exceed the capacity of the existing and planned stormwater drainage system and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

f) Otherwise substantially degrade water quality?

Less than Significant Impact. Refer to Response 4.9 (a). Construction of the proposed Project would include site grading and excavation. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities. Stormwater and non-stormwater runoff could potentially carry these pollutants offsite and into the City's drainage system. However, all earthwork activities would be completed in accordance with LAUSD standards and applicable regulations pertaining to stormwater runoff. SC-HWQ-1, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit. All new construction Projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by the

SWRCB to comply with a Construction General Permit, including development of a SWPPP, as required by the RWQCB NPDES. Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Construction General Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Construction General Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards. Construction impacts with regards to water quality would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. No housing would be developed as part of the proposed Project and the Project site is not located within a Federal Emergency Management Agency (FEMA) mapped flood hazard zone.[78] The Project site is located within Zone X, which is defined by FEMA as areas determined to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures in a 100-year flood hazard area. Therefore, no impacts to housing from flooding would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed in Response 4.9 (g), the proposed Project is not located within a FEMA mapped flood hazard zone. The Project site is located within Zone X, which is defined by FEMA as areas determined to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures within 100-year flood hazard areas that would impede or redirect flood flows. Thus, no impacts to structures from flooding would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. Earthquake-induced flooding is inundation caused by failure of old dams or other water-retaining structures due to earthquakes. According to the Project-specific geotechnical evaluation, the Project site is not within a dam inundation zone.[79] Potential impacts related to flooding, including failure of a levee or dam would not occur as a result of the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[78] FEMA,2008. Flood Insurance Rate Map (FIRM) Los Angeles County, CA Panel2031 of 2350, https://msc.fema.gov/portal/search?AddressQuery=1001%20W%2015th%20St%20San%20Pedro%2C%20CA%2090731#searchresultsanchor, accessed August 17, 2017.

[79] Group Delta, 2016. Comprehensive Geotechnical Report, Campus Modernization and Retrofit, San Pedro High School, 1001 West 15th Street, Los Angeles, CA. November 4, 2016.

j) Inundation by seiche, tsunami, or mudflow?

Less than Significant Impact. Seiches are seismically or wind induced tidal phenomena that occur in enclosed bodies of water. The Project site is not located adjacent to or near a standing body of water. The nearest body of water is the Palos Verdes Reservoir, located approximately 4.0 miles northwest of the Project site. Due to its distance from the reservoir, the proposed Project is not expected to expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche. Therefore, less than significant impacts from inundation by seiche would occur.

A tsunami is a sea wave of local or distant origin that results from large-scale seafloor displacements associated with earthquakes, major submarine landslides, or exploding volcanic islands. Tsunamis generally affect coastal communities and low-lying river valleys. According to the comprehensive geotechnical report, the Project site is not within a tsunami inundation zone and the Project is located approximately one mile from the Pacific Ocean/Los Angeles Harbor. The average elevation of the site is approximately 200 feet. No impact from tsunamis would occur.[80]

Mudflows occur on steep slopes where vegetation is not sufficient to prevent rapid erosion, or on gentle slopes if other conditions are met such as large sudden rainfall events. Mudflows contain large amounts of water, silt, sand, boulders, organic material, and other debris. The Project site is terraced down to the northeast with cut and fill pads. Engineered slopes are laid back or retained with wall structures. The City has mapped this area to have a potential for shallow surficial slope instability, however the site lies outside of the City's mapped landslide hazard area.[81] Therefore, the Project site is not at risk for mudflows. No impact from mudflows would occur. Further, inundation involving a seiche from the Palos Verdes Reservoir is not expected. Impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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[80] Ibid,
[81] Ibid.

4.10 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the Project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

4.10.1 Discussion

Projects implemented under the SUP are anticipated to have less-than-significant impacts to land use and planning within the LAUSD service area. The Project-specific analysis provided below determined that implementation of the proposed Project would have no impacts to land use and planning in the Project area.

4.10.2 Impact Analysis

Would the Project:

a) Physically divide an established community?

No Impact. The proposed Project does not include any action that could divide an established community. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The proposed Project lies entirely on an existing campus within an established LAUSD school boundary. The Project area is designated as public facilities and would not result in any zoning changes or changes in usage.[82] Because the proposed Project would be constructed on an established school campus, no impact related to the physical division of an established community would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[82] City of Los Angeles. ZIMAS, Planning and Zoning Map. Available at: http://zimas.lacity.org/, accessed August 17, 2017.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. As described in the Program EIR, the proposed Project would be consistent with the RTP/SCS. The proposed Project's consistency with the SCAQMD's air quality management plan will be assessed in the Air Quality section of the Draft EIR.

