Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Initial Study / Mitigated Negative Declaration

Prepared for
Inglewood Unified School District

FEBRUARY 2023

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TABLE OF CONTENTS

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project Initial Study / Mitigated Negative Declaration

Page

Acronyms ..... **iv**

Chapter 1 ..... **1**

Introduction **1**

1.1 Overview 1
1.2 CEQA Requirements 1
1.3 Terminology 2
1.4 Initial Study Organization 2
1.5 Incorporation By Reference 2

Chapter 2 ..... **3**

Project Description **3**

2.1 Project Overview 3
2.2 Environmental Setting 3
2.2.1 Project Location and Surrounding Uses 3
2.2.2 Project Site Characteristics 5
2.3 Proposed Project Characteristics 9
2.3.1 Woodworth Elementary School Campus 9
2.3.2 Morningside High School Campus 11
2.3.3 Landscaping Plan 17
2.3.4 Grading, Earthwork, Demolition, and Drainage 17
2.3.5 Sustainable Design Features 18
2.4 Construction Process and Timeline 19
2.5 Discretionary Approvals Required 19
2.5.1 Lead Agency 19
2.5.2 Reviewing Agencies 19
2.5.3 Permits and Other Approvals 19

Chapter 3 ..... **21**

Environmental Checklist **21**

Environmental Factors Potentially Affected 22
Environmental Checklist 23
Aesthetics 23
Agricultural and Forest Resources 29
Air Quality 31
Biological Resources 50
Cultural Resources 53

Page

Energy 59
Geology, Soils, and Seismicity 66
Greenhouse Gas Emissions 74
Hazards and Hazardous Materials 80
Hydrology and Water Quality 87
Land Use and Land Use Planning 92
Mineral Resources 93
Noise 94
Population and Housing 109
Public Services 110
Recreation 113
Transportation 115
Tribal Cultural Resources 120
Utilities and Service Systems 121
Wildfire 125
Mandatory Findings of Significance 128

Appendices

A. Lighting Technical Report
B. Air Quality Analysis
C. Cultural Resources
D. Energy Analysis
E. Geotechnical Investigation
F. Paleontological Resources
G. Greenhouse Gas Emissions Analysis
H. Hazardous Materials Assessment and Pipeline Risk Assessment
I. Low Impact Development Report
J. Noise Analysis
K. Traffic Impact Study
L. Sacred Lands File Search

List of Figures

Figure 1 Regional Location 4
Figure 2 Project Location 6
Figure 3 Morningside High School Demolition Plan 8
Figure 4 Conceptual Site Plan 10
Figure 5 Proposed Canopy Plan 14

List of Tables

Table 1: Existing Parking Count Summary 16
Table 2: Proposed Parking Count Summary 16
Table 3 Estimated Construction Schedule 37
Table 4 Maximum Regional Construction Emissions – Without Mitigation (Pounds per Day) 37
Table 5 Maximum Unmitigated Regional Operational Emissions (Pounds per Day) 39
Table 6 Maximum Daily Localized Construction Emissions 42

Page

Table 7 Maximum Daily Localized Operational Emissions 42
Table 8 Incremental Increase in Carcinogenic Risk and Hazardous Index From Construction Activities 46
Table 10 Project Operational Energy Usage 62
Table 11 Annual Project Greenhouse Gas Emissions 77
Table 12 City of Inglewood Base Ambient Noise Levels 95
Table 13 Ambient Noise Measurement Summary 97
Table 14 Predicted Construction Noise Levels at Nearby Sensitive-Receivers 98
Table 15 Predicted Existing Traffic Noise Levels 100
Table 16 Predicted Future Traffic Noise Levels 101
Table 17 Athletic Field Noise 103
Table 18 Softball Field Noise 104
Table 19 Vibration Source Levels for Construction Equipment 106

ACRONYMS

ADA	Americans with Disabilities Act
ALUCP	Airport Land Use Compatibility Plan
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
Cal/OSHA	California Division of Occupational Safety and Health
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CH_4	Methane
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CRHR	California Register of Historic Resources
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GHG	greenhouse gases
GWh	Gigawatt hours
HRA	Health Risk Assessment
HVAC	Heating/Ventilating/Air Conditioning
I	Interstate
IS	Initial Study

LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MTCO2E	metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
N_2O	Nitrous Oxide
O_3	ozone
PM	Particulate Matter
PM_{10}	particulate matter with an aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 micrometers or less
PRC	Public Resources Code
RAQS	Regional Air Quality Strategies
SCAG	Southern California Association of Governments
SCIC	South Coastal Information Center
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SLF	Sacred Lands File
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled

CHAPTER 1
Introduction

1.1 Overview

The Inglewood Unified School District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Initial Study/Mitigated Negative Declaration (MND) to evaluate the potential environmental impacts associated with the Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project (Proposed Project). The Proposed Project involves improvements to the existing Morningside High School campus and existing Woodworth Elementary School campus (collectively referred to as the Project Site), including demolition of existing facilities, repairs to existing canopies, interior improvements to classroom buildings and the auditorium, and the construction of new recreational fields and facilities including stadium lighting, electronic scoreboards, and public announcement (PA) systems. Improvements associated with the Proposed Project within the Morningside High School campus would also include a ticketing and concessions building, storage and restroom buildings. Proposed circulation improvements within the Morningside High School campus include additional parking lots, fire lanes, driveways and internal vehicular and pedestrian circulation paths. Landscaping and utility improvements would be included throughout the Morningside High School campus portion of the Project Site.

1.2 CEQA Requirements

Approval of the Proposed Project is a discretionary action and is therefore subject to the requirements of CEQA (Public Resources Code [PRC], Division 13, Sections 21000–21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000–15387). Initial Studies/Environmental Checklist Forms such as this document are typically used as a basis for deciding whether to prepare an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) for a project, pursuant to CEQA.

An Initial Study/Environmental Checklist Form is intended to satisfy the requirements of CEQA (PRC Division 13, Sections 21000-21177) and the State CEQA Guidelines (14 CCR 15000-15387). CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts. Per CEQA (14 CCR 15070), an MND may be prepared for a project subject to CEQA when an Initial Study has identified potentially significant impacts on the environment, but revisions have been made or mitigation has been added so that no significant impacts on the environment would result from project implementation. Based on the findings of this Initial Study, the District has determined that preparation of an MND is the appropriate method to present environmental review of the Proposed Project in compliance with CEQA.

1.3 Terminology

The following terms are used to describe the level of significance of impacts.

- A finding of *no impact* is used if the analysis concludes that a project would not affect the particular topic area in any way.
- An impact is considered *less than significant* if the analysis concludes that a project would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that a project would cause no substantial adverse change to the environment provided that environmental commitments or other enforceable measures are included as part of the Proposed Project.
- An impact is considered *potentially significant* if the analysis concludes that a project could have a substantial adverse effect on the environment.

1.4 Initial Study Organization

The content and format of this report are designed to meet the requirements of CEQA. This Initial Study/MND identifies the potential environmental impacts of the Proposed Project to support the decision to prepare an MND. The report contains the following sections.

- **Chapter 1, Introduction,** identifies the purpose and scope of the Initial Study/MND.
- **Chapter 2, Project Description,** identities the location and environmental setting of the Project Site and describes the Proposed Project in detail.
- **Chapter 3, Environmental Checklist,** presents the checklist responses for each resource topic. This section identifies the potential impacts of implementing the Proposed Project, and identifies all references and individuals cited in this Initial Study/MND.

1.5 Incorporation By Reference

This IS/MND relies on previously adopted regional and statewide plans and programs, agency standards, and background studies in its analyses, such as the South Coast Air Quality Management District's (SCAQMD) air quality management plan. Chapter 3, Environmental Checklist, provides a complete list of references utilized in preparing this IS/MND.

