July 2019 | Initial Study

GRAND VIEW ELEMENTARY SCHOOL RENOVATION PROJECT

Manhattan Beach Unified School District

Prepared for:

Manhattan Beach Unified School District
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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

The Manhattan Beach Unified School District (MBUSD or District) is proposing renovation and modernization of Grand View Elementary School (GVES), at 455 24th Street, Manhattan Beach, Los Angeles County. The renovations would involve ground reconfiguration, parking lot and drop-off area reconfiguration, modernization of existing buildings, building demolition, and new classroom and multipurpose building construction (proposed project). The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this project.

1.1 PROJECT LOCATION

GVES is at 455 24th Street in Manhattan Beach, Los Angeles County (project site). The project site consists of five APNs (4176-005-901, 4177-010-900, 4177-011-900, 4177-011-901, and 4177-002-900) totaling 14.03 acres. The City of Manhattan Beach is surrounded by the cities of El Segundo, Lawndale, Redondo Beach, and Hermosa Beach, as shown in Figure 1, *Regional Location*. The project site is west of the Pacific Coast Highway, between local streets Vista Drive, 24th Street, and Bell Avenue, as shown in Figure 2, *Local Vicinity*. Access to the project site is provided via 24th Street and Manor Drive for the western portion of the project site and Bell Avenue and 27th Street for the eastern portion of the project site.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The 14.03-acre project site is divided into three areas: the eastern third, known as the Grand View portion or "upper campus"; the western third, known as the Ladera portion or "lower campus"; and the northern, abandoned portion. See Figure 3, *Aerial Photograph*. The approximately 2.5-acre abandoned area is currently being used by community members for passive recreational uses, such as walking dogs, and only remnant of hardcourts remain. These three areas are collectively referred to as the project site. The upper and lower campus topography changes greatly, ranging from approximately 150 feet on the upper campus to 90 feet on the lower campus, and the northern, abandoned portion is approximately 120 feet.

The original school facilities were built in 1939 on the Grand View portion by the Public Works Administration, and more school buildings were added in about 1954. The school facilities on the Ladera portion were constructed in the 1960s and operated as a separate elementary school (School No. 9), which was closed in the 1990s. Currently, the Grand View and Ladera portions operate as one campus serving K through 5th grade students, except that part the Ladera portion is being leased to a private Montessori school.

The Grand View portion is developed with classroom buildings, food service building, library, kindergarten buildings, 12 portable classrooms, kindergarten playground, and a surface parking lot with student drop-off

area, accessed via 24th Place and 24th Street. The Ladera portion is developed with three classroom buildings, a multipurpose building, hardcourts, turf athletic fields, two playgrounds, a small parking lot, and a separate student loading area. The existing multipurpose room is one level high, and the classroom immediately south of the multipurpose room has five terrace levels. The existing school buildings total 68,214 square feet.

The Grand View portion of the campus was renovated in the 2000/01 school year and added student capacity through relocatable classroom buildings. Currently, GVES has maximum enrollment capacity of 789 students in grades TK through 5th. Two classroom buildings on the lower campus are being leased to a Montessori school.

1.2.2 Surrounding Land Use

The project site is irregularly shaped and bordered by Vista Drive and Grandview Avenue to the west, 24th Street and 24th Place to the south, Bell Avenue to the east, an alleyway and a sidewalk that extends from 26th Street along the northern boundary of the upper campus, and Sand Dune Park to the north of the abandoned lot. The sidewalk bordering the project site's northern boundary provides pedestrian access to Grandview Avenue. The project site is surrounded by residential uses across the street frontages, and also directly abuts residential units to the south near 24th Place. The residential uses are generally single-family units that are one to three stories high. Sand Dune Park is a three-acre park with a trail that leads to the top of the dune and a panoramic, east-facing view of the city and a fenced small children's play area with swings, merry-go-round, and climbing equipment. The park also has shaded picnic facilities, picnic tables, restrooms, and drinking fountains. Other surrounding uses include Manhattan Beach Public Works and the California Army National Guard's 578th Brigade Engineer Battalion facilities north of Sand Dune Park.

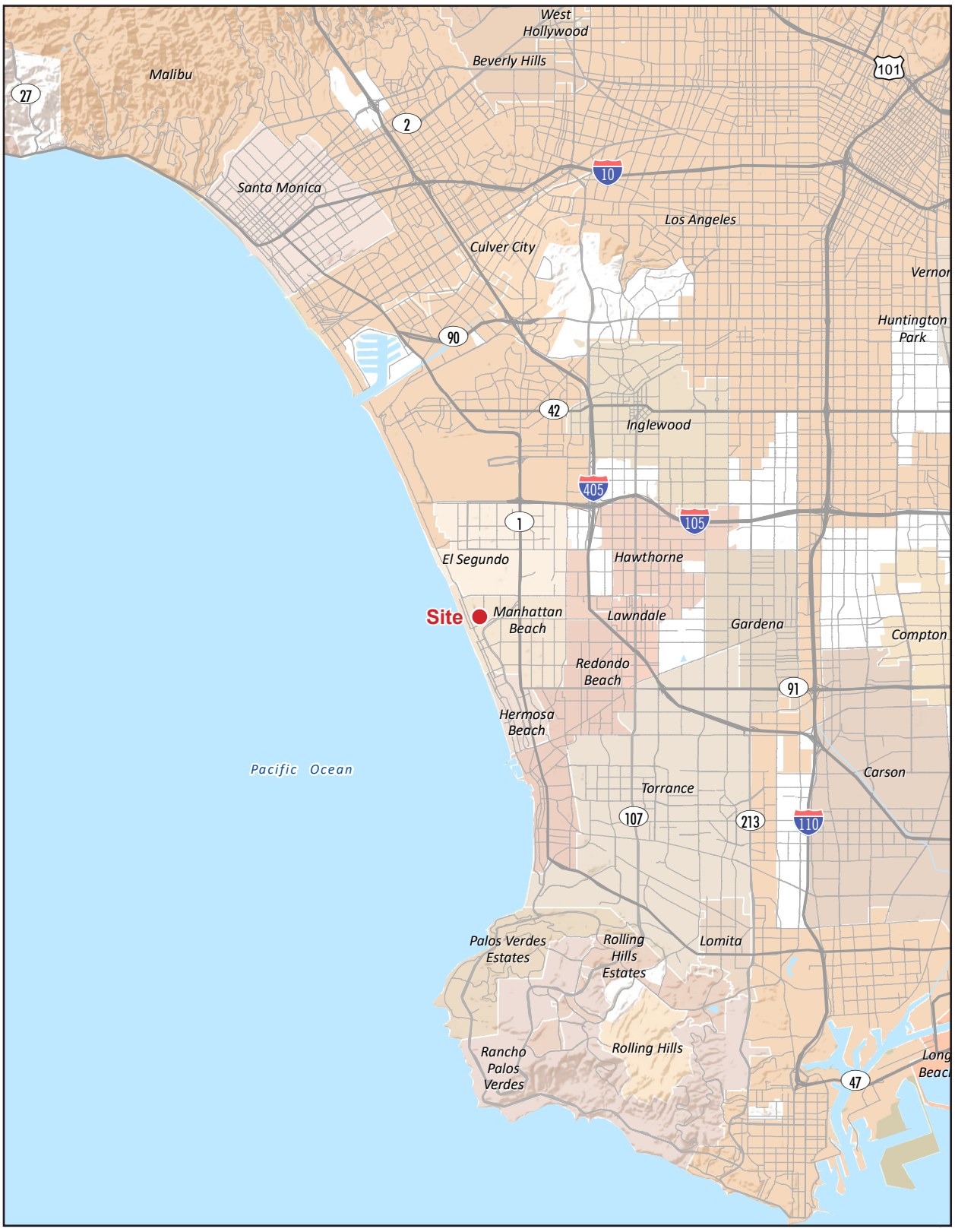
1.3 PROJECT DESCRIPTION

1.3.1 Proposed Land Use

The District proposes to modernize and reconfigure the existing GVES facilities by providing various new construction and renovation so that all areas of campus are more accessible and function more effectively as a single school. As shown in Figure 4, *Proposed Site Plan*, the proposed project involves two new buildings, a new, three-story multipurpose building and a two-story classroom building. The new multipurpose building would require demolition of the existing multipurpose building (4,400 square feet) and four-story classroom building (21,727square feet) on the Ladera portion of the project site.

The new, three-story multipurpose building (17,100 gross square feet) would be approximately 47 feet tall, with the top of the high roof at 137 feet elevation and the finished ground elevation at 90 feet; it would house administrative, food service, and multipurpose room functions. Figures 5a through 5d, *Multipurpose Building Elevations*, show north, south, east, and west building elevations, and Figure 6, *Multipurpose Building Sections*, shows different rooms to be housed in the multipurpose building.

Figure 1 - Regional Location
1. Introduction



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Source: ESRI, 2019

1. Introduction

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Figure 2 - Local Vicinity
1. Introduction

Source: ESRI, 2018

1. Introduction

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Figure 3 - Aerial Photograph
1. Introduction

School Boundary

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Scale (Feet)

Source: ESRI, 2018

1. Introduction

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Figure 4 - Site Plan
1. Introduction

Source: DLR Group, 2019

1. Introduction

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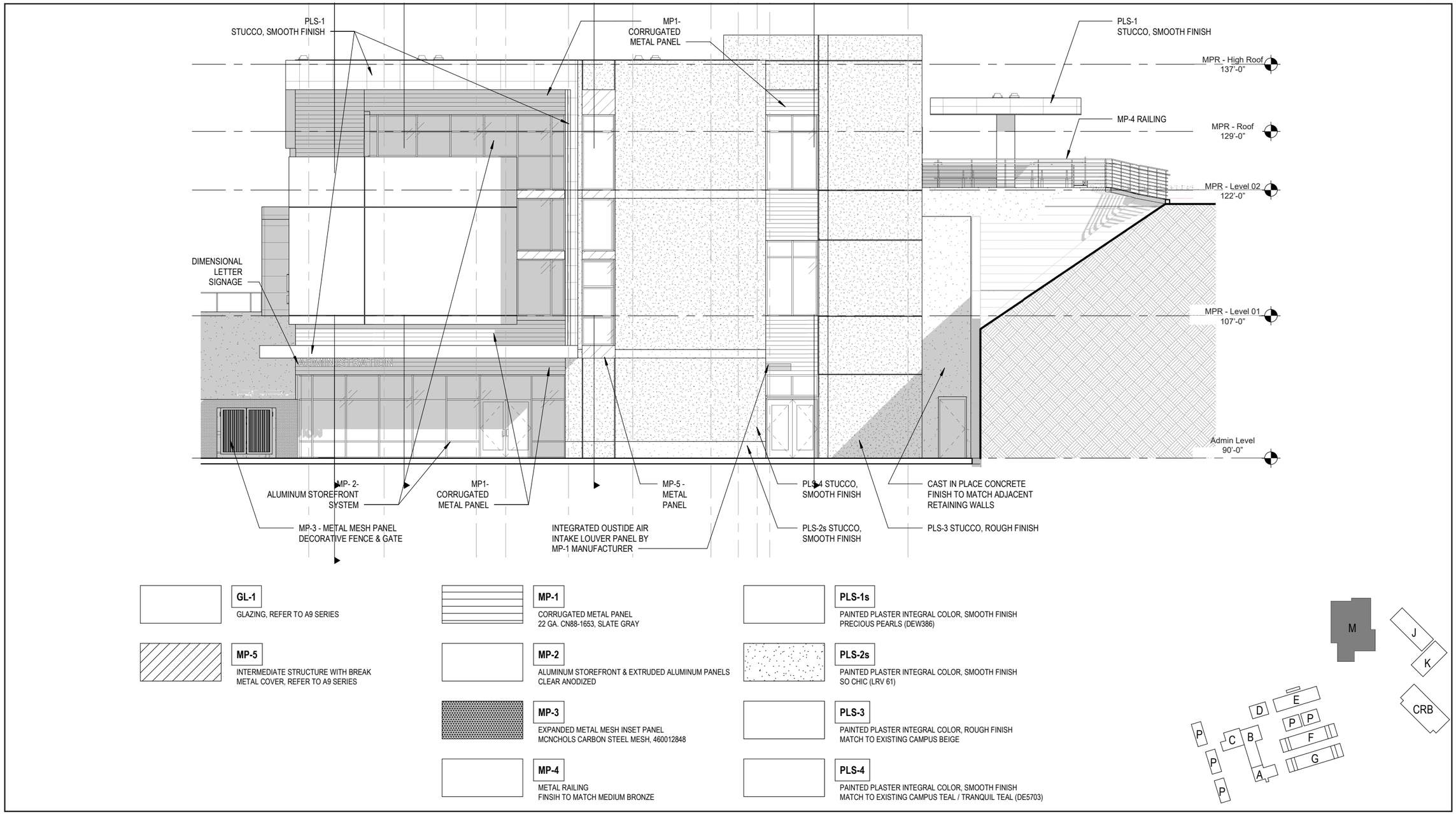
Figure 5a - MPR Building Elevations - North



Source: DLR Group, 2019

1. Introduction

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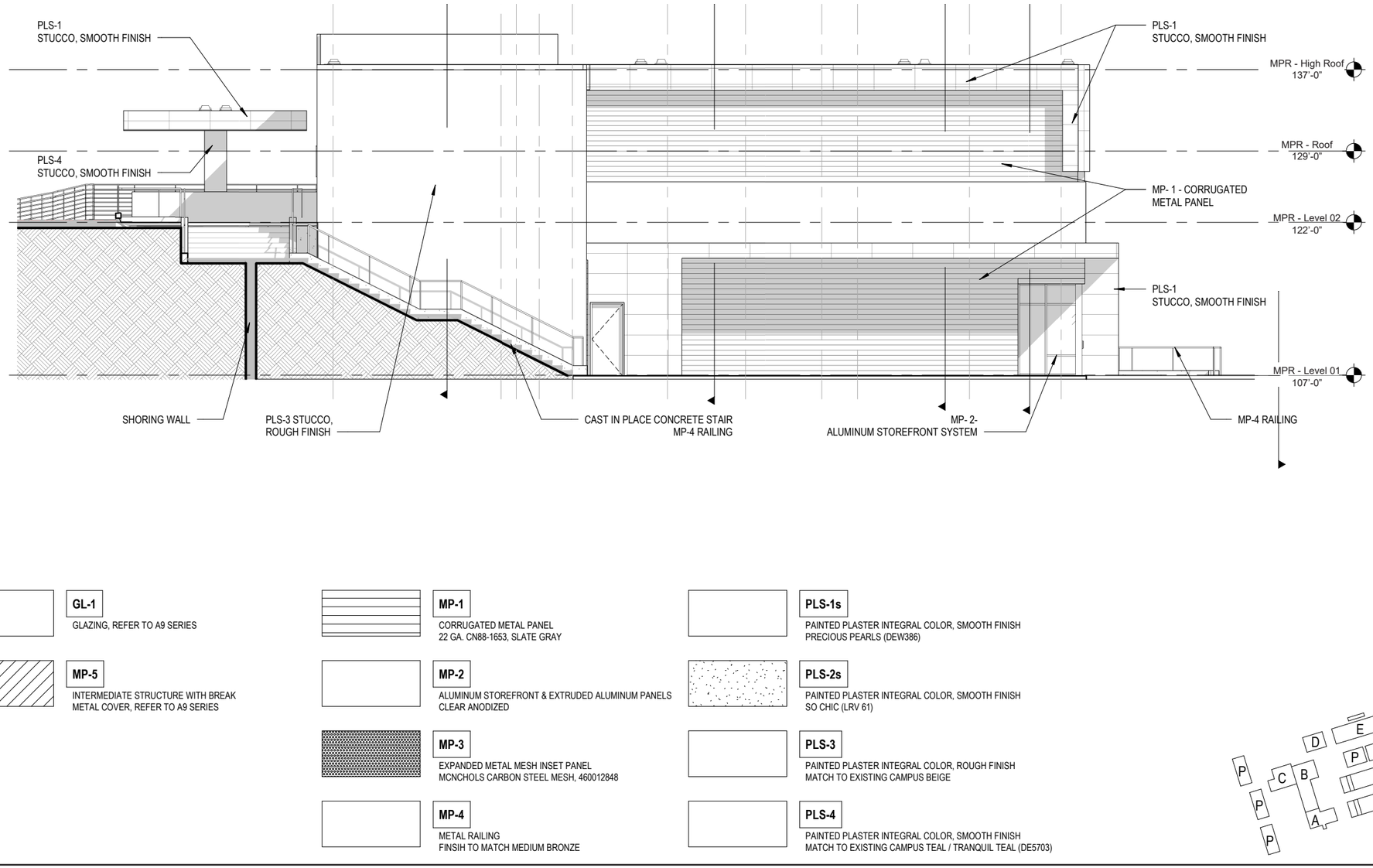
Figure 5b - MPR Building Elevations - South



Source: DLR Group, 2019

1. Introduction

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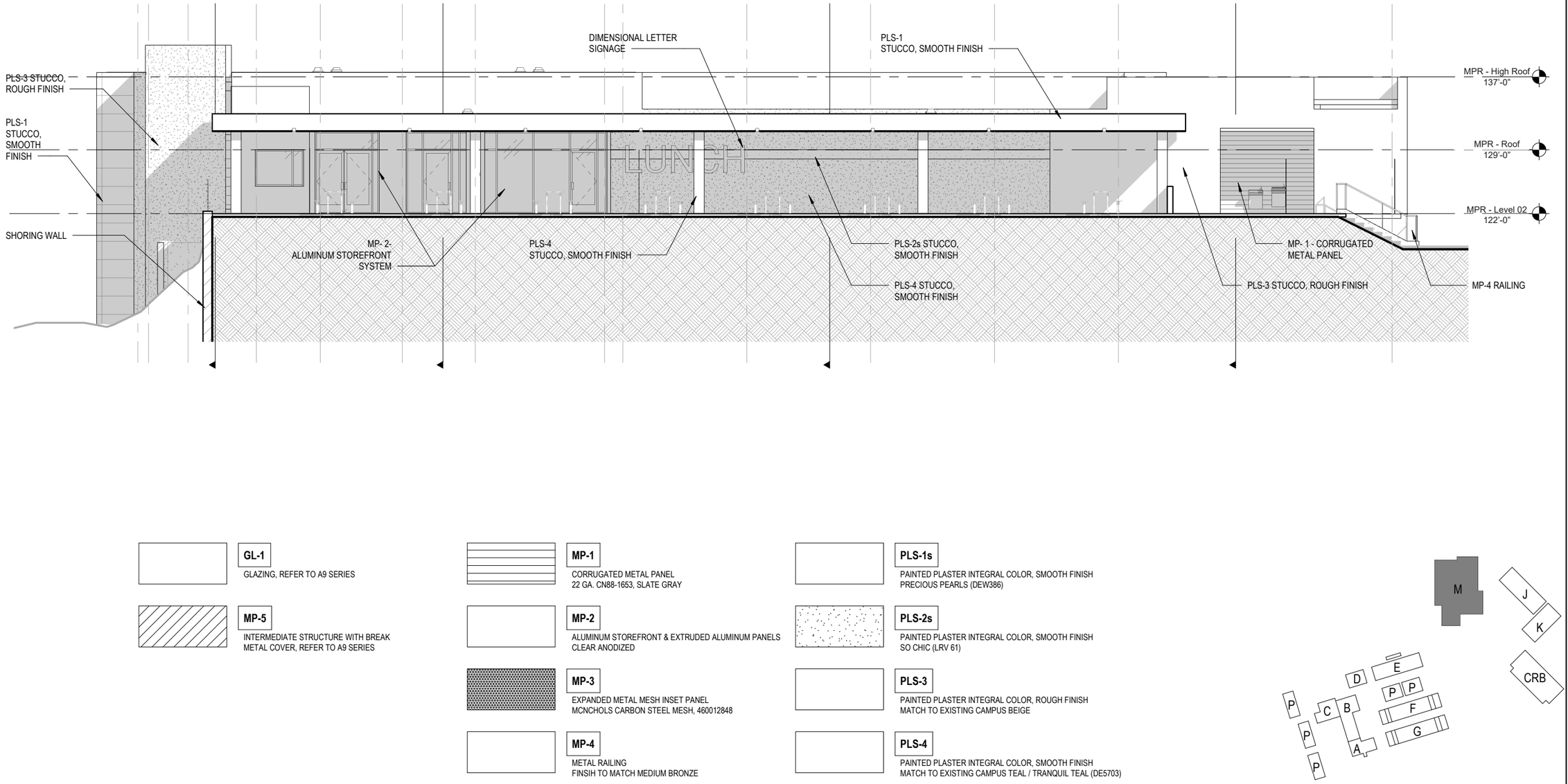
Figure 5c - MPR Building Elevations - West



Source: DLR Group, 2019

1. Introduction

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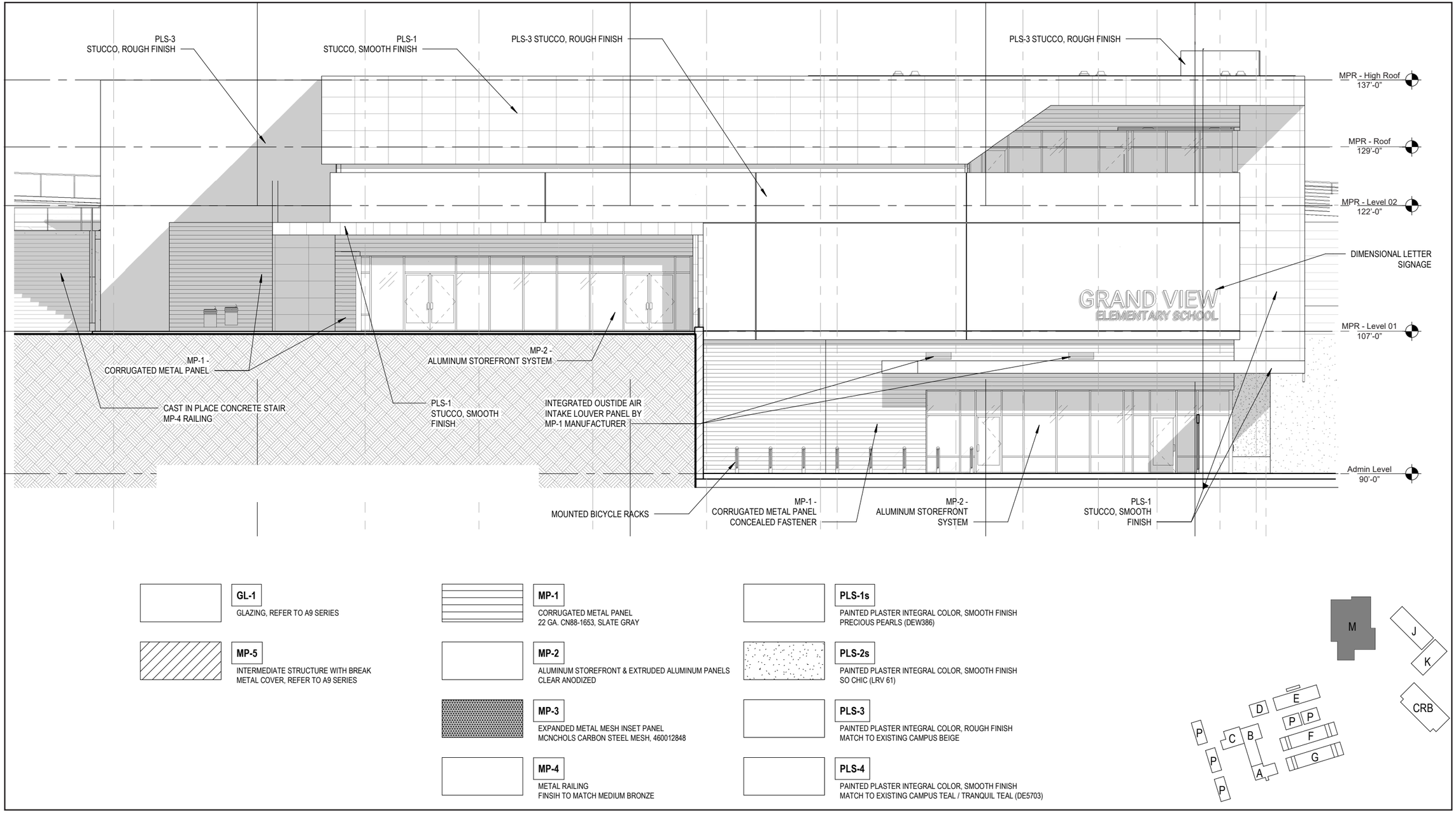
Figure 5d - MPR Building Elevations - East