Further, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, LAUSD will comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project. Following a two-thirds vote of the Board of Education, LAUSD can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the City of Los Angeles with notice of this action.

Even if it were not exempt, the City of Los Angeles General Plan designation for the Project site is "Public Facilities". The City of Los Angeles Municipal Code – Zoning Plan has designated the proposed Project as PF: Public Facilities, or a zone for the use and development of publicly owned land, including public elementary and secondary schools. As such, the proposed Project would be consistent with all applicable land use plans.[83] No impacts would occur as a result of the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. No habitat reserves established under the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) are located within the District, and no other habitat conservation plans are in the District.[84] Therefore, the Project site would not be located in or conflict with a HCP/NCCP and no impacts would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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[83] American Legal Publishing Corporation. City of Los Angeles Zoning Code, Section 12.04.09, PF Public Facilities Zone. Available at : http://library.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:la_all_mc, accessed August 11, 2017.

[84] CDFW, 2017. California Regional Conservation Plans. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed August 16, 2017.

4.11 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. 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?	☐	☐	☐	☒

4.11.1 Discussion

Projects implemented under the SUP are anticipated to have less-than-significant impacts to mineral resources within the LAUSD service area. The Project-specific analysis provided below determined that implementation of the proposed Project would have no impacts to mineral resources.

4.11.2 Impact Analysis

Would the Project:

a) & b) 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? 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. There are no known mineral resources within the Project site, and no known operational mineral resource recovery sites at the Project site or in the vicinity.[85] The proposed Project is located on an existing school campus. Further, the surrounding area has been developed with residential and public uses. The proposed Project is zoned as PF and the nearest mineral resources recovery site is more than 2.5 miles north of the campus.[86] The proposed Project would not result in any impacts to mineral resources since it would not result in the loss of identified mineral resources that would be of value to the region or the state. Therefore, no impacts related to mineral resources would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[85] California Geologic Survey, 2010.Update of Mineral Land Classification of Portland Cement Concrete Aggregate in San Gabriel Valley Production-Consumption Region, Los Angeles County, California Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf , accessed August 17, 2017.

[86] City of Los Angeles, 2002. General Plan, Conservation Element. Available at : https://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 11, 2017.

4.12 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the Project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☒	☐	☐	☐
e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒
f. For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

4.12.1 Impact Analysis

Would the Project:

a) Result in exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction and operational activities associated with the Project development have the potential to create noise impacts that may adversely affect surrounding residential and commercial uses. Noise levels from mobile and stationary sources may increase where construction of new buildings and other facilities are proposed. The Draft EIR will evaluate relevant noise standards and temporary and periodic noise levels associated with Project construction.

b) Exposure of people to generation or excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Groundborne vibration and groundborne noise could occur during the construction phase of the proposed Project. The Draft EIR will evaluate vibration standards and temporary and vibration levels which could occur during construction and operation of the Project.

c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Potentially Significant Impact. Implementation of the proposed Project has the potential to create stationary and mobile noise impacts that could adversely affect surrounding residential uses. These increases will occur as development occurs within the Project area. The Draft EIR will evaluate potential long-term noise impacts associated with the proposed Project.

d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Potentially Significant Impact. Construction activities associated with the proposed Project have the potential to create temporary increases in noise levels. The Draft EIR will evaluate potential construction noise impacts associated with the proposed Project.

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

No Impact. The nearest airport to the Project site is the Torrance Municipal Airport, located approximately 7 miles northwest of the Project site. The proposed Project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

f) For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. The Project area is not located within the vicinity of a private airstrip. No impacts would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.13 PEDESTRIAN SAFETY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PEDESTRIAN SAFETY. Would the Project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☐	☐	☒	☐
b. Create unsafe routes to schools for students walking from local neighborhoods?	☐	☐	☒	☐
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☒	☐

4.13.1 Discussion

The Program EIR includes SCs for minimizing impacts to pedestrian safety in the existing environment in areas where future Projects would be implemented under the SUP. The applicable SC related to Project-specific pedestrian safety impacts is provided in **Table 4.13-1**.[87]

TABLE 4.13-1
PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

Projects implemented under the Program EIR are anticipated to have less-than-significant impacts to pedestrian safety within the LAUSD service area. The Project-specific analysis provided below determined that implementation of the proposed Project would also have less-than-significant impacts to pedestrian safety.

