

INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM

1. Project Title: International Studies Learning Center Addition Project

2. Lead Agency Name and Address:

Los Angeles Unified School District
333 South Beaudry Avenue
Los Angeles, California 90017

3. Contact Person and Phone Number:

Edward Paek, AICP
CEQA Project Manager/Contract Professional
LAUSD Office of Environmental Health and Safety
(213) 241-4676

4. Project Location:

5225 Tweedy Boulevard
South Gate, California 90280

5. Project Sponsor's Name and Address:

Los Angeles Unified School District
333 South Beaudry Avenue
Los Angeles, California 90017

6. General Plan Designation:

Tweedy Boulevard Specific Plan

7. Zoning:

Residential Neighborhood Zone: Civic (CV)

8. Project Description:

Proposed Project

The proposed project is comprised of the following components: (1) an addition to the existing Legacy High School Complex (LHSC) campus for International Studies Learning Center (ISLC) middle school students; and (2) removal of portable buildings from the South Gate Middle School campus.

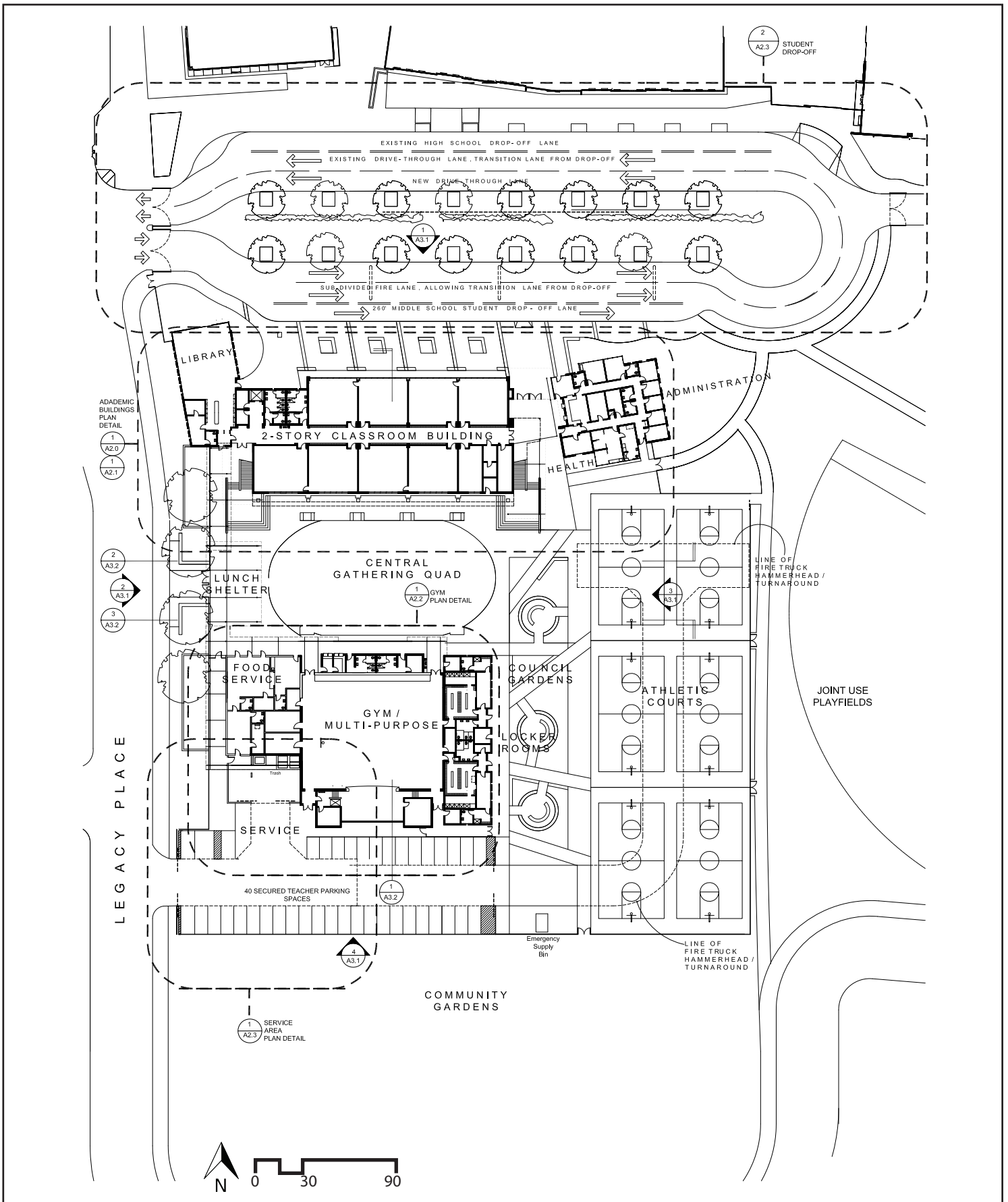
The ISLC Addition would be constructed on an undeveloped portion of the LHSC campus located at 5225 Tweedy Boulevard, South Gate, California. Formerly known as South Region High School #9 (or SRHS#9), the LHSC has been in operation on the project site since 2012 and

is comprised of three individual high schools; Science Technology Engineering Arts and Math (STEAM) High School, Visual And Performing Arts (VAPA) High School, and ISLC High School. ISLC currently operates on two campuses; classes for middle school students (grades 6 through 8) are held on the Southeast Middle School campus located at 2560 Tweedy Boulevard while classes for high school students (grades 9 through 12) are offered at the LHSC campus. Upon completion of the proposed project, the ISLC middle school program that is currently operating on the Southeast Middle School campus would be relocated to the ISLC campus.

The ISLC Addition would develop 4.9 acres of currently undeveloped land on the existing LHSC campus with 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a multi-purpose room (MPR) and gym. Buildings constructed under the proposed project would be a maximum of two stories tall and up to 27 feet in height. **Figure 1, Proposed Project Site Plan**, shows the footprint and layout of the proposed project. A detailed description of the proposed project's components and architecture design is provided below.

Subsequent to the construction of the ISLC Addition, approximately 17 classrooms in aging and deteriorating portable buildings located on the South Gate Middle School campus will be removed. It is unknown at this time whether the portable buildings will be stored at a separate site or if the buildings will be demolished. For the purpose of this analysis, it was assumed that the portable buildings would be demolished. The South Gate Middle School campus is located approximately 1.5 miles northwest of the project site at 4100 Firestone Boulevard in the City of South Gate. South Gate Middle School maintains the Los Angeles Unified School District's (LAUSD or District) second largest middle school student population, with approximately 2,200 students. The relocation of the ISLC middle school students from the Southeast Middle School campus to the ISLC Addition would allow for the realignment of middle school enrollment in the South Gate area. Further, the District will enact a "Zone of Choice"¹ policy for middle school students in the South Gate Area. As such, the need for portable buildings at South Gate Middle School will be reduced.

¹ Zones of Choice are geographic areas comprised of multiple school options. The school options in each zone are open to all resident students and represent the demographics of the local area.



SOURCE: Kemp Bros Construction and Gonzalez Goodale Architects

FIGURE 1

Project Location and Surrounding Uses

The project site is located on 4.9 undeveloped acres on the 35.2-acre LHSC campus within the City of South Gate in the southeastern portion of Los Angeles County (refer to **Figure 2, Legacy High School Complex and Project Site**). The project site is bordered by Tweedy Boulevard to the north, Chakemco Street to the south, Adella Avenue to the east, and an aluminum forger and a truck sale business to the west. A surface parking lot with 58 parking spaces occupies the northeast portion of the project site. The remaining portion of the project site is vacant; however several electrical poles traverse the site with ruderal vegetation located intermittently throughout the site.

The main LHSC campus is located directly north of the project site across Tweedy Boulevard. A concrete channelized portion of the Los Angeles River is located approximately 1,200 feet to the east, beyond which is Interstate 710 (I-710). A strip mall comprised of commercial uses (e.g., a post office, produce store, auto service shop and car wash) is located west of the site along Atlantic Avenue. A vacant parcel owned by the District separates the project site from existing single-family residences that are located approximately 550 feet to the south. A future community garden is planned for this site (refer to **Figure 3, Surrounding Land Uses**).

As part of the original LHSC development plan, the District is still executing various on-site and off-site improvements. These improvements include building new regional athletic fields on the southern 16 acres of the LHSC site (directly to the east of the proposed project site), widening Tweedy Boulevard between Atlantic Avenue and the LHSC, vacating portions of Chakemco Street and Adella Avenue, and creating a new perimeter roadway (to be called Legacy Lane) between Tweedy Boulevard and Burtis Avenue (see Figure 2). These various improvements were analyzed as part of the original CEQA documentation for the LSHC and are expected to be completed prior to completion of the proposed project.^{2,3}

Project Background

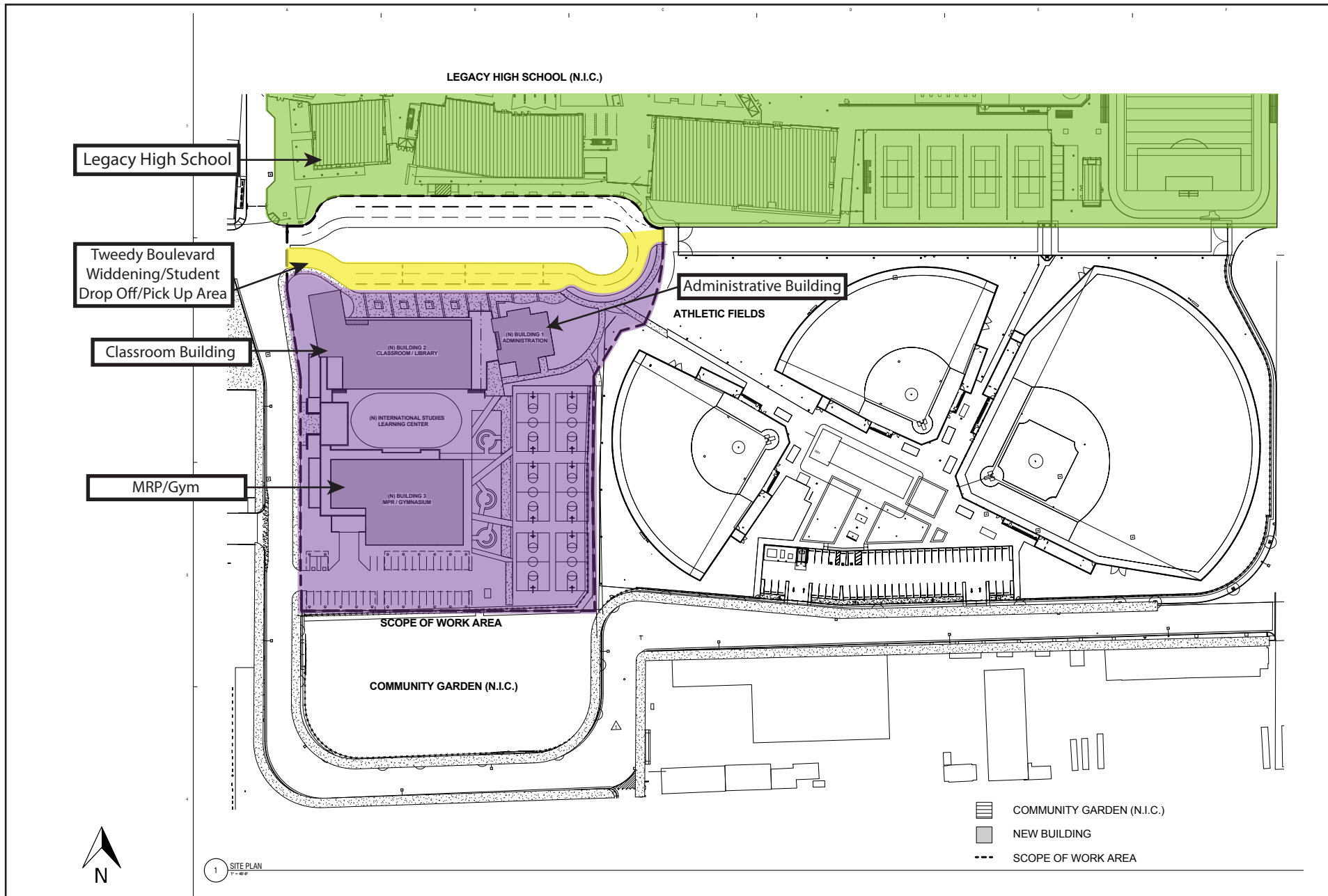
During the 2015-2016 school year, 868 middle and high school students attended ISLC, including 408 students in 6th, 7th, and 8th grades, and 460 students in 9th through 12th grades. Upon completion of the proposed project, the ISLC middle school program that is currently operating on the Southeast Middle School campus would be relocated to the ISLC campus. No changes would be made to the ISLC high school program, and the classes for the ISLC high school students would continue to be held on the LHSC campus.