3. Environmental Analysis



Source: DLR Group, 2019

1. Introduction

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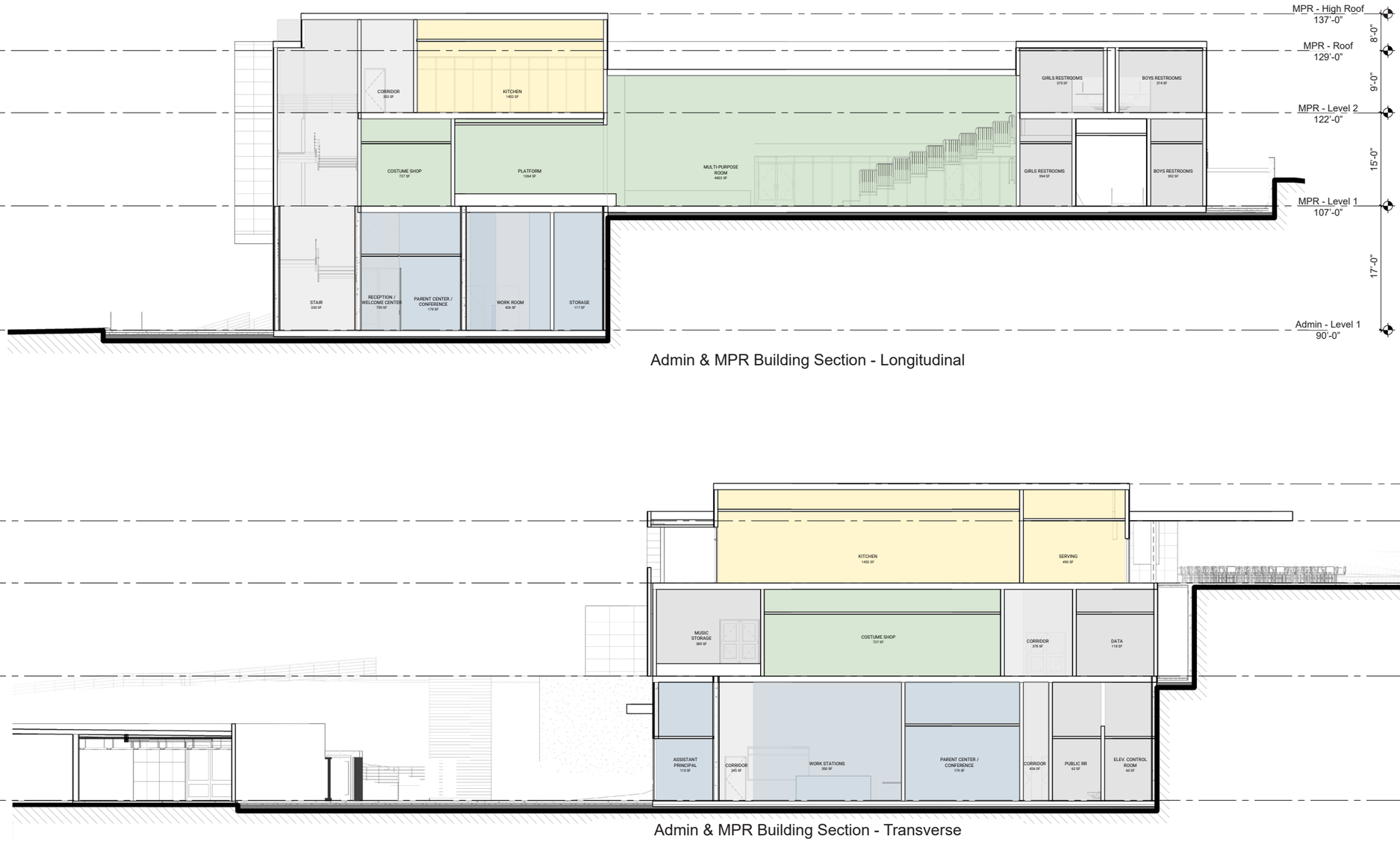
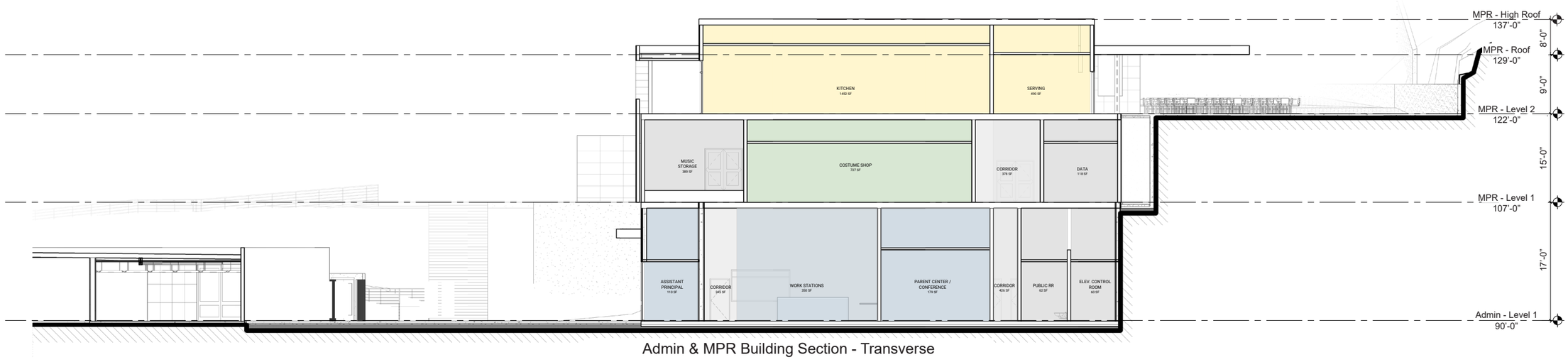
Figure 6 - Multipurpose Building Sections

3. Environmental Analysis



Admin & MPR Building Section - Longitudinal



Admin & MPR Building Section - Transverse

0 15
Scale (Feet)

Source: DLR Group, 2019

1. Introduction

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1. Introduction

The new two-story classroom building (13,600 square feet) would be constructed to the south of the new multipurpose building to replace the four-story classroom building that would be demolished. The new classroom building would be approximately 25 feet, with the top of the high roof height at 134 feet and the ground elevation at 109 feet. Figure 7, *Two-Story Classroom Building Elevations*, shows the building height, and Figure 8, *Two-Story Classroom Building Section*, shows rooms to be housed in the classroom building. Figure 9, *Proposed Project Visual Simulation*, illustrates the project site from the east with the new multipurpose building and two-story classroom building. Other improvements on the Ladera portion would include a new drop-off and 24-space parking lot from Bell Avenue; new outdoor basketball courts, soccer playfield, and gaga ball courts; and two play apparatus areas. The existing Buildings J and K, currently being leased to the Montessori operation, would be modernized to comply with current educational specifications. It is anticipated that the proposed project would also involve wet and dry utility systems upgrades to accommodate the proposed uses and meet current standards.

The northern abandoned portion of the campus, which was an asphalt playground but has fallen into disrepair and disuse, would be converted to two soccer fields. There is currently no vehicular access to this area, and the proposed project would provide a new emergency/fire lane from the Ladera portion of the campus (see Figure 4, *Proposed Site Plan*).

In the Grand View portion of the campus, six portables (four classrooms and two restrooms) would be removed as part of modernization, and the area would be used for additional parking and community garden area. Buildings A, B, C, D, E, F, and G in the Grand View portion would be modernized and repurposed to accommodate other programmatic needs. The modernization would include installation of more efficient HVAC system. The existing campus parking on 24th Street would be expanded to accommodate six additional parking spaces.

As shown in Table 1, changes are anticipated only in the special day class (SDC) classrooms and the kindergarten through 3rd-grade classrooms, adding two more classrooms. The proposed project would change the number of classrooms from 28 to 30, and the maximum enrollment capacity would increase by 24 students from the existing 735 students in grades TK through 5th to 759 students in grades TK through 5th and SDC students.

Table 1 Enrollment Capacity Summary

	Existing			Master Plan			
Grade	Classrooms	Loading	Capacity	Classrooms	Loading	Capacity	Change
SDC	0	12	0	2	12	24	+24
TK	1	24	24	1	24	24	0
K	3	24	72	4	24	96	+24
1-3	15	24	360	14	24	336	-24
4-5	9	31	279	9	31	279	0
Total	**28**		**735**	**30**		**759**	**+24**

Access

The existing student drop-off and pick-up area on Bell Avenue would be reconfigured so that the existing parking lot on Bell Avenue is expanded to provide 24 spaces and approximately 400 feet of student drop-off aisle. The existing drop-off area south of 27th Street would be eliminated, and the existing driveway to the parking lot would be used for ingress. New emergency/fire access would also be provided on the southern boundary of the campus along 24th Place, and the fire lane would extend and connect to the new soccer fields to the north.

1.3.2 Project Phasing

The project is preliminarily scheduled to begin in summer 2020 upon necessary approvals and to be completed by fall 2022.

1.4 EXISTING ZONING AND GENERAL PLAN

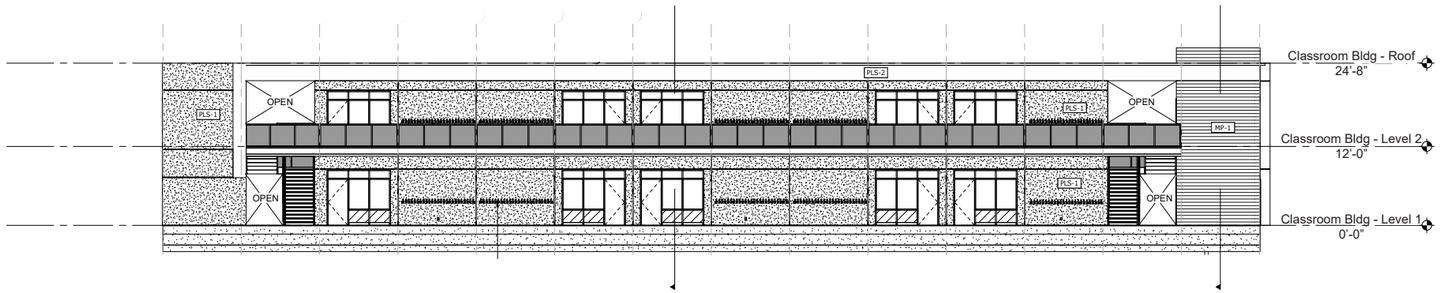
The project site is zoned PS–Public and Semi-Public on the zoning map, and designated as Public Facilities in the City of Manhattan Beach General Plan.

1.5 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

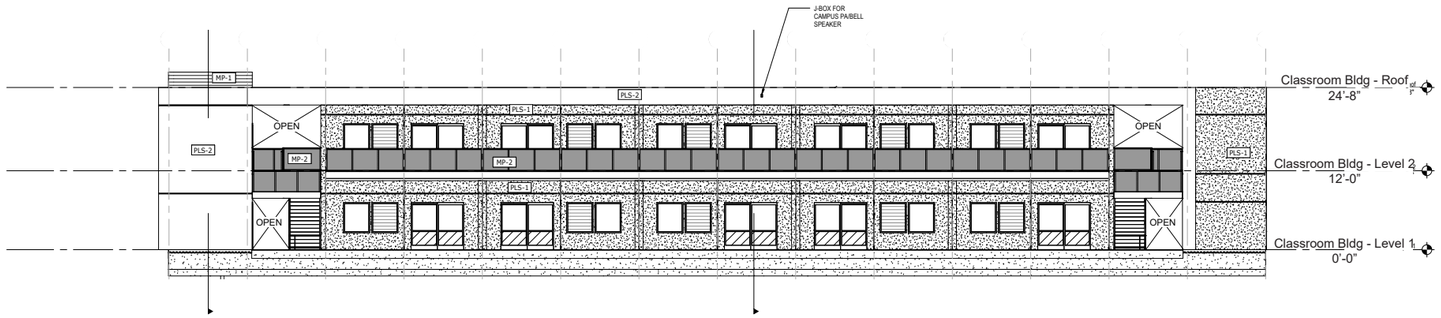
It is anticipated that approval required for the proposed project would include, but may not be limited to, the following:

- **City of Manhattan Beach Public Works Department.** Permit for curb, gutter, and other offsite improvements.
- **City of Manhattan Beach Fire Department.** Approval of plans for emergency access and emergency evacuation.
- **City of Manhattan Beach Department of Transportation.** Approval of construction-related haul route.
- **California Department of General Services, Division of State Architect (DSA).** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division (CDE).** If MBUSD is requesting modernization funds from the State Allocation Board, CDE must review and approve the plans (Education Code Section 17070.50) prior to submitting a funding request.
- **State Water Resources Control Board (SWRCB).** Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP).

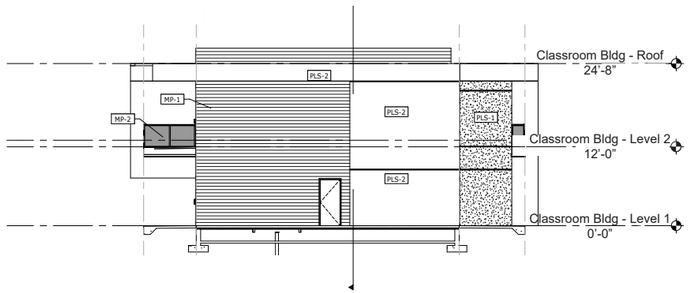
Figure 7 - Two-Story Classroom Building Elevation



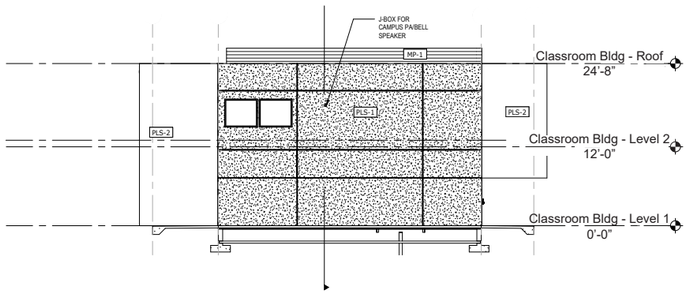
Classroom Building North Elevation



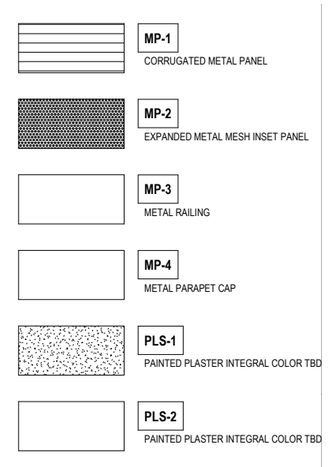
Classroom Building South Elevation



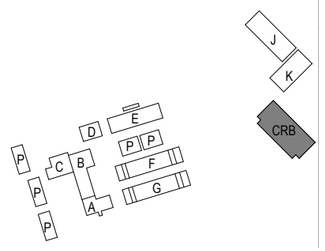
Classroom Building West Elevation



Classroom Building East Elevation



KEY PLAN



Existing

New

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Scale (Feet)

Source: DLR Group, 2019

1. Introduction

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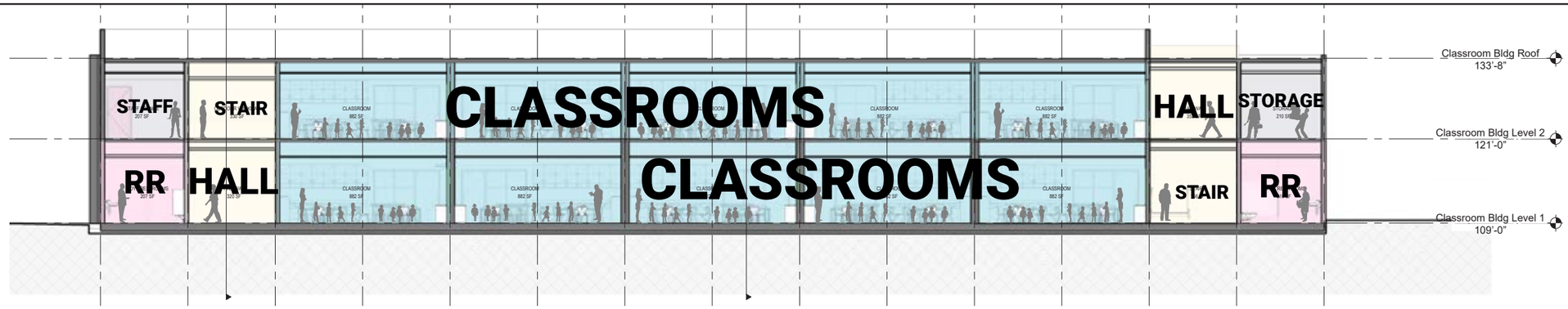
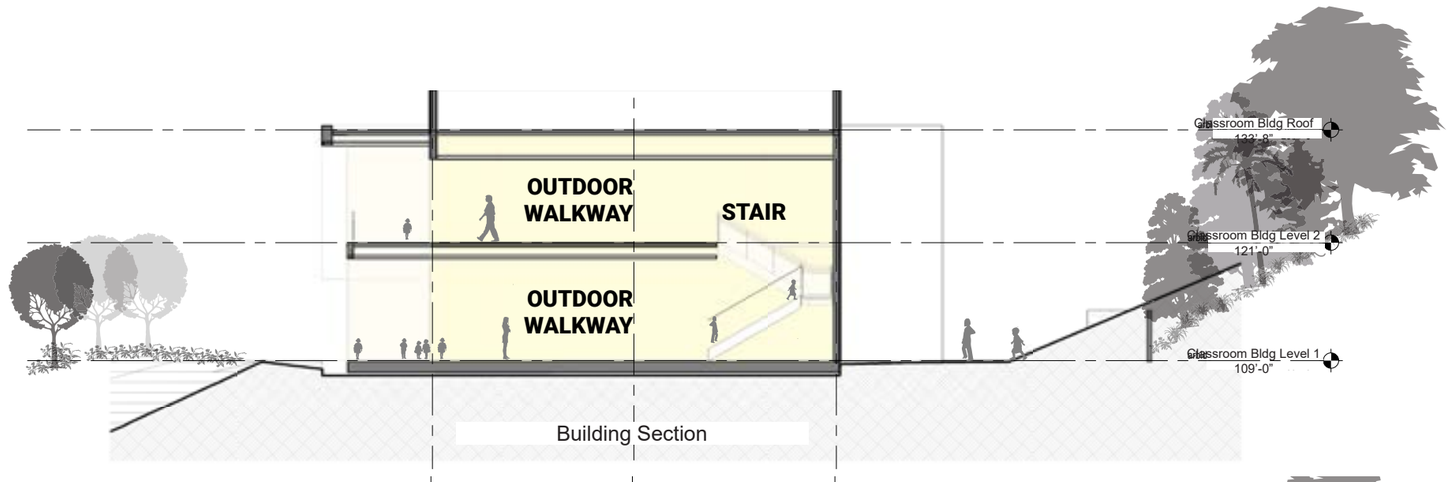
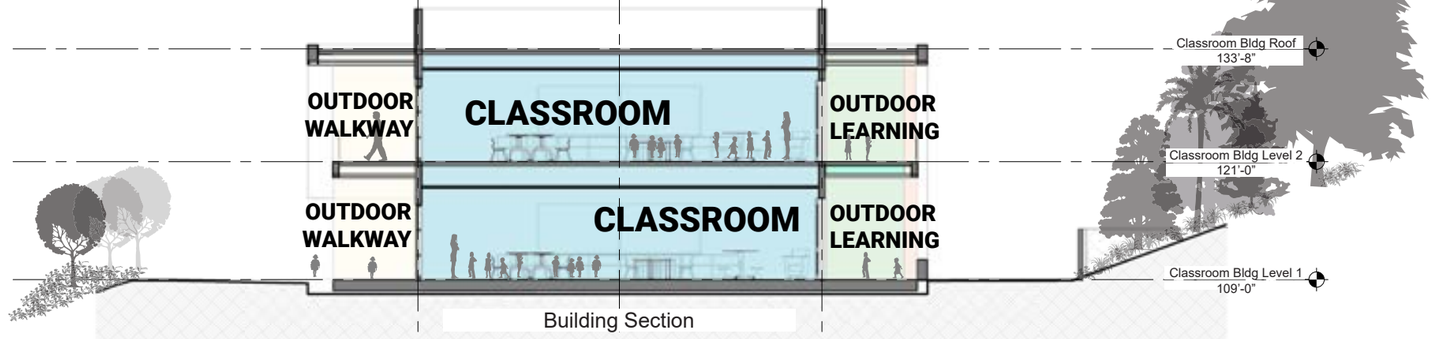
Figure 8 - 2-Story Classroom Building Sections



Longitutinal Building Section



Building Section



Building Section

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Scale (Feet)

Source: DLR Group, 2019

1. Introduction

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Figure 9 - Proposed Project Visual Simulation

1. Introduction

Source: DLR Group

1. Introduction

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- **Los Angeles Regional Water Quality Control Board (LARWQCB).** Issue National Pollution Discharge Elimination System (NPDES) permit, Clean Water Act Section 401 Water Quality Certification.
- **South Coast Air Quality Management District (SCAQMD).** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Asbestos Emissions from Demolition/Renovation Activities; Rule 201, Permit to Construct; Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil; site-specific soil mitigation plan; and site monitoring.

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Grand View Elementary School Renovation Project

2. **Lead Agency Name and Address:**
   Manhattan Beach Unified School District
   325 S. Peck Avenue
   Manhattan Beach, CA 90266

3. **Contact Person and Phone Number:**
   Dawnalyn Murakawa-Leopard, Deputy Superintendent
   310.318.7345 x5943

4. **Project Location:**
   455 24th Street
   Manhattan Beach, CA 90266
   (APNs 4176-005-901, 4177-010-900, 4177-011-900, 4177-011-901, and 4177-002-900)

5. **Project Sponsor's Name and Address:**
   Manhattan Beach Unified School District
   325 S. Peck Avenue
   Manhattan Beach, CA 90266

6. **General Plan Designation:** Public Facilities

7. **Zoning:** PF–Public Facilities

8. **Description of Project:** The District proposed to modernize and reconfigure the existing GVES facilities by providing various new construction and renovation so that all areas of campus are more accessible and function more effectively as a single school. The maximum enrollment capacity would be increased by two classrooms or 24 students.

   The proposed project would demolish the existing multipurpose building and four-story classroom buildings totaling 26,130 square feet on the Ladera portion of the project site and remove six portables (four classrooms and two restrooms) from the Grand View portion of the campus. In place of the existing multipurpose building, a new three-story, 17,100 square feet, cafeteria/multipurpose building (which is one combined space) would be constructed to house administrative, food service, and multipurpose room functions. A new two-story classroom building (13,600 square feet) would be constructed to the south of the new multipurpose building. Other improvements on the Ladera portion would include a new drop-off

and 24-space parking lot from Bell Avenue; new outdoor basketball courts, soccer playfield, and gaga ball courts; and two play apparatus areas. The existing Buildings J and K, currently being leased to the Montessori operation, would be modernized to comply with current educational specifications.

9. Surrounding Land Uses and Setting:
The project site is surrounded by residential uses and a park use.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement:

- City of Manhattan Beach, Public Works Department. Permit for curb, gutter, and other offsite improvements
- City of Manhattan Beach Fire Department.
- California Department of General Services, Division of State Architect (DSA).
- California Department of Education, School Facilities Planning Division (CDE).
- State Water Resources Control Board (SWRCB).
- Los Angeles Regional Water Quality Control Board (LARWQCB).
- South Coast Air Quality Management District (SCAQMD).

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

> Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The District has not received a letter from tribal groups requesting to be notified for a consultation in compliance with Assembly Bill (AB) 52. The California Native American Heritage Commission was contacted to request a list of California Native American tribes traditionally and culturally affiliated with the project area. The list received had five tribal entities, and query letters were sent to each. The District is in compliance with AB 52.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 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 impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on 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	July 1, 2019 *Date*
Michael D. Matthews, Superintendent *Printed Name*	Manhattan Beach USD *For*

2.4 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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of 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.

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) I**mpacts 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. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

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. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

2. Environmental Checklist

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 or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
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?			X	
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?			X	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
IX. 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?			X	
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?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?				X
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		X		
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water 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?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable. Except as provided in Public Resources Code Section 21099, would the project:

3.1 AESTHETICS

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

Less Than Significant Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. The project site has topography that ranges from 90 feet to 150 feet with steep slopes. The Grand View portion of the campus is generally higher in elevation than the Ladera portion—approximately 140 feet above mean sea level (amsl) versus 90 feet to 120 feet amsl. Surrounding residences near Bell Avenue to the east are at 70 to 85 feet amsl; residences near Grandview Avenue between 26th Street and 29th Street to the west are more than 160 feet amsl; and residences near Vista Drive to the southwest are 145 to 160 feet amsl—differences of 15 feet to 90 feet. The project site is already developed with structures that range from one to five stories. The residences in the surrounding area also vary in topography and height, ranging from one to three stories. Although the project would include new buildings, there are no protected or designated scenic vistas or views in the project vicinity. Sand Dune Park, which borders the northernmost boundary of the campus, has a panoramic view of the City to the east and some view to the south toward the project site. New buildings would have an overall height profile not exceeding the existing school facilities. Therefore, the proposed project would not obscure any scenic vistas. Impacts would not be significant, and no mitigation measures are required.