CHAPTER 2
Project Description

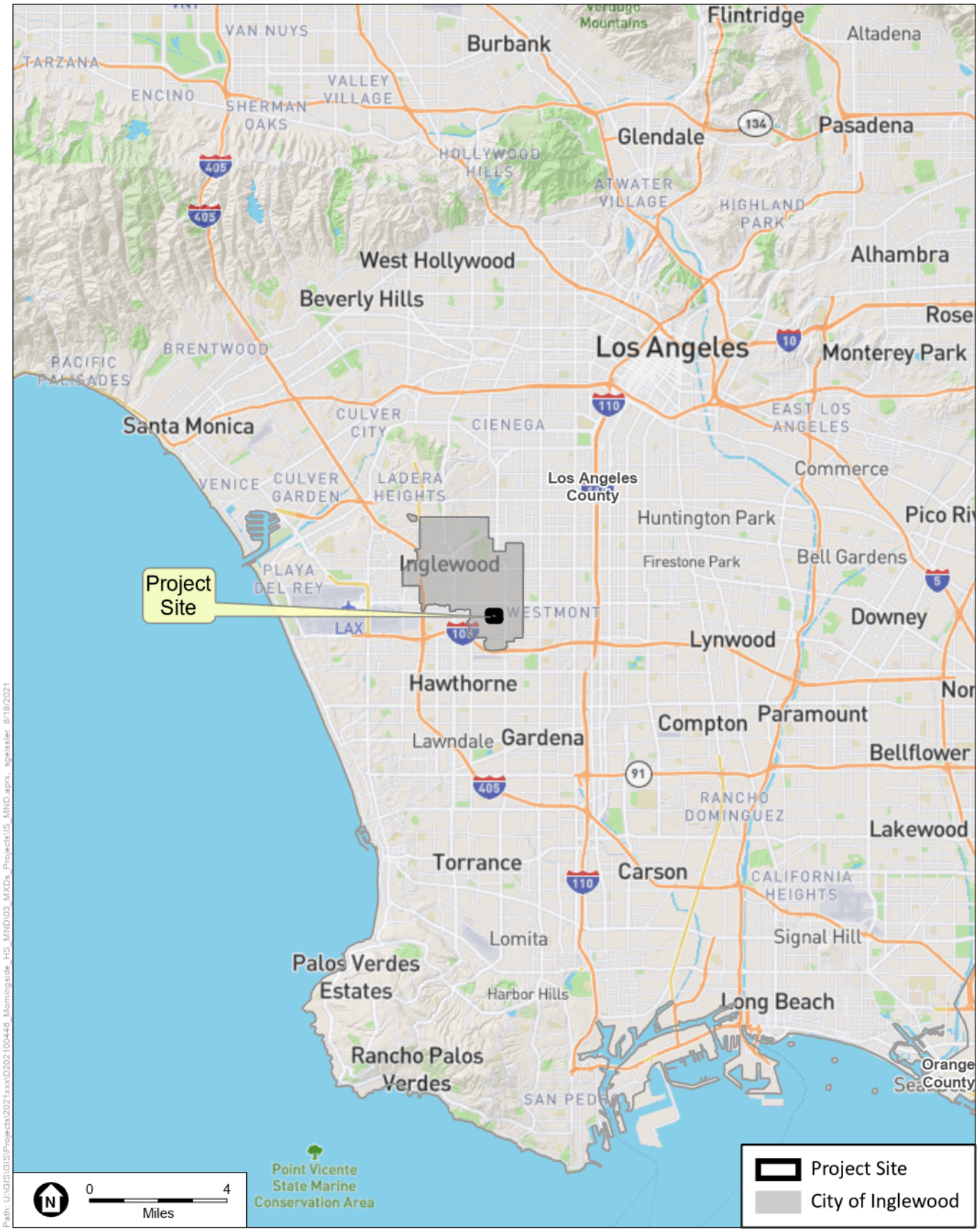
2.1 Project Overview

This chapter provides a description of the proposed Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project (Proposed Project), which provides a basis for the environmental analysis contained in this Initial Study/MND. The Proposed Project involves improvements to the Morningside High School campus and demolition of the existing Woodworth Elementary School campus (collectively referred to as the existing Project Site or existing campuses), including demolition of 14 buildings and hardscape on the Woodworth Elementary School campus and demolition of 13 buildings and hardscape (including 12 tennis courts and 6 basketball courts) and replacement of one of the demolished buildings on the Morningside High School campus. The Woodworth Elementary School campus is currently vacant after operations were merged with Monroe Middle School in 2019, creating the Woodworth-Monroe TK-8 Academy. The Proposed Project would also adjust the boundaries of the Morningside High School campus, reducing the campus by 17-acres, and also includes the construction of new facilities within the proposed Morningside High School campus including a relocated track and football/soccer field (including expanded seating at the bleachers), tennis courts, basketball courts, shotput and discus areas, a softball field, and a baseball field. Stadium lighting, electronic scoreboards, and public announcement (PA) systems are proposed at the football field, softball field, and baseball field. The Proposed Project would also include a ticketing and concessions building, a visitor team storage and restroom building, and a home team storage and restroom building. Additionally, proposed circulation improvements include an expansion of the existing northwest parking lot and fire lane, a new parking lot near the proposed baseball field and a new parking lot at the proposed football field and expanded internal pedestrian walkways leading to a proposed safe dispersal area. Landscaping and utility improvements would also be included throughout the proposed Morningside High School campus.

2.2 Environmental Setting

2.2.1 Project Location and Surrounding Uses

Morningside High School and Woodworth Elementary School are located just south of the community of Morningside Park, in the southeastern portion of the City of Inglewood within Los Angeles County, California. As shown in **Figure 1 (Regional Location)**, the Project Site is located approximately 0.9 mile north of Interstate (I-)105, approximately 1.8 miles east of I-405, and approximately 2.7 miles west of I-110. The Project Site includes the existing Morningside High School campus and existing Woodworth Elementary School campus which totals approximately 54 acres.



SOURCE: ESA, 2021

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 1
Regional Location

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The existing Morningside campus is approximately 48 acres located entirely within Assessor's Parcel Number (APN) 4030-033-901. The existing Woodworth campus is approximately 6 acres located within APN 4030-033-903.

The proposed improvements within the Morningside High School campus would occur within approximately 31 acres. The remaining 23 acres of land on the eastern portion of the Project Site, as shown in **Figure 2 (Project Location)**, is owned by the District and is proposed to be leased.

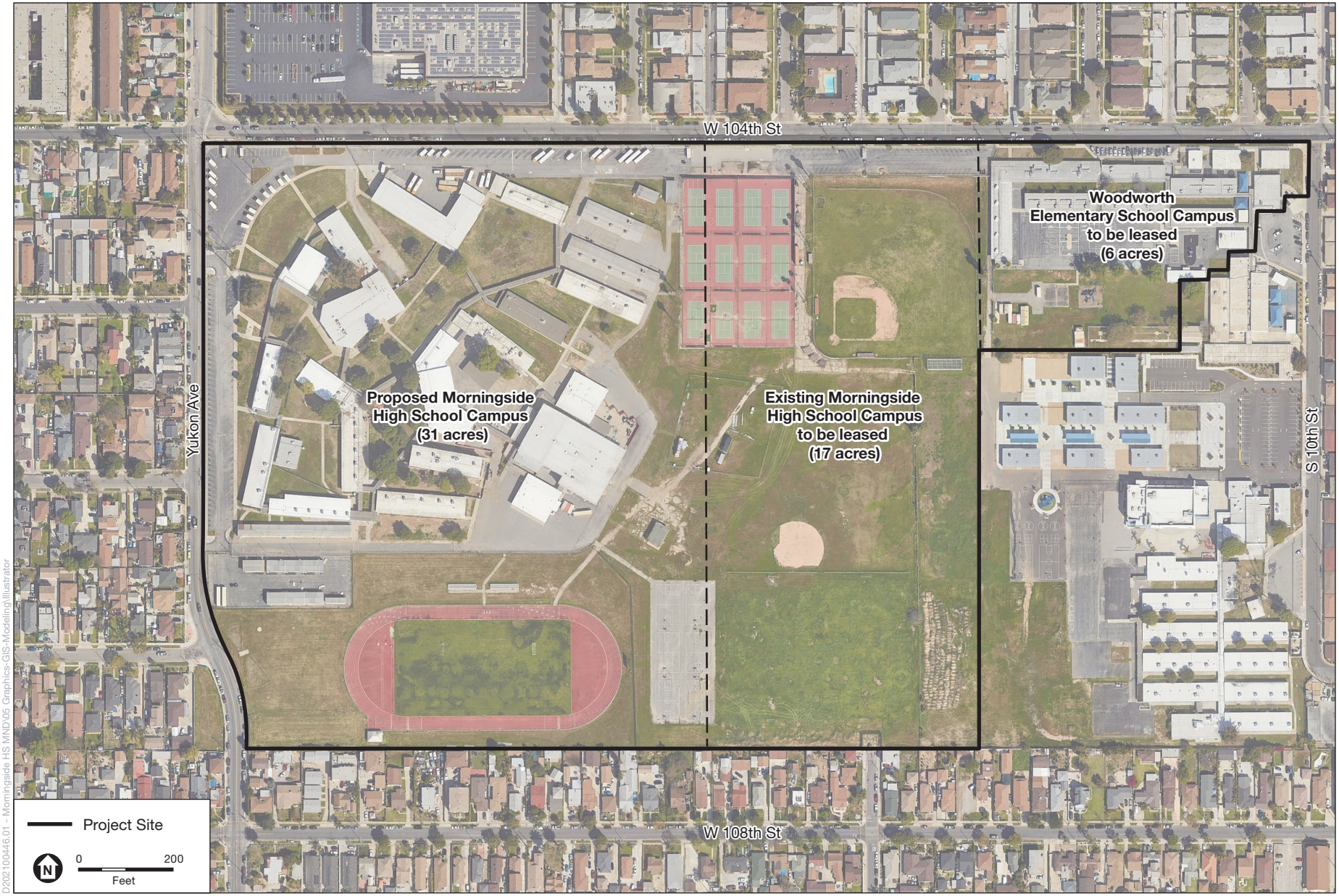
The Project Site is bounded to the north by West 104th Street, residential homes, and commercial uses. Yukon Avenue South and residential homes are located to the west of the existing Project Site, with residential homes and West 108th Street to the south. Additionally, Woodworth-Monroe TK-8 Academy and South 10th Avenue are located to the east of the existing Project Site.