The LHSC campus is owned by the District. Prior to being purchased by the District in the 1980s, the project site was used for light industrial and commercial operations including: automotive repair, fabrication of metal parts for automotive use, machining of metals, woods, and plastics, and pesticide formulation and testing. These historic uses resulted in

² LAUSD South Region High School No. 9 Draft EIR, December 2008

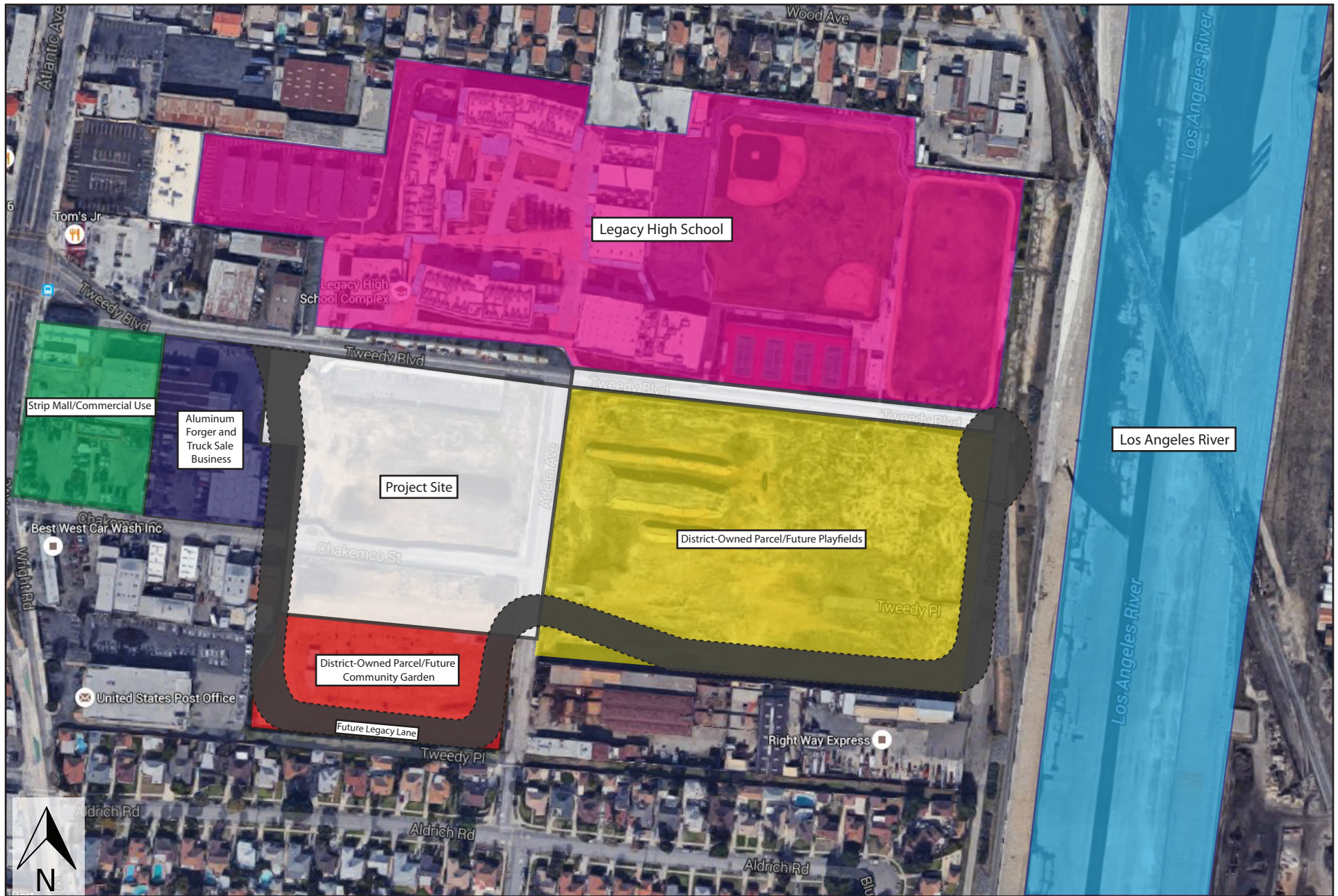
³ LAUSD South Region High School No. 9 Recirculated Draft EIR, May 2009

contamination of the soil, soil vapor and groundwater on the project site. Through a series of environmental investigations and subsequent remedial actions, the District has received a “No Further Action” from the Department of Toxic Substances Control (DTSC) in 2013 which allows for school construction to proceed. The District continues to monitor groundwater and soil vapor concentrations in the vicinity of the LHSC campus. Ongoing monitoring is expected to continue until at least 2020.



SOURCE: Kemp Bros Construction and Gonzalez Goodale Architects

FIGURE 2



SOURCE: Google Maps, 2016

FIGURE 3

Surrounding Land Uses

School Buildings

The proposed project is an educational facility that would provide programming and a new campus for the ISLC middle school students. Three buildings, including a 4,528 square foot administration building, 16,195 square foot MPR and gym, and 28,915 square foot classroom building would be constructed on the project site (totaling 49,638 square feet), as well as a 2,147 square foot lunch shelter.

The two-story classroom building would be comprised of 16 permanent classrooms and a library. The classroom building would be located on the northern portion of the project site immediately adjacent to the middle school student drop off and pick up lane (along Tweedy Boulevard) and the administration building. The one-story administration building would be located in the northeastern corner of the project site and would provide office space for school administrators, as well as the school nurse. The MPR and gym would be located on the southern end of the project site. The MPR and gym would be available for student gatherings, community events, and indoor eating as necessary. The covered lunch shelter would be contiguous to the MPR and gym. The buildings and lunch shelter would be configured in a courtyard formation to optimize supervision and sight lines from the administration building and all other programmed spaces on the project site. The main courtyard would be located in the center of the site and would be separated from the six basketball/volleyball courts by a tree grove and three small gardens.

Access and Circulation

The student drop off and pick up operation has been planned to minimize both potential vehicular queuing on the local street system and conflicts with the existing LHSC drop off and pick up operations. In addition, it is designed to address potential safety issues associated with the ISLC middle school student drop-off and pick-up operations.

A separate curbed vehicular drop off and pick up lane, similar to the existing LHSC drop off and pick up lane, would be located along Tweedy Boulevard. Under the proposed project, Tweedy Boulevard would be widened to accommodate a cement tree-lined median and an eastbound 12 foot drop off and pick up lane, as well as two eastbound 12 foot drive-through lanes. As shown in **Figure 1**, the vehicle queuing area would extend from the classroom building to the administration building and will allow for approximately 16 vehicles to queue completely on-site during drop-off and pick-up times. Speed humps would be installed in the two drive-through lanes to reduce vehicles' speeds. Signage would be installed along the parkway and would prohibit parking in the drop off and pick up area during arrival and dismissal times.

The surface parking lot located on the southern portion of the project site would be designated for faculty and staff use. Faculty and staff would access the secured surface parking lot via the future Legacy Lane.

The proposed project has been designed as a secure campus with access to the site controlled by gates and fences. The main school entrance would be located along Tweedy Boulevard, between

the classroom and administration buildings. Access to the ISLC facility would be provided through a gated breezeway. A chain link fence would be installed along the faculty and staff parking lot and the basketball and volleyball courts (along the eastern and southern perimeters). A wrought iron fence buffered with hedges and trees would be installed along the western boundary of the site. Secured gates will be located along the perimeter of the project site. Students will be able to access the site using the main entrance and the Legacy Lane gate.

Design and Architectural Features

The architectural style of the new buildings can be described as a “simplistic industrial.” **Figures 4 and 5, Proposed Project Renderings**, illustrate the design scheme for the proposed buildings. The massing of the buildings would be broken up with expansive windows that would be visually compatible with the buildings located on the developed portion of the LHSC campus. The proposed project would incorporate a large central courtyard with seating and trees. Two patios would flank the courtyard. The patio constructed along the south side of the classroom building would include a student reading garden, while the patio located along the north side of the MPR and gym building would include a faculty lunch garden. Security lighting would be provided using lighting fixtures that are designed to reduce glare, light trespass, and sky glow. Utilities located at ground level and on the roof would be screened with landscaping, fencing, and/or walls, as appropriate and depending on location. The proposed project would not include the use of materials that are highly reflective. Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façade and rooftop would be submitted for review by the Division of the State Architect (DSA) to ensure that highly reflective materials are not utilized.

Los Angeles Unified School District
THE INTERNATIONAL STUDIES LEARNING CENTER ADDITION



SOURCE: Kemp Bros Construction and Gonzalez Goodale Architects

FIGURE 4



View From Council Gardens Into Main Courtyard



View Looking From Drop-Off Round-About To Middle School Entry Breezeway



View Approaching Campus Drop - Off From Tweedy

SOURCE: Kemp Bros Construction and Gonzalez Goodale Architects

FIGURE 5

Recreation and Landscaping

As shown in **Figure 6, Proposed Project Landscape Plan**, a large courtyard with landscaping and bench seating would be located in the center of the project site providing students with an area to play. Basketball and volleyball courts would be located along the eastern portion of the site. New street trees and hedges would be planted around the perimeter of the project site. Vines are proposed for the wrought iron fence along Tweedy Lane. In addition, the proposed project includes planting areas throughout the project site including a Fruitless Maidenhair tree grove and circle gardens located adjacent to the MPR and gym building, accent trees, and a variety of succulent plantings at the northwest corner of the site.

As part of the proposed project, nighttime field lights would be added to the athletic fields planned for the southern portion of the LHSC campus. These lights would conform to the District's Design Standards for field lighting.

Program EIR for the School Upgrade Program

The proposed project is part of the District's School Upgrade Program (Program EIR). Therefore, this Initial Study, where applicable, incorporates the Program EIR by reference, thereby providing project-level analysis that concentrates on site-specific issues related to the proposed project.⁴ Applicable Standard Conditions of Approval (SC) provided therein are cited in this Initial Study. The Program EIR is available for review online at <http://achieve.lausd.net/ceqa> and at LAUSD's office listed above.

⁴ LAUSD School Upgrade Program Final EIR, certified November 10, 2015. <http://achieve.lausd.net/ceqa>



- Legend**
- 1 Main Courtyard with World Map Themed Paving
 - 2 Contrasting Color Concrete Accent Band
 - 3 Color Concrete Field Paving
 - 4 Dry Creek with Decorative Rocks and Boulders
 - 5 Council Circle Gardens
 - 6 Seat Walls
 - 7 Hedge Planting for Screening
 - 8 Overhead Canopy Lunch Structure
 - 9 Accent Trees: Desert Museum Palo Verde
 - 10 Patios with Enhanced Paving and Small Trees
North: Student Reading Garden
South: Faculty Lunch Garden
 - 11 Wrought Iron Fence with Vine Planting
 - 12 Tree Grove: Ginkgo biloba 'Autumn Gold' -
Fruitless Madenhair Trees
 - 13 Perimeter Evergreen Trees: Southern Live Oak or
European Frutless Olive
 - 14 D.G. Paving
 - 15 Natural Gray Concrete Sidewalk
 - 16 Hedge-Consolidated Fencing in Traffic Boulevard
 - 17 Accent Paving at Main Campus Entry/Breezeway
 - 18 Succulent Mix Planting with Decorative Rocks
 - 19 Flag Poles Circle Carrying International Flags
 - 20 Laser-Cut Steel City-Map Screen
w/ Projection Screen Above
 - 21 Chain Link (South and East Perimeters)
 - 22 Gate
 - 23 Bench
 - 24 Emergency Bin

SOURCE: Kemp Bros Construction and Gonzalez Goodale Architects

FIGURE 6

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

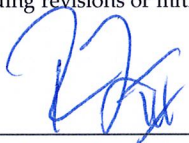
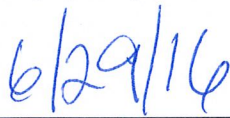
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gases | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input checked="" type="checkbox"/> Pedestrian Safety | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation and Traffic | <input type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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

Signature

Date

Robert Laughton, Director
 Office of Environmental Health & Safety
 CEQA Officer of the Los Angeles Unified School District

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

Issues:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, tress, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Responses:

a) **No impact.** Scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The project site is located in the City of South Gate, on an undeveloped portion of the LHSC campus, in a highly urbanized area surrounded by a mix of light industrial, light manufacturing, commercial, and single-family residential uses. There are no designated scenic vistas in the City or proximate to the project site.^{5,6} Further, due to the relative flat topography, intervening structures, and the density of development in the surrounding area, expansive views of the surrounding environment are not visible from the project site.