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

No Impact. The only officially designated state scenic highway in Los Angeles County is State Route 2 (SR-2)—the Angeles Crest Highway, part of the Angeles Crest Scenic Byway—approximately 17 miles northeast of the school campus. The new building would not be visible from SR-2. Additionally, the campus is not visible from other designated roadways in Los Angeles County—Arroyo Seco Historic Parkway, seven eligible state scenic highways, and five county scenic highways—or any City-designated Scenic Highways. Project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur, and no mitigation measures are required.

3. Environmental Analysis

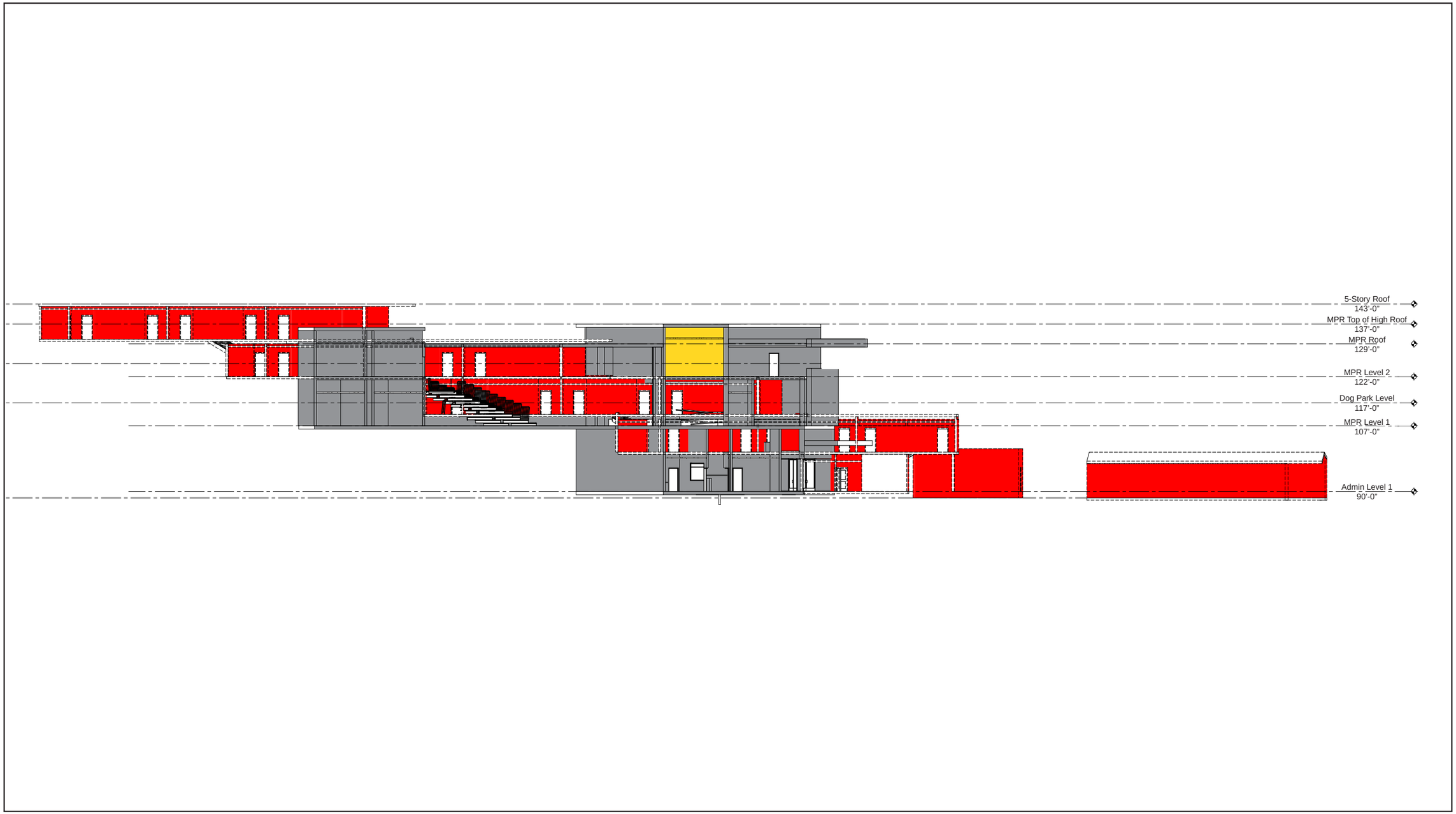
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable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

Less Than Significant Impact. The project site is in an urbanized area and is already developed with school facilities. The proposed project would result in demolition of the existing five-story building, construction of new three-and two-story buildings, and various improvements and modernizations throughout the campus. Although the proposed project would modify the existing visual setting of the project site, the new buildings would be of quality design and would be compatible with the existing visual character of the project site as an elementary school. As a state agency, the District is not subject to the City's regulations governing scenic quality. Manhattan Beach Municipal Code Section 10.28.040, Development Regulations, indicates that development regulations in the PS (Public and Semi-Public) District shall be as specified by the use permit from the City. Since no use permit is required, no development regulations governing scenic quality would be applicable to the proposed project.

Figure 9, *Proposed Project Visual Simulation*, shows what the project site would look like on the Ladera portion once the new buildings are constructed. The Ladera portion is the lower campus, and no scenic ocean view would be obstructed by the proposed project. The General Plan indicates that scenic views from Sand Dune Park are to the east, and the proposed project would place new buildings to the south; therefore, it would not significantly block any scenic vistas. As shown in Figure 10, *Multipurpose Building Elevations, Existing vs. New*, the new multipurpose building would not be substantially taller or have greater massing than the existing multipurpose room and the five-story classroom building to be demolished. The maximum height of the new multipurpose building would be approximately six feet less than the existing classroom building to be replaced. The new multipurpose building's high point would be at 137 feet amsl, and the maximum height of the existing classroom building is at 143 feet.

The new, two-story classroom building would be placed south of Building K, approximately 70 feet from the nearest residential units to the south. The new classroom building would be approximately 25 feet in height (see Figure 7, *Two-Story Classroom Building Elevations*) and approximately 132 feet amsl at the top of the roof. The classroom building would not exceed the height of the new multipurpose building or Buildings E, F, and G in the Grand View portion of the campus to the west. Since there is no applicable zoning and other regulations that govern the project site's scenic quality; the new buildings would not exceed the heights of the existing buildings, and the proposed project is not anticipated to obstruct any protected views, no significant impacts to scenic quality of the site and the surrounding area would occur. The proposed project would not substantially degrade the visual quality of the project area, and no mitigation measures are required.

Figure 10 - Multipurpose Building Elevations, Existing vs. New
3. Environmental Analysis



Existing

New

0 25
Scale (Feet)

Source: ESRI, PTV, VISTRO 2019

3. Environmental Analysis

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

Less Than Significant Impact. Existing sources of light on the project site include streetlights, vehicle headlights, building and security lights, and parking lot lights. The proposed project involves reconfiguration of the existing campus that could modify lighting fixture locations and/or add sources from building construction, parking lot reconfiguration, and new athletic field improvements. However, the project site is already developed and operating as elementary school, and the proposed project would not substantially increase the development intensity or change uses to create a significant increase in light and glare impacts. Additionally, no nighttime lighting is proposed at any of the improved athletic fields, including two soccer fields on the northern slope. It is also anticipated that there would be no outdoor uplighting or flashing lights that could potentially introduce substantially greater light at residences surrounding the project site. The proposed project would provide lighting sources similar to the existing uses and would not adversely affect day or nighttime views in the area. No mitigation measures are required.

3.2 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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. The Project would not convert farmland to nonagricultural uses. There is no agricultural or farm use on or in the vicinity of the campus; therefore, no project-related farmland conversion would occur. The campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder (DLRP 2018). No impact would occur, and no mitigation measures are required.

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

No Impact. The project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is PF–Public Facilities, and it is not zoned for agricultural use. Implementation of the proposed project would not conflict with such zoning. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur, and no mitigation measures are required.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. According to Public Resources Code (PRC) Section 12220(g), forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (PRC Section 4526). The campus is not zoned for forest land or timberland use. No impact would occur, and no mitigation measures are required.

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

No Impact. Construction of the Project would not result in the loss or conversion of forest land. No vegetation onsite is cultivated for forest resources. No forest land would be affected by the project. No impact would occur, and no mitigation measures are required.

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

No Impact. There is no mapped important farmland or forest land on or near the school campus, and project development would not indirectly cause conversion of such land to non-agricultural or non-forest use. No impact would occur, and no mitigation measures are required.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the school, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2016).

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan (AQMP). It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the AQMP. The most recently adopted comprehensive plan is the 2016 AQMP, adopted on March 3, 2017 (see Appendix A to this Initial Study for a description of the 2016 AQMP).

Regional growth projections are used by SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city/county general plans (SCAG 2016). Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

Construction activities would generate exhaust from construction equipment and vehicle trips, fugitive dust from demolition and ground-disturbing activities, and off-gas emissions from architectural coatings and paving. The proposed project involves renovation and modernization of the existing school facilities, resulting in demolition and construction of several school buildings. However, the proposed project would only increase the student enrollment capacity by two classrooms or 24 students for the special day classes; therefore, it would not have the potential to substantially affect SCAG's demographic projections. Based on the scope and nature of the project—replacing existing facilities with newer facilities—it is not considered a project of statewide, regional, or areawide significance that would require intergovernmental review under Section 15206 of the CEQA Guidelines. Therefore, the proposed project would not affect the regional emissions inventory and would not conflict with strategies in the AQMP. Impacts would be less than significant, and no mitigation measures are required.

b) 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?

Less Than Significant Impact With Mitigation Incorporated. The SoCAB is currently designated non-attainment for O_3 and $PM_{2.5}$ under the California and National AAQS, non-attainment for PM_{10} under the California AAQS, and non-attainment for lead under the National AAQS. Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Due to the extent of the SoCAB area and the large number of cumulative project emissions, a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds (SCAQMD 1993).

The SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$.

3. Environmental Analysis

Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes changes in regional impacts from short-term construction activities and long-term operation of the proposed project.

Construction Impact

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust emissions from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust emissions from on-road vehicles; and 4) off-gas emissions of VOCs from paints.

For purposes of this analysis, construction activities are anticipated to occur over an approximately 6.20-acre area of the 14.03-acre campus. Construction would involve building and hardscape demolition, grading, trenching, construction of the two-story classroom and three-story multipurpose buildings, modernization of nine existing buildings, asphalt paving, and architectural painting. Construction activities for the proposed school improvements are preliminarily scheduled to start June 2020 and last through December 2022. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2, and are based on the project's preliminary construction schedule, phasing, and equipment list provided by the project architect. Results of the construction emissions modeling are shown in Table 2, *Maximum Daily Construction Emissions*.

Table 2 Maximum Daily Construction Emissions

Construction Activity	Maximum Daily Emissions (lbs/Day)[1]					
	VOC	NO_x	CO	SO_2	PM_{10}[2]	$PM_{2.5}$[2]
Year 2020						
Asphalt Demolition, Grading (Site), Grading (Site Haul), Modernization (Existing Buildings)	7	83	46	0.14	8	5
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings)	6	61	41	0.08	6	4
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings), Architectural Coating (Building Exterior)	**185**	63	43	0.08	7	4
Grading (Two-Story Classroom), Grading (Export Haul), Utility Trenching (Classroom)	3	51	25	0.10	6	3
Grading (Classroom), Grading (Import Haul), Utility Trenching (Classroom)	3	51	25	0.10	6	3
Grading (Classroom), Utility Trenching (Classroom)	3	29	20	0.04	4	3
Building Construction (Three-Story Multipurpose)	2	20	17	0.03	1	1
Building Construction (Multipurpose and Classroom)	4	39	34	0.06	2	2
Year 2021						
Building Construction (Multipurpose and Classroom)	4	35	34	0.06	2	2
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten)	10	99.6	79	0.14	6	5
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten), Architectural Coating (Classroom)	23	101	80	0.14	6	5
Building Construction (Multipurpose), Building Demolition (Ladera and PAC), Modernization (Kindergarten)	8	82	62	0.11	5	4

Table 2 Maximum Daily Construction Emissions

Construction Activity	Maximum Daily Emissions (lbs/Day)[1]					
	VOC	NO_x	CO	SO_2	PM_{10}[2]	$PM_{2.5}$[2]
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose)	8	77	59	0.11	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Grading (Multipurpose), Utility Trenching (Multipurpose)	8	77	59	0.11	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose), Architectural Coating (Kindergarten)	24	78	61	0.11	7	5
Building Construction (Three-Story Multipurpose)	2	18	17	0.03	1	0.93
Year 2022						
Building Construction (Three-Story Multipurpose), Portable Buildings Removal, Asphalt Paving	7	64	68	0.12	4	3
Building Construction (Three-Story Multipurpose), Asphalt Paving	4	38	47	0.08	2	2
Building Construction (Three-Story Multipurpose)	2	16	17	0.03	0.90	0.79
Building Construction (Three-Story Multipurpose), Architectural Coating (Multipurpose)	6	17	19	0.03	0.99	0.87
Maximum Daily Emissions	185	101	80	0.14	8	5
SCAQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold	**Yes**	**Yes**	No	No	No	No

Source: CalEEMod Version 2016.3.2. Highest winter or summer emissions are reported.
Notes: lbs: Pounds.
[1] Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast Air Quality Management District.
[2] Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

As shown in Table 2, the maximum daily emissions for CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective SCAQMD regional significance threshold values. However, construction-related VOC emissions generated from paints used in architectural coating of the existing buildings would exceed the SCAQMD regional significance threshold for VOC. In addition, the combined construction-related NO_x emissions generated from off-road equipment used during the overlap of the building construction of the proposed multipurpose and two-story classroom buildings, demolition of the existing Ladera and multipurpose buildings, modernization of the existing kindergarten building, and painting of the proposed two-story classroom building activities would exceed the SCAQMD regional significance threshold for NO_x. Therefore, implementation of Mitigation Measures AQ-1 and AQ-2 would be required to reduce air quality impacts from project-related construction activities to a less than significant level. Mitigation Measures AQ-1 and AQ-2 would require the proposed project to use lower VOC-content paints and demolition equipment that would meet the EPA's Tier 3 emissions standards, respectively. As shown in Table 3, *Maximum Daily Regional Construction Emissions with Mitigation*, implementation of Mitigation Measures AQ-1 and AQ-2 would reduce construction-related emissions to below the significance thresholds. Therefore, air quality impacts from project-related construction activities would be less than significant with incorporation of mitigation.

3. Environmental Analysis

Table 3 Maximum Daily Regional Construction Emissions with Mitigation

Construction Phase	Maximum Daily Emissions (lbs/Day)[1]					
	VOC	NO_x	CO	SO_2	PM_{10}[2]	$PM_{2.5}$[2]
Year 2020						
Asphalt Demolition, Grading (Site), Grading (Site Haul), Modernization (Existing Buildings)	7	83	46	0.14	8	5
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings)	6	61	41	0.08	6	4
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings), Architectural Coating (Building Exterior)	51	63	43	0.08	7	4
Grading (Two-Story Classroom), Grading (Export Haul), Utility Trenching (Classroom)	3	51	25	0.10	6	3
Grading (Classroom), Grading (Import Haul), Utility Trenching (Classroom)	3	51	25	0.10	6	3
Grading (Classroom), Utility Trenching (Classroom)	3	29	20	0.04	4	3
Building Construction (Three-Story Multipurpose)	2	20	17	0.03	1	1
Building Construction (Multipurpose and Classroom)	4	39	34	0.06	2	2
Year 2021						
Building Construction (Multipurpose and Classroom)	4	35	34	0.06	2	2
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten)	6	74	84	0.14	4	4
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten), Architectural Coating (Classroom)	19	75	86	0.14	5	4
Building Construction (Multipurpose), Building Demolition (Ladera and PAC), Modernization (Kindergarten)	5	56	68	0.11	3	3
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose)	8	77	59	0.11	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Grading (Multipurpose), Utility Trenching (Multipurpose)	8	77	59	0.11	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose), Architectural Coating (Kindergarten)	24	78	61	0.11	7	5
Building Construction (Three-Story Multipurpose)	2	18	17	0.03	1	0.93
Year 2022						
Building Construction (Three-Story Multipurpose), Portable Buildings Removal, Asphalt Paving)	7	64	68	0.12	4	3
Building Construction (Three-Story Multipurpose), Asphalt Paving)	4	38	47	0.08	2	2
Building Construction (Three-Story Multipurpose)	2	16	17	0.03	0.90	0.79
Building Construction (Three-Story Multipurpose), Architectural Coating (Multipurpose)	6	17	19	0.03	0.99	0.87
Maximum Daily Emissions	**51**	**83**	**86**	**0.14**	**8**	**5**

Table 3 Maximum Daily Regional Construction Emissions with Mitigation

Construction Phase	Maximum Daily Emissions (lbs/Day)[1]					
	VOC	NO_x	CO	SO_2	PM_{10}[2]	$PM_{2.5}$[2]
SCAQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2. Highest winter or summer emissions are reported.
Notes: lbs: Pounds.
[1] Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast Air Quality Management District.
[2] Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Also includes implementation of Mitigation Measures (MM) AQ-1, which requires use of interior paints with a VOC content of 0 g/L for the existing buildings, except for the existing kindergarten buildings, and MM AQ-2, which requires off-road construction equipment, of 50 HP or more, used in building demolition activities to be fitted with Tier 3 rated engines.

Operational Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), energy use (natural gas), and mobile sources (i.e., on-road vehicles associated with a project). As stated, the proposed project would result in new classroom and multipurpose facilities to replace those in existence in addition to modernized buildings, new playfields, and asphalt surfaces. The new proposed buildings would be slightly smaller—30,700 total building square feet compared to the 30,836 total building square feet of the existing classroom, multipurpose, and portable buildings to be demolished. The new proposed buildings would, at minimum, be designed and built to meet the 2016 Building Energy Efficiency Standards and the 2016 California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing buildings designated for demolition, which would contribute to minimizing emissions. While the proposed project would result in an increase in student capacity, the proposed increase of 24 students would generate nominal criteria air pollutant emissions. Thus, it is anticipated that operation of the proposed project would result in an overall minimal net change in emissions compared to existing conditions, and would not exceed the SCAQMD regional operation-phase significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

Mitigation Measures

Construction Impact

AQ-1 The Manhattan Beach Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall only use interior paints with a VOC (volatile organic compound) content of 0 grams per liter (g/L) for all existing buildings to be modernized except the kindergarten buildings (Buildings J and K) to reduce VOC emissions. All building and site plans shall note use of paints with a VOC content of 0 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the requirement for use on interior paint with a VOC content of 0 g/L for the specified buildings, herein.

AQ-2 The Manhattan Beach Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall, at minimum, use equipment that meets the EPA's Tier 3 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all building demolition, unless it can be demonstrated to the District that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 3 emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to construction, the project engineer shall ensure that all building demolition plans clearly show the requirement for EPA Tier 3 emissions standards for construction equipment over 50 horsepower for the specific activities stated above. During construction, the construction contractor shall maintain a list of all operating equipment associated with building demolition in use on the site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The proposed project could expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute significantly to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and source receptor area. The nearest offsite sensitive receptors proximate to the project site are the adjacent residences surrounding the campus.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 4, *Localized Construction Emissions*, shows the maximum daily construction emissions (pounds per day) generated during onsite construction activities compared with the SCAQMD's screening-level construction LSTs. As shown in the table, the maximum daily NO_x, CO, PM_{10} and $PM_{2.5}$ construction emissions generated from onsite construction-related activities would be less than their respective SCAQMD screening-level LSTs. Therefore, project-related construction activities would not have the potential

to expose sensitive receptors to substantial pollutant concentrations and localized air quality impacts would be less than significant. No mitigation measures would be required.

Table 4 Localized Construction Emissions

	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
SCAQMD 1.31-acre LST	103	759	5.93	3.62
Building Construction (Three-Story Multipurpose) 2020	19	17	1	1
Building Construction (Three-Story Multipurpose) 2021	17	17	<1	<1
Building Construction (Three-Story Multipurpose), Asphalt Paving	38	34	2	2
Building Construction (Three-Story Multipurpose) 2022	17	17	<1	<1
Building Construction (Three-Story Multipurpose), Architectural Coating (Multipurpose)	17	18	<1	<1
Exceeds LST?	No	No	No	No
SCAQMD 2.31-Acre LSTs	138	1,050	8.72	5.31
Building Construction (Three-Story Multipurpose), Portable Buildings Removal, Asphalt Paving	64	66	3	3
Exceeds LST?	No	No	No	No
SCAQMD 2.50-Acre LSTs	142	1,101	9.16	5.50
Grading (Two-Story Classroom), Grading (Export Haul), Utility Trenching (Classroom)	29	19	4	3
Grading (Classroom), Grading (Import Haul), Utility Trenching (Classroom)	29	19	4	3
Grading (Classroom), Utility Trenching (Classroom)	29	19	4	3
Exceeds LST?	No	No	No	No
SCAQMD 2.63-Acre LSTs	142	1,101	9.16	5.50
Building Construction (Multipurpose and Classroom) 2020	38	34	2	2
Building Construction (Multipurpose and Classroom) 2021	35	33	2	2
Exceeds LST?	No	No	No	No
SCAQMD 3.31-Acre LSTs	160	1,318	11.06	6.31
Building Construction (Multipurpose), Building Demolition (Ladera and PAC), Modernization (Kindergarten)	80	60	4	4
Exceeds LST?	No	No	No	No
SCAQMD 3.50-Acre LSTs	164	1,368	11.49	6.50
Asphalt Demolition, Grading (Site), Grading (Site Haul), Modernization (Existing Buildings)	60	38	6	4
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings)	60	38	6	4
Asphalt Demolition, Grading (Site), Modernization (Existing Buildings), Architectural Coating (Building Exterior)	61	40	6	4
Exceeds LST?	No	No	No	No
SCAQMD 4.63-Acre LSTs	189	1,669	14.12	7.62
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten)	98	76	5	5

3. Environmental Analysis

Table 4 Localized Construction Emissions

	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
Building Construction (Multipurpose and Classroom), Building Demolition (Ladera Classrooms and PAC Multipurpose), Modernization (Kindergarten), Architectural Coating (Classroom)	99	78	5	5
Exceeds LST?	No	No	No	No
SCAQMD 4.81-Acre LSTs	193	1,719	14.55	7.81
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose)	76	57	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Grading (Multipurpose), Utility Trenching (Multipurpose)	76	57	7	5
Building Construction (Multipurpose), Asphalt Demolition (Dog Park), Modernization (Kindergarten), Grading (Multipurpose), Utility Trenching (Multipurpose), Architectural Coating (Kindergarten)	77	59	7	5
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2., and SCAQMD 2008a and 2011.
Notes: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the project site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the project site in Source Receptor Area 3.
1 Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast Air Quality Management District.
2 Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Construction Health Risk

The SCAQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The Office of Environmental Health Hazards Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments issued in March 2015 (OEHHA 2015). It has also developed a cancer risk factor and noncancer chronic reference exposure level for DPM. However, these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The proposed project is anticipated to be developed for approximately 2.5 years, which would limit the exposure to onsite and offsite receptors. SCAQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. In addition, construction activities would not exceed the screening-level construction LSTs. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the school, and project-related construction health impacts would be less than significant. No mitigation measures would be required.

Operation LSTs

Operation of the proposed project would not generate substantial quantities of emissions from onsite, stationary sources. Land uses that have the potential to generate substantial emissions from stationary sources require a permit from SCAQMD and include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur onsite. The proposed project does not fall within these

categories of uses. While operation of the proposed project would result in the use of standard onsite mechanical equipment such as heating, ventilation, and air conditioning installed for the new proposed buildings, air pollutant emissions generated would be nominal. Therefore, localized air quality impacts related to operation-related emissions would be less than significant, and no mitigation measures would be required.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). Because the proposed project would only result in increasing student capacity by only 24 students, the number of new peak hour vehicle trips would be minimal compared to the aforementioned screening levels. Therefore, it would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the school and impacts would be less than significant. No mitigation measures would be required.

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

Less Than Significant Impact. The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

> 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 provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed school renovation and modernization do not fall within the aforementioned land uses. Emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings, may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial number of people. Therefore, implementation of the proposed project would result in less than significant odor impacts, and no mitigation measures are required.

3.4 BIOLOGICAL RESOURCES

This section was prepared by Phil Brylski, a qualified biologist. Focused rare plant surveys were conducted on February 17 and April 13, 2019. The project site contains various ornamental plants that were planted in previous years, including walnut (*Juglans* sp), acacia (*Acacia* sp), fig (*Ficus* sp), cedar (*Calocedrus* sp), wild banana (*Stelitzia* sp), sago palm (*Cycas* sp) and Brazilian peppertree (*Schinus terebinthifolius*). The unused area to the north consists of a manufactured slope that extends over the western third of the parcel and a flat disturbed area over the remaining eastern part. The manufactured slope buttresses the residential development and roads to the west, and the flat area consists of weathered asphalt and a sandy area to the north. The plants on the slope of the unused area are predominantly ice-plant (*Carpobrotus edulis*), California wood sorrel (*Oxalis californica*), and wild radish (*Raphanus sativus*), with several coastal deerweed (*Acmispon glaber*) shrubs. The flat part of the unused area is a mixture of developed (old asphalt) and disturbed. The vegetation is ruderal, dominated by red-stemmed filaree (*Erodium cicutarium*), garland daisy (*Glebionis coronaria*), foxtail barley (*Hordeum murinum* ssp. *leporinum*), wild oat (*Avena fatua*), ripgut brome (*Bromus diandrus*), cheeseweed (*Malva parviflora*), and sweet fennel (*Foeniculum vulgare*). The soils on the unused area to the north are classified as Urban land-Abaft - loamy surface complex, which are sandy loam and loamy sand soils on an old dune field landform.