The Project Site is located within a suburban residential neighborhood comprised primarily of single-family (one- and two-story) homes, along with some commercial uses and other educational facilities. The Hollywood Park Specific Plan area, including SoFi Stadium is located approximately 0.25 mile to the north of the Project Site. Additionally, the approved Inglewood Basketball and Entertainment Center (IBEC) Project would be located 0.25 mile to the northwest of the Project Site. One of the project objectives of the approved IBEC Project is to create a sports and entertainment district within this area, consistent with the land uses of the surrounding Hollywood Specific Plan Area. The Project Site is also located approximately 2.5 miles east of the Los Angeles International Airport (LAX) and approximately 1.0 mile north of the Hawthorne Municipal Airport.

2.2.2 Project Site Characteristics

The Project Site is zoned as R-1, Residential Single Family and the Proposed Project would not alter the zoning designation (City of Inglewood 2022). According to the City of Inglewood General Plan, the Project Site has a land use designation of Low-Density Residential (LDR), which is consistent with its use as a school (City of Inglewood 2017). By state law, public school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094.

As shown in **Figure 2**, the Project Site is occupied by Morningside High School and Woodworth Elementary School. For Morningside High School, the primary campus development situated in the northwest portion of campus, consisting of classroom and administrative buildings. Athletic courts and fields are currently located within the south and eastern portions of the Morningside High School campus. The Project Site slopes gently to the south and southwest, with elevations between approximately 88 to 112 feet above mean sea level (AMSL) (Koury 2020). For Woodworth Elementary School, the primary campus development is situated on the northern and eastern portions of the campus, consisting of classroom and administrative buildings. Athletic courts and fields are located within the central, southern, and western portions of the existing campus.



SOURCE: ESA, 2022; Google Earth, 2022

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 2
Project Location

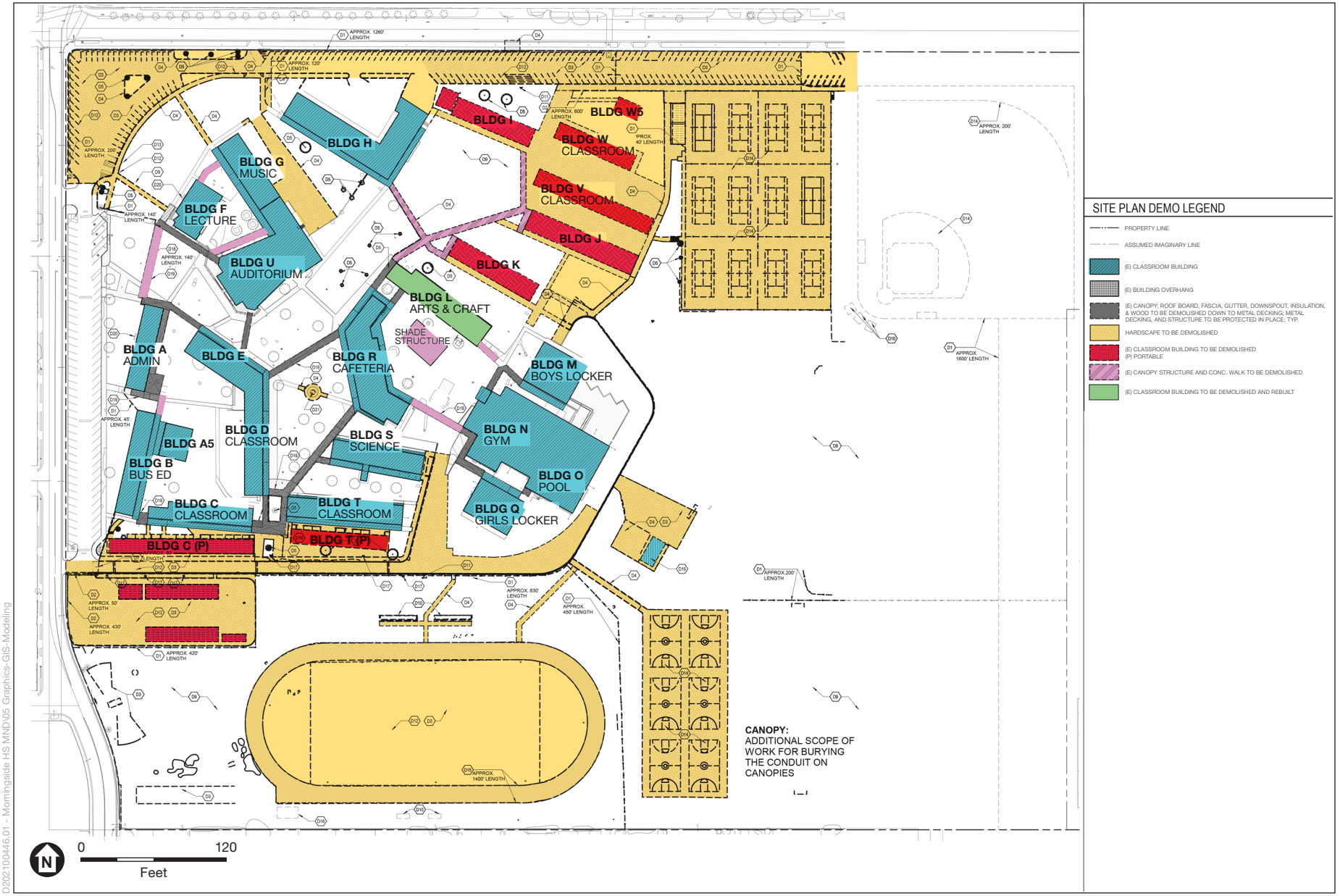
ESA

The Morningside High School campus currently includes 66 classrooms located within 12 classroom buildings (including 10 permanent classroom buildings and 2 relocatable classroom buildings). In addition to classroom buildings, the Morningside High School campus includes an administration building, an auditorium, locker rooms, cafeteria, and a gym with an indoor pool. The existing campus buildings are labeled Buildings A through W as shown on **Figure 3 (Morningside High School Demolition Plan)**. Covered and uncovered walkways and student seating areas are located between the campus buildings. Tennis courts and a baseball field are located east of the classroom buildings, adjacent to West 104th Street. A football field and six basketball courts are located to the south of classroom buildings, adjacent to Yukon Avenue South and residential homes. The existing recreational uses do not include stadium or field lighting. Landscaping is limited to shade trees located near the center of campus.

The Woodworth Elementary School campus currently includes classroom buildings, administrative buildings, recreational courts and fields, and parking, on approximately six acres.

The proposed improvements would occur within the western portion of the existing Morningside High School campus on approximately 31 acres. The portions of the existing tennis courts and basketball courts within the 23 acres proposed to be leased would be demolished. In addition, all of the existing buildings and hardscape on the Woodworth Elementary School campus would be demolished. No improvements are proposed within the approximately 17-acre eastern portion of the existing Morningside High School campus and approximately 6-acre Woodworth Elementary School campus, which are proposed to be leased by the District. With the revised boundaries of the Morningside High School campus, land uses to the north, south, and west would remain the same. The land in the eastern portion of the Project Site would include open space, an existing baseball stadium, and recreational fields and the open space that would result from the demolition of Woodworth Elementary School.