Although the proposed project would change existing views by adding new structures, no scenic vistas would be affected. In addition, regarding viewshed obstruction, the proposed project would be subject to **Standard Condition of Approval (SC) SC-AE-3** included in the Program EIR and listed below.

- **SC-AE-3:** LAUSD shall assess a proposed project’s consistency with the general character of the surrounding neighborhood, including any proposed

⁵ City of South Gate General Plan, May 2009.

⁶ California Department of Transportation, *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed May 19, 2016.

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.

Thus, no impact would occur and no further analysis is required in the EIR.

- b) **No impact.** No freeways, highways, or roads within or adjacent to the project site are designated as state scenic highways. The closest state designated highway, the Angeles Crest Highway (State Route 2), is approximately 19 miles north of the project site.⁷ In addition, the California Department of Transportation (Caltrans) has designated a six mile portion of the Arroyo Seco Parkway (e.g., State Route 110 (SR-110)) as a historic parkway. The Arroyo Seco Parkway is approximately 14 miles northwest of the project site. As no scenic freeways, highways, or roads are located proximate to the project site, no impact would occur and no further analysis is required in the EIR.
- c) **Less than significant impact.** Excluding the 58-space surface parking lot, the project site is vacant and exhibits low visual quality. The proposed project would alter the existing visual character of the project site from a vacant lot to a middle school campus consisting of three buildings with a maximum height of 27 feet. However, this change would not be considered adverse, as the project site does not currently possess high aesthetic value.

During the 24 month construction period, the presence of equipment and material storage, as well as exposed dirt, and trucks would result in temporary, short-term visual impacts. In a visual sense, construction impacts from the proposed project would be obtrusive and out of character with the surrounding area. As construction activities would be temporary, the visual impacts associated with construction will cease after completion.

The buildings surrounding the project site vary in age and architectural style from more contemporary structures located on the LHSC campus to single-story industrial spaces, and single-story standalone retail/commercial buildings that do not exhibit any one particular architectural style. The proposed project would be consistent with the general urban character of the surrounding area and the existing uses in the immediate vicinity of the project site. The proposed project's design is a "simplistic industrial" style that is compatible with the buildings located on the developed portion of the LHSC campus. The plant material, including the perimeter street trees, vines, and succulent plantings will act to soften the building facade and provide a buffer between the buildings and sidewalk.

⁷ California Department of Transportation, *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed May 19, 2016.

From an architectural perspective, the LAUSD School Design Guide⁸ (most recently adopted in 2015) provides guidance to design professionals, including in-house design professionals, to establish a consistent level of quality in school facilities throughout the District. As part of the application for development, the proposed project would be required to comply with the Submittal Requirements Checklist included in Book Four of the LAUSD School Design Guide, demonstrating that the proposed project is substantially consistent with the applicable design requirements for site planning, design, pedestrian scale, plants, utilities, and easements. Thus, impacts would be less than significant and no further analysis is required in the EIR.

- d) **Less than significant impact.** Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as a window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprise of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The proposed project would be constructed on an infill site. There are no structures currently located on the site. The project site is located in an urban environment characterized by high levels of ambient nighttime illumination. However, as the only nighttime lighting currently present on the undeveloped project site includes five street lights located around the perimeter of the existing surface parking lot, nighttime illumination levels are not high at the project site. As part of the proposed project, funding is expected to be available to upgrade field lighting at the athletic fields being developed in the southern portion of the LHSC site. Uses surrounding the project site that are sensitive to light levels and glare include single-family residences approximately 500 feet to the south.

Development of the project site would replace the vacant lot with three buildings, a covered lunch structure, a courtyard, landscaped areas, and basketball and volleyball courts. As part of the proposed project, funding is expected to be available to upgrade field lighting at the athletic fields being developed in the southern portion of the LHSC site.

The proposed project would increase the nighttime illumination of the project site from current levels. Lighting associated with the proposed project would include interior lights, courtyard lighting, campus marquees, architectural and/or thematic accent lights to highlight building elements, soft accent lighting for landscaping where appropriate, exterior security lighting, wall- or pole-mounted light fixtures, and field lighting. All

⁸ LAUSD School Design Guide 2015, <http://www.laschools.org/new-site/asset-management/school-design-guide>, accessed June 17, 2016.

new outdoor lighting being added as part of the proposed project would be subject to **SC-AE-6 through SC-AE-8** included in the Program EIR and listed below.

- **SC-AE-6:** During and after installation of lights, the Project shall comply with the School Design Guide, which outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
- **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

All lighting of outdoor areas will be directed onto the project site, including on walkways, parking areas, play areas (including basketball and volleyball courts), and away from adjacent properties and public right of way to avoid any light impacts from lighting fixtures included in the proposed project. Furthermore, the new street trees and hedges that would line the perimeter of the site would also minimize light spillover.

Implementation of these SCs would ensure impacts related to light and glare remain less than significant. No further analysis in the EIR is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **No impact.** The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland.” The project site is not located within an area designated as Important Farmland.⁹ The project site is located within an urbanized area of the City of South Gate. Although the project site is currently vacant, the site has been previously disturbed and was formerly developed with commercial and light industrial uses. No impact on farmland or agricultural resources would occur and no further analysis is required in the EIR.
- b,e) **No impact.** The project site is located within the Tweedy Boulevard Specific Plan area and zoned Residential Neighborhood Zone: Civic (CV). No agricultural use is permitted within these zoning designations and no conversion of Farmland would result from the proposed project.¹⁰ Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly the project site does not contain any lands covered by a Williamson Act Contract. Therefore, the proposed project would have no impact on agricultural zoning, Williamson Act contracts, and/or conversion of Farmland. No impact would occur and no further analysis is required in the EIR.
- c,d) **No impact.** There are no forest lands or timberlands on the project site. Consequently there is no conflict with rezoning of forest or timberlands. No impact would occur and no further analysis is required in the EIR.

⁹ California Division of Land Resources Protection, Farmland Mapping and Monitoring Program, website, <http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed May 26, 2016.

¹⁰ City of South Gate Zoning Map, March 2015.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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:</p>				
<p>a) Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>d) Expose sensitive receptors to substantial pollutant concentrations?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>e) Create objectionable odors affecting a substantial number of people?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Responses:

- a) **Potentially significant impact.** The project site is located within the South Coast Air Basin (SoCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a 2012 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California

Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of South Gate. The 2016 RTP/SCS, adopted on April 7, 2016 accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040. While the 2016 RTP/SCS projects an increase in population, number of households, and jobs in the region, according to the Program EIR, student enrollment throughout the District is forecast to decrease by 2.2 percent over the next 10 years (from 2014 to 2024). Thus, the proposed project would not increase student enrollment in the area, but instead would allow the current ISLC middle school students to relocate from the Southeast Middle School campus to the new ISLC facility.

The project site is vacant, and as such does not currently generate any air pollutant emissions. A minimal amount of vehicular emissions are generated by the vehicles that currently park in the surface parking lot located on north portion of the project site. Construction activities associated with the proposed project would generate exhaust from construction equipment and increased vehicle trips, fugitive dust from demolition of the surface parking lot, and ground-disturbing activities, and off-gas emissions from architectural coatings and paving. In addition, removal of the portable buildings located on the South Gate Middle School campus will generate vehicle exhaust.

Operation of the proposed project would increase development intensity in the area and could result in a potential increase in the criteria air pollutants. The EIR will evaluate the proposed project for consistency with regional growth forecasts and any impacts the proposed project may have on the attainment of regional air quality objectives.

- b) Potentially significant impact.** Short-term air pollutant emissions would occur during site preparation and construction activities associated with the proposed project. Construction activities have the potential to generate fugitive dust, stationary-source emissions, and mobile-source emissions. Construction emissions can vary substantially from day to day, depending on the level of activity, type of machinery in use, and for fugitive dust, the prevailing weather conditions.

In addition, the proposed project would generate long-term operation emissions. An air quality analysis will be conducted for the proposed project to determine if the resulting short- or long-term emissions would exceed SCAQMD's regional significance thresholds. This issue will be analyzed further in the EIR.

- c) 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 Air Acts. The project site is in the SoCAB, and is designated under the California ambient air quality standards (AAQS) as nonattainment for ozone (O₃), coarse inhalable

particulate matter (PM10), and fine inhalable particulate matter (PM2.5). The SoCAB area is attainment for nitrogen oxides (NO_x) (a California standard only). Under the National AAQS, the SoCAB area is designated as nonattainment for ozone O₃, and fine inhalable particulate matter PM2.5, but is within the attainment parameters for coarse inhalable particulate matter (PM10).¹¹ Construction of the proposed project may increase existing levels of criteria pollutants and contribute to the nonattainment/attainment status for these criteria pollutants in the SoCAB. As mentioned above, short-term air pollutant emissions would occur during construction activities associated with implementation of the proposed project. In addition, the proposed project would generate long-term operational emissions. An air quality analysis will be prepared to determine if implementation of the proposed project results in a cumulatively considerable net increase in any criteria air pollutant. This issue will be analyzed further in the EIR.

- d) **Potentially significant impact.** An impact is significant if sensitive receptors (such as children and the elderly) are exposed to substantial pollutant concentrations such as toxic air contaminants (TACs) and CO concentrations. Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The land uses located within the vicinity of the project site that are sensitive to air pollution include residential uses (located approximately 550 feet south of the project site), schools (including STEAM high school, VAPA high school, and International high school), churches, and parks. The EIR will evaluate the potential for the construction and operation of the proposed project to exceed SCAQMD's localized significance thresholds (LSTs) in accordance with SCAQMD's guidance methodology, generate traffic that results in significant CO hotspots, or generate substantial TACs. This issue will be analyzed further in the EIR.
- e) **Less than significant impact.** Potential sources that may emit odors during the 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 will be typical of most construction sites. Additionally, the odors would be temporary, and construction activity will be required to comply with **SC-AQ-2** through **SC-AQ-4** (listed below), and SCAQMD Rules 402 and 1113.¹² A less than significant impact relative to an odor nuisance would occur during construction associated with the proposed project.

¹¹ California Environmental Protection Agency Air Resources Board, National and State Area 2014 Designations, <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed May 26, 2016.

¹² SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The purpose of SCAQMD Rule 1113 is to limit the VOC content of architectural coatings used in the SCAQMD.

- **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 threshold.

LAUSD shall mandate that construction bid contracts include 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:

Exhaust Emissions

- 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.

Fugitive Dust

- 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.

General Construction

- 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.

According to the SCAQMD *California Environmental Quality Act (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.¹³ 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 in a manner as to minimize odors, as required by the City of South Gate and Los Angeles County Health Department regulations, and be emptied on a regular basis. Therefore,

¹³ South Coast Air Quality Management District, CEQA Air Quality Handbook; <http://www.aqmd.gov/ceqa/hdbk.html>, December 11, 2015.

the implementations of the proposed project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required in the EIR.

Issues:	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 modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

a-d & f) No impact. The project site is located in an urban area of the City of South Gate. Although the project site is currently vacant, the site has been previously developed with commercial and light industrial uses. No threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats, or wildlife corridors exist on this project site. While a portion of the Los Angeles River is located approximately 1,000 feet to the east, the segment closest to the project site is paved and does not support any habitat for threatened, endangered, or rare species. The site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The site is neither within nor proximate to any Significant Ecological Area, Land Trust, or Conservation Plan.¹⁴ No impact would occur and no further analysis in the EIR is required.

e) No impact. The project site has been previously disturbed and is located in a developed area. No trees, watercourses, and/or greenbelts are located on the project site.

¹⁴ Los Angeles County Department of Regional Planning, Significant Ecological Area Update Study 2000, Figure 1 Significant Ecological Areas Update Study 200 Existing Boundaries, accessed May 26, 2016.

Implementation of the proposed project would not interfere with the migration of any native species and/or result in the removal of any trees, as no trees exist on the site. Therefore, no impact would occur and no further analysis in the EIR is required.

Issues:	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 the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Responses

- a) **No impact.** A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.¹⁵ Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

Although past uses on the site include commercial and light industrial uses, the project site is currently vacant. As no buildings are located on the site, the proposed project would not cause any substantial adverse change in the immediate surroundings such that the significance of a historical resource would be materially impaired and impacts

¹⁵ California Public Resources Code Section 21084.1

would be less than significant. Following the construction of the ISLC Addition, portable buildings located on the South Gate Middle School campus will be removed. Removal of the classroom buildings would not result in ground-disturbing activities. As such, no adverse impact to historical resources would occur, and no further analysis is required in the EIR.