4.13.2 Impact Analysis

The Project site is developed with existing school uses. The campus comprises two city blocks and is bound by West 15th Street to the north, Dana Middle School immediately to the east, West 17th Street to the south, and South Leland Street to the west. Pedestrian access and circulation is provided on sidewalks on all streets surrounding the campus. The intersections on South Leland Street along the campus frontage (West 15th, West

[87] Pedestrian Safety Standard Conditions of Approval SC-PED-1 through SC-PED-4 would not apply to the pedestrian safety analysis for the proposed Project because the Trigger for Compliance is if the Project would increase student capacity by more than 25% or 10 classrooms.

16th, and West 17th streets) are all-way stop-controlled intersections, with school crosswalk pavement markings across South Leland Street at West 15th and West 16th streets. In addition, the intersection of West 17th Street / South Alma Street is an all-way stop-controlled intersection with school crosswalk pavement markings across West 17th Street.

Would the Project:

a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less than Significant Impact. The proposed Project would occur on the existing San Pedro High School campus (with no increase in enrollment); it would not directly or indirectly alter the configuration of the existing street system (including sidewalks, crosswalks or traffic control devices at intersections); it would alter vehicle access for the campus by introducing a new driveway on 17th Street for a reconfigured parking lot in the southwest corner of the Project site; and it would be designed to enhance path of travel, accessibility, and other pedestrian travel throughout the campus. The Project design would employ standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards.[88] Vehicular/bus drop-off and pickup zones will be located in the curb lane adjacent to the campus on Leland Street and 17th Street. The student drop-off and pickup operations have been planned to minimize vehicular queuing in traffic lanes on the local street system (and to reduce queuing that currently occurs on Alma Street and 15th Street). Conformance to District policies and local ordinances would ensure that adequate access would be maintained.

Project-related construction activities would temporarily increase vehicle trips throughout the Project area and on surrounding roadways, but traffic generated during construction activity generally would be compatible with the mix of vehicle types (autos and trucks) currently using regional and local roadways. As shown in Table 4.13-1, LAUSD requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) to the City of Los Angeles Department of Transportation (LADOT) for review prior to construction, as required by SC-T-4. Therefore, the proposed Project would not substantially increase vehicular and/or pedestrian safety hazards. As such, impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

b) Create unsafe routes to schools for students walking from local neighborhoods?

Less than Significant Impact. The proposed Project would be implemented at an existing campus and would not directly or indirectly eliminate sidewalks, crosswalks or traffic control devices at intersections. As shown in Table 4.13-1, LAUSD requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) to LADOT for review prior to construction, as required by SC-T-4. Therefore, the proposed Project would not create unsafe routes to school

[88] LAUSD SUP Final Environmental Impact Report, September 2015, at pages 5.13-10 to 5.13-11.

for students walking from local neighborhoods. As such, impacts would be less than significant and this issue will not be further analyzed in the Draft EIR.

c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

Less than Significant Impact. The I-110 and State Route (SR) 47 freeways are located about two miles northeast of the Project site, accessed via the Gaffey Street arterial (which is about 0.5 miles east of the Project site). The proposed Project would be implemented at an existing campus, which is bound by South Leland Street, West 15th and West 17th Streets, and Alma Street (all two-lane local collector streets), and would not directly or indirectly alter the configuration of the existing street system, including the sidewalks, crosswalks or traffic control devices at intersections. As described previously, there are sidewalks on each street adjacent to the Project site. The intersections on South Leland Street along the campus frontage (West 15th, West 16th, and West 17th streets) are all-way stop-controlled intersections, with school crosswalk pavement markings across South Leland Street at West 15th and West 16th streets. In addition, the intersection of West 17th Street / South Alma Street is an all-way stop-controlled intersection with school crosswalk pavement markings across West 17th Street.

While temporary construction activities (including truck accessing the campus) may result in congestion for those traveling along the streets that bound the campus, the campus location would not change. As such, implementation of the proposed Project would not pose a new safety hazard, compared to current conditions.[89] All SUP Projects would implement LAUSD standards and compliance measures as necessary. Therefore, implementation of the proposed Project would not pose a safety hazard related to being on a site that is adjacent to a major arterial roadway or freeway, and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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[89] LAUSD SUP Final Environmental Impact Report, September 2015, at pages 5.13-11 to 5.13-12.

4.14 POPULATION AND HOUSING

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

4.14.1 Impact Analysis

a)- c) No Impact. The proposed Project site is currently an operational high school serving students in grades 9 through 12. The proposed Project would not be designed or intended to increase the student population, rather the proposed Project is intended to provide the appropriate facilities for the current student capacity. No direct or indirect population growth in the area is anticipated. There are no residents on the Project site, and the proposed Project would not result in population or housing displacement of the surrounding community. Students that are displaced by classroom demolition during construction would be relocated/housed in vacant classrooms or temporary onsite (interim relocatable) classrooms while the new facilities are being constructed. Therefore, no impacts related to population and housing would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

XV. 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:

a) Fire protection?