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?

Less Than Significant Impact. Special status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the California Department of Fish and Wildlife; and plant species listed as rare by the California Native Plant Society. The project site contains vegetated areas that have not been disturbed for long periods of time and may require further evaluation. The project site is in the Venice Quad of the California Natural Diversity Database (CNDDB), and the Venice Quad includes special status bird, animal, and plant species (CDFW 2019). Table 5, *Special Status Plant Species Known From the Project Region*, shows the sensitive plants occurring in the region and their potential for occurrence on the project site, and Table 6, *Special Status Animal Species From Project Region*, shows the animal species.

Table 5 Special Status Plant Species Known From the Project Region

Species	Status		Habitat Preference	Potential for Occurrence on Project Site
	Federal/ State	CNPS/Local		
Centromadia parryi. australis Southern tarplant	None	CNPS 1B.1	Alkali meadows and flats, mesic grasslands, margins of marshes and vernal pools, riparian herb habitats, and ruderal or disturbed sites.	None, due to absence of suitable habitat.
Chaenactis glabriuscula var. orcuttiana Orcutt's pincushion	None	CNPS 1B.1	Remnant coastal dune habitats. Blooms from January to August. Reported from Sand Dune Park approximately 760 feet north of the vacant parcel of project site. Observed at this general location on April 13, 2019 at UTMs 11 S 369354.00 m E X 3751874.00 m N.	No potential for occurrence on the developed school area. Low potential for occurrence in the undeveloped area to the north. Not observed during two field surveys of project site.
Chorizanthe parryi var. fernandina San Fernando Valley spineflower	FC SE	CNPS 1B.1	Openings in coastal sage scrub and grasslands; often sandy. Occurs on open terraces, or in alluvial fans.	None due to absence of suitable habitat.
Dudleya virens insularis Island green dudleya	None	CNPS 1B.2	Rocky outcrops	None, due to absence of suitable habitat
Eryngium aristulatum var. parishii San Diego button-celery	FE SE	CNPS 1B.1	Vernal pools and mima mounds.	None, due to absence of suitable habitat.
Lasthenia glabrata ssp. coulteri Coulter's goldfields	None	CNPS 1B.1	Coastal salt marshes, playas, valley and foothill grassland, and vernal pools on alkali soils.	None, due to absence of suitable habitat
Navarretia prostrata *Prostrate navarretia*	None	CNPS 1B.1	Vernal pools and depressions in alluvial fans.	None, due to absence of suitable habitat

FED: Federal Classifications
FE Listed by the Federal government as an endangered species.
FT Listed by the Federal government as a threatened species.
FC Proposed listing by the Federal government as threatened species.
S Forest Service Sensitive Plant Species

STATE: State Classifications
CE Listed as endangered by the State of California
CT Listed by the State of California as a threatened species
SP Listed as a Special Plant by the CNDDB (2007)

Other
LC Local concern

California Native Plant Society (CNPS)
CNPS 1A Plants presumed extinct in California.
CNPS 1B Plants considered rare, threatened, or endangered in California and elsewhere.
CNPS 2 Plants rare, threatened, or endangered in California but more common elsewhere.
CNPS 3 Plants about which we need more information - A review list.
CNPS 4 Plants of limited distribution - A watch list..

CNPS Threat Extensions
0.1 Seriously endangered in California
0.2 Fairly endangered in California
0.3 Not very endangered in California

3. Environmental Analysis

Table 6 Special Status Animal Species From Project Region

Species Name	Status*	Habitat Preference	Potential to Occur on Project Site
Invertebrates			
Monarch butterfly (wintering sites) *Danaus plexippus*	USFS Sensitive	Roosts in wind-protected groves (e.g., in Eucalyptus trees, Monterey pine, cypress).	None, suitable roost trees are absent from project site
El Segundo blue butterfly *Euphilotes battoides allyni*	FE	Remnant coastal dune habitat.	None due to absence of suitable habitat. Coastal dune habitat and the species' host plant (*Eriogonum parviflorum*) do not occur on the site.
Vertebrates			
Reptiles			
Southern California legless lizard *Anniella stebbinsi*	CSC	Occurs in moist loose soil.	Low. The vacant site is dominated by asphalt blacktop and dry sandy soils.
San Diego coast horned lizard *Phrynosoma coronatum blainvillei*	CSC	Occurs in variety of habitats including coastal sage, grassland, chaparral, oak woodland, and riparian woodland with loose sandy soils and abundant native ants or other insects.	None, due to the absence of suitable habitat.
Birds			
Cooper's hawk *Accipiter cooperii*	CSC (nesting only)	Occurs in various woodland habitats, including riparian.	Low potential for nesting.
Burrowing owl *Athene cunicularia*	CSC	Open grassland, fallow fields, sparsely vegetated desert scrub, and edges of disturbed lands, where soil is friable for nesting burrows.	Low potential for occurrence on project site. No potential burrows were observed during the field survey.
Coastal California gnatcatcher *Polioptila californica*	FT CSC	Primarily in coastal sage scrub habitat, but also use chaparral, grassland, and riparian habitats in proximity to sage scrub.	None, due to absence of suitable habitat.
Mammals			
Pacific pocket mouse *Perognathus longimembris pacificus*	FE CSC	Coastal sage scrub and other habitats on the coasts of Orange and San Diego counties, on sandy soils	None, due to the absence of suitable habitat.

Federal
FE Federally Endangered
FT Federally Threatened
FPT Federally Proposed Threatened
FSC Federal Species of Concern
BLM S Sensitive species

State
SE State Endangered
ST State Threatened

State Department of Fish and Game (CDFG)
CSC California Species of Concern
CFP California Fully-Protected Species
SA Special Animal

The project site is developed with school facilities and lacks suitable habitat for sensitive plant and animal species. Although there are vegetation and plants on the campus that would be disturbed as part of the proposed project, they are not natural habitat, and the project site does not contain any special status species. Orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*) is not a listed species under state and federal wildlife agencies but is a California Native Plant Society (CNPS) 1B.1 species. This special interest plant species has no potential to occur on the existing developed school site and has low potential to occur on the abandoned lot to the north. Orcutt's pincushion was not observed on the project site during focused rare plant surveys on

February 17 and April 13, 2019. The survey on April 13 included the project site and the offsite area north of Manhattan Beach Dune Park, where Orcutt's pincushion had been observed previously, most recently in 2010 according to the CNDDB. The April 13 survey recorded flowering Orcutt's pincushion offsite north of Sand Dune Park, approximately 770 feet north of the project site. The sensitive plant community, coastal bluff scrub, does not occur on the project site. Therefore, disturbing these areas would not have a substantial adverse effect on any special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US. Fish and Wildlife Service. Impacts would not be significant, and no mitigation measures are required.

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?

Less Than Significant Impact. The project site is developed as an elementary school and there is no riparian habitat or other sensitive natural community identified in local, regional, state, or federal plan on the project site (Manhattan Beach 2003; LAC 2019; USFWS 2019; LCADRP 2015). Although there are landscaped areas and natural foliage areas, no areas have been identified in local, regional, state, or federal plans or regulations. The proposed project would not have any significant impact on a sensitive natural community. No mitigation measures are required.

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

No Impact. The project site is developed and operating as an elementary school. Although there are some vacant areas within the existing campus, the project site does not contain any federally protected wetlands, including but not limited to marsh, vernal pool, and coastal areas. Implementation of the proposed project would not have a substantial adverse effect on any protected wetlands. No impact would occur, and no mitigation measures are required.

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

Less Than Significant Impact. The project site is already developed and operating as an elementary school, and is surrounded by residential uses. Although Sand Dune Park bounds the project site to the north, there are no natural open space habitat that serves as wildlife corridor for native wildlife species. The project site is also not a native wildlife nursery site. The site does not contain surface water and therefore is not suitable as part of a movement or migration corridor for fish or aquatic birds. There are a number of ornamental trees and shrubs on the school site that could be used for nesting by migratory birds. When removing trees or vegetation, in compliance with California Fish and Game Code Sections 3503, 3503.5, 3513, and 3800, the proposed project is required to avoid the incidental loss of fertile eggs or nestlings or other activities that otherwise lead to nest abandonment. Therefore, the District is required to conduct pre-construction survey prior to removal of nesting habitat if construction-related vegetation removal occurs during nesting season (typically between

February 1 and September 1). Compliance with the existing regulation would ensure that the proposed project does not interfere substantially with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors. Impacts would not be significant.

The Migratory Bird Treaty Act of 1918 (MBTA) governs the take, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these items, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the MBTA.

In December 2017, the Department of the Interior issued a memorandum concluding that "consistent with the text, history, and purpose of the MBTA, [the statute's prohibitions on take apply] *only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs*" (emphasis added) (DOI 2017). Therefore, take of a migratory bird or its active nest (i.e., with eggs or young) that is incidental to, and not the purpose of, a lawful activity does not violate the MBTA. To provide guidance in implementing and enforcing this new direction, the USFWS issued a memorandum in April 2018 to clarify what does and does not constitute prohibited take (FWS 2018).

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

No Impact. The City of Manhattan Beach General Plan Land Use Element Policy LU-2.3 protects mature trees throughout the city, and encourages replacement with specimen trees whenever they are lost or removed. To implement this General Plan policy, the City has a tree ordinance that is applicable to trees in residential zones in Area Districts I and II. The project site is zoned Public Facilities, and implementation of the proposed project would not conflict with this tree ordinance. No impact would occur, and no mitigation measures are required.

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

No Impact. The City of Manhattan Beach does not contain any areas within an adopted habitat conservation plan or natural community conservation plan; significant ecological areas; or other approved local, regional, or state habitat conservation plan (USFWS 2019, LCADRP 2015). Implementation of the proposed project would not conflict with any habitat conservation plan, and no mitigation measures are required.

3.5 CULTURAL RESOURCES

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. The project site comprises two elementary school campuses, the original Grand View ES (including buildings A, B, D, E, and G), constructed in 1939, and Ladera ES (including classroom buildings J and K and the multipurpose room), all constructed in 1963. The

two campuses were merged in the 1990s, with the name Grand View ES assigned to the combined properties (MBUSD 2015:317). The 1930s buildings are referred to as the Grand View portion (upper campus), and the 1960s buildings are referred to as the Ladera portion (lower campus). Seven building are at least 45 years old; therefore, a Cultural Resources Evaluation was performed by ASM Affiliates to evaluate the historical and architectural significance of the buildings on the project site. The Cultural Resources Evaluation is included as Appendix B to this IS. The seven buildings are an administration building and ancillary buildings on the 1930s-era portion of the campus and four classroom buildings and a multipurpose room on the 1960s portion of the campus.

ASM Affiliates conducted an archival research to develop a general historic context for Manhattan Beach as well as site-specific information. As a public school, city building permits are not available for the campus, and the Los Angeles County Assessor's records do not include year-built data for the school buildings. Original architectural drawings were provided by the architectural firm working on the modernization of the campus. Partial Sanborn Fire Insurance maps of the parcels were used to confirm the construction timeline of the school and earliest possible date of construction. Historical photograph collections, including those in the archives of the Manhattan Beach Historical Society, were consulted to determine the alterations of the schools and the buildings. Newspaper databases provided confirmation of years of construction of the two campuses. City directories were not produced for the area. ASM also consulted historical maps and aerial photos to further understand the development of the area over time.

The South Central Coastal Information Center (SCCIC) records search was conducted to determine whether the project area had been previously subject to survey as well as to detect the presence or absence of previously documented cultural resources in the project area. The search included all records and documents on file with the SCCIC, as well as the National Register of Historic Places, the Office of Historic Preservation (OHP) Historic Property Directory, and the OHP Archaeological Determinations of Eligibility list. The records search indicated that a total of 18 previous reports were conducted and that eight resources have been previously documented within the one-mile records search radius. However, none of resources are in or in adjacent to the project site. All of the previously recorded resources are historic structures; no prehistoric resources have been previously documented within one mile of the project site.

Grand View ES is four blocks from the Pacific Ocean and is sited on a former sand dune. The first buildings were built in 1939 by the WPA, and the campus is a good example of Streamline Moderne architectural design. Grand View was the only Manhattan Beach public school west of the Pacific Coast Highway at the time of construction. In the 1960s, School No. 9 (Ladera) was built on the northwestern slope of the sand dune and operated as a separate elementary school for several decades before being shuttered in the 1990s. The Grand View part of the campus was renovated in 2000-2001, retaining its design elements while expanding capacity through relocatable classroom buildings and various new site features, including a small amphitheater and a garden plot.

There are 11 permanent structures on the site, seven of which are part of the original Grand View campus, and four that were part of the Ladera ES campus before the two schools merged. The two original campuses differ markedly in year of construction, architectural style, and location on the topography. The core of Grand View ES is a post–Long Beach Earthquake campus constructed in 1939 on a relatively flat parcel, and all of

the buildings display strong Streamline Modern elements, including single-story buildings with a horizontal orientation and curvilinear/rounded corners. Windows are plentiful and lack surrounds, creating a sleek appearance with the smooth stucco surfaces. The flat roofs and detailing emphasize the horizontality. The former Ladera ES campus, in contrast, was constructed in 1963 and is an example of Mid-Century-Modern school architecture. Details are sparse, corners are angular, and the main four-level classroom building is constructed on a steep slope with footpaths that meander through lush landscaped hillsides.

Historical architectural evaluation was conducted for Buildings A, B, D, E, and G in the Grand View portion of the campus and Buildings J and K, the classroom building, and multipurpose building on the Ladera portion of the campus.

Eligibility Significance Criteria

California Register of Historical Resources Significance Criteria

The California Register of Historical Resources (CRHR) program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. The criteria established for eligibility for the CRHR are directly comparable to the national criteria established for the National Register of Historic Places. To be eligible for listing in the CRHR, a building must satisfy at least one of the following four criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

Criterion 2. Is associated with the lives of persons important in our past;

Criterion 3. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

Criterion 4. Has yielded, or may be likely to yield, information important in prehistory or history.

Historical resources eligible for listing in the CRHR must also retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.

Integrity

For the purposes of eligibility for the CRHR, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The evaluation of integrity must be grounded in an understanding of a property's physical features. To retain historic integrity, a property must possess several, and usually most, aspects of the original building: location, design, setting, materials, workmanship, feeling, and association.

California Environmental Quality Act Significance Criteria

Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, under California Code of Regulations, Title 14, § 15064.5(a), a resource is considered by the lead agency to be a "historical resource" if it:

1) Is listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, § 5024.1; California Code of Regulations, Title 14, §§ 4850 et seq.).

2) Is included in a local register of historical resources, as defined in Public Resources Code, § 5020.1(k), or is identified as significant in an historical resource survey meeting the requirements of Public Resources Code, § 5024.1(g).

3) Is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (Public Resources Code, § 5024.1; California Code of Regulations, Title 14, § 4852).

Evaluation of Eligibility

CRHR Eligibility Assessment for Grand View Campus

ASM considered whether the Grand View ES campus is eligible as a historic district for listing in the CRHR. Because the Grand View ES campus comprises two distinct groups of buildings constructed in very different architectural styles during different eras, ASM considered each group as a separate potential historic district under the broad themes of Education and Architecture in Manhattan Beach.

Criterion 1. In consideration of the potential eligibility of the upper campus as a historic district, Grand View ES is the oldest school in Manhattan Beach and is the only remaining school that represents an important early period in the development of Manhattan Beach education. Construction was aided by the WPA, representing the role of the federal government in assisting the nation to recover from the economic hardships of the Great Depression. The period of significance for the Grand View Elementary School Historic District begins in 1939, when the core of the campus was constructed, and ends in 1954, when the last of the buildings were constructed. The Grand View portion of the campus is recommended as potentially eligible as a historic district under Criterion 1 of the CRHR under the theme of education.

Criterion 2. Many prominent local citizens were said to have attended the 1930s campus; however, no specific historically important individuals were identified who were strongly associated with the Grand View campus. Therefore, the campus is recommended not eligible as a historic district under CRHR Criterion 2.

Criterion 3. The original Grand View campus is an outstanding example of Streamline Moderne architecture. Character-defining features (CDFs) of the style are displayed throughout the Grand View Campus, including bands of windows, decorative raised horizontal bands, flat or nearly flat roofs, and flat canopies with banded fascia. Other CDFs include smooth wall surfaces clad in stucco, glass block windows, and rounded corners.

3. Environmental Analysis

The school buildings were designed by the notable firm of Plummer, Wurdeman, and Becket (Becket). Becket, a prolific and important architect in southern California, especially in the postwar years, is now considered a master architect, and the Grand View Campus is a good representation of his early work. Therefore, the campus is recommended potentially eligible as a historic district for the CRHR under Criterion 3 as a good representation of the Streamline Moderne style and for its association with a master architect. The period of significance for the Grand View Elementary School Historic District under Criterion 3 is 1939, the year of construction for the Streamline Moderne buildings.

Criterion 4. The Grand View Campus is a common property type that does not have the potential to provide information about history or prehistory that is not available through historic research. Therefore, the campus is recommended not eligible as a historic district under CRHR Criterion 4.

Integrity Assessment for Grand View Campus

The primary façade of the Administration Building (Building A) was modified before 1999. Regardless of this major alteration, which retained the important CDFs of the style, the 1930s portion of the campus retains all seven aspects of integrity. The school is in its original location, and its Moderne design is outstanding, retaining the materials and workmanship of the original buildings. Although the setting has been infilled and developed over the years, it remains a residential neighborhood. Overall, the campus continues to convey the feeling of the original school and association with its history.

Contributing Resources

Recommended contributors to the potential Grand View Elementary School Historic District are all of the buildings and structures constructed during the period of significance. These include Classroom Building E, which was constructed later, but still within the period of significance under Criterion 1. The kindergarten building was constructed in 1954, concurrent with Classroom Building E, but it was not surveyed for this evaluation because it will not be impacted by the proposed modernization project; thus, it is omitted for consideration as a potential contributor. In addition to the campus buildings, the Arcade and landscaping together contribute to the potential historic district by linking the buildings together and forming boundaries between classrooms and exterior space assigned to each.

CRHR Eligibility Assessment for Ladera Campus

Criterion 1. The Ladera buildings were constructed in 1963 and reflect the sensibilities of the postwar era, termed "Educating the Baby Boom" in the Los Angeles Unified School District Historic Context Statement. The buildings on the Ladera portion of the campus represent an important phase of education in Manhattan Beach, i.e., the postwar years when many new schools were constructed to accommodate increased enrollment. However, the Ladera campus is not a particularly good or rare representation of this period of educational development in Manhattan Beach. Therefore, the Ladera campus is recommended not eligible for listing as a historic district in the CRHR under Criterion 1.

Criterion 2. No specific historically important individuals were identified who were strongly associated with the Ladera portion of the campus. Therefore, the campus is recommended not eligible as a historic district for the CRHR under Criterion 2.

Criterion 3. The Ladera portion of the campus clearly represents the Mid-Century Modern style in its extensive use of glazing, flat roofs, and modular design. However, many better examples of the style are seen on campuses throughout southern California and Manhattan Beach. Furthermore, research did not identify the architect of the campus. Therefore, the 1960s-era campus is recommended not eligible as a historic district in the CRHR under Criterion 3.

Criterion 4. The Ladera portion of the campus is a common property type that does not have the potential to provide information about history or prehistory that is not available through historic research. Therefore, the campus is recommended not eligible as a historic district under CRHR Criterion 4.

Because the Ladera portion of the campus is not eligible for listing as a historic district under any criteria of the CRHR, integrity is irrelevant to this evaluation. As such, potential contributors and period of significance are not identified.

Summary

Four buildings as well as the landscaping and corridors of the Grand View Campus are more than 45 years old and recommended eligible for the CRHR. Therefore, they are considered CEQA historical resources, meeting the requirements of Public Resources Code § 5024.1(g).

Mitigation Measure

CUL-1 Prior to removal of the windows, the Manhattan Beach Unified School District (MBUSD) shall be documented to Historic American Buildings Survey (HABS) Level 2 standards, according to the outline format described in the Historic American Building Survey Guidelines for Preparing Written Historical Descriptive Data. Photographic documentation should follow the Photographic Specification–Historic American Building Survey, including 30 to 40 archival-quality, large-format photographs of the campus, with a focus on Buildings F and G. Construction techniques and architectural details should be documented, especially noting the measurements, hardware, and other features that tie architectural elements to a specific date.

Original architectural plans should be archivally reproduced on vellum. Three copies of the HABS documentation package should be produced, with one copy including original photo negatives that shall be placed in an archive or history collection accessible to the general public.

OR,

MBUSD shall develop interpretative signs to communicate the significance of Grand View Elementary School to the community. This could consist of a permanent interpretive exhibit that would incorporate information from historic photographs, HABS documentation, or other materials in a location accessible to the public. The interpretive exhibit should be developed by a qualified team, including a historian and graphic designer. If this mitigation measure is followed, the exhibit should be located somewhere on the school grounds.

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

Less Than Significant Impact. According to the SCCIC, no archaeological resources have been recorded within a one-mile radius of the project site. There have been 18 previous investigations within a one-mile radius that identified eight historic structures and no prehistoric resources (ASM 2019). Furthermore, a pedestrian archaeological survey was conducted on January 30, 2019, throughout the project site, including all accessible and visible ground surface. No previously undocumented cultural materials or resources were observed during the pedestrian survey. The project site has been previously disturbed, and the existing school was built atop sand dunes. The new buildings would be constructed on engineered fills. Considering the lack of archaeological resources discovered in the project site and its vicinity, and the underlying geologic units, the potential for discovering archaeological resources is considered minimal. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. California Health and Safety Code, Section 7050.5, requires that in the event that human remains are discovered within a project site, disturbance of the site shall halt and 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. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains are those of a Native American, he or she shall contact the Native American Heritage Commission by telephone within 24 hours. The proposed project would comply with existing law, and potential impacts to human remains would be less than significant. This issue will not be addressed further in the EIR.

3.6 ENERGY

Would the project:

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

Less Than Significant Impact. Construction of the proposed project would require energy use to power the construction equipment. The energy use would vary during different phases of construction—the majority of construction equipment during demolition and grading would be gas powered or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. The construction contractors are anticipated to minimize idling of construction equipment during construction and reduce construction and demolition waste by recycling.

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. Impacts related to transportation energy use during construction would

be temporary and would not require expanded energy supplies or the construction of new infrastructure. Impacts would not be significant.

The project site is already developed as an elementary school and consumes electrical and gas energy. The proposed project would not change the land use of the project site.

The existing school consumes electricity for various purposes, including heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; use of onsite equipment and appliances, etc. Southern California Edison provides electric service to the City of Manhattan Beach, including the project site. The proposed project would be required to comply with the current Building Energy Efficiency Standards, so that it would not result in wasteful or unnecessary energy demands. Based on the CalEEMod calculation from air quality modeling, the existing school uses 224,170 kWh annually, and the proposed project would decrease the electricity consumption to 176,153 kWh per year, a decrease of 48,017 kWh/yr. Therefore, the proposed project would not result in a significant impact related to electricity.

Southern California Gas Company (SCG) provides gas service in the City of Manhattan Beach, including the project site. The project site is already operating as an elementary school, and there is extensive and reliable gas services in the area. Based on the CalEEMod calculation from air quality modeling, the project site consumes 413,189 kBTU per year, and the proposed project would decrease the consumption by 148,101 kBTU/year to 265,088 kBTU/year. Therefore, the proposed project would not result in a significant impact related to gas energy.