- b) **Less than significant impact.** Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. Under AB 52, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. "Tribal cultural resources" are defined as either (1) "sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the state register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the state register; or (2) resources determined by the lead agency, in its discretion, to be significant based on the criteria for listing in the state register.

While the project site is vacant, the site has been previously developed with commercial and light industrial uses. As the project site has been subject to past subsurface disturbance associated with grading, foundations, and most recently ground disturbing remedial actions needed to remove groundwater and soil contaminants beneath the project site, it is unlikely that undisturbed unique archeological resources exist on the project site. In addition, removal of the aging portable buildings (including 17 classrooms) located on the South Gate Middle School campus would not result in ground-disturbing activities that could inadvertently disturb archaeological resources located on the campus.

A 2008 record query sent to the South Central Coastal Information Center (SCCIC) at California State University Fullerton for the LHSC project stated that no archaeological sites have been identified on maps maintained by the SCCIC within a ¼-mile radius of the LHSC campus.¹⁶ (The project site comprises an undeveloped portion of the LHSC campus). In addition, a 2008 Native American Heritage Commission (NAHC) Sacred Lands File (SLF) for the LHSC project site determined that no Native American cultural resources were within LHSC project area.¹⁷

No known "tribal cultural resources" as defined under Public Resources Code 21074 are located on the project site. In accordance with California Public Resources Code section 5097.9, a letter was sent to the NAHC on October 9, 2015 for a related project occurring on the project site , requesting outreach with the local tribes, in regards to the project

¹⁶ Correspondence from the South Central Coastal Information Center, file # SCCIC #8297.5362, dated February 20, 2008.

¹⁷ Correspondence from the Native American Heritage Commission, date February 15, 2008.

site. No outreach request was received by the District from the NAHC.¹⁸ LAUSD will again notify the NAHC as part of the Notice of Preparation process for the proposed project and contact any requested local tribes.

Although the unanticipated discovery of unique archeological resources is possible during soil excavation activities (e.g., during installation of utilities), based on the lack of previous resources on the site, the probability that archeological resources will be discovered is low. In addition, compliance with Program EIR **SC-CUL-13**, **SC-CUL-17**, and **SC-CUL-18** (included below), would require that upon discovery of an archeological resource (1) construction activities in the immediate area of the find shall cease and LAUSD shall retain a qualified archaeologist to determine the significance of the find, (2) LAUSD shall determine if a Phase III Data Recovery/Mitigation Program is necessary, and (3) if the archeological resource is a Native American resource work shall stop within a 30-foot radius of the discovery.

- **SC-CUL-13:** The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.
- **SC-CUL-17:** LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMIR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.
- **SC-CUL-18:** 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

¹⁸ A copy of the letter sent to the NAHC is included in **Appendix V**

and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

The project would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the project site during grading or other construction activities, the District must be notified immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the District, has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

Implementation of these SCs as well compliance with the federal, state, and local regulations would ensure impacts to archaeological resources remain less than significant. No further analysis in the EIR is required.

- c) **Less than significant impact.** As discussed above, the project site has been previously disturbed and, therefore, it is unlikely that undisturbed paleontological resources exist on the project site. Further, removal of the aging portable buildings, currently located on the South Gate Middle School campus, would not require excavation and/or any additional ground-disturbing activities on the campus. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and remedial excavation activities. Surface grading, necessary for installation of utilities, is unlikely to uncover any paleontological resources. Prior remedial activities completed on the project site included soil excavation activities that removed approximately 3,700 cubic yards of soil (40 feet below ground surfaces (bgs)), which exceeds the depth of grading activities projected for the proposed project.

In addition, compliance with Program EIR **SC-CUL-19** and **SC-CUL-20** (included below), would require the District to contract with a paleontological monitor for on-call purposes when developing a project sites sensitive to paleontological resources, and if a site is deemed to be highly sensitive for paleontological resources, an approved paleontological monitor shall be on the site during ground-disturbing activities.

- **SC-CUL-19:** LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain onsite for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
- **SC-CUL-20:** The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining appropriate actions where potentially significant impacts may occur. If paleontological resources are discovered during excavation, grading, or construction, the District shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Thus, potential impacts from the proposed project on paleontological resources would be less than significant, and no further analysis is required in the EIR.

- d) Less than significant impact.** No formal cemetery exists on the project site or in the vicinity of the proposed project. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that intact human remains are present beneath the site. Further, while removal of the aging portable buildings from the South Gate Middle School campus would not result in any ground-

disturbing activities, grading activities that occur on the project site have the potential to disturb previously undiscovered subsurface human remains.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remains are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the NAHC by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic in an EIR is necessary.

Issues:	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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses

- a.(i) Less than significant impact.** The proposed project would not directly expose people or structures to the risk of loss, injury, or death due to rupture of a known earthquake fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The project site is located in the Los Angeles Basin within the Transverse Ranges Geomorphic Province in Southern California. The closest known active fault to the site is the Newport-Inglewood fault, located approximately 5.5 miles to the west. The project site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone.¹⁹ Thus, the potential for surface ground rupture at the project site is considered low.²⁰ No further analysis is required in the EIR.
- a.(ii) Potentially significant impact.** The project site is located within the seismically active Southern California area and therefore could be subject to moderate and possibly strong ground motion due to earthquakes. The closest known fault line to the project site, the Newport-Inglewood fault, is located approximately five and a half miles west of the site.²¹ The project will be constructed in accordance with California Building Code (CBC) and Division of State Architect (DSA) standards; as well as the Geotechnical Report recommendations including compliance with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings. However, since past remediation activities on the site have removed 30 feet of potentially contaminated soils that have been replaced with clean imported soils, soil suitability and potential for groundshaking will be further evaluated in the EIR.
- a.(iii) Less than significant impact.** Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low-density, fine, clean sandy soils; and (3) high intensity ground motion. Studies indicate that saturated, loose and medium dense, near-surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential.

According to the Department of Conservation South Gate Quadrangle the project site is located within the State Earthquake Induced Liquefaction Seismic Hazard Zone. The Geotechnical Report prepared for the proposed project analyzed the potential for liquefaction to occur on the project site. Based on tests that took into account the existing site conditions, including the peak ground acceleration, average shear wave velocity,

¹⁹ California Geological Survey Alquist-Priolo Earthquake Fault Zones, Table 4 Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010.

²⁰ Comprehensive Geotechnical Report Proposed International Learning Center, prepared by Group Delta, October 2015.

²¹ Comprehensive Geotechnical Report Proposed International Learning Center, prepared by Group Delta, October 2015.

and groundwater depth of 10 feet, the Geotechnical Report findings determined that impacts from liquefaction (including loss of bearing capacity) would be less than significant and the settlement of soil layers would not be detectable at the surface layer.²² Thus, no further analysis is required in the EIR.

a.(iv) No impact. Landslides and other types of slope failures, such as lateral spreading, can result in areas with varying topography in the event of an earthquake. The project site is comprised of flat terrain and no significant ground slopes exist in the vicinity of the project site. The project site is not susceptible to landslides.^{23,24} Therefore, the likelihood of seismically induced landslides affecting the project site is considered to be remote. No impact would occur. No further analysis is required in the EIR.

b) Less than significant impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The project site is located in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the project site. The proposed project is an educational facility that will include landscaped and hardscaped area, and will not contain large amounts of exposed soil. Following the completion of construction of the proposed project, the potential for soil erosion or the loss of topsoil is expected to be extremely low. Although portable buildings would be removed from the South Gate Middle School campus, the campus is developed with athletic fields, buildings, and ball courts. Therefore, removal of portable buildings would not result in erosion and or the loss of top soil through exposed soils.

With the exception of the surface parking lot, no structures are located on the project site. Construction of the proposed project would involve soil disturbance activities including grading that will leave soil on the project site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the proposed project would be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul route approval from the City and LAUSD, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, the proposed project would be required to comply with standard regulations, including South Coast Air Quality Management

²² Comprehensive Geotechnical Report Proposed International Learning Center, prepared by Group Delta, October 2015.

²³ California Department of Conservation, South Gate Quadrangle, Landslide and/or Liquefaction Map, http://gmw.consrv.ca.gov/shmp/download/quad/SOUTH_GATE/maps/ozn_sgate.pdf, accessed October 12, 2015.

²⁴ Comprehensive Geotechnical Report Proposed International Learning Center, prepared by Group Delta, October 2015.

District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The proposed project would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors would be required to prepare and implement a SWPPP and associated best management practices (BMPs). Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed project would not occur and soil erosion impacts would be less than significant. No further analysis is required in the EIR.

- c) **Potentially significant impact.** Potential impacts with regard to liquefaction and landslide potential are evaluated above.

Building improvements founded on collapsible soils may be damaged by sudden and often induced settlement when these soils are saturated after construction. Collapsible soils are typified by low values of dry unit weight and natural water content. The amount of settlement depends on the applied vertical stresses and the extent of wetting and available water. As discussed above, approximately 30 feet of soils were removed from the project site during remediation activities. As such, suitability of soils will be evaluated in the EIR.

- d) **Potentially significant impact.** Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Based on laboratory testing the surface soils found on the project site were determined to have a very low expansion potential. However, since past remediation activities on the site removed 30 feet of potentially contaminated soils that have been replaced with clean imported soils, soil suitability will be further evaluated in the EIR.
- e) **No impact.** Project implementation would not use septic tanks or alternative wastewater disposal systems. The proposed project would connect to the existing sewer system. Therefore, no impact would occur, and no further study is required.

Issues:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Background

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

According to the 2010 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming.

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows:

By 2010, reduce GHG emissions to 2000 levels;

By 2020, reduce GHG emissions to 1990 levels; and

By 2050, reduce GHG emissions to 80 percent below 1990 levels.

In response to Executive Order S-3-05, the Secretary of Cal/EPA created the CAT, which, in March 2006, published the first CAT Report (2006 CAT Report). The 2006 CAT Report identified a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020.

As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in

California ports. The Proposed Scoping Plan was approved by the ARB on December 11, 2008.

Because climate change is already affecting California and current emissions will continue to drive climate change in the coming decades, the need to adapt to the impacts of climate change is recognized by the State of California. The 2009 California Climate Adaptation Strategy Discussion Draft (the Strategy) begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The goals of the strategy are to analyze risks and vulnerabilities and identify strategies to reduce the risks. Once the strategies are identified and prioritized, government resources will be identified. Finally, the strategy includes identifying research needs and educating the public.

Climate change risks are evaluated using two distinct approaches: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human system's ability to cope with and adapt to change by examining historical experience with climate variability and extrapolating this to understand how the systems may respond to the additional impact of climate change. The major anticipated climate changes expected in the State of California include increases in temperature, decreases in precipitation, particularly as snowfall, and increases in sea level, as discussed above. These gradual changes will also lead to an increasing number of extreme events, such as heat waves, wildfires, droughts, and floods. This would impact public health, ocean and coast resources, water supply, agriculture, biodiversity, and the transportation and energy infrastructures.

Key preliminary adaptation recommendations included in the Strategy are as follows:

Appointment of a Climate Adaptation Advisory Panel;

Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020;

Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;

Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;

Consideration of climate change impacts for all significant State projects;

Assessment of climate change impacts on emergency preparedness;

Identification of key habitats and development of plans to minimize adverse effects from climate change;

Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;

Amendment of Plans to assess climate change impacts and develop local risk reduction strategies by communities with General Plans and Local Coastal Plans; and

Inclusion of climate change impact information into fire program planning by State firefighting agencies.

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), which required the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Natural Resources Agency by July 1, 2009. On April 13, 2009, OPR submitted to the Secretary for Natural Resources its proposed amendments to the state CEQA Guidelines for greenhouse gas emissions, as required by Senate Bill 97. These proposed CEQA Guideline amendments provided guidance to public agencies regarding the analysis and mitigation of the effects of greenhouse gas emissions in draft CEQA documents. On December 31, 2009, the Natural Resources Agency transmitted the Adopted Amendments and the entire rule-making file to the Office of Administrative Law (OAL). On February 16, 2010, OAL approved the Adopted Amendments and filed them with the Secretary of State for inclusion in the California Code of Regulations. The Adopted Amendments became effective on March 18, 2010.