The Morningside High School campus currently includes three contiguous surface parking lots located adjacent to the intersection of Yukon Avenue and West 104th Street that partially wrap around the campus (referred to as Lot A in the northwest corner, Lot B along the northern boundary, and Lot D along the western boundary). These existing parking lots currently include 172 total parking spaces, including 33 bus stalls and 133 standard non-accessible vehicle spaces, and 6 Americans with Disabilities Act (ADA) accessible spaces. The contiguous parking areas are currently used by both staff and visitors. Lot B is reserved for bus parking only. The parking lots are accessible via two entrances along Yukon Avenue, which provide access to Lots A and D, and three entrances along West 104th Street, which provide access to Lots A and B. Lots A and D will remain accessible after school hours. A gated emergency access road extends from Lot D and the southernmost Yukon Avenue driveway into the center of the Morningside High School campus, northeast of the campus gym building.



SOURCE: Lionakis, 2022

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 3
Morningside High School Demolition Plan

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The Morningside High School campus recently underwent renovation and modernization efforts to numerous buildings from July 2019 to April 2021 as part of the Los Angeles World Airports (LAWA) sound insulation program. The LAWA upgrades included interior and exterior sound attenuation improvements, including heating/ventilation/air conditioning (HVAC), new doors, windows, ceilings, flooring, lighting, and fire alarm and low-voltage upgrades to buildings A, B, C, D, E, F, G, R, S, and T. In addition, ADA upgrades were made in buildings A, C, D, F, R, S, and T and for associated walkways near buildings A, B, C, D, E, F, G, R, S, and T.

Morningside High School currently has a reported student enrollment of 583 for the 2021-2022 school year (District 2021) with an estimated 67 staff members employed at the school. The school is open during the traditional school year (late August through June) and includes summer school sessions on campus. School hours (and the associated bell schedule) generally encompass 8:00 a.m. to 3:00 p.m. Monday through Friday. In addition, there are several after-school clubs and organizations that run on the campus. Athletic events typically occur on campus from 3:00 p.m. to 9:00 p.m. on weekdays; however, all nighttime events currently occur inside the gym for basketball and volleyball. The existing outdoor field is currently only utilized for soccer games.

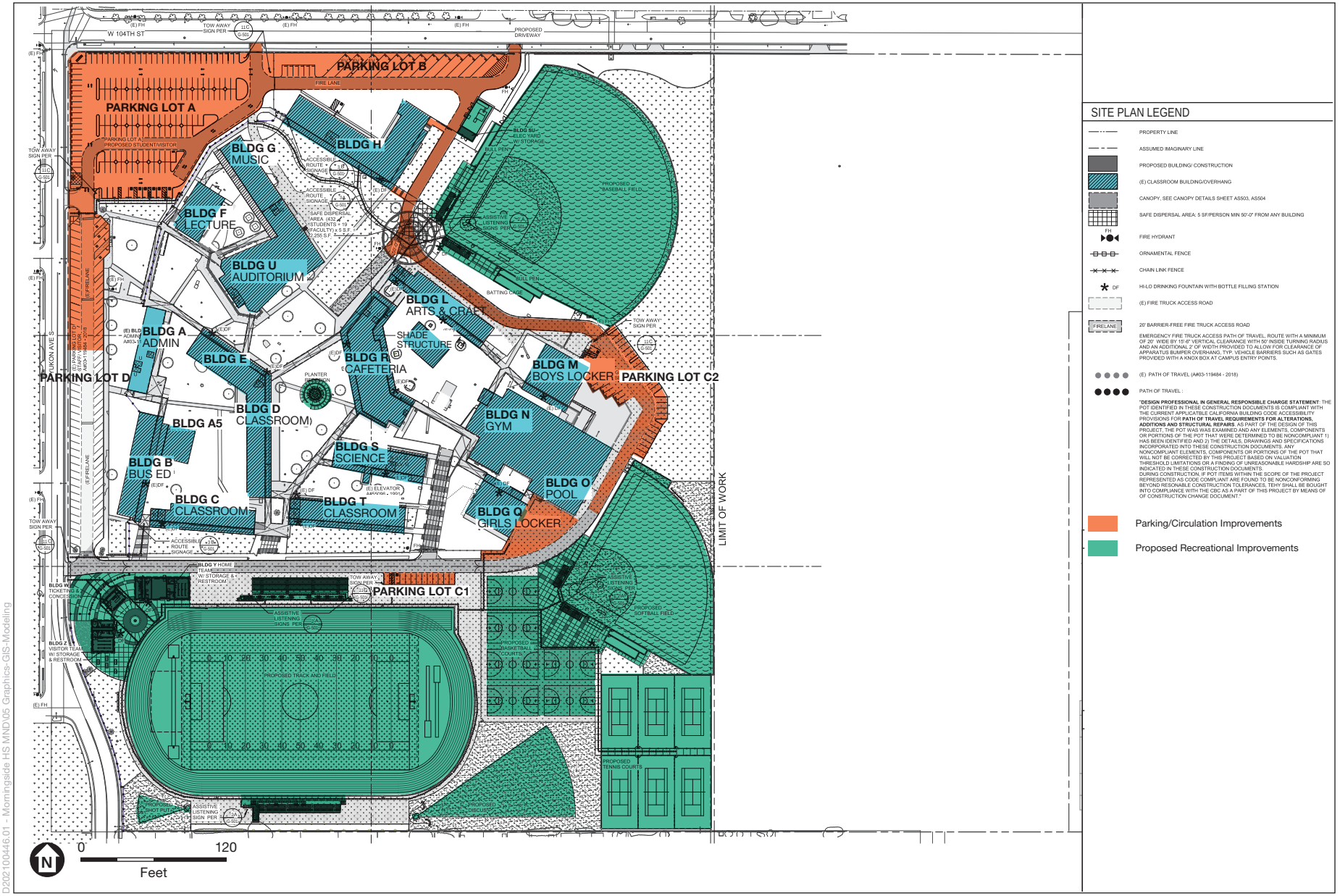
As mentioned above, the Woodworth Elementary School campus is currently vacant after operation of the elementary school merged with Monroe Middle School to create Woodworth-Monroe TK-8 Academy in 2019.

2.3 Proposed Project Characteristics

The Proposed Project would demolish all existing structures and hardscape present on the Woodworth Elementary School campus and would modernize the Morningside High School campus. The existing Morningside High School campus layout and proposed demolition activities are shown on **Figure 3** and the Morningside High School proposed components are shown on **Figure 4 (Conceptual Site Plan)**. In order to accommodate the proposed improvements described below, the Proposed Project includes the demolition of 13 buildings on the Morningside High School campus (including Buildings I, J, K, L, V, W, W5, a service building, and five portable buildings) and hardscape (including 12 tennis courts and 6 basketball courts) along with the replacement of Building L.

2.3.1 Woodworth Elementary School Campus

The existing Woodworth Elementary School campus currently includes 14 buildings comprised of classrooms and administrative buildings, as well as recreational courts and fields, and parking. The existing buildings and hardscape on the Woodworth Elementary School campus would be demolished. No improvements are proposed within the approximately 6-acre campus, which is proposed to be leased by the District.



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SOURCE: Lionakis, 2022

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 4
Conceptual Site Plan

ESA

2.3.2 Morningside High School Campus

Recreational Components

Proposed Ticketing, Concessions, and Home/Visitor Team Facilities

The Proposed Project would include the demolition of portable buildings located on the southwest portion of the Morningside High School campus, and the construction of a ticketing and concessions building, courtyard with lunch tables, and team rooms area, northwest of the existing football/soccer field, adjacent to Yukon Avenue. The proposed ticketing and concessions building (Building W), visitor team room building (Building Z), and home team room building (Building Y) would be concrete masonry block and 18 feet (ft) in height. Both team rooms buildings would include storage facilities, restrooms, drinking fountains and water bottle filling stations.

Proposed Track and Field

The Proposed Project would include the demolition of the existing field areas located to the south of the Morningside High School campus, and the construction a new track and synthetic turf football/soccer field, as shown on **Figure 3** and **Figure 4**.

The proposed track would be located around the football/soccer field, as regulated by the California Interscholastic Federation (CIF). Pole vault and high-, long- and triple-jump areas would be located within the new track and field area. Located just south of the proposed track and football/soccer field, are proposed discus and shotput throwing areas. The existing bleachers north and south of the existing track would be removed and replaced with expanded raised-bleacher seating areas for the proposed track and football/soccer field. The existing home and visitor bleachers have a combined total of 600 seats. The proposed home and visitor side bleachers for the proposed track and field area would have a total seating capacity of 1,515 including 61 assisted listening devices, eight (8) designated aisle seats, 18 semi-ambulant (18-inch) seats, 18 companion (18-inch) seats, and 18 wheelchair spaces. A new public announcement (PA) system, computerized scoreboard, and stadium lighting would be installed around the football/soccer and track field.