Less than Significant Impact. Fire protection services would be provided by the LAFD. Fire Station 48, located at 1601 S. Grand Avenue, San Pedro, CA 90731, 0.7 miles from the Project site would be the primary responder.[90] Construction of the proposed Project may result in a temporary increase in demand for fire protection and emergency medical services. However, the proposed Project would not result in an increase in student capacity at San Pedro HS. Implementation of the proposed Project would not generate increased demands for fire protection and emergency services due to a significant increase in people on the campus. Response times would not be affected by the proposed Project because LAFD is already serving the Project site. The proposed Project would not generate the need for a new fire station, as the Project is growth accommodating, not growth inducing, since it would serve existing and expected students that already reside within the enrollment boundaries of the school. In addition, the Project would be required to comply with LAFD and City of Los Angeles Department

[90] LAFD, official website, http://www.lafd.org/, accessed August 17, 2017

of Building and Safety regulations for water availability, fire hydrant pressure, and accessibility for firefighting equipment. Further, the proposed Project would result in improved circulation that would improve emergency response to the campus. Compliance with applicable state, City and District requirements, including installation of fire sprinklers, fire alarm devices, emergency access and evacuation procedures would also ensure that impacts to fire protection services would remain less than significant. As such, no new or expanded fire protection services or facilities would be required. Therefore, impacts related to fire protection would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

b) Police protection?

Less than Significant Impact. LAUSD operates its own police department, the Los Angeles School Police Department (LASPD), which provides security for the schools and centers within its jurisdiction. The Project site lies within the South Division of the LASPD. The City of Los Angeles Police Department (LAPD) would be the secondary provider of police protection within the proposed Project area. The Harbor Community Police Station located at 2175 John S. Gibson Boulevard in San Pedro, approximately 2.5 miles from the Project site, would supplement police Protection along with the LASPD.[91] Demands for police protection are generally generated by an increase in the population within a service area. The proposed Project would not increase student capacity at San Pedro HS. Implementation of the proposed Project would not generate increased demand for police services, as the Project is growth accommodating, not growth inducing, since it would serve existing student capacity within the enrollment boundaries of the school. During construction, the proposed Project has the potential to result in temporary demands for police services during construction from possible trespass, theft, and/or vandalism. However, the construction areas would be fenced and would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. Further, the Project would comply with LAUSD Standards regarding emergency response procedures and school safety. Therefore, the proposed Project would not result in an increase of student capacity nor would it result in new operations requiring additional police protection. Therefore, impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Schools?

Less than Significant Impact. The proposed Project would not increase the student population nor would it displace the current student population to offsite locations. Students temporarily displaced by construction activities would be placed in interim classrooms onsite. No other LAUSD campuses or facilities outside of San Pedro HS would be impacted by the proposed Project. Therefore, impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

[91] LAPD, official website, Harbor Community Police Station, http://lapdonline.org/harbor_community_police_station, accessed August 17, 2017.

d) Parks?

No Impact. The proposed Project would not interfere with or have adverse impacts related to parks. The proposed Project would not involve new housing or long-term employment opportunities that would increase the population or lead to an increase in the need for new or altered parks. The proposed Project would enhance the existing recreational facilities in the area. The recreational facilities on the campus are available to the community for use pursuant to the Civic Center Act (CA Ed. Code Sections 38130 – 38139). No impacts would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

e) Other public facilities?

No Impact. The proposed Project would not result in substantial adverse impacts associated with the need for new or physically altered public facilities and/or services. The Project would not involve the construction of homes or result in an increase in population. The surrounding residential area would not be affected by the proposed Project, and therefore, no impact would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
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?	☐	☐	☒	☐

4.16.1 Impact Analysis

Would the Project:

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?

No Impact. The proposed Project would include active and passive areas located throughout the Project site, including a courtyard and several other landscaped areas. As a result, the recreational facilities in the area would be enhanced by providing improved recreational spaces that would be accessible to the community. The proposed Project would not increase the number of students enrolled at the campus and is not growth inducing. Therefore, the Project would not increase the use of regional facilities such that substantial physical deterioration of the facility would occur and no impacts would occur. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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?