In the CEQA Guideline Amendments, a threshold of significance for greenhouse gas emissions was not specified, nor does it prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis and rely on the lead agencies to make their own significance threshold determinations based upon substantial evidence. The CEQA Amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change's "global" nature. Typical CEQA analyses address local actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects may be substantial, the GHG emissions from a single general development project would have no noticeable effect on global climate.

For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact. While the ARB published some draft thresholds several years ago, they were never adopted and the ARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

The SCAQMD is currently developing significance thresholds for greenhouse gas (GHG) emissions, but has published draft thresholds using a tiered approach. The draft approach as most recently updated in September 2010 is as follows:²⁵

Tier 1: Is the project exempt from further analysis under existing statutory or categorical exemptions? If yes, there is a presumption of less than significant impacts with respect to climate change.

Tier 2: Is the project’s GHG emission within the GHG budgets in an approved regional plan? (The plan must be consistent with *State CEQA Guidelines* §§15064(h)(3), 15125(d), or 15152(s).) If yes, there is a presumption of less than significant impacts with respect to climate change.

Tier 3: Is the project’s incremental increase in GHG emissions below or mitigated to less than the significance screening level (10,000 metric tons of carbon dioxide equivalent [MTCO_{2e}] per year for industrial projects; 3,500 MTCO_{2e} for residential projects; 1,400 MTCO_{2e} for commercial projects; 3,000 MTCO_{2e} for mixed-use or all land use projects)? If yes, there is a presumption of less than significant impacts with respect to climate change.

Tier 4: Does the project meet one of the following performance standards? If yes, there is a presumption of less than significant impacts with respect to climate change.

Option #1: Achieve some percentage reduction in GHG emissions from a base case scenario, including land use sector reductions from AB 32.

Option #2: For individual projects, achieve a project-level efficiency target of 4.8 MTCO_{2e} per service population by 2020 or a target of 3.0 MTCO_{2e} per service population by 2035. For plans, achieve a plan-level efficiency target of 6.6 MTCO_{2e} per service population by 2020 or a target of 4.1 MTCO_{2e} per service population by 2035.

Tier 5: Does the project obtain offsets alone or in combination with the above to achieve the target significance screening level (offsets provided for 30-year project life, unless project life limited by permit, lease, or other legally binding conditions)?

²⁵ South Coast Air Quality Management District, “Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting #6,” <http://www.aqmd.gov/ceqa/handbook/GHG/2008/oct22mtg/oct22.html>. 2008.

If yes, there is a presumption of less than significant impacts with respect to climate change. Otherwise, the project is significant.

As of July 2011, the SCAQMD has not announced when or if, in light of recent CEQA case law, staff is expecting to present a finalized version of these thresholds to the Governing Board for consideration. The SCAQMD has adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable to boilers and process heaters, forestry, and manure management projects.

The Tier 3 thresholds are the most applicable to this project. Tier 3 requires that a project's incremental increase in GHG emissions should be below or mitigated to less than the significance screening level. Proposed projects that do not exceed the thresholds would not be considered to have a significant impact on the attainment of air quality goals and would, therefore, be considered to be consistent with the current air quality plan.

Responses:

- a) **Less than significant impact.** The proposed project would generate direct GHG emissions from new vehicle trips and onsite area sources. Additionally, indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would also be generated. The Program EIR estimated GHG emissions for Central Los Angeles High School No. 12. This project entailed the construction of a 19-classroom high school facility on a 1.28-acre LAUSD-owned site, adjacent to the existing Miguel Contreras Learning Complex. The Program EIR determined it is not anticipated that development under the school upgrade program would generate GHG emissions that would exceed the SCAQMD significance thresholds. Schools are typically growth accommodating land uses built to serve the local community; therefore, a new school would reduce the overall VMT in the region and thereby reduce mobile-source GHG emissions. **Table 1, GHG Emissions of an LAUSD School**, shows the total emissions generated from Central Region High School No. 12.

**Table 1
GHG Emissions of an LAUSD School**

Central Los Angeles High School No. 12 ¹		
Source	MTCO _{2e} /Year	Percent of Project Total
Area	0	0%
Energy	241	17%
Transportation	938	64%
Waste	227	16%
Water	39	1%
Amortized Construction Emissions ²	30	2%
Total	1,475	100%
Proposed SCAQMD Bright-Line Screening Threshold	3,000 MTCO _{2e}	NA
Exceeds Proposed Bright-Line Screening Threshold?	No	NA

Source: LAUSD School Upgrade Program EIR, June 2014, Table 5.7-4

Notes: The sum of the emissions does not equal 100 percent of the total emissions due to rounding.

¹ = Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated

² = As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology²⁶

As shown in the table, development of a new school adjacent to an existing school would not exceed the proposed SCAQMD significance thresholds of 3,000 MTons. Future school projects would comply with the Scoping Plan early action statewide measures (e.g., low-carbon fuel standard and renewable portfolio standard) and would also be built to meet the latest Building Energy Efficiency Standards and CALGreen. Compliance with these statewide requirements and measures would reduce GHG emissions.

The proposed project does not increase capacity as ISLC middle school students would be relocated from Southeast Middle School to the ISLC addition site. As such, no new trips would be generated by the project; rather trips would be transferred from one site to a different site. The project also includes removal of inefficient portables from the South Gate Middle School campus allowing for zone choice in the South Gate area. Further, the Program EIR anticipates an overall decline in student population over a ten year period. In addition, the proposed project would be subject to the GHG SCs included in the Program EIR. **SC-GHG-1** through **SC-GHG-5** (included below), would require water and energy efficient features and measures be included prior to operation of the proposed project.

- **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 a 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.

Application of these COAs would further reduce the proposed project's GHG emissions. Therefore, the cumulative contribution to GHG emissions from the project would be less than significant. No further analysis is necessary in the EIR.

- b) Less than significant impact.** In response to concern regarding GHGs and global climate change, the state passed Assembly Bill 32 (AB 32) also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq) mandated a reduction in the state's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

The project site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed project would be well below the SCAQMD thresholds, the proposed project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed project would not conflict with the state's ability to meet its GHG goals under AB 32.

In addition, Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategy that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multi-modal transportation options, and identifying land use strategies that

focus new housing and job growth in areas served by public transit. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. Development of the proposed project would fill the educational needs of the South Gate community (i.e., provide a new educational facility for ISLC middle school students). As discussed under **Section VII(a)** above, the ISLC facility would allow the ISLC middle school students currently attending classes on the Southeast Middle School campus to relocate to the project site, approximately 2.6 miles to the east. As the project site is relatively near to the Southeast Middle School campus, there would be no significant increase in travel distance or vehicle miles traveled, compared to the middle school student's existing commute. Thus the proposed project would be consistent with the 2016 RTP/SCS as middle school students living in the South Gate Zone of Choice area would continue to attend classes nearby and in an area served by public transit (e.g., Metro bus lines 260, 115, 117, 612, 762 and South Gate's Westside Route (a local bus route). Impacts would be less than significant and no further analysis is required in the EIR.

Issues:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Issues:	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 of 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 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries 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?	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
j)	Be located on a site where the property line less than the following distance from the edge of respective power line easement: <ul style="list-style-type: none"> • 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? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k)	Be located on a site that is within 1,500 feet of a railroad track easement?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
l)	Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
m)	Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n)	Be located within 1,500 feet of a pipeline that may pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o)	Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
q)	Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
r)	Be located on a site with a traffic pattern for school buses that can pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
s)	Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Responses:

- a) **Less than significant impact.** A significant impact would occur if the proposed project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the proposed project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials would be contained, stored, and used in accordance

with manufacturers' instructions and handled in compliance with applicable standards and regulations.

The proposed project will include 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a MPR and gym. Educational facilities do not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks on-site. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be store on site. In addition, certain courses such as sciences classes and industrial arts may involve small quantities of chemicals, fuels and other petroleum products, solvents, and paints.

The design and operation of the proposed project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances (i.e., collecting hazardous materials on a regular basis to minimize the quantity stored on campus), installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, impacts related to the transport, use, or disposal of hazardous materials use would be less than significant. No further analysis is required in the EIR.

- b) 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.

The proposed project would not create a hazard through upset or accident conditions involving hazardous materials. As discussed in **Threshold (a)** above, the use of hazardous materials and substances at school facilities during operations would be minimal and in small quantities. Additionally, all materials and substances would be subject to applicable health and safety requirements. This would include affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of

hazardous materials. Potential impacts would be less than significant. No further analysis is required in the EIR.

- c) **Less than significant impact.** The project site is located on an undeveloped portion of the LHSC campus. The developed portion of the LHSC campus is immediately adjacent to the project site and Tweedy Elementary School is approximately 900 feet to the northwest of the project site.

As discussed in **Threshold (a)** above, construction of the proposed project would involve the use of those hazardous materials that are typically necessary for construction of educational facilities (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the proposed project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the proposed project would be required to implement standard BMPs set forth by the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

Operation of the proposed project may require a limited quantity of hazardous materials (e.g., for landscaping, custodial, and educational purposes) be stored on the project site. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment.

As the proposed project would comply with all federal, state and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Potential impacts would be less than significant. No further analysis is required in the EIR.

- d) **Less than significant impact.** The project site is listed as a hazardous materials site pursuant to Government Code Section 65962.5, which is the Hazardous Waste and Substances Sites (Cortese) List.²⁷ As discussed in the Project Description above, prior to the 1980s, the project site was used for light industrial and commercial operations. These historic uses resulted in contamination of the groundwater and soil on the project site. Prior to construction of the proposed project, in compliance with direction from the

²⁷ State Water Resources Control Board Geotracker website, <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=5225+Tweedy+Boulevard+South+Gate+C+A+>, accessed November 12, 2015.

DTSC, the District was required to propose and carry out remedial activities necessary to remove the contaminated soil and remediate the groundwater on the project site. The District received a “No Further Action” determination from the DTSC in 2013 that allows construction of the new middle school to proceed. The District will continue to monitor the groundwater and soil vapor until at least 2020. No further analysis is required in the EIR.

- e-f) **No impact.** The project site is not located within an airport land use plan or within the vicinity of a public airport or private airstrip. The Long Beach Airport, the closest municipal airport to the site, is located approximately 14 miles to the south. The Commerce Business Park Heliport, a private airport, is located approximately 4 miles northeast of the project site. Therefore, no impact related to an airport land use plan would occur. No further analysis is necessary.

- g) **Less than significant impact.** The proposed project is not anticipated to interfere with an emergency response plan or evacuation plan. During an emergency, surrounding properties would evacuate onto the main roads, toward the freeways. The proposed project would not alter street patterns associated with the major emergency evacuation routes or severely clog the evacuation routes. Further, a separate curbed vehicular drop off and pick up lane, similar to the existing LHSC drop off and pick up lane, would be located along Tweedy Boulevard. The student drop off and pick up operation has been planned to minimize potential vehicular queuing on the local street system and conflicts with the existing LHSC drop off and pick up operations, as well as to address potential safety issues associated with the ISLC middle school student drop-off and pick-up operations. Therefore, the impact would be less than significant and no further analysis is required in the EIR.

- h) **No impact.** The project site is located within a highly developed, urbanized area of the City of South Gate and is not subject to wildland fires. No impacts related to wildland fires are anticipated and no further analysis is required in the EIR.

California Department of Education Thresholds

Title 5 of the California Code of Regulation Section 14010 incorporates health and safety factors provided in the California Department of Education’s (CDE) *School Site Selection and Approval Guide*. In combination with the thresholds provided in the *State CEQA Guidelines*, these thresholds (**Thresholds i** through **s**, below) ensure that schools provide a safe learning environment for students. The following discussions provide analysis of the CDE school site safety thresholds.

- i) **Potentially significant impact.** Historical evidence shows that hazardous waste has been disposed of on the project site. The State Department of Health Services has not identified the project site as a hazardous substance release site, nor does the site contain

one or more pipelines which transport hazardous waste.²⁸ However, due to the presence of chemicals of concern, remedial activities were necessary to remove groundwater and soil contaminants. Impacts related to being located on a hazardous materials disposal site could be potentially significant. This topic will be analyzed further in the EIR.