Proposed Courts

The Proposed Project also includes the demolition and reconstruction of the existing basketball courts and relocation of tennis courts to the east of the proposed track and football/soccer field. A total of six basketball courts and six tennis courts are proposed. Chain link fencing surrounding the basketball courts would be 10-ft in height and chain link fencing with fabric mesh surrounding the tennis courts would be 12-ft in height.

Proposed Softball Field

Additionally, a softball field is proposed just north of the proposed basketball and tennis courts. The new softball field would include bleacher seating, team dugout areas, warmup bullpens, a batting cage, stadium lighting, a new computerized scoreboard, and a PA system.

Fencing along the dugout and bullpen would be a combination of chain link, chain link with fabric, and nylon netting, that would extend a maximum of 40-ft in height overall at the backstop and would taper down towards the outfield. The proposed bleachers for the softball field would have a total seating capacity of 186 including 8 assisted listening devices, 8 companion seats, and 8 wheelchair spaces.

Proposed Baseball Field

In the northern portion of the Project Site, six buildings, including five classroom buildings (Buildings I, J, K, V, and W), associated walkways with metal canopies, and twelve existing tennis courts would be demolished to accommodate with the construction of a CIF-regulated natural turf baseball field. The proposed baseball field would include new bleacher seating areas, team dugout areas, warm-up bullpens, a batting cage, computerized scoreboard, stadium lighting, and a new PA system. Fencing along the dugout and bullpen would be a combination of chain link, chain link with fabric, and nylon netting, that would extend a maximum of 40-feet in height overall at the backstop and would taper down towards the outfield. The existing baseball bleachers have a capacity of 300 seats. The proposed bleachers for the baseball field would have a total seating capacity of 246 including 10 assisted listening devices, 8 companion seats, and 8 wheelchair spaces.

Campus Modernization

The Proposed Project also includes improvements to modernize the entire Morningside High School campus. Interior improvements are proposed for Building U (Auditorium) and Building H (Shop Classroom), as described in detail below. No portable temporary classrooms and restrooms would be added to the campus during construction.

Existing Building Improvements

i) Building U (Auditorium)

The existing Auditorium would be revised and upgraded to modernize existing features such as the stage rigging, lighting and sound systems, and to improve the line of sight to the stage. The lighting and sound systems would be upgraded and both interior and exterior improvements would be provided to stop outside sound and light transmission into the theatre space. The auditorium would also be upgraded to provide ADA-compliant features. Certain features of the existing auditorium, such as the original seating is proposed to be salvaged and reused.

ii) Building H (Shop Class)

The interior of the existing Shop Class would be modernized by creating a common classroom supporting 35 students. Existing space within Building H would be utilized as a shop class for set building and sound stage to support the performing arts. Building H improvements would include installation of an overhead pipe grid, secure equipment room, restroom renovations, and upgrades to the HVAC, exterior doors and windows, roof insulation, and lighting.

iii) Building L (Classroom)

Building L is currently a single-story building comprised for four classrooms. Upgrades to Building L have been reviewed by DSA Fire & Life Safety. Building L would be demolished and

replaced with a new single-story four-classroom modernized building in the same location. In addition to four classrooms, the building would accommodate new ADA-accessible restrooms, a storage room, and a workroom. The building footprint would accommodate a proposed lunch shelter between Buildings L, N, and R. Modernization improvements include new HVAC to be placed on the roof, fire alarms, electrical improvements, and interior and exterior building lighting with sensors and controls.

Additional Exterior Campus Improvements

Additional modernization improvements include exterior upgrades to multiple buildings and walkways within the campus, including the replacement of outdated exterior soffits (rafter beams) and canopies, roofing, fire hydrants, accessibility signage, ornamental and chain-link fencing, and drinking fountain and water bottle filling stations throughout campus. The existing canopies to be either demolished or repaired and walkways are shown in **Figure 5 (Proposed Canopy Plan)**. Existing security fencing and fire hydrants located throughout the proposed construction and demolition areas would be salvaged wherever possible.

Utility Improvements

i) Electric/Telecom

A new electrical yard and storage building (Building SU) is proposed at the northern portion of the Project Site, just west of the proposed baseball field. In addition, the Proposed Project would include utility and technology retrofits throughout the campus, including relocation of electrical conduits from roofs and canopies to underground and the installation of intercoms and security cameras**.** Existing electrical utility features including two feeders, two transformers, a main switchboard, substation, transformer, and a pull box would be removed.

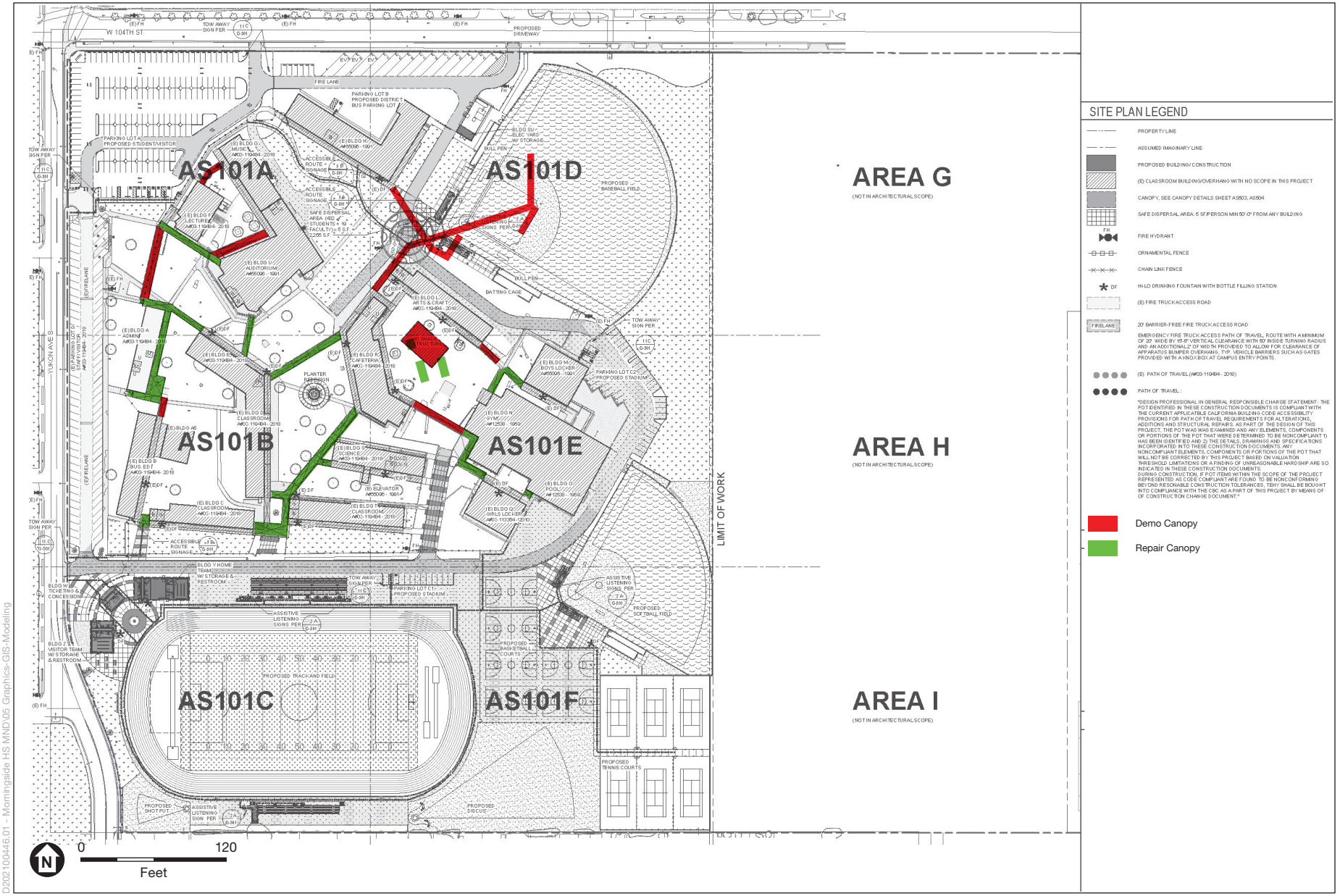
Proposed electrical and utility features include fiber optic lines, telecommunications lines, intrusion alarms, public announcement systems, firm alarms, stub conduit boxes, mounted box conduits, underground conduits and pole mounted conduits. Utility work would be coordinated with Southern California Edison (SCE). Fully automatic, addressable fire alarm systems with emergency voice/alarm communication systems would be provided in all buildings included in the scope of the Project per 2016 California Fire Code (CFC) 907.2.3 and National Fire Protection Association (NFPA) 72.

ii) Water/Sewer

The Project would install new sewer pipelines, new domestic and fire water line systems, which would connect to existing mainlines. The Project would also include connections to the existing reclaimed water lines for irrigation uses and would install a reclaimed water meter. Expanded utilities services are not planned; however, aging utility infrastructure would be replaced based on available funding.