Less than Significant Impact. The proposed Project does include recreational facilities; however, it would not require the construction or expansion of recreational facilities outside existing LAUSD-owned property. The proposed Project would include upgrades to athletic facilities on the San Pedro HS campus. These improvements would enhance the recreational facilities that are available to the community. Potential environmental impacts associated with the proposed Project (which includes improvements to the recreational facilities) are analyzed in this IS and the forthcoming Draft EIR. No significant adverse physical effect on the environment is expected as a result of the proposed Project. Therefore, environmental impacts related to community recreational facilities would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.17 TRANSPORTATION AND CIRCULATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION & CIRCULATION. Would the Project:				
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

4.17.1 Discussion

Projects implemented under the Program EIR are anticipated to have less-than-significant impacts related to transportation and circulation within the LAUSD service area with the incorporation of SCs. Applicable SCs related to Project-specific impacts to transportation and circulation are provided in Table 4.17-1.

TABLE 4.17-1

TRANSPORTATION AND CIRCULATION STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-T-2	**School Design Guide** Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

4.17.2 Impact Analysis

The proposed Project would occur on the existing San Pedro HS campus. Because the proposed Project would not increase capacity for enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project. Therefore, the analysis presented herein focuses on potential traffic impacts associated with Project construction.

Access to the Project site is provided by a series of local and regional roads. The roads that would be used by Project-related traffic (construction workers and trucks) are anticipated to be West 14th Street and West 17th Street (two-lane local streets) from Gaffey Street (four-lane arterial), and I-110 and SR 47 (regional freeways, located about two miles northeast of the Project site). The street intersections on the expected haul routes where Project truck traffic would turn generally are controlled by traffic signals or by stop signs on all approaches.

Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant Impact. As stated above, school enrollment would remain the same following construction of the Project, and there would be no permanent increase in traffic generated by the school. Construction activity associated with the proposed Project is not expected to generate a substantial number of vehicle trips (truck trips or otherwise).

Construction of the proposed Project would include onsite demolition, excavation, stockpiling, grading, and building activities. In addition, trucks would intermittently deliver building materials to the site. The work hours would be such that construction workers would primarily travel to and from the Project site outside of morning and evening peak traffic hours. In most cases, truck loading/unloading would be conducted between the hours of 7:00 a.m. and 6:00 p.m., with truck trips spread throughout the day during work hours. To assist in site ingress and egress, flaggers provided by the Project contractor(s) may be used to assist or direct traffic flows to and from the local streets. The surrounding roadways would be able to support the increase in traffic from construction workers and truck activity. Potential Project-related construction traffic impacts would be mitigated by compliance with and incorporation of LAUSD SCs, such as limiting construction-related trucks to off-peak commute periods.

As shown in Table 17-1, LAUSD requires its contractors to submit a construction worksite traffic control plan to LADOT for review prior to construction, as required by SC-T-4. A "haul route permit" may be required and obtained from LADOT. Therefore, the Project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. Level of service standards established by jurisdictions/agencies are intended to regulate long-term (permanent) traffic increases associated with new development and do not apply to short-term (temporary) traffic increases that occur during construction. As stated previously, school enrollment would remain the same following the Project, and there would be no permanent increase in traffic generated by the Project. Potential impacts associated with the proposed Project would be limited to construction activity. Specifically, increased vehicle trips and potential congestion generated by construction-related passenger vehicles and truck trips, would cease when construction is complete. Additionally, to the extent feasible, construction-related trucks (and other vehicle trips) would be limited to off-peak commute periods, consistent with SC-T-4. Implementation of the proposed Project would not result in any long-term, ongoing effects related to traffic and congestion. No impacts would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?

No Impact. The nearest airport (Torrance Municipal Airport) is located approximately 7 miles northwest of the Project site. Project construction would not change air traffic patterns. In addition, the proposed Project would not involve the installation of structures that could interfere with air space. No impact would occur from the Project. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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

Less than Significant Impact. The proposed Project would not result in any hazards due to design features or incompatible uses. The proposed Project would be implemented at an existing school site. Vehicular/bus drop-off and pickup zones would be located in the curb lane adjacent to the campus on Leland Street and 17th Street. The student drop-off and pickup operations have been planned to minimize vehicular queuing in traffic lanes on the local street system (and to reduce queuing that currently occurs on Alma Street and 15th Street). Conformance to District policies and local ordinances would ensure that adequate access would be maintained. LAUSD would implement SC-T-2, which requires that the proposed new parking areas would be designed to meet the District's School Design Guidelines which provide requirements for campus designs that ensure that potential hazards or incompatible uses are avoided. Changes to existing roadways are not part of the proposed Project. In addition, traffic generated during Project construction would be generally compatible with the mix of vehicle types (autos and trucks) currently using the regional and local roadways surrounding the campus. As such, impacts from the Project would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

e) Result in inadequate emergency access?