- j) **Potentially significant impact.** Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall 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. Power lines are located along the streets surrounding the project site, including Tweedy Boulevard, Chakemco Street, Adella Avenue, Tweedy Place, and Burtis Street. In addition, there is a cell tower located in the southwest corner of the District-owned parcel south of Chakemco Street. The proposed project will include the construction of 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a MPR and gym. Impacts are not known at this time. Therefore, this issue will be analyzed further in the EIR.
- k) **Less than significant impact.** The project site would be located within 1,500 feet of a railroad track easement. The Los Angeles River and Union Pacific railroad tracks (Spur No. 810961T) are located approximately 1,200 feet to the east of the project site. As required by Program EIR **SC-HAZ-3**, a Rail Safety Study was completed as part of the original SRHS#9 project to determine potential safety concerns relative to rail lines located within 1,500 feet of the Project Site.²⁹ Union Pacific railroad operates a single track operation with guardrails. Data for the risks associated with potential train accidents/incidents were analyzed to determine the predicted number of accidents/incidents per million train miles for the railroad. The predicted number of total accidents/incidents per million train miles for Union Pacific in California is 1.12 per million train miles while in Los Angeles County the risk is 0.006 per million train miles. Since the predicted number of total accidents/incidents is less than one in a million train miles, the risk is acceptable in accordance with the LAUSD criteria. As a result, impacts would be less than significant and no further analysis is required in the EIR.
- l) **Potentially significant impact.** The project site is located in an urban area and adjacent to major arterial roadways as well as a freeway. While, the I-710 is located 0.37 miles east of the project site, a concrete channelized portion of the Los Angeles River and railroad tracks provide a buffer between the freeway and the project site. Atlantic Boulevard, a north/south four lane arterial roadway with left-hand turn pockets, is located approximately 550 feet to the west. Atlantic Boulevard could pose a safety hazard to students and staff accessing the project site. Additional analysis is necessary. Thus, this issue will be analyzed in the EIR.

²⁸ National Pipeline Mapping System, NPMS Public Map Viewer, <https://www.npms.phmsa.dot.gov/PublicViewer/composite.jsf>, accessed November 3, 2015.

²⁹ LAUSD South Region High School No. 9, Notice of Preparation and Initial Study, April 2008.

- m) **No impact.** The project site is located on an undeveloped portion of the LHSC campus complex. Pursuant to CCR, Title 5, Section 14010(h), a school site shall not be located near an aboveground water tank that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional. The CDE *School Site Selection and Approval Guide* (2000) extends the regulatory protection for hazardous substance pipelines to high-pressure water lines within 1,500 feet of a school site.

No infrastructure, including water storage tanks, reservoirs, and/or high pressure water lines are located near the project site. Therefore, no impact would occur and no further analysis is necessary in the EIR.

- n) **Potentially significant impact.** Pursuant to CEC Section 17213(a)(3), a school district shall not approve a project involving the acquisition of a school site that contains one or more aboveground or underground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood. Under CCR, Title 5, Section 14010(h) the school site shall not be located near a fuel storage tank or within 1,500 feet from the easement of an aboveground or underground pipeline that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional, which may include certification from a local public utility commission.

Less than 500 feet to the west of the project site, a 26-inch high-pressure pipeline is located along Atlantic Avenue (42 inches below the ground).³⁰ The natural gas pipeline is owned and operated by the Southern California Gas Company. In addition, two 8-inch petroleum product pipelines and a 9-inch natural gas pipeline owned and operated by Chevron are located five to ten feet from the eastern property boundary.³¹ As the pipelines are located within 1,500 feet of the project site and the proposed project is an educational facility, additional analysis is required in the EIR.

- o) **No impact.** The 4.9-acre project site is rectangular parcel. The site is not unusually shaped and has a sufficient length to width ratio that is consistent with CDE standards for school sites, which state that the length-to-width should not exceed 2:1. As illustrated in the project description, the proposed structures, parking, and play areas could be accommodated within the site. There would be no impact, and further analysis is not necessary.

- p) **No impact.** The project site is located on an undeveloped portion of the LHSC campus. The site is located within an urbanized community of the City of South Gate and is surrounded by commercial, light industrial, institutional, and residential uses. As such, no change would occur to land use and the proposed project would be sited on an existing school property. Therefore, no adverse impacts to student health or safety

³⁰ LAUSD South Region High School No. 9 Recirculated Draft EIR, May 2009.

³¹ LAUSD South Region High School No. 9 Recirculated Draft EIR, May 2009.

would occur as a result of surrounding development, and no further analysis is required in the EIR.

- q) **Less than significant impact.** Although no propane tanks are known to be located on the project site, propane tanks could be present at businesses located along the surrounding commercial and light industrial uses, immediately adjacent to the project site. Rules and regulations pertaining to the storage, transportation, and use of propane would ensure that all propane tanks would not pose a safety hazard to individuals on the project site. Impacts would be less than significant, and no further analysis is required in the EIR.
- r) **Potentially significant impact.** The project site is vacant. Operation of the proposed project would permanently increase vehicle, pedestrian, bicycle, school bus, and public transit trips throughout the project area and on surrounding roadways. Project related construction activities would also temporarily increase vehicle trips on nearby roadways. A traffic assessment will be prepared for the proposed project, and the methodology, findings, and conclusions of the analysis will be provided in the EIR.
- s) **Potentially significant impact.** The Cooper Drum site is located at 9316 South Atlantic Avenue in South Gate and is approximately 1,500 feet north of the project site. While this site is currently undergoing soil and groundwater remediation under the oversight of the USEPA, this threshold will be analyzed in the EIR.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially 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 uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Create or contribute runoff water which would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h)	Place within a 100-year flood hazard areas structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j)	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **Less than significant impact.** As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges,

which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project will create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project will discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts will also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the proposed project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements will ensure that the construction of the proposed project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality. In addition, the proposed project would be subject to the Program EIR **SC-HWQ-1 Stormwater Technical Manual and SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site**.

- **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 SUSMP requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
- **SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site:** 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

Thus, construction related ground disturbance activities as well as operation activities would not result in significant impacts to water quality. Therefore, water quality impacts would be less than significant and no further analysis is required in the EIR.

- b) **Less than significant impact.** A significant impact would occur if the proposed project substantially depleted groundwater or interfered with groundwater recharge. The proposed project would develop the project site with 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a MPR and gym. While a majority of the project site is vacant, the site is not identified as an opportunity for groundwater recharge activities.³²

In addition, as discussed in **Section VIII(c)** above, due to past land use activities (e.g., light industrial and manufacturing activities) the groundwater beneath the project site is contaminated. As directed by the DTSC, the District is currently carrying out approved remedial activities to ensure the contaminants currently on the project site are remediated, and do not continue to contaminate the groundwater beneath the site. Following site redevelopment, groundwater recharge on the project site would continue to be negligible, similar to existing conditions. As no underground parking would be provided on the site, excavation would be minimal and include surface grading for building foundations and trenches for utilities. Any groundwater extracted from the project site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the proposed project's potential impacts relating to dewatering would be less than significant. No further analysis is required in the EIR.

- c) **Less than significant impact.** A significant impact would occur if the proposed project substantially alters the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. No stream or river is present on the project site. A concrete channelized portion of the Los Angeles River is located 0.2 miles east of the project site. Excluding the surface parking lot, the project site is permeable and stormwater is retained on the project site.

The topography of the project site is relatively level. Very little change would occur to the drainage pattern on the project site with development of the proposed project. During construction, erosion and siltation from the project site could increase significantly as a result of soil disturbance from surface grading and limited excavation. Construction-related activities that expose soils to potential mobilization by rainfall/runoff and wind are primarily responsible for sediment releases. Such activities include removal of vegetation, grading and trenching of the site. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Unless adequate erosion controls are installed and maintained at the site during construction, significant

³² Environmental Protection Agency, Pacific Southwest Region 9, designated sole source aquifers, <https://www3.epa.gov/region9/water/groundwater/ssa.html>, accessed May 27, 2016.

quantities of sediment may be delivered from the concrete channel and discharged into the Pacific Ocean. The proposed project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the proposed project. As such, impacts would be less than significant. No further analysis is required in the EIR.

- d) **Less than significant impact.** A significant impact would occur if the proposed project substantially altered the drainage pattern of an existing stream or river so that flooding will result. No streams or rivers exist on the project site. As discussed above, all stormwater is currently retained on the project site. Drainage patterns would not change with implementation of the proposed project and the proposed project would be required to implement a SWPPP. Further, while the proposed project would include hardscape areas, and thus increase the percentage of impermeable surfaces on the project site, compared to existing conditions; the proposed project's storm drainage system would ensure the rate and/or amount of surface water discharged from the project site would not result in flooding on-or off-site. As such, impacts would be less than significant and no further analysis is required in the EIR.
- e) **Less than significant impact.** A significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems serving the project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

There are three general sources of potential short-term construction-related stormwater pollution associated with the proposed project.

1) The handling, storage, and disposal of construction materials containing pollutants. Generally, routine safety precautions for handling and storing construction materials effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

2) The maintenance and operation of construction equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

3) Ground-disturbing activities (e.g., grading, excavation, etc.) which when not controlled, may generate soil erosion and/or loss of top soil via storm runoff or mechanical equipment. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be

implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the District shall be required to implement all applicable and mandatory BMPs in accordance with the SWPPP. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the surface parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed project must comply with water quality standards and wastewater discharge BMPs set forth by the SWRCB. Compliance with existing regulations would reduce the potential for the proposed project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. No further analysis is required in the EIR.

- f) **Less than significant impact.** A significant impact would occur if the proposed project would substantially degrade water quality. Other than the sources discussed above, the project does not include other potential sources of contaminants which could potentially degrade water quality. Therefore, project impacts related to operational water quality would be less than significant. No further analysis is required in the EIR.

- g-h) **Less than significant impact.** The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk. The project site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.³³ Therefore, the proposed project would not involve the development of new housing and/or structures within an identified 100 year flood hazard. Impacts would be less than significant and no further analysis is required in the EIR.

- i) **Less than significant impact.** As discussed above, the project site would not expose people or structures to significant risk including injury or death as a result of flooding. There are no dams located in the City and/or the surrounding area. No impact would occur and no further analysis is required in the EIR.

- j) **No impact.** A significant impact would occur if the proposed project exposed persons or structures to an area susceptible to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant

³³ FEMA's Flood Map Service Center, Panel 06037C1810F.

undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The project site is not mapped within a tsunami hazard zone. Similarly, damage to the project site due to a seiche is not likely at the project site because no bodies of water are present near the site. Although the Los Angeles River is located less than one mile east of the project site, this portion of the River has been paved and was designed to prevent future flooding. Furthermore, the project site, which is not positioned downslope from any unprotected slopes or landslide areas, and is not positioned in an area of potential mudflow. Therefore, no impact related to inundation by seiche, tsunami, or mudflow would occur. No further analysis is required in the EIR.

Issues:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **No impact.** The project site is located in an urban area of the City on an undeveloped portion of the 35.2-acre LHSC campus. The proposed project would develop the vacant 4.9-acre project site with 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a MPR and gym. Surrounding land uses include a concrete channelized portion of the Los Angeles River, located approximately 1,200 feet to the east, beyond which is I-710. A strip mall comprised of commercial uses (e.g., a post office, produce store, auto service shop and car wash) is located west of the site along Atlantic Avenue. A vacant parcel owned by the District separates the project site from existing single-family residences that are located approximately 550 feet to the south (refer to **Figure 3**).

Buildings constructed on the infill site would be a maximum of two stories tall and up to 27 feet in height. The proposed project site is in use as a school facility and therefore would not physically divide an established community. No impacts would result and no further analysis is necessary in the EIR.

- b) **No impact.** The project site is located on an undeveloped portion of the LHSC campus. The site is within the Tweedy Boulevard Specific Plan and zoned Residential Neighborhood Zone Civic. The proposed project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project site as it is zoned for school use and in use as a school facility. No impact would occur and no further analysis is required in the EIR.
- c) **No impact.** The project site is not within a habitat conservation plan or a natural community conservation plan (See **Section IV, Biological Resources, f**). Thus, the proposed project would not conflict with any applicable conservation elements or natural community conservation plan. No impact would occur as a result of project implementation. No further analysis is required in the EIR.

Issues:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

a-b) No impact. The project site is located in the City of South Gate in a heavily urbanized area. The California Geological Survey has designated the City of South Gate as a Mineral Resources Zone 1 (MRZ-1) area. No significant mineral resources are located in MRZ-1 areas.³⁴ Therefore, no impact associated with mineral resources would occur, and no further analysis is required in the EIR.

³⁴ California Department of Conservation, Generalized Aggregate Resource Classification Map, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/Plate_4-1.pdf, accessed May 26, 2016.