Access, Parking, and Circulation

As shown on **Figure 3**, existing vehicular access to the Morningside High School campus is currently provided by two driveways along Yukon Avenue and three driveways along West 104th Street. The Proposed Project would continue to utilize the driveways along Yukon Avenue and



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SOURCE: Lionakis, 2022

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 5
Proposed Canopy Plan

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would reconstruct two driveways along West 104th Street. The easternmost driveway on 104th Street would be eliminated. Internal circulation routes would be provided via fire lanes between the parking lots. As previously detailed, the Project Site currently includes three contiguous surface parking lots that partially wrap around the campus, referred to as Lot A in the northwest corner, Lot B along the northern boundary, and Lot D along the western boundary. Parking lot and internal circulation improvements are described in greater detail below.

Lot A

The Proposed Project would demolish the existing walkways and canopies between Lot A and the campus buildings to the southwest to provide for an expanded parking lot. Lot A would be re-paved, re-configured, and re-striped to include dedicated internal circulation lanes, and additional parking. As shown in **Figure 4**, the expanded Lot A would maintain driveway accessibility from Yukon Avenue and West 104th Street. A bike rack with seven loops would also be included in Lot A. Lot A would serve as student and visitor parking and would remain accessible after school hours.

Lot B

Lot B would be demolished, re-paved, reconfigured, and re-striped to provide District bus parking and would include a new dedicated fire lane (northern fire lane). This parking lot would also include six standard spaces. Access to Lot B and the northern fire lane would continue to be provided by the existing driveways on West 104th Street. Lot B would not be accessible to the public as this lot would serve as dedicated bus parking.

Lot C

The Proposed Project also includes the construction of two additional stadium parking lots (C1 and C2), located along the southern fire lane near the proposed track and football/soccer field (Lot C1), and south of the proposed baseball field (Lot C2). Lot C1 would be mostly readily accessible via a southern fire lane from Yukon Avenue immediately north of the proposed ticketing and concession building. Lot C2 would be readily accessible via the northern fire lane from West 104th Street. An eastern fire lane would provide contiguous circulation throughout the Project Site. Clean air/vanpool/electric vehicle spaces would be provided in Lot C1. Lots C1 and C2 would not be accessible to the public after school and event hours.

Lot D

Parking would continue to be provided for staff and visitors in Lot D. Parking Lot D would be reconfigured to include additional parking spaces from an offshoot of the main fire lane near the north entrance to this lost from Yukon Avenue. Lot D would serve as student and visitor parking and would remain accessible after school hours.

Parking Summary

As discussed in detail below in **Table 1**, *Existing Parking Count Summary,* and **Table 2**, *Proposed Parking Count Summary*, the Proposed Project would increase the number of total parking spaces (both accessible and non-accessible) from 139 to 308 (including 25 electric vehicle spaces) and decrease the number of bus parking spaces from 33 to 13.

TABLE 1: EXISTING PARKING COUNT SUMMARY

Lot Number	Standard/Non-Accessible Spaces	Accessible Spaces	Bus Stalls	Lot Total (spaces, bus stalls)
Lot A – Staff/Visitor	48	2	0	50
Lot B – Bus Parking	3	0	33	3, 33
Lot D – Staff/Visitor	82	4	0	86
Total Existing	**133**	**6**	**33**	**139, 33**
Source: Lionakis, 2022.				

TABLE 2: PROPOSED PARKING COUNT SUMMARY

Lot Number	Standard/Non-Accessible Spaces	Accessible Spaces	Bus Stalls	Lot Total (spaces, bus stalls)
Lot A – Staff/Visitor	164	6	0	170
Lot B – Bus Parking	6	1	13	7, 13
Lot D – Staff/Visitor	82	4	0	86
Lot C1 – Stadium	11	1	0	12
Lot C2 – Stadium	31	2	0	33
Total Proposed	**294**	**14**	**13**	**308, 13**
Source: Lionakis, 2022.				

Fire Lane Improvements

Additional internal vehicular circulation would be limited to emergency vehicles and would be provided via an extension of the existing southern fire lane, which would continue to be accessed from Yukon Avenue. The southern fire lane extension would continue from the existing terminus and would then meander to the north to connect to the northern fire lane. Specifically, the extension would be constructed primarily within the eastern portion of the campus between the Buildings L, M, N, O and Q and past the proposed recreational components. The connection of the northern and southern fire lanes would occur within the proposed Lot C2 parking lot. The proposed fire lane improvements would maintain a 20-foot-wide, barrier-free emergency access route to internal campus with minimum of 50-foot turning radii.

Pedestrian Improvements

Following the proposed parking lot improvements, the Project would reconstruct and expand pedestrian walkways within the proposed Morningside High School campus. The Project would replace pavements and covered walkway canopies as needed throughout the. In addition, the Project would construct a Safe Dispersal Area consisting of 2,255 square feet of paved area, which would provide enough space for 432 students and 19 faculty to evacuate to in the event of an emergency within the proposed campus boundaries. A Safe Dispersal Area is an area that allows occupants evacuating a structure to gather and maintain a safe distance from the structure without leaving the property and traveling to a public way. Additionally, emergency circulation for pedestrians would be improved through the addition of accessible route signage and improved circulation of internal walkways. Security improvements would include the addition of secured pedestrian and vehicular gates with lockable knox boxes for emergency service providers.

Signage and Lighting

The Project Site is located within the Outdoor Lighting Zone designation of LZ-03 for Moderately High-Urban Areas per Title 24 CCR Part 1 Section 10.114. The Project would include the construction of 52 new light emitting diode (LED) light fixtures for recreational

facilities within the Project Site that would be 16 to 90 feet in height and located around the vicinity of the new football/soccer and track field, softball field, and baseball field. The football/soccer and track field would include four (4) 90-foot tall light poles.

Other proposed exterior lighting for the Project includes lighting for student parking, campus path lighting, and additional exterior building lights for proposed Buildings S, U, W, Y, and Z. A total of 74 new lighting fixtures would for parking and path lighting would be installed on the Project Site. Interior lighting would also be installed for the proposed facilities described above.

A monument sign would be installed on the northwest corner of the campus at the corner of Yukon Avenue and West 104th Street and the existing marquee adjacent to existing Building A, facing Yukon Avenue would be replaced with an electric marquee. As described above for the recreational components, three computerized scoreboards would be installed, one at the proposed track and football/soccer field, one at the proposed baseball field, and one at the proposed softball field.

2.3.3 Landscaping Plan

The majority of the Project Site consists of segmented classroom buildings, walkways, and sports fields. The southern and central portion of the Project Site is mostly pervious and contains grasses and vegetation. Ornamental shade trees are the primary existing form of landscaping within the Project Site. Existing palm trees along Yukon Avenue and West 104th Street would be protected in place.

The Project would protect-in-place existing concrete paving along the frontages of campus buildings where feasible. The majority of landscaping improvements would consist of the placement of synthetic turf between classroom buildings, the football/soccer and track field, softball field, and baseball field. In addition, aggregate surfacing and asphalt/concrete pavement would be replaced/constructed in multiple areas throughout the Project Site. Additional drought tolerant trees and shrubs for landscaping would be added throughout the Project Site, primarily along the perimeter of campus, fence lines, and walkways.

All landscaping, except for the proposed sports fields, would be designed to use recycled water for irrigation. Irrigation for the sports fields would utilize potable water. In addition, all upgrades and landscaping would be in conformance with the 2019 California Green Building Standards Code (CALGREEN), Part 11, Title 24 CCR.

2.3.4 Grading, Earthwork, Demolition, and Drainage

Construction would involve demolition of existing paving, buildings, and field uses; site clearing; grading and excavation for the proposed buildings and recreational component footings; utility, circulation, and landscaping improvements, structural development; and site cleanup. Construction of the Proposed Project would result in approximately 809,940 sf of impervious surfaces and approximately 550,940 sf of pervious surfaces across the 31-acre proposed Morningside High School campus. The 17-acres of the existing Morningside High School campus to the east, would remain in its existing condition, with a minor reduction in impervious

surfaces from the demolition of the existing tennis courts. Demolition of structures and hardscape at the Woodworth Elementary School campus would result in a reduction of approximately 104,301 sf of impervious surfaces across the six-acre site. The Proposed Project would require a maximum excavation depth of 10.5 feet for stadium lighting and new footings and would include 30,700 cubic yards (cy) of soil cut and export. In addition, the Proposed Project would require export of approximately 62,000 cy of demolition debris from the Morningside High School campus and 27,600 cy of demolition debris from the Woodworth Elementary School campus, for a total of 89,600 cy of demolition debris, resulting from demolition of buildings, canopies, tennis and basketball courts, parking lots, and concrete walkways.