Less than Significant Impact. San Pedro HS is located in a developed urban area with an existing roadway network that accommodates the movements of emergency vehicles that travel in the area. Projects are required to provide emergency vehicle access for the LAFD. Conformance to District policies and local ordinances would ensure that adequate access would be maintained. Per SC-T-4, LAUSD requires its contractors to submit a construction worksite traffic control plan (including strategies to maintain emergency access at all times) to LADOT for review prior to construction. Staging areas for construction would be located on school property; therefore, emergency access to the site would not be adversely affected during Project construction. The proposed Project's impact to emergency vehicle access, therefore, would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant Impact. In general, adopted policies, plans, and programs pertaining to public transit, bicycle, and pedestrian travel are intended to be used for long-term planning purposes and do not apply to construction activities. The proposed Project would not directly or indirectly eliminate alternative modes of transportation, transportation corridors, or facilities (e.g., bus stops). Further, the proposed Project would not prevent the use of any roads on which public transit routes operate, and as stated above, school enrollment would remain the same following the Project; there would be no permanent increase in traffic generated by the school.

Students, faculty and staff can currently travel to school using public transit routes, bicycles and by walking. As discussed previously, there are sidewalks on all streets surrounding the school. In addition, LAUSD encourages

ride-sharing programs for students and teachers, as well as walking and riding bicycles to school. The Project site vicinity is served by the City of Los Angeles DASH San Pedro Route, with bus stops at West 19th Street and South Leland and South Alma streets, and by the County of Los Angeles Metropolitan Transit Authority , with bus stops for Route 205 and 550 located on West 13th Street at South Leland Street.

During construction activities, the Project may affect sidewalk accessibility within the San Pedro HS campus. However, any effects on sidewalk accessibility would be temporary (limited to construction), and the construction contractor would be required to ensure safe alternative routes are available. Therefore, pedestrian access to the school during construction would be minimally altered, and as required by SC-T-4, contractors would be required to submit a construction worksite traffic control plan (including strategies to manage pedestrian and bicycle circulation) to LADOT for review prior to construction. For these reasons, the Project would have a less-than-significant impact on the performance and safety of public transit, bicycle or pedestrian facilities. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.18 TRIBAL CULTURAL RESOURCES

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 Section21074 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

4.18.1 Discussion

The Program EIR includes SCs for minimizing impacts related to tribal cultural resources within the existing environment in areas where future Projects would be implemented under the SUP. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided in **Table 4.18-1**.

TABLE 4.18-1
TRIBAL CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-TCR-1	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

4.18.2 Impact Analysis

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) 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. To date the District has not received any tribal requests to be notified about Projects in the District. However, in the unlikely event that construction-related ground disturbance results in the discovery of potential resources, SC-TCR-1 would be implemented in order to avoid potential impacts to Tribal resources. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in PRC Section 21074. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. To date, LAUSD has not received any requests for notification or consultation from California Native American Tribes regarding resources defined by PRC Section 21074. No Tribal cultural resources were identified in the Project site and there is no substantial evidence that Tribal cultural resources have the likelihood of being discovered on the campus. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in PRC Section 21074. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.19 UTILITIES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES. Would the Project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the Project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

4.19.1 Discussion

The Program EIR includes SCs for minimizing impacts to utilities and service system in the existing environment in areas where future Projects would be implemented under the SUP. Applicable SCs related to Project-specific impacts to utilities and service systems are provided in **Table 4.19-1**.

TABLE 4.19-1
UTILITIES AND SERVICE SYSTEMS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-USS-1	**School Design Guide.** Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. **Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.** This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.

4.19.2 Impact Analysis

Would the Project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. The City of Los Angeles Department of Public Works (LADPW) provides wastewater services for the Project site. The Project site is located within the Terminal Island Water Reclamation Plant (TI WRP). The TI WRP is designed to treat 15 million gallons per day, but it experiences a lower average dry-weather water flow, resulting in available treatment capacity.[92]

Construction of the proposed Project would generate a minimal volume of wastewater and would nominally increase wastewater generation. Implementation and operation of the proposed Project would not change the existing uses or introduce new uses that would exceed the wastewater treatment requirements of the Los Angeles RWQCB. As discussed previously in Section 4.6, *Geology and Soils*, the proposed Project would be required to prepare a SWPPP outlining the BMPs to be implemented to avoid or minimize runoff discharges. Further, the SWPPP would include erosion control BMPs to control and minimize erosion and sedimentation being discharged from the Project site. Additionally, any wastewater discharge by the proposed Project would be required to comply with the NPDES permit requirements. Therefore, compliance with these existing