The proposed project may result in increased transportation energy consumption during construction and operation. However, considering the size and scale of the proposed project that would accommodate two additional classrooms to an existing school, and the surrounding highly urbanized neighborhood which is served by numerous gasoline and diesel fuel facilities and infrastructure, the proposed project would not result in a substantial demand for energy that would require expanded supplies or the construction of new transportation energy infrastructure. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The proposed renovation and modernization would replace or improve existing school facilities, thereby providing better energy efficiency. The new buildings would be constructed to meet the 2016 California Green Building Standards and Energy Efficiency Standard, and the existing buildings' HVAC system and electrical system would be updated for efficiency. The proposed project would not conflict with or obstruct a state or local renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

3.7 GEOLOGY AND SOILS

The analysis in this section is based in part on the following technical reports:

3. Environmental Analysis

- *Geologic and Environmental Hazards Assessment Report, Grand View Elementary School*, PlaceWorks, April 2019. (Appendix C)
- *Preliminary Geotechnical Exploration Grand View Elementary School, 455 24th Street, Manhattan Beach, California*, Leighton Consulting, Inc., September 14, 2018. (Appendix D)

Would the project:

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

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

No Impact. The project site is not located within the Alquist-Priolo Earthquake Fault Zoning Map (DOC 2019). The nearest Alquist-Priolo Earthquake Fault Zone is approximately 5.9 miles northeast of the site for the Newport-Inglewood Fault, based on a review of readily available geologic literature and the Manhattan Beach General Plan (PlaceWorks 2019). Therefore, there is no potential for the rupture of a known earthquake fault at the project site. No impact related to an earthquake rupture would occur, and no mitigation measures are required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The proposed project would not increase exposure of people or structures to greater earthquake impacts than the existing conditions. Southern California is a seismically active region, and impacts from ground shaking can occur many miles from an earthquake epicenter. New buildings would be constructed in accordance with applicable building codes and standards. The most recent state building standard is the 2016 California Building Code (CBC) (Title 24, Part 2, California Code of Regulations). These codes provide minimum standards to protect property and the public welfare by regulating the design and construction of excavations, foundations, building frames, walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC's provisions for earthquake safety are based on factors such as occupancy type, the types of soil and rock onsite, and the probable strength of ground motion at the project site. A geotechnical study was prepared for the proposed project and concluded that, as is the case for most southern California, strong ground shaking impact could occur. However, compliance with the existing CBC regulations and implementation of measures required by the approved geotechnical study would ensure that impacts from strong seismic ground shaking are reduced to a less than significant level. The proposed project also requires review from the Division of State Architect (DSA) for compliance with design and construction and accessibility standards and codes. The District, with oversight from DSA, will comply with these requirements in the design and construction of the new school buildings. Seismic ground shaking impacts would be less than significant, and no mitigation measures are required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load supporting capability when subjected to intense shaking. Any buildings or structures on these sediments may float, sink, or tilt as if on a body of water. The project site is in the Venice Quadrangle and is not within an area that has been identified as being potentially susceptible to liquefaction (DOC 1999). Potentially significant impacts from liquefaction are not anticipated. No mitigation measures are required.

iv) Landslides?

Less Than Significant Impact. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, seismic activity, etc. The portion of the project site that is immediately below Sand Dune Park is in an earthquake-induced landslide zone (DOC 1999), as shown in Figure 11, *Landslide Hazard Zone*. The portion of the project site within the landslide zone contains a westerly-ascending slope on the order of approximately 50 feet in height at a ratio of approximately 2:1 (horizontal:vertical). This natural slope is underlain by Holocene-age dune sand. Late Holocene (Qe) sediments typically consist of loose, well-sorted, fine-grained sand that is poorly consolidated, friable, dry, and prone to erosion. A second slope on the order of 36 feet in height descends from the eastern edge of the pad to Bell Avenue. The dilapidated concrete pad and natural east slope are underlain by stockpile material composed of locally derived sand. This stockpile fill buries the lower portion of the natural westerly slope, essentially buttressing it. The area identified as landslide hazard area is required to be investigated for potential seismic-induced landsliding. Mapped limits of this hazard are similar in geographic area to other similar areas in Manhattan Beach, confined to a narrow northwesterly trending area along the lee side of the dune ridge. The Manhattan Beach Hazard Mitigation Plan (2008) indicates that the probability of landsliding in these areas is low. Although surficial erosion and slumping of sand is a concern at this campus, dune sands are homogeneous and isotropic, and such uniform deposits do not have a deep-seated instability issue that would cause a substantial landslide impact. The slopes are also covered by mature vegetation to reduce impacts from erosion and slope instability. Therefore, the geotechnical report determined that the proposed project would not result in significant landslide impact. However, a slope stability analysis is required once a grading plan is developed, and cult and/or fill slope grading would be conducted in accordance with Appendix J of the 2016 CBC. Compliance with the 2016 CBC would ensure that impacts related to landslide are less than significant.

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

Less Than Significant Impact. Construction of the proposed project would involve site grading and construction, and thus could cause erosion if effective erosion control measures are not used. The proposed project is required to comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board (SWRCB). The District is required to obtain coverage by developing and implementing a Stormwater Pollution Prevention Plans (SWPPP), estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to

minimize stormwater pollution. Implementation of BMPs specified in the SWPPP would ensure that the proposed project does not result in substantial soil erosion or the loss of topsoil during construction. During operation, all project surfaces would be covered by vegetation, athletic field, building surface, walkways, parking lots, and driveways, and there would be no exposed soils susceptible to soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. See responses to Section 3.7(a)(iii) above for liquefaction and 3.7(a)(iv) for landslide impacts.

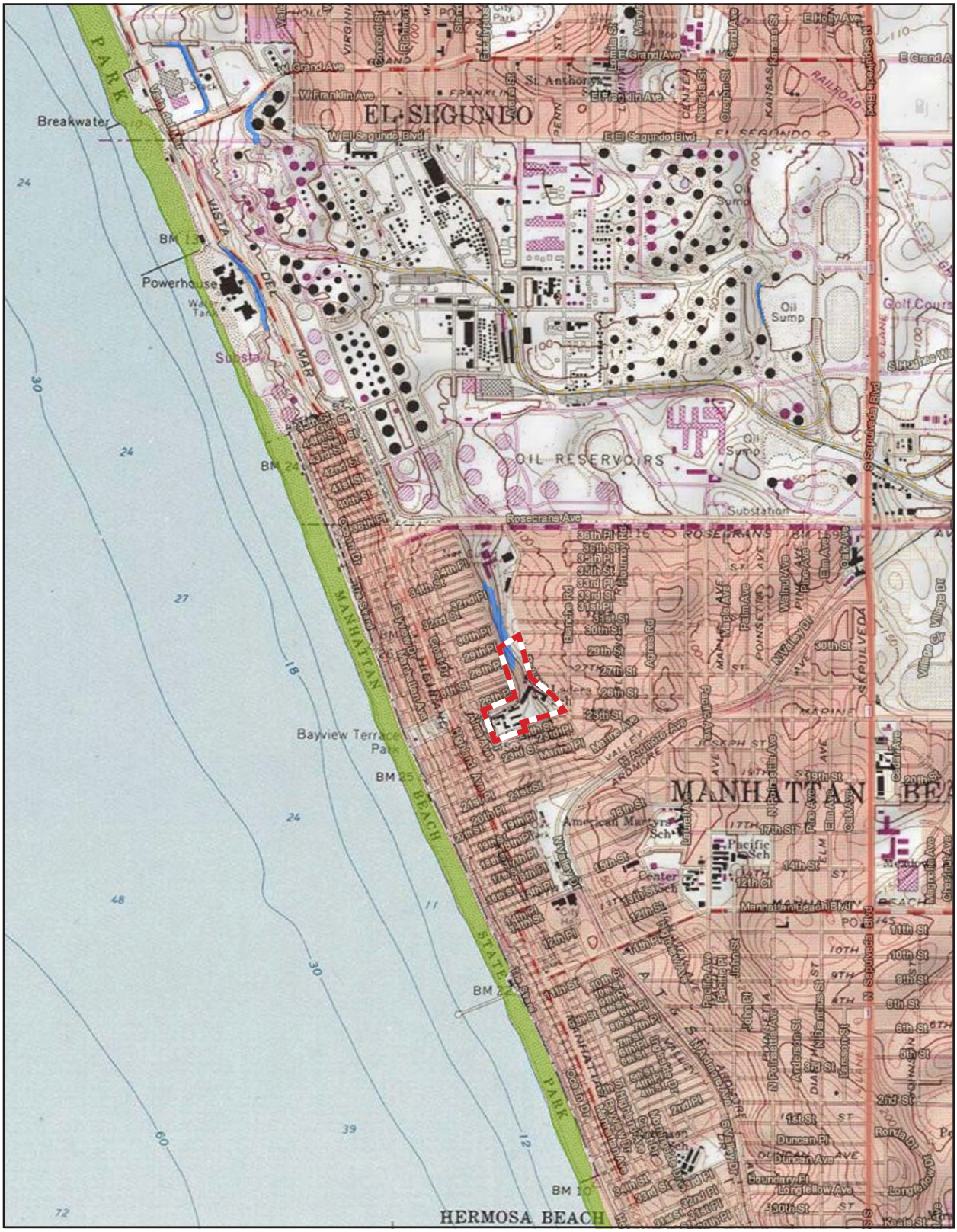
The project site is mantled by deposits of undocumented artificial fill (map symbol Afu), and this artificial fill is underlain by Holocene age deposits of eolian (wind-blown) dune sand, and at depth by old eolian and sand dune deposits of Pleistocene age. According to the exploratory borings as part of the geotechnical report, deposits of artificial fill were encountered to depths of up to six feet below ground surface. Deeper fill is anticipated at the toe of the leeward dune slope. Encountered fill typically consisted of loose, fine-grained silty sands containing scattered pebbles/gravels, concrete, and other rubble. Eolian sand and dune deposits of late Holocene (Qe) typically consist of loose, well-sorted, fine-grained sand that is poorly consolidated, friable, dry, and prone to erosion. Old Eolian sand and dune deposits of Pleistocene age (Qoe) are similar in composition and depositional environment to the younger dune sand unit, but exhibit a richer soil chroma and slightly increased density.

Lateral spreading refers to lateral displacement of large, surficial blocks of soil as a result of pore pressure buildup or liquefaction in a subsurface layer. As discussed in Section 3.7(a)(iii), the potential for liquefaction is low on the project site; therefore, the potential for lateral spreading impact is also considered low.

Subsidence refers to the phenomenon of widespread land sinking and is generally related to substantial overdraft of groundwater or petroleum reserves from underground reservoirs. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Dune sands are not susceptible to collapse when wet, and have negligible expansion potential. Therefore, the potential for subsidence or collapse is considered low. The proposed project would be designed and constructed to protect structural integrity and infrastructure against geologic hazards per the recommendations in the Preliminary Geotechnical Exploration (Appendix D), in accordance with CBC requirements, and as reviewed and approved by DSA. Impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. No mitigation measures are required.

Figure 11 - Landslide Hazard Zone

3. Environmental Analysis



Source: Leighton, 2018

3. Environmental Analysis

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

Less Than Significant Impact. The project site is developed as an elementary school and the soils have been disturbed previously. Artificial fill materials are anticipated in previously graded areas and where buildings have been constructed. The proposed project would excavate beyond fill materials that may contain expansive soils. However, expansive soils would be excavated and replaced with approved fill materials with acceptable expansion potential in compliance with the CBC and DSA. The existing CBC and DSA requirements would ensure that the proposed project is not exposed to safety hazards from expansive soils. Impacts would be less than significant, and no mitigation measures are required.

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?

No Impact. Development of the proposed project would not require the installation of a septic tank or alternative wastewater disposal system. The proposed project would utilize the existing local sewer system. Therefore, no impacts would result from septic tanks or other onsite wastewater disposal systems. No mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. A paleontological records search for the Grand View Elementary School was performed by the Natural History Museum of Los Angeles County, Vertebrate Paleontology Section, in May 2019 (included as Appendix E to the IS). The records search indicated that there are no vertebrate fossil localities that lie within the project site boundaries.

However, localities have been identified nearby in the same sedimentary units that are in the project area. The project site and its vicinity's surface deposits consist of older Quaternary dune sands, and these types of deposits typically do not contain significant vertebrate fossils in the uppermost layers. However, older sedimentary deposits at depth may contain fossil vertebrates. The closest was identified approximately three miles to the north in the middle of Los Angeles International Airport near Tom Bradley International Terminal, which produced a fossil specimen of an elephant (Proboscidea) at a depth of 25 feet below the surface; a specimen of fossil baby mammoth, *Mammuthus,* was discovered at a depth of 40 feet below street grade just south of West 98th Street and west of Bellanca Avenue, approximately 3.7 miles to the north; and mammoth bones were also discovered at an unrecorded depth near the intersection of Prairie Avenue and 139th Street, approximately 3.8 miles to the east. Therefore, it is anticipated that surface grading or very shallow excavation in the Quaternary dune sands exposed in the project site have low potential for encountering any fossil vertebrates. However, deeper excavation that extend into older deposits could uncover vertebrate fossils. Impacts would be potentially significant without mitigation. The potential impacts to previously unidentified paleontological resources would require mitigation to minimize impacts to less than significant.

Mitigation Measure

GEO-1 Prior to the beginning of ground disturbances, the Manhattan Beach Unified School District shall retain a qualified paleontologist to monitor ground-disturbing activities that occur in older Quaternary deposits that could potentially contain paleontological resources. Before ground-disturbing activities begin, a qualified paleontologist shall prepare a monitoring plan specifying the frequency, duration, and methods of monitoring. Sediment samples shall be collected in the deposits and processed to determine the small-fossil potential in the project site, and any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydro fluorocarbons, per fluorocarbons, and chlorofluorocarbons.[1]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[2] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately.[3] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[2] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[3] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

The proposed project would generate GHG emissions from construction activities, energy use (directly through fuel consumed for building heating), mobile sources (e.g., vehicle trips associated with the increase in student capacity), and area sources (e.g., consumer products, coatings). However, because the proposed project would only result in an increase in student capacity of 24 students, and would result in newer, more energy-efficient buildings that would be slightly smaller than the existing buildings, it is anticipated that the net change in operation-phase GHG emissions associated with the proposed project would be nominal. Table 7, *Project-Related Construction GHG Emissions*, shows the construction-related emissions associated with the proposed project. Annual construction emissions are based on total construction emissions amortized over 30 years per SCAQMD methodology (SCAQMD 2008b). As shown in the table, project-related GHG emissions of 59 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year as a result of project implementation would not exceed the proposed SCAQMD bright-line threshold of 3,000 $MTCO_2e$/year (SCAQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions is less than significant, and no mitigation measures are required.

Table 7 Project-Related Construction GHG Emissions

Year	GHG ($MTCO_2e$)
2020	440
2021	805
2022	523
Total	1,769
Amortized Construction Emissions[1]	59 $MTCO_2e$/Yr
Proposed SCAQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold	No

Source: CalEEMod, Version 2016.3.2. Totals may not equal to the sum of the values as shown due to rounding
Notes: MTons: metric tons; $MTCO_2e$: metric ton of carbon dioxide equivalent
[1] Total construction emission are amortized over 30 years per SCAQMD methodology.

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual

projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. The new buildings are required to comply with the Building Energy Efficiency Standards and California Green Building Code (CALGreen). On December 24, 2017, CARB adopted Final 2017 Climate Change Scoping Plan Update to address the new 2030 target to achieve a 40 percent reduction below 1990 levels by 2030, established by SB 32 (CARB 2017b). While measures in the Scoping Plan apply to state agencies and not the proposed project, the project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project would be consistent with the CARB Scoping Plan and no impact would occur. No mitigation measures are required.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

In addition to AB 32, the California legislature passed SB 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS was adopted in April 2016 (SCAG 2016). The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. The proposed project would provide facilities improvements to the existing school campus. While its implementation would result in an increase in overall student capacity, this increase in capacity would serve the local population. Serving the local community could contribute in reducing the vehicle miles traveled by providing the local community with closer options. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS and no impact would occur. No mitigation measures are required.

3.9 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?

Less Than Significant Impact. Construction of the proposed project would likely involve the use of some hazardous materials, such as vehicle fuels, lubricants, greases, and transmission fluids in construction equipment, and paints and coatings in building construction. However, use of hazardous materials during construction would be temporary and would cease upon completion of construction in fall of 2022. Additionally, the use, storage, transport, and disposal of hazardous materials by construction workers and school staff would be required to comply with existing regulations of several agencies, including the

Department of Toxic Substances Control, US Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), California Department of Transportation (Caltrans), and the City of Manhattan Beach Fire Department.

Operation of the proposed project would involve the use of small amounts of hazardous materials for cleaning and maintenance purposes typical of janitorial staff, and pesticides by school maintenance staff. However, the project site is already developed and operating as an elementary school, and the proposed renovations would not change the existing use as an elementary school. No routine transport, use, or disposal of hazardous materials currently occurs onsite, and no new or expanded handling of hazardous materials would result from project implementation. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A Phase I Environmental Site Assessment was prepared for the project site (Phase I). The Phase I was performed in general conformance with the scope and limitations of the ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the United States Environmental Protection Agency's (EPA) 2006 All Appropriate Inquiry (AAI) Rule (40 CFR Part 312). The objective of a Phase I is to assess whether "recognized environmental conditions" (REC), historical RECs, and controlled RECs are associated with the project site. An REC is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment. According to the Phase I, no REC, historical REC, or controlled REC are identified for the project site.

Asbestos containing materials (ACMs) were removed from the Ladera portion of the campus during modernization occurred in 2000. ACMs were used in building materials from approximately 1930s to 1977. Asbestos was banned by EPA in thermal insultation in 1975, in spray-applied decorative surfacing material in 1978 and in flooring felt in 1993. Therefore, the proposed project may encounter ACMs during modernization of the Grand View portion of the campus, and during demolition. The potential for encountering lead-based paint (LBP) during construction also exists. However, the District is required to implement regulatory requirements outlined in the Title 8, CCR Subchapter 4 (Construction Safety Orders), Section 1529 (pertaining to asbestos) and Section 1532.1 (pertaining to lead-based paint), and Title 29 CFR 1926, Subpart Z and Title 40 CFR 61, Subpart M (pertaining to asbestos) and Title 29 CFR 1926, Subpart D (pertaining to lead) to ensure that all removal and disturbance of ACM and LBP and subsequent waste disposal are performed in accordance with these rules and regulations provide exposure limits, exposure monitoring, respiratory protection and good working practice by trained workers. In California, ACM and LBP abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. California HSC Sections 17920.10 and 105255 require lead to be contained during demolition activities. Any modernization activities that have the potential to expose construction workers and/or the public to ACMs will be conducted in accordance with applicable regulations, including but not limited to the California Health and Safety Code, Section 39650 et seq.; California Code of Regulations, Title 8, Section 1529; and California Occupational Safety and Health Administration regulations in the California Code of Regulations, Title 8,

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Section 1529, Asbestos. All construction work concerning ACMs would be performed in accordance with all applicable and relevant laws and regulations. Additionally, electrical equipment was labeled as not having PCBs, and no staining or leaking was observed near the transformers. Therefore, PCBs are not expected to have impacted the project site. The proposed project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. Impacts would not be significant, and no mitigation measures are required.

Although the Phase I did not identify any REC, historical REC, or controlled REC, if state funding is used for the proposed project, the proposed project would require an oversight from the Department of Toxic Substances Control, at which time soil testing would be necessary to assess the surface soils for potential impacts from LBP and organochlorine pesticides from possible termiticide usage.

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

No Impact. No schools other than Grand View Elementary School are within 0.25 mile of the project site. The proposed K-8 school operation would not involve using, handling, or disposing hazardous materials or substances. Implementation of the proposed project would not cause hazardous emissions or involve hazardous or acutely hazardous materials, and no mitigation measures are required.

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?

Less Than Significant Impact. The project site is currently developed as an elementary school. Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. An electronic database service EDR was used to complete the environmental records review, and the results are shown in Table 8, *EDR Database Search Results*. As shown, the project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, except on the HAZNET list for lawful disposal of organic solid waste in 2000 and ACMs in 1996. The HAZNET listing involved only two lawful disposals over 19 years ago and no violations. Therefore, the proposed project would not create a significant hazard to the public or the environment due to being identified in the HZAZNET list. Impacts would not be significant, and no mitigation measures are required.

Table 8 EDR Database Search Results

Database	Approximate Search Distance	Subject Site Listed?	Number of Sites within Search Area
Federal NPL Sites	1 mile	No	0
Federal Delisted NPL Sites	0.5 mile	No	0
CERCLIS Sites	0.5 mile	No	0
CERCLIS-NFRAP Sites	0.5 mile	No	0
Federal ERNS	Site only	No	0
RCRA non-CORRACTS TSD Facilities	0.5 mile	No	0
RCRA CORRACTS Facilities	1 mile	No	1
RCRA Generators	Site and Adjoining	No	3
Federal Institutional/Engineering Control Registry	0.5 mile	No	0
State and Tribal Equivalent NPL Sites	1 mile	No	1
State and Tribal Equivalent CERCLIS Sites	1 mile	No	5
State and Tribal Registered Storage Tanks	Site and Adjoining	No	1
State and Tribal Landfills and Solid Waste Disposal Sites	0.5 mile	No	0
State and Tribal Leaking Storage Tanks	0.5 mile	No	4
State and Tribal Institutional Controls/Engineering Control	Site only	No	0
State and Tribal Voluntary Cleanup Sites	0.5 mile	No	0
State and Tribal Brownfield Sites	0.5 mile	No	0
Orphan Site List	Site and Adjoining	No	2
HAZNET	Site only	Yes	2

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

Less Than Significant Impact. The nearest airport to the school is Los Angeles International Airport (LAX) in the City of Los Angeles, approximately 2.4 miles north. The project site is not within the airport influence area or the airport land use planning area of LAX (ALUC 2004). The proposed project would not result in a new use that would interfere with air traffic patterns, increase traffic levels, or change traffic locations such that it would result in a safety risk. No impact would occur, and no mitigation measures are required.

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

Less Than Significant Impact. The proposed project would reconfigure the existing internal circulation, site access, and trip distribution. The project site's surrounding roadways would continue to provide emergency access through the project area and to surrounding properties during the project's construction.

The Disaster Route Priority Plan, carried out by the County Department of Public Works, is a countywide multi-jurisdictional plan to quickly assess the condition of the highway system and critical facilities and prioritize the clearing, repair, and restoration of key regional highway routes following a major disaster, such as a large

earthquake. The disaster routes also serve as alternative interim transportation routes to the freeway system if portions of the freeway system are damaged or destroyed. In a major disaster, the County Department of Public Work's road maintenance forces would immediately survey and report the condition of the portions of the disaster routes in the unincorporated areas and contract cities. The project area is in Disaster Planning Area G, Manhattan Beach, in the Disaster Routes Priority Plan (Los Angeles 2019). Sepulveda Boulevard is identified as a disaster route, and I-405 is identified as the freeway disaster route. Disaster routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment, and they are not evacuation routes. During a disaster, these disaster routes have priority for clearing, repairing, and restoration over all other roads. The proposed project would not result in substantial physical impacts to any disaster routes. Instead, the proposed project would improve the existing internal circulation patterns and emergency access with minimal increase in student enrollment capacity. Although construction-related activities could interfere with an adopted emergency response plan during the construction phase, the impacts would be temporary, and cease upon completion of the construction phase. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No mitigation measures are required.

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

Less Than Significant Impact. The project site is not identified as high wildland fire area. The City's Community Safety Element also indicates that urban fires represent the sole fire threat in Manhattan Beach. The proposed project would not expose people or structure to a significant risk involving wildland fires. Impacts would not be significant, and no mitigation measures are required.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. A significant impact would also occur if the proposed project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

New construction projects can result in two types of water quality impacts: (1) short-term impacts from discharge of soil through erosion, sediments, and other pollutants during construction and (2) long-term impacts from impervious surfaces (buildings, roads, parking lots, and walkways) that prevent water from being absorbed/soaking into the ground, thereby increasing the pollutants in stormwater runoff. Impervious surfaces can increase the concentration of pollutants, such as oil, fertilizers, pesticides, trash, soil, and animal waste, in stormwater runoff. Runoff from short-term construction and long-term operation can flow directly into lakes, local streams, channels, and storm drains and eventually be released untreated into the ocean.

The project site is already developed with school facilities; therefore, continued operation of the school would not substantially change the pollutants generated from the project site. The project site currently consists of 0.46 acre of non-rooftop impervious coverage and 2.03 acres of rooftop impervious coverage, which totals to 2.49 acres of impervious coverage. The proposed project would increase the non-rooftop impervious coverage to 1.25 acres and decrease the rooftop impervious coverage to 0.46 acre, which totals to 1.71 acres of impervious coverage (Kimley Horn 2019). Therefore, post-construction impervious area would be less than the pre-construction condition; the proposed project would not substantially degrade surface water quality and no stormwater treatment is required. A Water Quality Memo for the proposed project is included as Appendix F to this IS.

During construction, because the area of disturbance exceeds one acre, the proposed project would be regulated under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the SWRCB. The District is required to obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. Construction phase soil erosion impacts would be less than significant, and no further analysis is required.

After completion of the proposed project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The proposed project would result in decreased overall impervious coverage, therefore, would not substantially degrade surface or groundwater quality. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The project site is in the West Coast Groundwater Basin (WCGB) of the Santa Monica Bay Water Management Area. Water service to the City of Manhattan Beach, including the project site, is provided by the City of Manhattan Beach with water purchased from the wholesaler, West Basin Municipal Water District (WBMWD). WBMWD does not supply groundwater to retail agencies but supplies a portion of the supply used for groundwater replenishment. The WCGB covers approximately 140 square miles and is bounded on the north by the Baldwin Hills and the Ballona Escarpment, on the east by the Newport-Inglewood Uplift, to the south by San Pedro Bay and the Palos Verdes Hills, and to the west by Santa Monica Bay. Aquifers in the WCGB are generally confined and receive the majority of their natural recharge from adjacent groundwater basins or from the Pacific Ocean (seawater intrusion). The proposed project would result in decreased impervious coverage and would not substantially impact WBMWD's ability to supply water for replenishment. The proposed project would also increase the maximum student capacity by 24 students and would result in negligible impact on water demand. Therefore, impacts to groundwater would be less than significant, and no mitigation measures are required.