Drainage improvements would be included for all recreational components and exterior finished grades or surfaces would all be designed with positive drainage away from foundations. Ground surfaces and paved surfaces within 10 feet of building foundations would be sloped a minimum of 5% and 2%, respectively. Planters would have adequate surface drainage to present standing water adjacent to foundations. Additional catch basins, storm drains, and landscape drains would be installed throughout the Project Site to ensure adequate site drainage is met for the additional impervious surface area. A Low Impact Development (LID) Plan has been prepared for the proposed Morningside High School campus, which includes design features to changes to the areas of pervious and impervious surfaces within this 31-acre area in order to address runoff and water quality treatment post-construction.

In addition, the following erosion and sediment control measures would be implemented during construction:

- All inlets receiving stormwater runoff from the Project Site shall be equipped with inlet protection.
- All paved areas shall be kept clear of earth materials and debris and the Project Site shall be maintained so to minimize sediment laden runoff entering the storm drain system.
- Stockpiled earthen material shall be either covered with a tarp or watered sufficiently to eliminate dust.
- 6-foot-tall dust fences shall be installed around the Project Site during construction activities.
- Fiber rolls shall be utilized to stabilize soils and prevent erosion.
- Regraded dirt shall be stabilized against erosion through hydroseeding, anchored geotextile fabric, or equivalent measure.

2.3.5 Sustainable Design Features

Per the California Energy Code Section 110.10B, the Proposed Project is required to provide 1,184.25 sf of solar ready area. The Proposed Project would exceed this requirement and would provide 1,250 sf of solar ready area for the roof. As discussed above, the proposed parking

improvements also include 25 electric vehicle parking spaces. Irrigation improvements included in the Proposed Project would utilize reclaimed water and check valves or anti-drain valves are required on all sprinkler heads where low point drainage could occur as part of the model water efficient landscape ordinance requirements. The Proposed Project would comply with all mandatory measures under 2019 California Green Building Standards Code (CALGREEN), Part 11, Title 24 CCR for equipment and systems efficiency.

2.4 Construction Process and Timeline

Construction is anticipated to begin Summer of 2023 and would occur for a duration of 24 months with a 5-day work week. Construction is expected to occur between 7:00 a.m. and 8:00 p.m., Monday through Friday, and would comply with the City of Inglewood Municipal Code limits regarding construction activity (Municipal Code Section 5-41). Nighttime construction activities would occur in compliance with the City's Municipal Code, which requires issuance of a permit for construction equipment operated outside the hours of 7:00 a.m. – 8:00 p.m. or for work on weekends. Construction activities are anticipated to overlap with active school hours. All construction and work areas would be clearly demarcated and student access would be prohibited, consistent with construction efforts on other District facilities. All construction equipment staging would be located on-site, in clearly demarcated areas that would not disturb existing school uses. During construction, materials and equipment may be visible from Yukon Avenue and West 104th Street, however the District would screen these areas with construction fencing. Construction workers would park on the Project Site in specially designated areas. Construction of the Proposed Project may require detours and temporary lane closures along Yukon Avenue and West 104th Street in order to construct new curb cuts and gutters for the parking lots and other parking lot improvements.

2.5 Discretionary Approvals Required

2.5.1 Lead Agency

In conformance with CEQA Guideline Sections 15050 and 15367, the District is the Lead Agency, which is defined as the "public agency, which has the principal responsibility for carrying out or approving a project."

2.5.2 Reviewing Agencies

There are no responsible or trustee agencies. The California Division of State Architects (DSA) reviewed and approved the preliminary project design in November 2020 (#03-120195) for compliance with California Code of Regulations Title 24 and access compliance requirements on November 24, 2020.

2.5.3 Permits and Other Approvals

Actions and approvals that may be required from other agencies for the Proposed Project include:

- DSA –Project closeout and certification will be required during the construction phase
- State Water Resources Board - Construction General Permit coverage

- Los Angeles Regional Water Quality Control Board –National Pollutant Discharge Elimination System (NPDES) Permit coverage and review/approval Stormwater Pollution Prevention Plan (SWPPP)
- City of Inglewood Department of Public Works – Permit for construction noise if construction activities are required outside of the hours identified in the City's Municipal Code

References

City of Inglewood. 2022. *Inglewood Zoning Map*. Updated September 2022. Website: ZONING-MAP-Pub-Sept-2022 (cityofinglewood.org) (accessed December 2022.).

City of Inglewood. 2017. *General Plan Land Use Element Map*. Updated January 2017. Website: https://www.cityofinglewood.org/DocumentCenter/View/11512/General-Plan-Land-Use-Map- (accessed December 2022).

Koury Engineering & Testing, Inc. 2020. *Limited Geotechnical Investigation Report for Various Campus Upgrades at Morningside High School, 10500 Yukon Avenue South, Inglewood, CA 90303*. Prepared January 22, 2020.

CHAPTER 3
Environmental Checklist

1.	**Project Title:**	Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project
2.	**Lead Agency Name and Address:**	Inglewood Unified School District Business Services 401 S. Inglewood Avenue Inglewood, CA 90301
3.	**Contact Person and Phone Number:**	Marguerite Williams, Chief Business Official, Inglewood Unified School District (310) 419-2700
4.	**Project Location:**	Morningside High School 10500 Yukon Avenue Inglewood, CA 90303
5.	**Project Sponsor's Name and Address:**	Inglewood Unified School District Business Services 401 S. Inglewood Avenue Inglewood, CA 90301
6.	**General Plan Designation(s):**	Low-Density Residential (LDR)
7.	**Zoning:**	R-1, Residential Single Family
8.	**Description of Project:**	School improvements (see Chapter 2, Project Description)
9.	**Surrounding Land Uses and Setting:**	North: West 104th Street; Multi-family residential; and commercial uses South: West 108th Street; Single-family residential East: Monroe Middle School, Woodworth Imagine Learning Magnet Elementary School, and South 10th Avenue West: Yukon Avenue South; Single-family residential
10.	**Other public agencies whose approval is required:**	Office of the Division of State Architect; State Water Resources Board, Los Angeles Regional Water Quality Control Board, City of Inglewood
11.	**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code Section 21080.3.1:**	Native American tribes have not reached out to the Inglewood Unified School District to be notified of projects as part of the District's CEQA review process. As a result and pursuant to Assembly Bill 52, the District does not need to send out project notification letters to any tribes.

Environmental Factors Potentially Affected

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

☒ Aesthetics	☐ Agriculture/Forestry Resources	☒ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards and 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

DETERMINATION:

On the basis of this initial study:

☐ 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 Jordan A. Miles — Date 02/15/2023

Environmental Checklist

Aesthetics

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
1.	**AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	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?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☒	☐	☐

Discussion

a) **No Impact.** The Project Site includes two existing school campuses within an urbanized area of the City of Inglewood (City). As described above, surrounding land uses are primarily comprised of residential uses including single-family homes to the west and south, multi-family uses and commercial uses including a Costco to the north, and other educational uses in including Woodworth-Monroe TK-8 Academy to the east. According to the City of Inglewood General Plan Open Space Element (1995), the City is a fully developed and urbanized community. There are no designated or otherwise identified scenic vistas within the City or within the vicinity of the Project Site. The Proposed Project would include demolition and construction of school facilities on an existing campus. Although the proposed demolition and improvements would be visible to the public from the public right-of-way along West 104th Street, South 10th Street, and Yukon Avenue, the proposed improvements would not change the current views to and from any scenic vistas, as none are present within the vicinity of the Project Site. As a result, no impacts to scenic vistas would occur.

b) **No Impact.** According to the California Department of Transportation (Caltrans) Scenic Highways Mapping Program, there are no designated or eligible State scenic byway is the Arroyo Seco Historic Parkway Scenic Byway (Interstate 110 [I-110]) between postmiles 25.7 and 31.9 located north of the Project Site, north of downtown Los Angeles and south of Interstate 210 in Pasadena (Caltrans, 2019). The Project Site is more than seven miles from this portion of I-110. Therefore, no impacts related to scenic resources along a state scenic highway would occur.

c) **Less-Than-Significant Impact.** The Project Site is located in an urbanized (suburban) area within an existing school campus, including administrative office buildings, classrooms, and recreational facilities. The existing visual character surrounding the Project Site is that of a residential neighborhood, with single-family residences surrounding the school to the south and west, commercial uses and multi-family uses to the north, and educational facilities to the southeast. The Morningside High School campus is currently developed as a high school with permanent and portable buildings, athletic fields, tennis and basketball courts, and parking lots. While the Project Site itself is relatively level and slopes gently to the south and southwest at elevations between 88 and 112 feet (NAVD88). The Woodworth Elementary School campus is currently developed with vacant buildings after operations were merged with Monroe Middle School, located directly south of the Woodworth Elementary School campus.