[92] LACSD. Terminal Island Water Reclamation Plant. Available at : https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tiwrp;jsessionid=J5jyOxBrCkF_2KlhE5ic39I32PdhvmlPORNnbi7iAPKr7WQ7Qzjf!416075125!-628142333?_afrLoop=6390492630176527&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D6390492630176527%26_afrWindowMode%3D0%26_adf.ctrl-state%3D184v3zyvoo_4, accessed August 17, 2017.

regulations would result in a less-than-significant impact to wastewater treatment requirements. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

Less than Significant Impact. The proposed Project would be developed in three phases over a 3 to 4-year period. The construction schedule would have limited to no overlap between phases. All construction would occur during daytime hours, specifically 7:00 a.m. to 7:00 p.m. Monday through Friday. Construction is anticipated to begin in January 2019 and to be completed in March 2022. The proposed Project is estimated to require on average approximately 150 construction personnel per day for the heaviest period of construction. During construction, water would be required for activities such as dust control; however, these activities would be limited and temporary and would not consume large amounts of water. While wastewater at the Project site would be primarily generated by construction activities and construction workers, due to the temporary nature of the construction activities and the minimal number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, impacts associated with Project construction would be less than significant No mitigation is required and this issue will not be further analyzed in the Draft EIR.

The proposed Project would not result in increased enrollment or capacity. Therefore, implementation of the proposed Project would not increase total water consumption within the District, and would not require construction of new or expanded water treatment facilities, and impacts related to Project operation would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

c) Require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. As discussed previously in Section 4.9, *Hydrology and Water Quality*, construction of the proposed Project would require implementation of a SWPPP, which would outline construction BMPs for site drainage and implement an appropriate combination of monitoring and resource impact avoidance. In addition, the proposed Project would use the existing stormwater drainage facilities and would not significantly alter the onsite drainage patterns. A preliminary pre- and post-construction analysis was completed utilizing a 25-year storm event. Based on the findings, the proposed Project would not result in an increase in peak flow. The proposed Project would not require or result in construction or expansion of stormwater drainage facilities. The proposed Project site is located in a developed area of the City of Los Angeles, which contains an existing stormwater collection and conveyance system. The Project site is an existing school campus, and the proposed Project would include landscaping features which would reduce stormwater runoff from the Project site. In addition to compliance with NPDES permit requirements, applicable laws, regulations, and practices, construction and operation would ensure that impacts associated with runoff would not exceed the capacities of existing stormwater drainage systems. Implementation of SC-USS-1 and SC-USS-2 would ensure that impacts would be less than significant. Therefore, the proposed Project would not require or result in the

construction of new stormwater drainage facilities or expansion of existing facilities and impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. Construction of the proposed Project would require water use for construction activities, such as dust control measures. However, these activities would be limited and temporary, and as such, would not consume large quantities of water such that additional supplies would be required. Therefore, short-term impacts associated with requiring additional water supply would be less than significant.

Although overall square footage of buildings would increase and efficiencies may reduce the amount of water used in the building, it is assumed that water demand would remain the same as the existing conditions due to no increase in capacity, landscaping and associated irrigation systems. Therefore, the demand for non/potable water supply would be accommodated by existing supplies. Therefore, the long-term impact to non/potable water supply would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

e) Result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?

Less than Significant Impact. During construction of the proposed Project, wastewater at the Project site would be primarily generated by construction activities and construction workers. However, due to the temporary nature of the construction activities and the limited number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, short-term impacts associated with wastewater treatment would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

Although overall square footage of buildings would increase, it is assumed that wastewater demand would remain the same as existing conditions. The proposed Project would not increase student capacity. Therefore, the demand of wastewater and wastewater treatment would be accommodated by existing conditions. Therefore, the long-term impact to wastewater treatment capacity would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Less than Significant Impact.

Excavated soil would be either directly loaded into staged trucks or temporarily stockpiled on plastic liners next to the excavation areas until it could be loaded out for off-site disposal. The soil would then be transported off-site to an appropriate licensed facility for disposal, based on previous waste profile characterization results.

The excavated soil would be segregated and managed as non-hazardous, non-RCRA hazardous, or RCRA hazardous waste.

Non-hazardous soils would be transported to an approved Class 3 landfill for disposal or use as daily cover. Non-RCRA and RCRA hazardous soils would be transported to a licensed and properly permitted Class 1 disposal facility or an out-of-state facility permitted to accept hazardous waste. The Class 1 disposal facility that accepts the RCRA hazardous soil may require that the soil be treated prior to disposal pursuant to the land ban restrictions found at Title 40, CCR, Part 376.