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

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. As discussed in Section 3.10(a), the proposed project would be required to comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the SWRCB. Compliance with the required regulation and implementation of BMPs recommended in the SWPPP would ensure that the proposed project does not result in substantial erosion or siltation on- or offsite. Once the construction phase is completed, no untreated or exposed soils that are susceptible to erosion or siltation would remain; therefore, impacts during operation would be less than significant. No mitigation measures are required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. As discussed in Section 3.10(a), the proposed project would decrease the overall impervious coverage of the project site from 2.49 acre to 1.71 acres, an approximately 31 percent reduction. Therefore, implementation of the proposed project would not increase the rate or amount of surface runoff to result in flooding. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed in Section 3.10(a), the proposed project would decrease the overall impervious coverage of the project site from 2.49 acre to 1.71 acres, an approximately 31 percent reduction. Additionally, as a BMP, a water quality treatment system may be installed at the downstream end of the campus within the landscaping at the northern parking lot area to catch any trash, oil, and debris trapped in the storm drain system. And farther downstream, a dry well water treatment system may also be installed to infiltrate smaller storm events. Therefore, the proposed project would have beneficial impacts on the runoff conditions and would not result in substantial additional sources of polluted runoff. No mitigation measures are required.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The proposed project would slightly modify the existing runoff pattern but would not impede or redirect flood flows because it would decrease the impervious coverage of the project site. Additionally, no portions of Manhattan Beach lie within any federally designated flood zone (Manhattan Beach 2003). No mitigation measures are required.

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

Less Than Significant Impact.

Flood hazard. The project site is in the Zone X designated as area of minimal flood hazard (FIRM No. 06037C1770F) (FEMA 2008). No portions of Manhattan Beach lie within any federally designated flood zone (Manhattan Beach 2003). Less than significant flooding impact is anticipated.

Tsunami. Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The school campus is at an elevation range of approximately 110 feet to 160 feet above sea level and is approximately 0.3 mile inland from the Pacific Ocean. The campus is outside the tsunami hazard zone and would not be directly affected by a tsunami (CAL OES 2019). A less than significant tsunami impact is anticipated.

Seiche. A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The project site is approximately 0.34 mile south of the Edward C. Little Water Recycling Facility in the City of El Segundo, which produces approximately 40 million gallons of useable water every day. However, the project site is already developed with a school, and no increase or change in drainage pattern of the project would result in increased flooding hazard from the water storage tanks in the Water Recycling Facility. Project development would not directly or indirectly exacerbate flood hazards due to potential failure of nearby reservoirs. Impacts would not be significant, and no mitigation measures are required.

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

Less Than Significant Impact. The City's water is purchased from WBMWD. WBMWD has an approximately 185-square-mile service area and provides wholesale potable water to 17 cities in southwest Los Angeles County, including Manhattan Beach. Implementation of the proposed project would not involve any activities that could potentially affect the City's and WBMWD's water supply sources and systems. WBMWD would continue to adhere to applicable water quality regulations in the Urban Water Management Plan. The proposed project would not conflict with or obstruct implementation of a water quality control plan.

The Water Replenishment District of Southern California (WRD) is the largest groundwater agency in the State of California. WRD's service area covers a 420-square-mile region of southern Los Angeles County. WRD ensures that a reliable supply of high quality groundwater is available through the use of recycled water and stormwater capture. WRD is responsible for monitoring and testing groundwater throughout the region. The project site is in the WCGB of the WRD, and considering the size of the proposed project, and because the proposed project would decrease the impervious coverage of the project site, it would not involve any activities that could adversely affect WRD's water quality control programs. Impacts would be less than significant, and no mitigation measures are required.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The project site is within the boundaries of the existing Grand View Elementary School, surrounded by residential and park uses. The proposed project would not result in the physical separation of the surrounding community. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is within the boundaries of the existing Grand View Elementary School and is zoned PF–Public Facilities. The project site is already developed with as an elementary school facilities and the proposed project would not change the land use of the site. The proposed project would not conflict with any land use plan, policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. No mitigation measures are required.

3.12 MINERAL RESOURCES

Would the project:

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

No Impact. The project site is developed and operating as an elementary school, and the proposed renovation would not result in the loss of availability of a known mineral resource that would be a value to the region. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is developed and operating as an elementary school. The City's General Plan does not identify any locally important mineral resources recovery sites. No impact would occur, and no mitigation measures are required.

3.13 NOISE

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep.

Fundamentals of noise and vibration and additional regulatory background information, including local regulations, are included in Appendix G.

Existing Noise Environment

The project site is in a predominantly residential area surrounded by single-family homes and Sand Dune Park to the north. The noise environment surrounding the project site is influenced primarily by traffic noise on local roadways, such as Bell Avenue, 24th Street, and Vista Drive. Noise from adjacent residential uses, such as maintenance, parking, and existing school-related noise, contributes to the total noise environment in the project vicinity. The project site falls within the 60 dBA CNEL contour, as shown in Manhattan Beach Noise Element (see Appendix G).

Sensitive Receptors

The closest off-site sensitive receptors to the project site are adjacent residences to the east, south, and west and Dune Sand Park to the north. On-site sensitive receptors would be students during project construction.

City of Manhattan Beach Municipal Code

The City of Manhattan Beach Municipal Code includes a noise ordinance in Chapter 5.48, Noise Regulations, that limits daytime and nighttime exterior noise levels. Exterior noise limits are summarized in Table 9, *Exterior Noise Limits*, below. Exempt from the noise limits in Table 9 are activities conducted on public or private school grounds such as athletic and entertainment events (Section 5.48.200, Outdoor Activities). Construction activities are also exempt under Section 5.48.250, Construction Activity, during the hours of 7:30 AM to 6:00 PM on weekdays and 9:00 AM to 6:00 PM Saturdays. No construction activities shall take place on Sundays or on City-recognized holidays.

Table 9 Exterior Noise Limits

Designated Land Use or Zoning Classification	Time of Day	Exterior Noise Level, dBA
Residential	7:00 AM to 10:00 PM	50
	10:00 PM to 7:00 AM	45
Commercial	7:00 AM to 10:00 PM	65
	10:00 PM to 7:00 AM	60
Industrial	7:00 AM to 10:00 PM	70
	10:00 PM to 7:00 AM	70

Source: City of Manhattan Beach Municipal Code
Notes:
Exterior noise standards may not be exceeded:
- For a cumulative period of more than 30 minutes in any hour (L_{50})
- By 5 dBA for a cumulative period of more than 15 minutes in any hour (L_{25})
- By 10 dBA for a cumulative period of more than 5 minutes in any hour (L_{8})
- By 15 dBA for a cumulative period of more than 1 minutes in any hour (L_{2})
- By 20 dBA for any period of time (L_{max})

Would the project result in:

3. Environmental Analysis

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

Less Than Significant Impact With Mitigation Incorporated.

Construction Noise

The total duration for project construction is anticipated to be approximately two years and six months. Construction equipment for the proposed project would include equipment such as graders, excavators, tractors, loaders, backhoes, forklifts, air compressors, dozers, and trucks.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet from the worker and vendor vehicles and haul trucks. Haul trips would occur most during the hauling of soil and debris from grading and demolition phases. However, these occurrences would generally be infrequent and short-lived. Therefore, noise impacts from construction haul trips would be considered less than significant.

Worker and vendor trips would total a maximum of 59 daily trips during overlapping construction phases. Current site access is through 24th Street and Bell Avenue, and it is anticipated construction vehicles would also access the site this way. Existing average daily trips on Bell Avenue and 24th Street are 1,740 assuming that average daily trips are approximately ten times the peak hour volumes in the traffic analysis for the project. This would result in a temporary noise increase of 0.23 dBA CNEL or less, which would not be perceptible and would therefore result in a less than significant increase.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from

construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements. Noise levels from project-related construction activities were calculated from the simultaneous use of all applicable construction equipment at spatially averaged distances (i.e., from the acoustical center of the general construction site) to the property line of the nearest receptors. Although construction may occur across the entire phase area, the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors.

The expected construction equipment mix was categorized by construction activity using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 10, *Project Related Construction Noise*. RCNM modeling input and output worksheets are included in Appendix G.

Table 10 Project-Related Construction Noise, dBA L_{eq}

Construction Activity Phase	Off-Site Sensitive Receptor(s) Residential uses to south (200 feet)	Onsite-Sensitive Receptor(s) Buildings J & K (120 feet)
Asphalt/Building Demolition	73	77
Grading	74	78
Utility Trenching	65	69
Building Construction	72	76
Portable Building Removal	74	78
Asphalt Paving/Hardcourts Installation	75	79
Architectural Coating	62	66

Notes: Calculations performed with the FHWA's RCNM software are included in Appendix G. Distance measurements were taken using Google Earth (2019) from the acoustical center of the project site.
Decibels rounded to the nearest whole number.

On-Site Receptors

The nearest on-site building is approximately 120 feet from the acoustical center of the site. At that distance, exterior noise levels could reach up to 79 dBA. Typical exterior-to-interior noise attenuation is 25 dBA with windows closed, resulting in interior noise levels of approximately 54 dBA. Speech interference is considered intolerable when background noise levels exceed 60 dBA. Therefore, because average construction noise levels are not expected to exceed 60 dBA, this would result in a less-than-significant impact to students on-site.

Off-Site Receptors

As discussed above, the Municipal Code Section 5.48.250, Construction Activity, exempts construction activities from the noise standards provided the activity is limited to the hours of 7:30 AM to 6:00 PM on weekdays and 9:00 AM to 6:00 PM Saturdays. No construction activities shall take place on Sundays or on City recognized holidays. In the absence of defined construction noise level standards from the City, the Federal Transit Administration's recommended criterion of 90 dBA L_{eq} is used in this analysis.

3. Environmental Analysis

As shown in Table 10, above, construction-related noise levels would not exceed the 90 dBA L_{eq} threshold at the nearest sensitive receptors (residences 200 feet to the south). Sand Dune Park is approximately 800 feet to the north, and levels would be less there than at the nearest residences. However, the anticipated total duration of construction is approximately two years and six months starting in June of 2020 and ending in December of 2022. Given the relatively long duration, construction noise, if uncontrolled, has the potential to be a nuisance to nearby sensitive receptors, and this would be considered potentially significant. With implementation of Mitigation Measure NOI-1, this impact would be reduced to less than significant.

Operational Noise

Mechanical Equipment

Heating, ventilation, and air conditioning (HVAC) systems would be replaced in Buildings B, C, D, and E in the Grand View portion of the campus and new HVAC equipment would be installed at the new buildings on the Ladera portion of the campus. The nearest residential property lines to the proposed HVAC replacements and new buildings are approximately 80 feet south. Typical HVAC equipment generates noise levels up to 72 dBA at distance of 3 feet. At a distance of 80 feet, noise levels would attenuate to 43 dBA and would, therefore, not exceed the City's stationary daytime and nighttime noise standards of 50 dBA and 45 dBA, respectively. Therefore, this impact would be less than significant.

Student Recreational Noise

While the proposed project would result in a student increase from 735 to 759 students (total increase of 24 students), the increase is from the special day classes (SDC) and is not expected to substantially increase the noise associated with recess, lunch, or other recreational activities. Overall outdoor activities would be similar to existing conditions, since the student enrollment capacity would only be increased by two SDC classrooms. However, outdoor activities would be spread out more and take place in additional campus areas—such as two new playfields to be developed in the currently abandoned lot to the north, where outdoor activity would be closer to residences to the along Grandview Avenue, from 27th Street to 30th Street. However, these would be daytime school-related activities, and no nighttime lighting would be provided. Therefore, noise levels generated from the new playfields would not be substantially greater than the existing noise levels at the campus. In addition, the project does not propose changes in operation of the school bell schedule, and recess and lunch periods would remain the same. In addition, Section 5.48.200, Outdoor Activities, of the Manhattan Beach Municipal Code exempts noise from public school grounds, including but not limited to athletic and entertainment events, from the noise standards. Therefore, impacts from recreational activities would be less than significant.

Traffic Noise

With respect to project-related increases, noise impacts can be put into three categories. The first is "audible" impacts, which refer to increases in noise level that are perceptible to humans. Audible increases generally refer to a change of 3 dBA or more since this level has been found to be the threshold of perceptibility in exterior environments. The second category, "potentially audible" impacts, refers to a change in noise level between 1 and 3 dBA. The last category includes changes in noise level of less than 1 dBA that are typically "inaudible" to the human ear except under quiet conditions in controlled environments. Only "audible" changes in noise

levels at sensitive receptor locations (i.e., 3 dBA or more) are considered potentially significant. Note that a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dBA CNEL increase in traffic-generated noise levels. An increase of 3 dBA CNEL is often used as a threshold for a substantial increase.

The peak hour traffic volumes along roadways in the project area (see Appendix H) were used to determine the permanent traffic noise level increase due to implementation of the proposed project. This analysis compares the Existing plus Project AM peak hour traffic volumes to the Existing AM peak hour traffic volumes to estimate the project increase. The permanent noise level increase along the worst-case scenario roadway segment was estimated to be 2.6 dBA CNEL or less throughout all study roadway segments. Even though the projected trip increase is negligible, where the existing AM peak hour trips are 10, an increase of 8 additional trips would result in an increased noise level of 2.6 dBA CNEL. All other study area roadway segment volumes would not be doubled, and the noise level increase would be less than 2.6 dBA. Since the permanent noise level increase due to project-generated traffic would be less than 3 dBA, the proposed project would not cause a substantial permanent noise level increase at surrounding noise-sensitive receptors. The project would also not contribute substantially to a cumulative traffic noise increase. Therefore, the project traffic noise increase would have a less than significant impact. No mitigation measures are required.

Mitigation Measure

NOI-1 Consistent with the City of Manhattan Beach Municipal Code, construction activities shall not take place weekdays between the hours of 6:00 PM and 7:30 AM, before 9:00 AM or after 6:00 PM on Saturday, or at any time on Sundays or City-recognized holidays. In addition, the following best management practices shall be observed:

- At least 90 days prior to the start of construction activities, all off-site residences within 500 feet of the project site will be notified of the planned construction activities. The notification will include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification should include the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- The project sponsor and contractors will prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan, including those details listed herein, will be included as part of the permit application drawing set and as part of the construction drawing set.
- At least 10 days prior to the start of construction activities, a sign will be posted at the entrance(s) to the job site, clearly visible to the public, which includes permitted construction days and hours, as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint,

they will investigate, take appropriate corrective action, and report the action to the District.

- During the entire active construction period, equipment and trucks used for project construction will utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields, shrouds or temporary noise barriers), wherever feasible.
- During the entire active construction period, stationary noise sources (e.g., generators and air compressors) will be located as far from sensitive receptors as possible, and they will be muffled and enclosed within temporary sheds, or insulation barriers or other measures will be incorporated to the extent feasible.
- Select haul routes that avoid the greatest amount of sensitive use areas.
- Signs will be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment will be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise producing signals, including horns, whistles, alarms, and bells will be for safety warning purposes only. The construction manager will use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

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

Less Than Significant Impact.

Operational Vibration

The operation of the proposed project would not include any substantial long-term vibration sources. Thus, no significant vibration effects from operations sources would occur.

Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used as the limit for nonengineered timber and masonry buildings (which would apply to the surrounding structures) (FTA

2018). Table 11, *Vibration Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at the nearest sensitive receptors. As shown in Table 11, typical construction equipment aside from vibratory rollers produce vibration levels of less than 0.2 in/sec at a distance of 25 feet. At a distance of greater than 25 feet, vibratory roller vibration levels would attenuate to less than the 0.2 in/sec PPV. The nearest structures to possible paving activities are residential homes to the south at approximately 35 feet, which would result in vibration levels less than 0.2 in/sec PPV. Therefore, this impact would be less than significant, and no mitigation measures are required.

Table 11 Vibration Levels for Typical Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Vibratory Roller	0.21
Large Bulldozer	0.089
Loaded Trucks	0.079
Jackhammer	0.035
Small Bulldozer	0.003

Source: FTA 2018.

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

Less Than Significant Impact. The nearest airport is LAX, approximately 2.5 miles north. The project site lies outside of the 65 dBA CNEL noise contour based on the 2019 first-quarter report and would not result in exposure of future residents or workers to airport-related noise (LAWA 2019). The project site is not within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public or private use airport (ALUC 2004). Airport noise impacts would be less than significant, and no mitigation measures are required.

3.14 POPULATION AND HOUSING

Would the project:

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

Less Than Significant Impact. Population growth is directly correlated with the development of new homes or businesses and indirectly correlated to providing necessary infrastructure. The project site is already developed with school facilities and served by necessary infrastructure. The proposed project would increase the student enrollment capacity by two SDC classrooms. The proposed project would serve the existing and future District population and would not induce substantial population directly or indirectly. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is Grand View Elementary School, and the proposed project would not displace housing in the area surrounding the project site. No impact would occur, and no mitigation measures are required.

3.15 PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. The project site is served by the City of Manhattan Beach Fire Department. The fire department has two fire stations, 30 career firefighters and 24 volunteer personnel. Firefighters work two 24-hour shifts followed by 96 hours or four days off. The Manhattan Beach Fire Department has a constant staffing policy that requires staffing 9 firefighters per shift—a battalion chief, 2 fire captains, 2 fire apparatus engineers, and 4 firefighters. The nearest fire station is Station 1 at 400 15th Street, approximately 0.4 mile south of the project site; Station 2 is approximately 1.3 miles to the southeast. Station 1 is equipped with the following equipment and personnel:

- One paramedic engine company (E21) crew of 3
- One paramedic rescue (R21) crew of 2
- One BLS ambulance (A21) crew of 2
- One command vehicle (BC21) crew of 1
- Fire administrative offices (fire chief, fire prevention personnel, administrative assistant)

The proposed project would renovate and modernize the existing Grand View Elementary School to better serve the existing and future District student population. The proposed project would only result in an increase of two SDCs or 24 students, not substantially increasing demands for fire protection services at the project site. The new buildings and renovated facilities would be equipped with appropriate fire protection equipment, such as a fire sprinkler system, as required by the Fire Code. Any hazardous materials related to class instructions would be stored, used, maintained, and disposed of in accordance with applicable regulations. The reconfigured internal access, including emergency vehicle access, would be required to be reviewed and approved by DSA and the fire department. Therefore, the proposed project would not require new or expanded fire service facilities, and no mitigation measures are required.

b) Police protection?

Less Than Significant Impact. The City of Manhattan Beach Police Department provides police services to the project site and would continue to do so. The police department employs approximately 65 sworn and 43

civilian full-time employees and operates under two "bureaus"—Administration/Investigations and Field Operations. The proposed increase in student enrollment capacity is minor, two classrooms, and is not anticipated to result in additional demands on police protection. Although there would be changes in student drop-off/pick-up and pedestrian activities around the school site due to changes in internal circulation and parking, these changes would not require expanded or otherwise physically modified police protection facilities. Impacts would be considered less than significant, and no mitigation measures are required.

c) Schools?

Less Than Significant Impact. The project site is within the existing Grand View Elementary School, and the proposed project would not generate additional school demands within the District boundaries. Although the leased Montessori operation would need to relocate, it is a private school; its relocation would not require construction of new public schools elsewhere. The proposed project would have a less than significant impact on school facilities, and no mitigation measures are required.

d) Parks?

Less Than Significant Impact. Demands for parks are correlated with population growth or new development. The proposed renovation and modernization of an elementary school would not result in demands for new or expanded parks. No impact would occur, and no mitigation measures are required.

e) Other public facilities?

No Impact. The need for an expansion of existing public facilities or development of new public facilities such as library or daycare services is generally correlated with an increase in population and/or growth-inducing development projects. The proposed project is not a growth-inducing project and would not result in an increase in population. No impacts to public facilities would occur, and no mitigation measures are required.

3.16 RECREATION

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

Less Than Significant Impact. Demand for parks most often result from the development of new housing or other development actions that increase population. The proposed project is not a population-increasing or growth-inducing project. The proposed project would serve the existing and future student population that are already served by local and regional recreational facilities. The abandoned lot to the north of the campus is being used as a dog park for some of the community members. However, the lot was never developed as a dog park, and elimination of this passive use would not increase the use of existing neighborhood and regional parks, as community members would likely to walk about the block with their dogs, if the lot is not available. Furthermore, the proposed project would provide two new soccer fields on this previously underused area, providing additional recreational facilities to the community. The proposed project would not increase the use

of nearby recreational facilities or contribute to their deterioration. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The proposed project involves renovation and modernization of existing elementary school facilities, and it includes reconfigured hardcourts and new soccer fields. Physical effects related to construction of these facilities are addressed throughout this Initial Study, and no other adverse physical impacts are anticipated. Construction or expansion of recreational facilities other than those proposed onsite are not necessary. Impacts would not be significant, and no mitigation measures are required.

3.17 TRANSPORTATION

A traffic study was prepared for the proposed project and is included in Appendix H of this Initial Study. The traffic study was prepared in accordance with the methodology used for preparation of traffic impact analyses in the cities of Manhattan Beach and El Segundo. The analysis in this section is based in part on the traffic study.

Traffic Study Methodology

Intersection LOS

A level of service (LOS) is a standard performance measurement to describe the operating characteristics of a street system in terms of the level of congestion or delay experienced by motorists. Service levels range from A through F, which relate to traffic conditions from best (uncongested, free-flowing conditions) to worst (total breakdown with stop-and-go operation).

The intersection LOS analysis is based on the traffic volumes observed during the peak hours. The peak hours selected for analysis were the highest volumes that occur in four consecutive 15-minute periods from 7 AM to 9 AM and from 4 PM to 6 PM on weekdays.

The methodology used to assess the operation of a signalized intersection is based on the Intersection Capacity Utilization (ICU). Roadway level of service under the ICU methodology is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility (volume-to-capacity ratio, or V/C). A facility is defined as being "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This V/C value is based on volumes by lane, signal phasing, and approach lane configuration. The traffic study used the Highway Capacity Manual (HCM) methodology to calculate the overall average intersection delay at all-way stop intersections, and the worst-case approach delay was calculated at two-way stop intersections. Table 12, *Intersection Level of Service*, describes the level of service concept and the operating conditions expected under each level of service for signalized and unsignalized intersections.

Table 12 Intersection Level of Service

LOS	Definition	Signalized Intersection volume/capacity ratio (ICU)	Stop-Controlled Intersection average stop delay per vehicle (sec/veh) (HCM)
A	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	0.000–0.600	≤10
B	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.	0.601–0.700	>10–15
C	Good operation. Occasionally backups may develop behind turning vehicles. Most drivers feel somewhat restricted.	0.701–0.800	>15–25
D	Fair operation. There are no long-standing traffic queues. This level is typically associated with design practice for peak periods.	0.801–0.900	>25–35
E	Poor operation. Some long standing vehicular queues develop on critical approaches.	0.901–1.000	>35–50
F	Forced flow. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movements of vehicles out of the intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.	Greater than 1.000	>50

Source: TRB 2010, 1980.

Traffic Study Area Street System

The traffic study evaluated the following street system based on the anticipated attendance area for the existing Grand View School Elementary School, a review of the circulation network, and the potential for traffic impacts with the proposed project:

- **Bell Avenue:** This undivided, two lane, north-south roadway is classified as a local roadway. Stop signs control the study intersections of Bell Avenue at 27th Street, Bell Avenue at 26th Street, and Bell Avenue at Blanche Road.

- **Blanche Road:** This undivided, two lane, north-south roadway is classified as a major local roadway. Stop signs control the study intersection of Blanche Road at 25th Street, Blanche Road at 24th Street, and Blanche Road at Marine Avenue.

- **Highland Avenue:** This undivided, two lane, north-south roadway is classified as a collector roadway. Traffic signals control the study intersection of Highland Avenue at 24th Street, and stop signs control the study intersection of Highland Avenue at Marine Avenue.

- **Marine Avenue:** This undivided, two lane, east-west roadway is classified as a major local roadway. Stop signs control the study intersection of Blanche Road at Marine Avenue.

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- **Manor Drive:** This undivided, two lane, north-south roadway is classified as a local roadway. Stop signs control the study intersection of Manor Drive at 24th Street.
- **Rosecrans Avenue:** This divided, four lane, east-west roadway is classified as a major arterial roadway. Traffic signals control the study intersection of Bell Avenue at Rosecrans Avenue.
- **Vista Drive:** This one-way, north roadway is classified as a local roadway. Stop signs control the study intersection of Vista Drive at 24th Street.
- **24th Street:** This undivided, two lane, east-west roadway is classified as a local roadway. The posted speed limit in the school zone is 15 mph. Stop signs control the study intersections of Highland Avenue at 24th Street, Vista Drive at 24th Street, Manor Drive at 24th Street, and Blanche Road at 24th Street.
- **25th Street:** This undivided, two lane, east-west roadway is classified as a local roadway. There is on-street parking on both sides. Stop signs control the study intersection of Blanche Road at 25th Street.
- **26th Street:** This undivided, two lane, east-west roadway is classified as a local roadway. There is on-street parking on both sides. Stop signs control the study intersection of Bell Avenue at 26th Street.
- **27th Street:** This undivided, two lane, east-west roadway is classified as a local roadway. There is on-street parking on both sides. Stop signs control the study intersection of Bell Avenue at 27th Street and Blanche Road at 27th Street.