Issues:	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 levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **Potentially significant impact.** Construction and operation of the proposed project will have the potential to increase noise levels in the vicinity of the project site. Construction activities could generate substantial noise affecting existing residences adjacent to the project site. On-site operational activities, such as outdoor use of proposed open space and recreation areas, and stationary sources, including mechanical systems also have the potential to increase noise levels. In addition, vehicle trips that would be generated by the proposed project could result in increased noise. The EIR will address the potential noise impacts associated with construction and operation of the proposed project.
- b) **Potentially significant impact.** Groundborne vibration or noise would primarily be generated during construction of the proposed project. The temporary increase in the groundborne vibration levels could impact sensitive land uses (e.g., schools and churches) within the project area. This issue will be analyzed further in the EIR.
- c) **Potentially significant impact.** Operation of the proposed project could result in new sources of noise, primarily from project-related traffic (including vehicles entering and exiting the surface parking lot, and the loading/unloading of delivery trucks), HVAC and mechanical systems, and outdoor recreation areas. The EIR will evaluate the potential for noise generated by the proposed project to substantially increase existing noise levels in the vicinity of the project site.
- d) **Potentially significant impact.** Demolition and construction activities associated with the proposed project will result in a temporary increase in noise levels in the areas adjacent to the project site. This issue will be analyzed further in the EIR and mitigation measures will be included as necessary.
- e) **No impact.** The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest public airport is the Los Angeles International Airport, located approximately 17 miles west of the project site. As such, the proposed project will not expose individuals accessing the project site to excessive airport-related noise levels. No impacts would occur and no further analysis is required.
- f) **No impact.** The project site is not in the vicinity of a private airstrip. The Commerce Business Park Heliport, a private airport, is located approximately 4 miles northeast of the project site. As a result, individuals accessing the project site would not be exposed to excessive noise levels from any private airstrip. No impacts would occur and no further analysis is required.

Issues:	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create unsafe routes to schools for students walking from local neighborhoods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Responses:

- a-b) Potentially significant impact.** The proposed project would utilize the existing network of regional and local roadways that serve the project area. A separate curbed vehicular drop off and pick up lane, similar to the existing LHSC drop off and pick up lane will be located along Tweedy Boulevard. Under the proposed project, Tweedy Boulevard will be widened to accommodate a cement tree lined median and an eastbound 12 foot drop off and pick up lane, as well as two eastbound 12 foot drive-through lanes. Project-related impacts to vehicle and pedestrian safety will be analyzed further in the EIR.
- c) Potentially significant impact.** The project site is located in an urban area. Atlantic Avenue, an arterial roadway is located directly west of the project site, and I-710 is located 0.37 miles to the east. While a concrete channelized portion of the Los Angeles River and railroad tracks provide a buffer between the project site and I-710, Atlantic Boulevard could pose a safety hazard to students and staff accessing the project site. A traffic assessment that includes analysis of existing roadway hazards will be prepared for the proposed project. This topic will be analyzed further in the EIR.

Issues:	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 road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **No impact.** Currently ISLC is operating on two campuses; classes for middle school students (grades 6 through 8) are held on the Southeast Middle School campus located at 2560 Tweedy Boulevard while classes for high school students (grades 9 through 12) are offered at the LHSC campus. During the 2015-2016 school year 868 middle and high school students attended ISLC, including 408 students in 6th, 7th, and 8th grades, and 460 students in 9th through 12th grades.³⁵ Upon completion of the proposed project, the ISLC middle school program that is currently operating on the Southeast Middle School campus would be relocated to the ISLC campus. No changes will be made to the ISLC high school program, the classes for the ISLC high school students would continue to be held on the LHSC campus. There would be no increase in the number of students attending ISLC. The portables on the South Gate Middle School campus that will be vacated when the ISLC students relocate to the LHSC campus would be removed and not repopulated. Thus the proposed project would not directly or indirectly induce population growth in the area. Impacts would be less than significant and no further analysis is required in the EIR.

³⁵ Issam Dahdul, LAUSD Facilities Development Manager, written communication May 17, 2016.

b-c) No impact. Excluding the surface parking lot, the project site is currently vacant with no structures. Therefore, the proposed project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. No impacts would occur, and no further analysis is required in the EIR.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	--	------------------------------	-----------

XV. PUBLIC SERVICES. Would the project:

a) 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:

i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

a.(i) Less than significant impact. First response for fire and paramedic services to the project site would be provided by the Los Angeles County Fire Department Fire Station No. 54 located at 4867 Southern Avenue, approximately 0.5 mile northwest of the project site. As no structures are located on the project site, the site currently does not generate a need for fire protection services. Under the proposed project; the ISLC would be developed on the project site and include a 4,528 square foot administration building, 28,915 square foot classroom building, a 16,195 square foot gym and MPR, and 2,147 square foot lunch shelter.

The ISLC high school program is currently operating on the LHSC campus (immediately north of the project site) and the ISLC middle school program is currently operating on the Southeast Middle School campus, approximately 2.6 miles west of the project site. The ISLC is projected to be operable in fall 2019. The ISLC middle school students would be relocated from the Southeast Middle School campus to the ISLC at this time. However, the overall student population in the general area would remain the same. Emergency and fire services for the 408 students in 6th, 7th, and 8th grades that

currently attend ISLC classes on the Southeast Middle School campus are provided by the Los Angeles County Fire Department.

As discussed in the Program EIR, the District requires and implements a number of fire, emergency, and safety procedures including, emergency drills and procedures (REF-5803.2), emergency response protocol for LAUSD facilities (SAF.30), emergency operations plan, District emergency response and preparedness (BUL-5433.1), school site emergency/disaster supplies (REF-5451.1) and emergency communications and response actions (REF-5741.0), which would be required and implemented for the proposed project.

In addition, LAUSD will coordinate with the Los Angeles County Fire Department regarding safety measures that should be incorporated into the design of the proposed project, including installation of fire alarms, sprinklers, as well as the ability to meet the required water demand, and fire hydrant pressure. With the inclusion of any necessary safety features, the need for fire protection services would be minimal and would not be sufficient to result in a need for new or expanded facilities. Therefore, impacts related to the need for new or expanded fire protection facilities would be less than significant and no further analysis is required in the EIR.

- a.(ii) Less than significant impact.** Primary law enforcement services for the new ISLC middle school campus would be handled by the Los Angeles School Police Department (LASPD). The LASPD provides general law enforcement services for all LAUSD campuses, however the everyday ISLC campus activities would be under the supervision of the principal, vice principal, teachers, and other staff members. The South Gate Police Department would provide additional police protection services to the project site.

While the project site is currently vacant and does not generate police calls, the proposed project would develop the project site with three school buildings and a lunch shelter. During the 24 month construction period, South Gate Police services are not expected, except in the cases of trespass, theft, and/or vandalism. Due to the number of construction workers projected to be on the site on a daily basis, any increase in the need for police protection services would be minimal and would not be enough to require new or expanded police facilities.

The proposed project has been designed as a secure campus, with access to the site controlled by gates and fences. Drivers and pedestrians who are part of the public-at-large would not be permitted to park in the school's surface parking lot or access the ISLC campus. Persons with business on campus would be required to check in with the school's administration at the entry to the ISLC campus before being allowed on-site. The school would install electronic security and fire alarm systems.

Similar to fire protection services, public police service needs are generally related to the size of the population and geographic area served, the number and type of calls for service, and other community and physical characteristics. The proposed project would not increase the student population in the area. The ISLC high school program currently operates on the LHSC campus, while the ISLC middle school program currently operates on the Southeast Middle School campus, approximately 2.6 miles west of the project site. Both sites are served by the same police facilities. The relocation of the ISLC middle school program would not require an increase in demand for police protection services.

Further, implementation of the project design features, including lighting and the installation of an electronic security system would ensure that impacts related to police protection services would be less than significant. Therefore, no further analysis is required in the EIR.

- a.(iii) No impact.** The proposed project would not include any residential component and would not directly and/or indirectly result in population growth. Development of the proposed project would allow ISLC middle school students currently attending classes on the Southeast Middle School campus to be relocated to the new ISLC facility.

The relocation of the ISLC middle school students from the Southeast Middle School campus to the new ISLC facility (and the removal of the portable buildings from the South Gate Middle School) would allow for the alignment of middle school enrollment in the South Gate area, and provide relief for overcrowded LAUSD middle schools in the South Gate Area. As such impacts to existing schools would be less than significant. No impact would occur and no further analysis is required in the EIR.

- a.(iv) No impact.** The City of South Gate Parks and Recreation Department manages 10 park facilities and provides recreation programs to City residents. South Gate Park, located at 4900 Southern Avenue is 0.7 miles northwest of the project site. The proposed project would not include any residential uses that would result in a permanent population increase. The proposed project design includes active and passive areas located throughout the project site, including basketball and volleyball courts, upgrades to existing field lighting, a courtyard, a tree grove and several other landscaped areas. In addition, as part of the original LHSC development plan, the District will be constructing new athletic fields in the southern portion of the site that will be available for use by ISLC middle school students. As such, it is not expected that the relocation of the ISLC middle school students from the Southeast Middle School campus to the project site would result in the need for new or expanded recreational facilities. No impact would occur and no further analysis is required in the EIR.

- a.(v) Less than significant impact.** The County of Los Angeles operates two libraries in the City. The Leland R. Weaver Library, located at 4035 Tweedy Boulevard is approximately one mile west of the project site. The proposed project would include a library, which

would reduce the potential for impacts to surrounding County libraries. In addition, no residential units are included as part of the proposed project which would result in a permanent increase in population. Therefore, any increase in use of public libraries would be less than significant and no further analysis is required in the EIR.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION. Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses:

- a) **No impact.** Refer to **Section XV, Public Services a(iv)**, above. As discussed above, the proposed project would not result in the addition of any residential uses and would not increase demand on local parks. As part of the proposed project, funding is expected to be available to upgrade field lighting at the athletic fields being developed in the southern portion of the LHSC site (refer to **Section I(d)** above). to existing City park and recreation facilities, the potential for field lighting to spill over onto any adjacent properties will be evaluated in the EIR. No further analysis regarding impacts to local parks is required in the EIR.
- b) **No impact.** Refer to **Section XV, Public Services a(iv)**, above. Implementation of the proposed project would include the construction of new recreational facilities, not require new recreation facilities to be constructed and/or existing recreation facilities to be expanded. No impact would occur and no further analysis is required in the EIR.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION and TRAFFIC. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Responses:

- a) **Potentially significant impact.** The proposed project is an educational facility that would include 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, and a MPR and gym. Operation of the proposed project would increase vehicle, pedestrian, bicycle, and public transit trips throughout the project area and on surrounding roadways. Project related construction activities would also temporarily increase vehicle trips on nearby roadways. A traffic assessment will be prepared for the proposed project, and the methodology, findings, and conclusions of the analysis will be provided in the EIR.
- b) **Potentially significant impact.** The congestion management program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010. All freeways, tollways, and selected arterial roadways in the County are part of the CMP Highway System. Analysis of project-related traffic impacts to CMP roadways will be included in the traffic impact assessment and analyzed further in the EIR.
- c) **No impact.** The proposed project would not impact air traffic. The project site is not located within an airport safety zone nor does the project propose any structure that would conflict with air traffic patterns. The nearest public airport is the Los Angeles International Airport, located approximately 17 miles west of the project site. No impact would occur and no further analysis is needed in the EIR.
- d) **Potentially significant impact.** The proposed project would utilize the existing network of regional and local roadways that serve the project area. In addition, a separate curbed vehicular drop off and pick up lane, similar to the existing LHSC drop off and pick up lane will be located along Tweedy Boulevard. Under the proposed project, Tweedy Boulevard will be widened to accommodate a cement tree lined median and an eastbound 12 foot drop off and pick up lane, as well as two eastbound 12 foot drive-through lanes. While the student drop off and pick up operations have been planned to minimize potential vehicular queuing on the local street system and conflicts with the existing LHSC drop off and pick up operations, the design could cause a permanent alteration to the local vehicular circular and patterns. Analysis of this design feature will be analyzed in the EIR.
- e) **Potentially significant impact.** The project is not anticipated to interfere with an emergency response plan or evacuation plan. However, construction activities could not result in temporary partial obstruction of adjacent roadways. Impacts to existing emergency response plans and/or evacuation plans/routes will be analyzed in the EIR.
- f) **Less than significant impact.** Bus lines, including the County of Los Angeles Metropolitan Transit Authority (Metro) and the City of South Gate Get Around Town

Express lines run along Atlantic Avenue. Construction and operation of the proposed project would not interfere with bus stops or other alternative transportation. Impacts related to alternative transportation would be less than significant, and no further analysis is required in the EIR.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? In making this determination, the District shall consider whether the project is subject to the water supply assessment requirements of Water Code Section 10910, et. seq. (SB 610), and the requirements of Government Code Section 664737 (SB 221).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Responses:

a) **Less than significant impact.** The RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. Approximately 99 percent of wastewater generated in the City is transported to and treated at the Los Angeles County Sanitation Districts' (LACSD) facilities. The remaining wastewater flows into the City of Paramount's wastewater infrastructure where it is then transported to and treated at a LACSD facility.³⁶

The LACSD operates 10 water reclamation plants (WRPs) and one ocean discharge facility, which can cumulatively treat 510 million gallons per day.³⁷ The WRPs have been designed to treat typical wastewater effluent generated by school facilities. Prior to operation of the proposed project, LAUSD will obtain a NPDES permit from the RWQCB that will include wastewater discharge requirements, such as effluent quality criteria, as determined by the RWQCB.