All non-RCRA hazardous or RCRA hazardous wastes would be disposed of at a California Class I land disposal facility or an out-of-state landfill permitted to accept such wastes. The waste management facilities listed below may be selected for this Project:

- Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman, California 93239, Phone: (559) 386-9711
- Clean Harbors Buttonwillow, LLC, 2500 West Lokern Road, Buttonwillow, California, 93206, Phone: (661) 762-6200

The Kettleman Hills Facility has a remaining capacity of 500,000 cy[93] and the Clean Harbors Buttonwillow Facility has a remaining capacity of 4,900,000 cy.[94] The total combined permitted remaining capacities for Class I land disposal facilities is more than 5,000,000 cy. The disposal of up to 500 cy of soil would represent less than 1 percent of the combined permitted remaining capacities, and the Project would not exceed or significantly reduce the available landfill capacities.

Prior to Project construction, demolition of 13 buildings would occur, totaling approximately 50,904 square feet, which could generate up to 2,428 tons of debris. The Project site is served by the Los Angeles County Sanitation District (LACSD), which includes sanitary landfills, recycle centers, materials recovery/transfer facilities, and energy recovery facilities. The nearest such facility, the Puente Hills Materials Recovery Facility (MRF) accepts construction/demolition waste. The Puente Hills MRF is permitted to receive up to 4,400 tons per day and accepts on average approximately 2,760 tons per day, which leaves a remaining capacity of approximately 1,640 tons per day.[95] Thus, it is anticipated that the Puente Hills MRF would have sufficient capacity to accept the Project-related debris and would be able to accommodate the proposed Project's solid waste disposal needs during construction. Therefore, the short-term impact associated with construction would be less than significant.

Operation of the proposed Project would generate similar quantities of solid waste compared to existing conditions. Compliance with all applicable regulations related to reducing solid waste would ensure proper handling and disposal of solid waste associated with operation of the proposed Project. Additionally, all solid waste facilities serving the Project area have remaining intake capacity. Compliance with existing regulations

93 Chemical Waste Management, Inc., Remaining Landfill Capacity: https://www.wmsolutions.com/pdf/brochures/CWM_Kettleman_Hills_Brochure.pdf
94 Nielsen, David, Clean Harbors Buttonwillow, telephone conversation on March 31, 2016.
95 LACSD. Puente Hills Materials Recovery Facility. Available at: http://www.lacsd.org/solidwaste/swfacilities/mrts/phmrf/phmrffactsheet.asp, accessed August 11, 2017.

would ensure that operation of the proposed Project would result in a less than significant impact. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. The proposed Project would comply with all applicable federal, State, and local statutes and regulations related to the handling and disposal of solid waste materials. Construction debris would be handled and disposed of according to District Specification 01 4524, LAUSD's SCs (including but not limited to: SC-USS-1), and the applicable local and regional standards. Operation of the proposed Project would generate similar quantities of solid waste compared to existing conditions, and would require disposal within a landfill. Compliance with all applicable regulations related to reducing solid waste would ensure the proper handling and disposal of solid waste associated with the proposed Project. The proposed Project would comply with the recycling requirement in AB 341, as well as the construction and demolition (C&D) waste recycling/reuse requirement in California Green Building Standards Code Section 5.408, and LAUSD School Design Guide & Specification 01340, Construction and Demolition Waste Management, that requires the collection and separation of all C&D waste materials generated onsite, reuse or recycling onsite, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum 75 percent of the C&D waste generated. Therefore, impacts would be less than significant. No mitigation is required and this issue will not be further analyzed in the Draft EIR.

4.20 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the Project 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?	☒	☐	☐	☐
b. Does the Project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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 cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

4.20.1 Impact Analysis

Does the Project:

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

Potentially Significant Impact. As discussed in Section 4.4, *Biological Resources*, the proposed Project would not impact any endangered fauna or flora. Further, because of the developed, residential nature of the Project vicinity, construction and operation of the proposed Project would not impact the habitat or population of the Project site and the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in Section 4.5*, Cultural Resources***,** as excavation occurs, cultural resources may be impacted. The Draft EIR will address the Project's potential impact on cultural resources and mitigation measures will be recommended, where necessary.

b) 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)?

Potentially Significant Impact. Implementation of the proposed Project could contribute considerably to cumulative impacts. Each of the issues identified above as potentially significant will be evaluated for cumulative impacts within the Draft EIR. Mitigation measures will be recommended, if necessary.

c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Implementation of the proposed Project could result in significant impacts that may result in substantial adverse effects on human beings. These potential effects will be addressed in the Draft EIR, and mitigation measures will be recommended, if necessary.

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