Traffic Study Area Intersections

Traffic and pedestrian counts were taken at the following intersections and roadway segments on Thursday December 13, 2018. The traffic study area intersections were selected for evaluation based on the calculated roadway circulation network and classifications.

1. Highland Avenue at 24th Street
2. Highland Avenue at Marine Avenue
3. Vista Drive at 24th Street
4. Manor Drive at 24th Street
5. Bell Avenue at 27th Street
6. Bell Avenue at 26th Street
7. Blanche Road at Rosecrans Avenue
8. Blanche Road at 27th Street
9. Blanche Road at Bell Avenue
10. Blanche Road at 25thStreet
11. Blanche Road at 24th Street
12. Blanche Road at Marine Avenue

All study area intersections are under the jurisdiction of the City of Manhattan Beach, with the exception of intersection #7, Blanche Road at Rosecrans Avenue, which is on the border with the City of El Segundo. Figure 12, *Traffic Study Area Intersections*, and Figure 13, *Existing Lane Configurations and Traffic Control*, show the circulation network of the traffic study area, intersection analyses locations, and lane configurations and traffic control.

Traffic Study Area Roadway Segments

The traffic study also selected the following eight roadway segments for evaluation:

1. Highland Avenue, North of Marine Avenue
2. 24th Street between Vista Drive and Grandview Avenue
3. Bell Avenue between 27th and 26th Street
4. Blanche Road between 24th and 23rd Street
5. 29th Street between Bell Avenue and Blanche Road
6. 27th Street between Bell Avenue and Blanche Road
7. Blanche Road between 30th Street and 29th Street
8. 25th Street, East of Blanche Road

Significance Threshold

City of Manhattan Beach LOS Criteria

The City of Manhattan Beach goal for peak hour intersection operation is LOS D or better. To determine whether the addition of project-generated trips results in a significant impact at a study intersection and thus requires mitigation, the City of Manhattan Beach has established the following thresholds of significance, which are based on the County of Los Angeles Department of Public Works' Traffic Impact Analysis Report Guidelines (LACPW 1997):

- A significant project impact occurs at a study intersection when the addition of project-generated trips causes an ICU increase of 0.02 while operating at LOS D; or
- A significant project impact occurs at a study intersection when the addition of project-generated trips causes an ICU increase of 0.01 while operating at LOS E or F.

There are no established thresholds of significance for stop-controlled intersections in the City of Manhattan Beach. Therefore, the following threshold of significance is utilized to determine if the addition of project-generated trips results in a significant impact at an unsignalized study intersection, and thus requires mitigation:

- At stop-controlled intersections, a significant project impact occurs if one of the minor street approaches is forecast to operate at LOS E or F and the addition of project-generated trips causes an increase in delay of four or more seconds. Nevertheless, judgment is required to consider the relevance of turning traffic volume, lane configuration, queuing impacts, and other parameters affecting intersection operations.

3. Environmental Analysis

City of El Segundo LOS Criteria

The City of El Segundo General Plan Circulation Element states that the city goal for peak hour intersection operation is LOS D or better. To determine whether the addition of project-generated trips results in a significant impact at a signalized study intersection and thus requires mitigation, the following thresholds of significance must be met:

- A significant project impact occurs at a signalized study intersection when the addition of project-generated trips causes the peak hour level of service of the study intersection to change from acceptable operation (LOS A, B, C, or D) to deficient operation (LOS E or F); or

- A significant project impact occurs at a signalized study intersection when the addition of project-generated trips causes an ICU increase of 0.02 or more when the "With Project" intersection LOS is at LOS E or F.

There are no unsignalized traffic study intersections in El Segundo.

Existing Conditions

Existing Conditions Intersection Operations Analysis

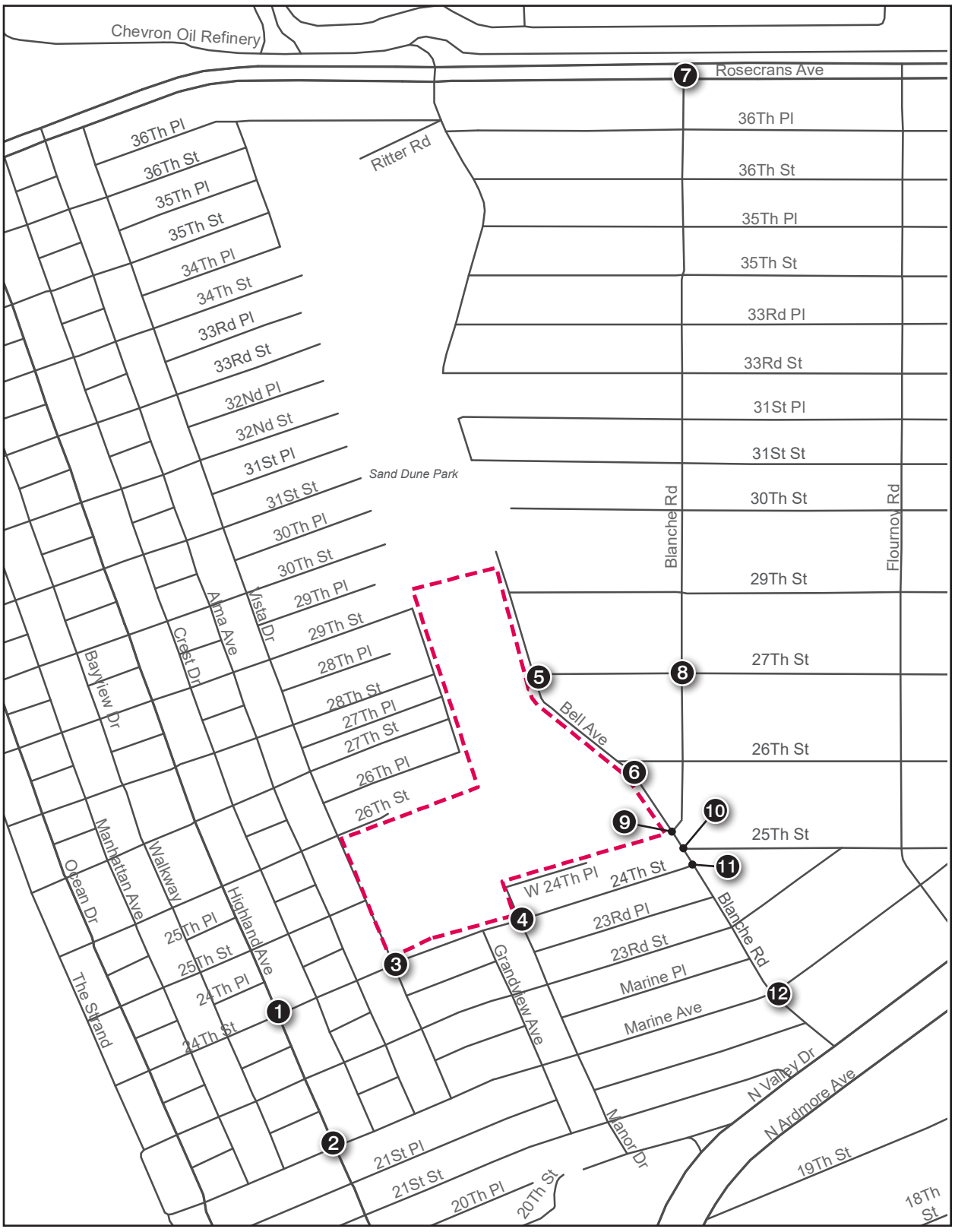
As shown in Table 13, *Existing Peak Hour Intersection Levels of Service*, all traffic study area intersections currently operate at an acceptable LOS of C or better during the peak hours.

Table 13 Existing Peak Hour Intersection Levels of Service

Intersection	Traffic Control	AM Peak Hour			PM Peak Hour		
		Average Delay (sec/veh)	V/C	LOS	Average Delay (sec/veh)	V/C	LOS
1. Highland Avenue at 24th Street	Two-Way Stop	15.37	-	C	14.43	-	B
2. Highland Avenue at Marine Avenue	Signalized	-	0.684	B	-	0.774	C
3. Vista Drive at 24th Street	All-Way Stop	8.56	-	A	7.66	-	A
4. Manor Drive at 24th Street	All-Way Stop	8.70	-	A	7.72	-	A
5. Bell Avenue at 27th Street	All-Way Stop	7.61	-	A	7.55	-	A
6. Bell Avenue at 26th Street	Two-Way Stop	9.13	-	A	8..85	-	A
7. Blanche Road at Rosecrans Avenue	Signalized	-	0.550	A	-	0.452	A
8. Blanche Road at 27th Street	All-Way Stop	11.10	-	B	8.46	-	A
9. Blanche Road at Bell Avenue	Two-Way Stop	12.10	-	B	11.23	-	B
10. Blanche Road at 25thStreet	All-Way Stop	11.13	-	B	8.76	-	A
11. Blanche Road at 24th Street	All-Way Stop	11.43	-	B	8.80	-	A
12. Blanche Road at Marine Avenue	All-Way Stop	12.73	-	B	10.26	-	B

Notes: LOS calculation worksheets included in Appendix B of Traffic Study (Appendix H).

Figure 12 - Study Intersections
3. Environmental Analysis



Source: ESRI, 2018

3. Environmental Analysis

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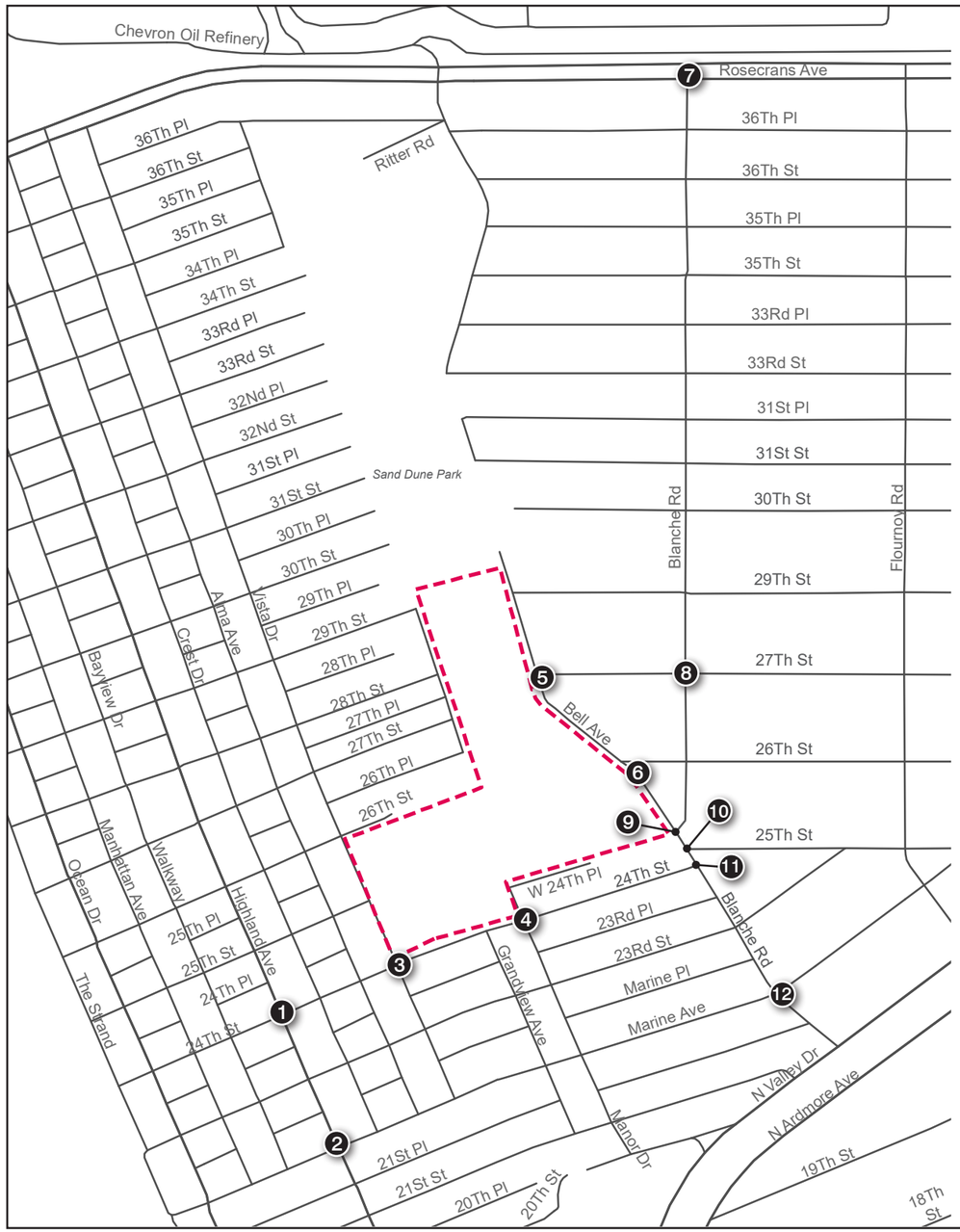
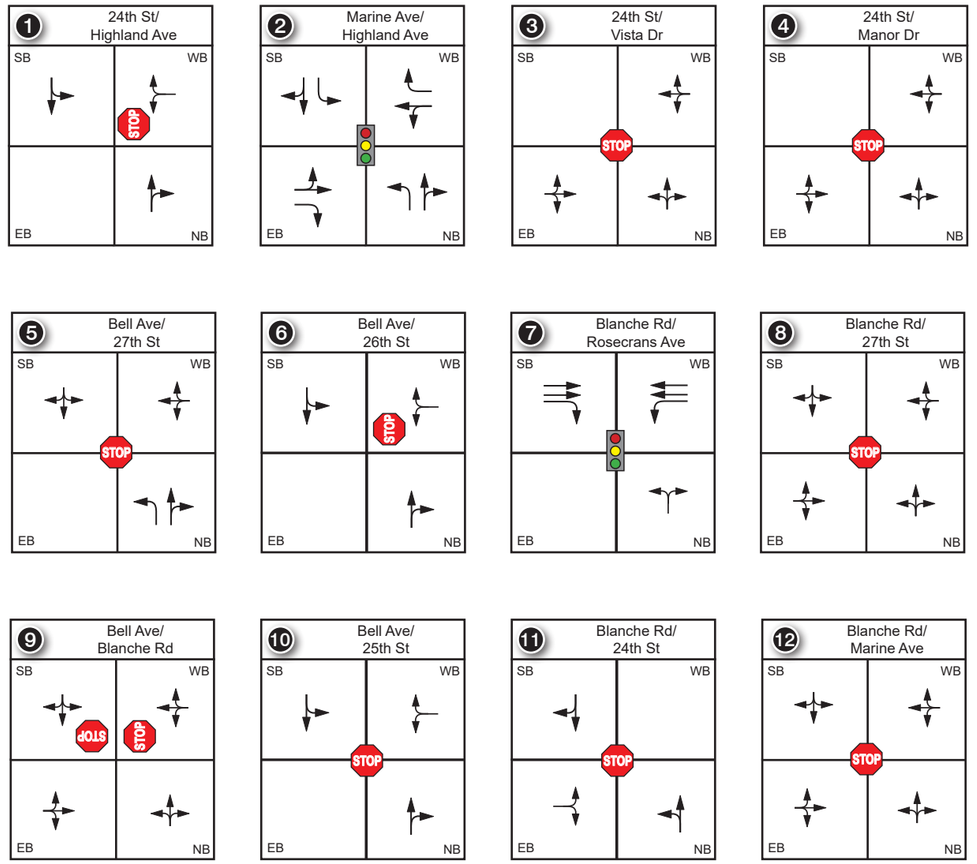
Figure 13 - Existing Lane Configurations and Traffic Control





School Boundary

Study Intersections (12)

Traffic Signal

Stop Sign

0 500
Scale (Feet)

Source: ESRI, PTV, VISTRO 2019

3. Environmental Analysis

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Roadway Traffic

To review traffic volumes in the vicinity of the existing drop-off lot off 24th Place, roadway counts were taken on 24th Street between Vista Drive and Grandview Avenue. The counts indicate that the daily traffic on that segment is 1,054 vehicles per day, and most of the traffic heads eastbound (674 eastbound, 380 westbound). The peak traffic is between 7:15 and 8:15 AM, with a total of 121 vehicles, and between 2:15 and 3:15 PM, with 117 vehicles.

The existing roadway volume on Bell Avenue between 26th and 27th Street in the vicinity of the existing drop-off area off Bell Avenue is approximately 782 (420 northbound, 363 southbound). The counts indicate that the highest morning peak traffic volume is between 7:30 and 8:30 AM, with approximately 128 vehicles, and the highest afternoon peak traffic is at student dismissal, between 2:15 and 3:15 PM, with approximately 137 vehicles.

The existing roadway volume on 27th Street between Bell Avenue and Blanche Road is approximately 417 (204 eastbound, 213 westbound). The highest AM peak traffic is between 8 AM and 8:45 AM with 77 vehicles, and PM peak traffic is between 2 PM and 2:45PM, also with 77 vehicles.

The existing hourly roadway volume on 29th Street between Bell Avenue and Blanche Road is approximately 302 vehicles daily (149 eastbound and 153 westbound). The highest morning peak traffic volume is between 7:00 and 7:45 AM, with approximately 34 vehicles, and the highest afternoon peak traffic volumes is at student dismissal, between 2:15 and 2:45 PM, with approximately 48 vehicles.

Project Trip Generation and Trip Distribution

To estimate student traffic that would shift from the 24th Place drop-off area in the Grand View portion to the expanded drop-off area on Bell Avenue, published trip generation rates for elementary school students were utilized. The number of students that is anticipated to be dropped off at this location is derived from an estimate of the students occupying the buildings near Bell Avenue. The new classroom building would provide 10 additional classrooms for grades 1 to 5, relocating from the Grand View portion to the Ladera portion of the campus. Assuming that each classroom would have a capacity of 24 students, there would be a total of 16 classrooms near the Bell Avenue area, therefore, serving a total of 384 students (16 classrooms x 24 students = 384). It should be noted that the Montessori School, which has an enrollment of 145 students, currently utilizes Bell Avenue for drop-off, and the traffic counts conducted for the traffic analysis already account for this Montessori School traffic to be removed. Therefore, the number of additional students expected to be dropped off in this Bell Avenue area is calculated to be 239 students (384 students – 145 students = 239 students).

The trip generation was calculated based on rates in the Institute of Transportation Engineers' (ITE) manual, Trip Generation (10th edition), for Land Use 520, Elementary School. Table 14, *Traffic Pattern Change Estimate*, shows the trip generation rates and project trip generation for the daily, AM peak hour, the commuter PM peak hour, and student dismissal hour. It is anticipated that the number of trips to be relocated to the drop-off area at Bell Avenue would be 452 daily trips—160 trips (86 inbound and 74 outbound) during the AM peak hour, 41 trips (20 inbound and 21 outbound) during the PM peak hour, and 82 trips (37 inbound and 45 outbound)

in the student dismissal hour. For this analysis, it is conservatively assumed that the PM student dismissal school traffic would overlap with the traffic commuter PM peak hour traffic.

Table 14 Traffic Pattern Change Estimate

		Trip Generation[1]									
			AM Peak Hour			PM Peak Hour[2]			PM Student Dismissal[3]		
Land Use	Unit	Daily	In	Out	Total	In	Out	Total	In	Out	Total
Elementary School	Students	1.89	0.36	0.31	0.67	0.08	0.09	0.17	0.15	0.19	0.34
Project Trip Generation	239	452	86	74	160	20	21	41	37	45	82

[1] Trip generation rates for peak hour of adjacent streets, per the ITE Trip Generation Manual, 10th edition.
[2] PM peak hour represents the commuter peak hour traffic from 4–6PM.
[3] PM student dismissal represents mid-afternoon hours approximately from 1–3 PM.

Although it is anticipated that some of the current drop-offs at the 24th Place area would relocate to the drop-off area at Bell Avenue after project implementation, this traffic analysis uses a conservative approach and assumes no reduction in traffic at the 24th Place drop-off area. This assumption allows the traffic analysis to absorb the 24-student increase in student capacity.

Trip Distribution

The traffic study geographically distributed the traffic that would be generated by the school onto the street network by evaluating the layout of the traffic study area roadway network and reviewing land uses designated as residential in the area. In addition, the new classroom building and the multipurpose building in the Ladera portion and expanded drop-off area would change the traffic patterns in the area, because more parents and staff would use the areas off Bell Avenue for parking and student drop-off/pick-up. Figure 14, *Project Trip Distribution*, presents the anticipated trip distribution for the proposed project.

Would the project:

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

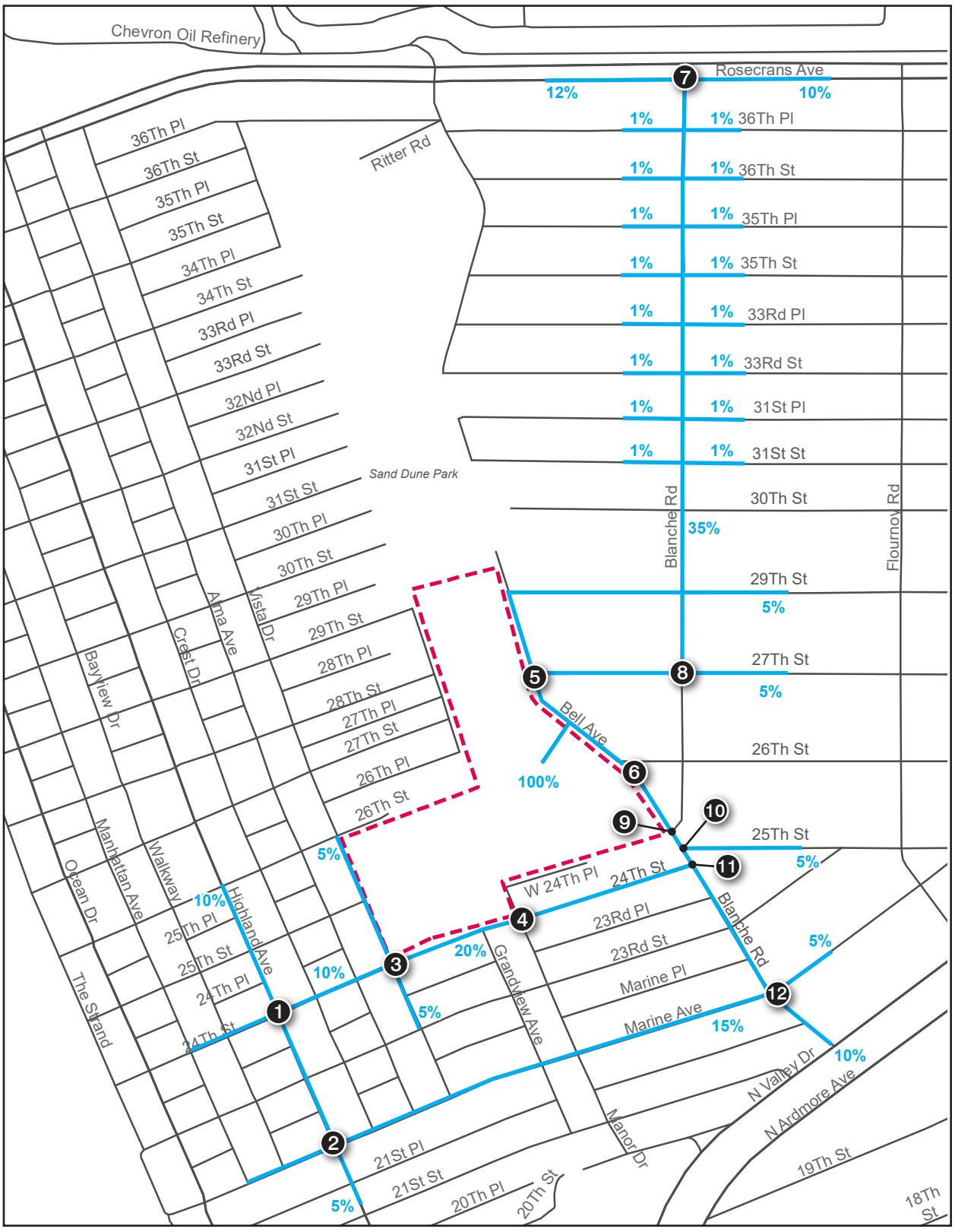
Less Than Significant Impact.