As ISLC middle school students are currently attending classes on the Southeast Middle School campus (approximately 2.6 miles west of the project site), the proposed project would not expand the District's total student capacity or increase student enrollment. Therefore, the proposed project would not require construction of new or expanded wastewater treatment facilities, and would not exceed the RWQCB's wastewater

³⁶ City of South Gate General Plan 2035, Public Facilities and Services Element.

³⁷ Los Angeles County Sanitation District website, <http://www.lacsd.org/default.asp>, accessed May 27, 2016.

treatment regulations. The proposed project would require the installation of on-site sewer lines which would connect to the existing adjacent sewer lines. Wastewater generated on the project site would be transported to LACSD facilities via the City's sewer lines. Impacts would be less than significant and no further analysis is required in the EIR.

- b) **Less than significant impact.** Refer to **Threshold (a)** above, for a discussion of wastewater impacts. Wastewater impacts would be less than significant.

As discussed above, the proposed project would not directly or indirectly induce population growth in the project area. Under the proposed project, ISLC middle school students currently attending classes at the Southeast Middle School campus would be relocated to the new ISLC facility located on the project site. The City of South Gate Water Division would provide water service to the project site. Water is conveyed to users in the project area along several circulating water mains of varying sizes. The proposed project would require the installation of on-site water lines which would connect to the existing adjacent water lines. Further, the project plans would be reviewed by the City's Water Division to determine if any additional infrastructure is needed on- or off-site. Therefore, the proposed project would not require the construction of new water facilities and/or expansion of existing water facilities. Impacts would be less than significant and no further analysis is required in the EIR.

- c) **Less than significant impact.** The majority of the project site is vacant and covered in permeable surfaces. A surface parking is located on the northern portion of the project site.

Following project buildout, the project site would be covered almost entirely with impervious surfaces, with the exception of landscaped areas. The project would be designed with drainage systems, such as concrete culverts, an underground storm drain system, drain inlets, and roof drain downspouts that would direct storm water flows to the existing and proposed on-site catch basins and then to the municipal storm drains. Storm water drainage plans would be submitted to the City of South Gate Department of Public Works for review and approval prior to the development of any drainage improvements. These plans must meet all requirements for the City's municipal separate stormwater sewer system permit, so that no impact to water quality at downstream facilities would occur. In addition, the proposed project would comply with all applicable water quality standards and waste discharge requirements. Consequently, the construction or expansion of new or existing stormwater drainage facilities is not anticipated, and the impact of the proposed project on storm water drainage facilities would be less than significant. No further analysis is required in the EIR.

- d) **Less than significant impact.** Senate Bill 221 and Senate Bill 610 amended existing California law regarding land use planning and water supply availability by requiring more information and assurance of supply than is currently required in an Urban Water

Management Plan (UWMP). As of January 1, 2002, California law requires water retail providers to demonstrate that sufficient and reliable supplies are available to serve large-scale developments (i.e., 500 dwelling units or 250,000 square feet of commercial space) prior to completion of the environmental review process and approval of such large-scale projects.

Under SB 610, it is the responsibility of the water service provider to prepare a Water Supply Assessment (WSA) requested by a City or County for any “project” defined by Section 10912 of the Water Code that is subject to CEQA.

Section 10912 of the Water Code defines a “project” as

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- a proposed hotel or motel, or both, having more than 500 rooms;
- a proposed industrial, manufacturing or processing plant, or industrial park, planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor space;
- a proposed mixed-use project that includes one or more of the previously listed projects; or
- a proposed project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

The proposed project would not meet any of the criteria resulting in the need for a WSA; therefore, a WSA is not necessary.

During construction water may be used on site for dust suppression or similar activities. The small amount of water necessary during construction of the proposed project would not result in the need for new or expanded water entitlements. Construction of the proposed project would not result in a significant impact to the City’s existing water supply.

Buildout of the proposed project would not increase demand on the City’s water supplies. As discussed under **Threshold (b)** above, upon completion of the proposed project, ISLC middle school students would be relocated from the Southeast Middle School campus (where ISLC middle school classes are currently offered), to the ISLC

addition on the project site. The City of South Gate Water Division currently provides potable water to the middle school students attending classes at the Southeast Middle School campus and would continue to provide potable water to the new ISLC facility. Thus, for the reasons discussed above, implementation of the proposed project would have a less than significant impact associated with water demand. No further analysis is required in the EIR.

- e) **Less than significant impact.** Refer to **Threshold (a)** above, for a discussion of wastewater impacts. The proposed project would not result in population growth in the area. Wastewater impacts would be less than significant and no further analysis is required in the EIR.
- f) **Less than significant impact.** In 1989, the State of California passed the California Integrated Waste Management Act (CIWMA) in response to reduced landfill capacity. This legislation (generally known by the name of the enacting bill AB 939) required cities and counties to reduce the amount of solid wastes entering existing landfills, through recycling, reuse and waste prevention efforts. AB 939 required every city and county in the state to prepare a Source Reduction and Recycling Element to its Solid Waste Management Plan that identified how each jurisdiction would meet the mandatory state waste diversion goals of 25 percent by the year 1995 and 50 percent by the year 2000. On June 30, 2008, the State Assembly amended Senate Bill 1252 to include further waste diversion goals of 60 percent by the year 2015 and 75 percent by the year 2025.³⁸ The purpose of AB 939 was to “reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible.”

Construction of the proposed project would generate construction debris. The surface parking lot would be demolished during the 24 month construction period. Waste materials generated during construction are expected to be typical construction debris, including concrete, stucco, asphalt, rocks, building materials, wood, paper, glass, plastic, metals, cardboard, and other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern), as well as green wastes. The District would be subject to the 2013 CAL Green Construction Waste Reduction Requirements that require 50 percent of the construction waste generated on the project site be diverted from landfills³⁹. Waste generated during demolition and construction that is not recycled would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities generally within Los Angeles County, including the Commerce Refuse to Energy Facility, the Bradley Landfill, the El Sobrante

³⁸ CWIMB, *Senate Bill 1252 Amendment*, June 30, 2008.

³⁹ CalRecycle, *Frequently Asked Questions Website*,

<http://www.calrecycle.ca.gov/LGCentral/Library/canddmodel/instruction/faq.htm#CALGreen>, accessed June 1, 2016.

Landfill, the Southeast Recovery Resource Facility, and the Synagro Regional Composting Facility.⁴⁰

Operation of the proposed project would not result in an increase in solid waste generation as the proposed project would not expand the District's total student capacity or increase student enrollment in the project area. The District contracts with private waste haulers to dispose of solid waste generated on school campuses.

Disposal of the portable buildings from the South Gate Middle School campus would result in an incremental increase in solid waste disposal at local landfills. The disposal of the removal classrooms would not result in a significant impact to the existing Los Angeles County landfills.

Further, the one-time disposal of the portable buildings represents a negligible fraction of the solid waste generated within the region. Thus, the proposed project would not significantly impact available landfill capacity. No further analysis is required in the EIR.

- g) Less than significant impact.** During construction and operation of the proposed project, the District would comply with all applicable City, County, and state solid waste diversion, reduction, and recycling mandates, including compliance with the City's Source Reduction and Recycling Element (SRRE). Compliance with these regulations and mandates would assist in reducing the amount of waste deposited in local landfills. Therefore, impacts related to regulatory compliance would be less than significant, and no further analysis is required in the EIR.

⁴⁰ City of South Gate General Plan 2035, Public Facilities and Services Element.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Responses:

- a) **Less than significant impact.** As discussed in **Section IV, Biological Resources**, the proposed project would not impact any endangered fauna or flora. Further, because of

the highly urbanized nature of the project site and the surrounding area, 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 V, Cultural Resources** potential impacts related archaeological and paleontological resources would be less than significant following the implementation of the regulatory compliance measures, including the Program EIR **SC-CUL-13, SC-CUL-17, and SC-CUL-18**. No further analysis is required in the EIR.

- b) **Potentially significant impact.** Potentially significant impacts are identified in this Initial Study related to air quality, geology and soils, hazards and hazardous materials, noise, pedestrian safety, and transportation and traffic. Cumulative impacts to the other resources for which potentially significant impacts are identified in this Initial Study will be analyzed further in the EIR.
- c) **Potentially significant impact.** Operation of the proposed project could result in potentially significant impacts related to air quality, geology and soils, hazards and hazardous materials, noise, pedestrian safety, and transportation and traffic. All of the potentially significant impacts identified in this Initial Study could have direct or indirect substantial adverse impacts on human beings. These impacts will be analyzed further in the EIR.

ACRONYMS and ABBREVIATIONS

Air Resources Board	ARB
Air Quality Management Plan	AQMP
Ambient Air Quality Standards	AAQS
Backlight-Uplight-Glare	BUG
Below Ground Surfaces	bgs
Best Management Practices	BMPs
California Building Code	CBC
California Department of Education	CDE
California Department of Transportation	Caltrans
California Environmental Quality Act	CEQA
California Integrated Waste Management Act	CIWMA
California Water Code	CWC
Carbon Dioxide	CO ₂
Climate Action Team	CAT
Coarse Inhalable Particulate Matter	PM10
Congestion Management Program	CMP
Construction General Permit	CGP
County of Los Angeles Metropolitan Transit Authority	Metro
CO ₂ equivalents	CO ₂ e
Division of the State Architect	DSA
Environmental Protection Agency	EPA
Federal Emergency Management Agency	FEMA
Fine Inhalable Particulate Matter	PM2.5
Greenhouse Gases	GHG
Hydrofluorocarbons	HFCs
Illuminating Engineering Society	IES
Interstate 710	I-710
International Dark –Sky Association	IDA
International Studies Learning Center	ISLC
Legacy High School Complex	LHSC
Localized Significance Thresholds	LSTs
Los Angeles County Sanitation District	LACSD
Los Angeles Unified School District	LAUSD
Los Angeles Unified School District Program EIR	LAUSD Program EIR
Maximum Extent Practicable	MEP
Methane	CH ₄
Mineral Resources Zone 1	MRZ-1
Model Lighting Ordinance	MLO
Most Likely Descendant	MLD
Multi-Purpose Room	MPR
National Pollution Discharge Elimination System	NPDES
Native American Heritage Commission	NAHC

Nitrogen Oxides	NO _x
Nitrous Oxide	N ₂ O
Office of Administrative Law	OAL
Office of Planning and Research	OPR
Ozone	O ₃
Perfluorocarbons	PFCs
Regional Transportation Plan /Sustainable Communities Strategy	RTP/SCS
Sacred Lands File	SLF
Science Technology Engineering Arts and Math	STEAM
Special Flood Hazard Areas	SFHA
South Central Coastal Information Center	SCCIC
South Coast Air Basin	SoCAB
South Coast Air Quality Management District	SCAQMD
Southern California Association of Governments	SCAG
Source Reduction and Recycling Element	SRRE
Standard Condition	SC
Standard Urban Storm Water Mitigation Plan	SUSMP
State Route 110	SR-110
State Water Resources Board	SWRB
Stormwater Pollution Prevention Plan	SWPPP
Sulfur Hexafluoride	SF ₆
Toxic Air Contaminants	TACs
Urban Water Management Plan	UWMP
Waste Discharge Requirements	WDR
Water Supply Assessment	WSA
Water Reclamation Plant	WRP
Water Vapor	H ₂ O
Visual And Performing Arts	VAPA

PREPARERS OF THE INTIAL STUDY

Lead Agency

Los Angeles Unified School District (LAUSD)
Office of Environmental Health & Safety (OEHS)
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Gwenn Godek, CEQA Advisor/Contract Professional
Edward Paek, AICP, CEQA Project Manager/Contract Professional

Environmental Consultant

Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101
(626) 564-1500
Jessica Kirchner Flores, Managing Principal
Kathleen King, Project Planner
Van Hoang, Publications Coordinator