Future Year 2023 Conditions Intersection Operations Analysis

In order to project future year 2023 conditions, an ambient growth rate of 1.031 percent per year was added to daily and peak hour traffic volumes on surrounding roadways in addition to traffic generated by the development of future cumulative projects. A list of cumulative projects is included in Table 6, Cumulative Projects Trip Generation, of the Traffic Study, and locations are shown in Figure 11, Cumulative Developments Location Map, of the Traffic Study (Appendix H of the IS). These are list of projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. The ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects.

Figure 14 - Project Trip Distribution

3. Environmental Analysis



Source: ESRI, 2019

3. Environmental Analysis

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As shown in Table 15, *Intersection Delay and LOS, 2023 Cumulative No Project and Plus Project Conditions*, under the future no project condition, all intersections would operate at acceptable LOS C or better. Traffic volumes and turning movements under the 2023 No Project conditions are in Appendix E to the Traffic Study, and under 2023 Plus Project conditions are in Appendix F to the Traffic Study.

Table 15 Intersection Delay and LOS, 2023 No Project and Plus Project Conditions

		Cumulative 2023 No Project						Cumulative 2023 Plus Project					
		AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
Intersection	Traffic Control	Avg Delay (sec/veh)	V/C	LOS	Avg Delay (sec/veh)	V/C	LOS	Avg Delay (sec/veh)	V/C	LOS	Avg Delay (sec/veh)	V/C	LOS
1. Highland Ave /24th St	TWS	15.95	-	C	15.03	-	C	16.14	-	C	15.71	-	C
2. Highland Ave /Marine Ave	S	-	0.71	C	-	0.797	C	-	0.71	C	-	0.798	C
3. Vista Dr /24th St	AWS	8.50	-	A	7.67	-	A	8.81	-	A	7.75	-	A
4. Manor Dr /24th St	AWS	8.35	-	A	7.50	-	A	8.67	-	A	7.58	-	A
5. Bell Ave /27th St	AWS	7.41	-	A	7.50	-	A	7.60	-	A	7.64	-	A
6. Bell Ave /26th St	TWS	8.54	-	A	8.85	-	A	9.23	-	A	9.00	-	A
7. Blanche Rd /Rosecrans Ave	S	-	0.57	A	-	0.47	A	-	0.58	A	-	0.48	A
8. Blanche Rd /27th St	AWS	10.33	-	B	8.36	-	A	10.76	-	B	8.53	-	A
9. Blanche Rd /Bell Ave	TWS	12.29	-	B	11.37	-	B	14.11	-	B	12.06	-	B
10. Blanche Rd /25th ST	AWS	10.46	-	B	8.60	-	A	11.68	-	B	8.84	-	A
11. Blanche Rd /24th St	AWS	10.54	-	B	8.64	-	A	11.56	-	B	8.91	-	A
12. Blanche Rd /Marine Ave	AWS	11.52	-	B	10.24	-	B	12.17	-	B	10.48	-	B

Notes: LOS calculation worksheets in Appendix E of Traffic Study (Appendix H).
All intersections under jurisdiction of Manhattan Beach, except for Intersection #7, which is under City of El Segundo/Manhattan Beach jurisdiction.

Also shown in Table 15, under 2023 Cumulative Plus Project conditions, all intersections would continue to operate at acceptable LOS C or better. Although there would be small increases in delay at all traffic study intersections, all traffic study intersections would continue to operate at LOS C or better, and therefore would not exceed the significance threshold level. The proposed project would not result in significant impacts at any study intersections, and no mitigation would be required.

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

Less Than Significant Impact. On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines, one of which was the removal of vehicle delay and LOS from consideration under CEQA. Transportation impacts will instead be evaluated based on a project's effect on vehicle miles traveled (VMT). Lead agencies are allowed to opt into the revised transportation guidelines, but the new guidelines must be used starting July 1, 2020. The City has not adopted revised traffic impact analysis guidelines, and analysis of vehicle LOS remains the appropriate method for determining the project's transportation impact. However, a disclosure of the proposed project's effect on VMT is provided here for informational purposes.

The CalEEMod is a sketch model used statewide to estimate pollutant and greenhouse gas emissions for various aspects of construction and operation of a proposed project. The Technical Advisory on Evaluating

3. Environmental Analysis

Transportation Impacts in CEQA (OPR 2018) identifies sketch models (and CalEEMod specifically) as potential tools for analyzing a project's VMT. Table 16 *Project Effect on Vehicle Miles Traveled*, provides a comparison of VMT from this CalEEMod sketch model by inputting the existing and proposed vehicle trips from the proposed project. The model result is based on a worst-case scenario increase of 46 daily trips (existing 1,389 daily trips to proposed 1,435 daily trips) from the two additional SDC classrooms. As shown in Table 16, the proposed project would result in a net increase of 111,662.84 annual vehicle miles, or an increase of 3.3 percent from the existing condition. Such an increase would not be considered significant. Furthermore, it should be noted that SDC classrooms would likely serve the before and afterschool needs of the students who are already attending the Grand View ES; therefore, it would accommodate, not necessarily change or increase driving distance for the existing or future school population. Impacts would be less than significant, and no mitigation measures are required.

Table 16 Project Effect on Vehicle Miles Traveled

Land Use	Annual VMT
Existing Condition	3,419,674.38
Post-project Condition	3,531,337.21
Net Change	**111,662.84**

Source: CalEEMod Version 2016.3.
VMT = vehicle miles traveled

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

Less Than Significant Impact With Mitigation Incorporated.

Vehicular Access

Currently most student drop-off and pick-up takes place at the parking area off 24th Street in the southwest portion of the campus. The drop-off area includes two one-way lanes—one for student loading/unloading, and one pass-by lane. Egress from the drop-off area is via a right turn only onto 24th Street toward Vista Drive.

Implementation of the proposed project would reconfigure and expand the parking on Bell Avenue to serve the new classroom building and multipurpose building; therefore, some of the traffic on 24th Street would shift to Bell Avenue and increase traffic on Bell Avenue. The existing parking on 24th Street would be expanded to accommodate 6 additional parking spaces. The expanded Bell Avenue parking would provide 24 parking stalls, approximately 400 feet of internal circulation loop, and an approximately 30-foot-wide drop-off area. The approximately 400-foot circulation loop would allow approximately 16 vehicles to queue (25 feet per vehicle). Therefore, in addition to the drop-off area, parents would also have the option to park in the parking lot or at curbside spaces on Bell Avenue, and walk their children to/from the school entrance.

The volumes in the worst-case period would be the morning hour, when traffic volumes are highest. As shown in Table 14, *Traffic Pattern Change Estimate*, there would be 86 vehicles entering the driveway and 74 vehicles egressing in the AM peak hour. It is anticipated that 38 vehicles would come from the north via 29th and 27th

Street, and 47 vehicles coming from the south and east would reach the site via Bell Avenue. Vehicles would enter the drop-off area via the driveway north of 27th Street and exit from the driveway just south of 27th Street. It is anticipated that queues would be limited to the drop-off area and around the ingress driveway on Bell Avenue north of 27th Street. Queues to enter the student drop-off/pick-up area forming on the west side (southbound) of Bell Avenue would not block any driveways. It is possible that queues to enter the drop-off area on the northbound lane on Bell Avenue could potentially block one residence driveway and the westbound approach at 27th Street to Bell Avenue. However, the typical morning peak drop-off and afternoon pick-up activity lasts about 20 minutes, and any possible queue would dissipate immediately afterward.

Because the ingress driveway would be north of 27th Street, the existing pavement markings and striping (i.e., parking restriction, crosswalk, etc.) at the intersection of Bell Avenue at 27th Street would no longer be adequate to serve the school population. The existing northbound left-turn lane on Bell Avenue would not align with the ingress access of the new driveway, and vehicular queues would extend to the existing crosswalk. Therefore, these markings and striping would need to be eliminated and/or relocated to provide safe access to and from the campus. The proposed project would require changes to the existing crosswalk makings and roadway striping; however, with recommended modifications as shown in Figure 15, *Site Access Recommendations*, the proposed project would not substantially increase hazards due to a design feature. Impacts would be less than significant with implementation of Mitigation Measure TRAN-1. Furthermore, the District will coordinate with the City to further improve the traffic flow if additional measures are deemed necessary by the City, as identified in TRAN-2.

Pedestrian Access

Pedestrian access would continue to be provided via paved sidewalks on Bell Avenue and Blanche Avenue. There would be increased vehicular traffic on streets where school-related traffic already occurs. However, the project site is already operating as an elementary school, and adjacent roadways already provides vehicular and pedestrian access to the project site. Yellow-painted crosswalks would continue to provide safe access to the project site at key intersections of Bell Avenue at 27th Street, Blanche Avenue at 25th Street, and Blanche Avenue at 24th Street; and a crossing guard at Bell Avenue at 27th Street during student arrival and dismissal times would also remain. According to a site visit on December 12, 2018, from 7:40 AM to 8:15 AM during the student drop-off period, traffic was relatively free of congestion in the area. This existing condition is expected to improve, because the project-related traffic would be redistributed to the east side of the campus and improve the drop-off area off Bell Avenue. Impacts would be less than significant, and no mitigation measures are required.

Mitigation Measure

TRAN-1 Prior to the opening of the school, Manhattan Unified School District (District) shall work with the City of Manhattan Beach to identify on-site traffic signing and striping to be implemented in conjunction with detailed construction plans for the project. A conceptual restriping and access reconfiguration layout is presented in Figure 15, *Site Access Recommendations*, of the Initial Study. As shown in Figure 15, the northbound lane of Bell Avenue at the intersection with 27th Street shall be restriped; the existing crosswalk north of the ingress driveway shall be relocated; "keep clear" pavement markings shall be added at the

intersection; "no crossing" sign facing east of the intersection shall be added; and parking restrictions along Bell Avenue shall be marked. Modifications to the roadway markings and striping shall be in conformance with design standards from the California Manual of Uniform Traffic Control Devices for Streets and Highways and City of Manhattan Beach standards.

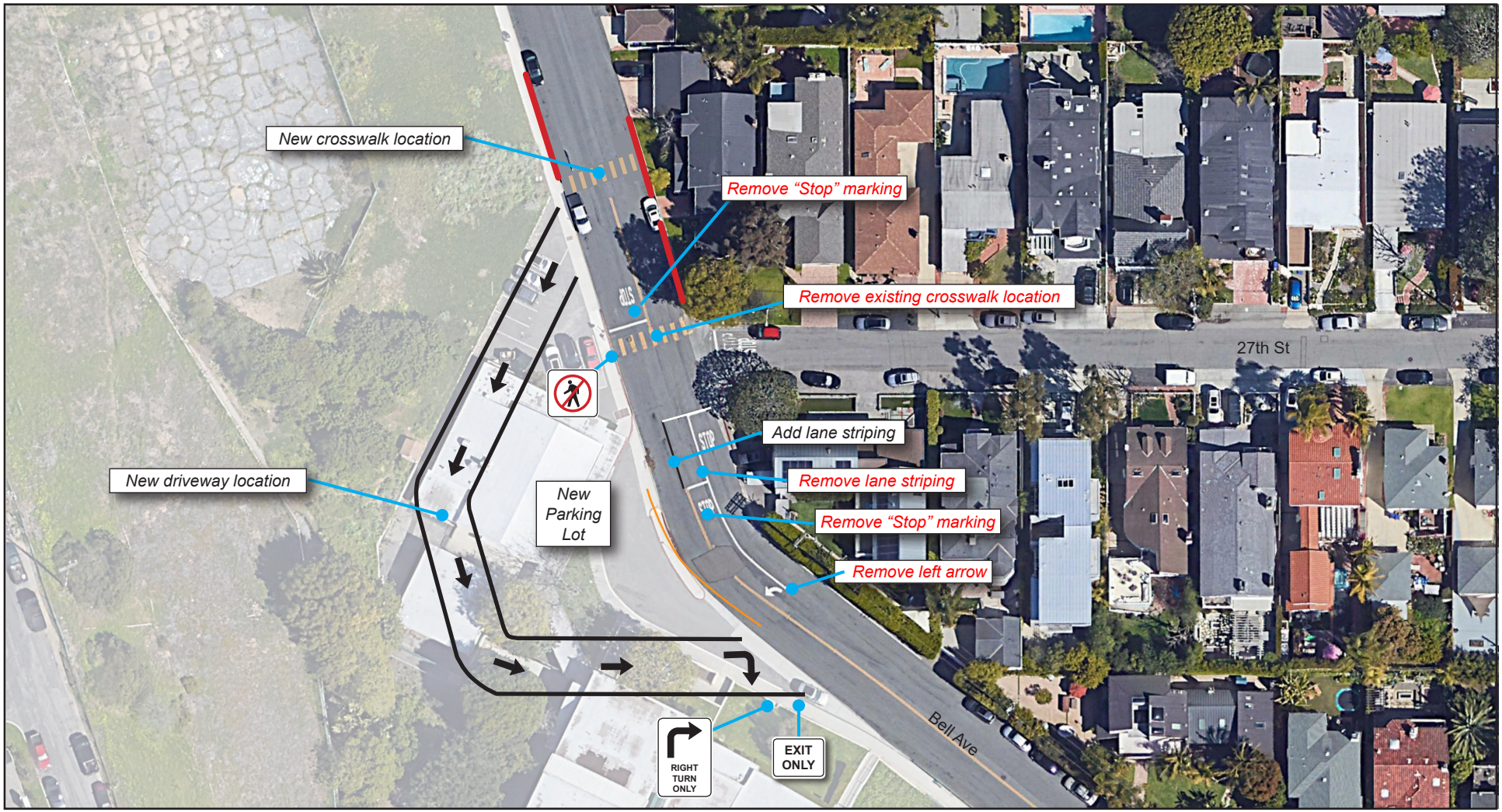
TRAN-2 Before and after opening of the school, at the request of City of Manhattan Beach, Manhattan Beach Unified School District shall consider and implement the following operational features, as appropriate, to improve traffic flow and to provide an efficient drop-off and student pick-up:

- Restrict egress driveways to allow right-turn-out movements only during student drop-off and pick-up times to reduce conflicting movements with vehicles heading north to the ingress driveway.
- Provide monitor(s) to help children get in and out of cars during the first two weeks of opening of the school.
- Provide monitor(s) to ensure that all motorists move as far forward in the queue as possible and keep small gaps between cars to reduce the queue lengths during the first two weeks of opening of the school; and provide a signage to facilitate this operational feature.
- Provide clear pavement markings and white curb markings to delineate the drop-off/pick-up area.
- Educate parents, students, and staff on drop-off/pick-up procedures, and encourage students to walk to school.
- Periodically review traffic operations in the vicinity of the campus to ensure that traffic operations are satisfactory.

d) Result in inadequate emergency access?

Less Than Significant Impact. The proposed project would not result in inadequate emergency access. The proposed project would improve access and circulation features at the school, including an internal emergency/fire access road, and continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. New emergency access driveways and internal fire lanes would be provided through the campus to access the school buildings, hardcourts, and playfield. All access features are subject to and must satisfy the City's and DSA's design requirements. Impacts would be less than significant, and no mitigation measures are required.

Figure 15 - Site Access Recommendations



Source: Google Earth Pro, 2019; DLR Group, 2019

3. Environmental Analysis

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3.18 TRIBAL CULTURAL RESOURCES

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources. As part of the AB 52 process, Native American tribes must submit a written request to MBUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. MBUSD must then provide written, formal notification to those tribes, and the tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project. When these steps are completed, MBUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

To date, MBUSD has not received any requests to be notified about projects in the District. Additionally, as part of the Cultural Resources Report, a request for a search of the Sacred Lands File held by the California Native American Heritage Commission was made by ASM on January 17, 2019, and a list of five tribal entities who may have an interest in the project area was provided. A query letter was sent to each of the five listed tribal entities, but no responses have been received. As discussed in Section 3.5(b) of *Cultural Resources*, given the pedestrian archaeological survey on January 30, 2019, and lack of previously identified archaeological resources near the project site and in the geologic units that cover the project site, the potential for uncovering sensitive tribal resources during ground disturbance is low.

The project site is not currently listed in the California Register of Historical Resource or in a local register of historical resources. Public Resources Code Section 5020.1(k) defines local register of historical resources as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. There is no local ordinance or resolution that identifies the project site as a historical resource. The proposed project would not result in potential impacts to sensitive tribal resources; no impact is anticipated. No mitigation measures are required.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1,

the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. PRC Section 5024.1(c) indicates that a resource may be listed as an historical resource in the California Register if it meets any of the four National Register of Historic Places criteria. This discussion is also provided in Section 3.5(a) of *Cultural Resources*. As part of the Cultural Resources Report, the Grand View ES facilities were documented and evaluated. After careful consideration of the ability of the resources to reflect the historic theme with which they are associated, it was determined that the upper campus (Grand View portion) is recommended eligible for the CRHR under criteria 1 and 3 as the Grand View Elementary School Historic District, with a period of significance of 1939 to 1954. The upper campus is eligible under criterion 1 because it is the oldest school in Manhattan Beach and the only remaining school that represents an important early period in the development of Manhattan Beach education. It is eligible under criterion 3 because the architecture is a good representation of the Streamline Moderne style for its association with a master architect (i.e., Plummer, Wurdeman, and Becket). However, the historical-significance value of the project site is unrelated to its significance to a California Native American tribe. The proposed project would not result in potential impacts to the significance of the resource to a California Native American tribe, and less than significant impact is anticipated. No mitigation measures are required.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact.

Water. The project site is already operating as an elementary school and served by adequate water facilities. The proposed project would update the existing water system to better serve the school, and the new buildings would be required to comply with the California Green Building Standards Code (Nonresidential) (Title 24, Part 11). CalGreen standards include mandatory water-conserving measures for plumbing fixtures to reduce water usage. The proposed project would increase the maximum school capacity by 24 students, or 3.3 percent increase from the existing capacity. This increase is considered minimal, and combined with the efficient water-conserving fixtures, the increase in student capacity would not require construction of new or expanded water facilities that could cause significant environmental effects. Impacts would be less than significant.

Wastewater. The City maintains most of the sewer main lines throughout the City, and wastewater that is collected by the City's sewer system is pumped to the Los Angeles County Sanitation District for treatment. Collected effluent is treated at the Joint Water Pollution Control Plant (JWPCP) in Carson. The sewer main to JWPCP tunnels under Sand Dune Park and connects to the east and west portions of the City. The project site is already developed and operating as an elementary school, served by existing wastewater system. The new and renovated school buildings would be required to comply with CALGreen standards (Title 24, Part 11), and the existing wastewater system would be updated to meet the current standards. Therefore, considering water-

conservation plumbing, although the proposed project would increase the maximum student capacity by 24 students, it is not anticipated that this increase would result in substantially more wastewater. The proposed project would not require expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater. As discussed under Impact 3.10(a), the proposed project is not anticipated to increase stormwater runoff generated from the project site and would not require new or expanded stormwater facilities. Impacts would be less than significant.

Electric power. Electricity to the project site is provided by the Southern California Edison (SCE). The project site is already developed and operating as an elementary school, served by electricity. The proposed project would upgrade existing electrical power systems to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen standards (Title 24, Part 11). Based on the CalEEMod calculation from air quality modeling, the existing condition uses 224,170 kWh annually, and the proposed project would decrease the electricity consumption to 176,153 kWh per year, a decrease of 48,017 kWh/yr. Therefore, the proposed project is anticipated to have beneficial impacts related to electricity consumption, and impacts would be less than significant.

Natural gas. Southern California Gas Company (SCG) provides gas service in the City of Manhattan Beach and has facilities throughout the City, including the project site. The project site is already developed and operating as an elementary school, and served by natural gas facilities. The proposed project would upgrade existing gas systems to achieve the current California Building Energy and Efficiency Standards and CALGreen standards. Based on the CalEEMod calculation from air quality modeling, the project site consumes 413,189 kBTU per year, and the proposed project would decrease the consumption by 148,101 kBTU/year to 265,088 kBTU/year. Therefore, improvements to existing natural gas facilities would not result in significant environmental effects. Impacts would be less than significant.

Telecommunication. Cable service to the City of Manhattan Beach is provided by Spectrum and Frontier Communications. There are also various landline and wireless telecommunication companies that serve the project site. The project site is already developed and operating as an elementary school, and served by cable and telecommunication service providers. No major infrastructure improvements are required to provide telecommunication to the new and renovated buildings. Significant environmental effects are not anticipated, and impacts would be less than significant.

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

Less Than Significant Impact. The City provides water service within its city boundaries, including the project site. Projected populations in the City's service area were based on projections obtained from the Southern California Association of Governments. The City obtains its water supply through two active groundwater wells (Well 11A and Well 15) in the West Coast Basin and a connection that supplies imported water from the Metropolitan Water District of Southern California (MWD) (Stetson 2017). Additionally, the City has supplied recycled water to customers for nonpotable irrigation uses since 1995. The City purchases recycled water supply from WBMWD. The City is a subagency of WBMWD, a wholesale water agency. The City's adjudicated groundwater right is 1,131 acre-feet per year (afy), which does not include any leased water

or surplus water from the previous years. Over the past five years, the City has purchased an average of 3,250 afy of treated imported water. The City has adequate water supply to serve the its projected demands through 2040 during normal, dry, and multiple dry years. The existing school is already included as part of the institutional and governmental sector use in the water demand projections. The proposed project would serve the existing school population in Manhattan Beach, and an increase of two SDC classrooms or 24 students would not result in adverse impacts to the water supplies available to the City. Impacts would be less than significant, and no mitigation measures are required.

c) Result in a determination by the waste water 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?

Less Than Significant Impact. The City of Manhattan Beach provides wastewater services to approximately 3.9 square miles of the land within its corporate boundaries, including the project site. The majority of the local sewers tie into one of the Los Angeles County Sanitation District (LACSD) trunk sewers crossing through the City. The sewage is then transported to LACSD's JWPCP in the City of Carson. The project site is in Sewershed 2 of the City, and both Manhattan Beach and LACSD trunk sewers cross the project site east-west between Bell Avenue and Grandview Avenue. The City is a part of LACSD's South Bay Cities District. Regional trunk sewers collect the sewage generated in the City and transport it to LACSD's JWPCP, which is east of I-110 at 24501 S. Figueroa Street in the City of Carson. The plant occupies approximately 420 acres, and approximately 200 of the 420 acres are used as buffer areas between the operational areas and surrounding residential neighbors. The facility provides both primary and secondary treatment for approximately 260 million gallons of wastewater per day (mgd), and has a total permitted capacity of 400 mgd (LAC 2019).

The existing school is already served by JWPCP and its wastewater collected in Sewershed 2 of the City. The proposed project would serve the existing school population in the City, and an increase of two SDC classrooms or 24 students would not result in adverse impacts to the wastewater treatment capacity. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The project site is an operating elementary school and would continue to be served by Waste Management, Inc. Solid waste collected by WM is disposed at the El Sobrante Landfill and recycling is taken to a material recovery facility to be sorted by material type hen baled and sold as markets are feasible. Organic waste is first sorted at Waste Management's Carson Transfer Station. The existing Grand View Elementary School implements a green program known as "Grades of Green" since 2007 to reduce trash and conserve energy. The school already implements various trash-reducing activities such as trash-free lunches, campus composting, and in-class recycling to reduce solid wastes. The proposed project would renovate and modernize the existing school, and an increase of 24 additional student enrollment capacity would not result in an excessive amount of solid waste.

Demolition and construction activities would temporarily increase solid waste; however, at least 65 percent of all construction and demolition debris generated by the project would be diverted. Although the District is not

subject to the City's Municipal Code Chapter 5.26, Construction and Demolition Debris Waste Reduction and Recycling Requirements, which requires diversion of at least 65 percent of C&D debris, the District will comply with the standards, consistent with the District's ongoing efforts to reduce trash. Construction trash impacts would be temporary and would not be considered a significant impact. No mitigation measures are required.

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

Less Than Significant Impact. The District is required to comply with all state solid waste diversion, reduction, and recycling mandates, and would do so for the proposed project. No impact to federal, state, or local statutes related to solid waste would occur. No mitigation measures are required.

3.20 WILDFIRE

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

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

No Impact. The project site is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impact would occur, and no mitigation measures are required.

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

No Impact. The project site is not in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impact would occur, and no mitigation measures are required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. As discussed in Section 3.4, *Biological Resources*, the project site has been developed with school facilities since the 1930s and does not contain any special status or sensitive biological resources. The proposed project would not 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 sensitive plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 3.5, *Cultural Resources*, the upper campus is recommended eligible for the CRHR under criteria 1 and 3 as the Grand View Elementary School Historic District with a period of significance of 1939 to 1954. Therefore, a mitigation measure has been incorporated to ensure that the proposed project does not eliminate important examples of the major periods of California history. Section 3.5, *Cultural Resources*, also substantiated that the proposed project would not have an adverse impact on California's prehistoric cultural resources. No additional impact is identified, and no mitigation measure is required.

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

Less Than Significant Impact. As discussed throughout this Initial Study, the proposed project would have no impact and less than significant impacts with and without mitigation measures. Therefore, all impacts are individually limited and would not result in any cumulatively significant impact. No mitigation measures are required.

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

Less Than Significant Impact. As discussed in the above analyses, the proposed project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. Impacts would be less than significant, and no mitigation measures are required.

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