Public views addressed in this analysis include those from West 104th Street and Yukon Avenue. Views from private residences and the adjacent education facilities are not considered protected views under CEQA, and therefore are not further discussed.

Construction. Construction of the Proposed Project would include the presence of a construction staging area and construction fencing as well as the use of heavy machinery including, but not limited to, large trucks, bulldozers, excavators and a crane. The Project Site is largely enclosed with chain link fencing, except for the parking lots fronting Yukon Avenue and West 104th Street. The existing fencing and temporary construction fencing would screen public views of construction activities on the Project Site. Construction activities are anticipated to occur for 24 months in various phases including demolition, grading and excavation, construction, and finish work. In addition, trucks used to haul excavation material off-site during construction would follow the City's designated truck routes to ensure large trucks would not travel through local residential streets and would utilize W Century Boulevard to I-405 or S Prairie Avenue or Crenshaw Boulevard to I-105 (City of Inglewood Public Works Department, 2021). Visual impacts associated with construction equipment and activities on the Project Site for this temporary duration would not degrade the urbanized visual character of the Project Site or its surroundings resulting in a significant visual impact.

Operation. All proposed improvements would occur entirely within the developed Project Site. After construction, the proposed improvements would be partially viewable depending on viewing location due to the installation of new security fencing around the perimeter of the Project Site and intervening buildings and landscaping throughout the Project Site.

Prominent existing visual elements on the southwestern end of the Project Site, Yukon Avenue, include the existing track and field facilities and portable buildings. Along the northwestern portion of the Project Site a parking lot and administrative and classroom buildings are visible. Views along Yukon Avenue would change due to the proposed parking and circulation improvements and new security fence and landscaping. Views of the existing track and field area would change due to the construction of the new athletic

facilities. Views along South 10th Avenue would change due to the proposed demolition of the classroom buildings located along the eastern portion of the Project Site. Operation of new lighting fixtures would alter the existing visual character of the existing track and field area by introducing new nighttime lighting, tall metal poles, a new ticketing and concession area, new locker rooms, restrooms and storage, and new stadium seating. Use of these facilities may occur up to 7 days per week and may be subject to a facility use permit from the District. Although the Project Site would be more prominent at night compared to existing conditions, due to the oblique viewing angle, existing and proposed landscaping on site, and proposed new architecture, the views of illuminated surfaces would be limited. In addition, field lighting is relatively commonplace on athletic fields around the City. For example, field lights are installed at the track and football field at Washington Preparatory High School, located approximately 1.3 miles east of the Project Site. In addition, the Project Site is located approximately 0.25 mile south of the Hollywood Park and is located within the Outdoor Lighting Zone designation of LZ-03 for Moderately High-Urban Areas per Title 24 CCR Part 1 Section 10.114. As such, the addition of field lighting would be consistent with the character of existing athletic fields and other land uses in the area.

Prominent existing visual elements along West 104th Street include bus parking, classrooms and the existing baseball field and tennis court fencing. However, views from this roadway are largely screened by the existing chain link fencing. The proposed parking improvements would maintain bus parking within this area. Views from West 104th Street would change due to the proposed demolition of the classroom buildings located along the northern portion of the Project Site. However, the proposed baseball stadium would be located in place of these demolished buildings, relocated from the existing location on the northeastern portion of the Project Site. Therefore, views from West 104th Street would remain largely unchanged from existing conditions. There are no proposed development or construction in the location of the existing baseball field.

Despite these changes, public views along West 104th Street and Yukon Avenue would not be substantially altered as the proposed modifications would be consistent in size, scale and building materials of existing campus structures. Ornamental landscaping would remain or would be re-planted along the exterior perimeter of the Project Site and security fencing would be installed similar to the existing chain link fencing surrounding the Project Site. Therefore, the visual character and quality of public views would not be significantly impacted from public viewpoints.

Due to site configuration and intervening structures and landscaping, only those buildings and activities near the perimeter of the Project Site would be visible along West 104th Street and South 10th Street. The majority of the new athletic facilities would all be located adjacent to the public right-of-way and would be visible from the surrounding streets. The proposed track and football/soccer field would be directly adjacent to and visible from Yukon Avenue and the proposed baseball field would be directly adjacent to and visible from West 104th Street. Other modernization elements of the Proposed Project, including repairing interior and exterior finishes, replacing flooring and interior

lighting, and landscaping improvements would not be visible from public vantage points due to security fencing and intervening structures and landscaping. Lastly, the proposed parking and circulation improvements would update existing parking areas on the Project Site and would not constitute a significant change in the visual quality from public views.

Overall, the visual character would be similar to the existing conditions, which is that of an existing high school, school-related uses, and athletic facilities. Moreover, the Proposed Project would replace the existing aging school infrastructure with new improved structures, and therefore would aim to improve the visual quality of public views of the Project Site. Therefore, impacts on the visual character or quality of public views of the Project Site or surrounding area would be less than significant.

d) **Less-Than-Significant with Mitigation Incorporated.** The Project Site is located adjacent to West 104th Street, South 10th Street, and Yukon Avenue which contain cars and streetlights that emit light and glare during the day and night consistent with suburban residential neighborhoods. In addition, the campus currently includes exterior security lighting. There is currently no lighting provided for the existing athletic facilities on the Project Site.

Construction. Construction activities would occur over 24 months and may include occasions of nighttime work. Temporary lighting sources required for nighttime construction activities may result in sources of light for adjacent residences and result in a source of glare to motorists on adjacent roadways. However, mitigation measure **MM-AES-1** would require the construction contractor to provide evidence to the District and the City that all temporary nighttime lighting shall be downfacing and shielded to prevent light spillage outside of the Project Site boundaries. Therefore, with implementation of mitigation measure **MM-AES-1**, temporary construction impacts related to light and glare would be reduced to a less than significant level.

Operation. After Project construction activities are complete, the Proposed Project would include the introduction of several new sources of artificial light throughout the Project Site. New lighting on the Project Site would be installed within all parking lots and the new athletic facilities, including stadium lighting at the proposed track and field facility.

In accordance with the City's Municipal Code Section 12-55.5(c) Parking Lot Site Improvements, lights provided to illuminate parking areas shall be installed, directed and shielded to confine all direct rays of artificial light within the boundaries of the subject development. Therefore, the proposed parking lot lighting would not result in a significant source of light and glare.

In order to assess the potential impacts of the additional stadium lighting and lighting for the athletic facilities on the Project Site, a *Lighting Technical Report* was conducted by Studio K1, see Appendix A. The purpose of the report was to determine potential nighttime lighting impacts associated with Project lighting and spillover to nearby residential properties and public roads. According to this report, the proposed light fixtures would generate a maximum of 1.5 footcandles at any property line (see Appendix

A). The light levels along the perimeter of the Project Site would be very low, with the only noticeable spill found on the south property line edge bordering West 108th Street from the proposed track and field lights, ranging from 0.1 to 1.5 footcandles. This increase in illuminance would be under the LAMC maximum of 2.0 footcandles of additional light at any sensitive receptor. Additionally, the proposed light fixtures would be fully shielded and downward directed to allow for more control with only minimal spill beyond the Project Site boundary compared to the existing building mounted and parking lot light fixtures. Use of shields and downward directing of lighting would also reduce opportunities for light pollution and potential glare to motorists on adjacent roadways. Although the Project Site would be more prominent at night compared to existing conditions, due to the oblique viewing angle, existing and proposed landscaping on site, and proposed new architecture, the views of illuminated surfaces would be limited.

Potential impacts resulting from the proposed lighting improvements would be further reduced through compliance with the California Green Building Standards Code (CALGreen), which are adopted by reference in the City's Municipal Code per Ordinance 20-05. Section 5.106 of CALGreen includes requirements for shielding, maximum light levels at the site boundary, and automatic light controls to reduce light pollution (City of Inglewood 2019).

Windows are the main source of glare complaints on buildings. While the Proposed Project would include interior and exterior improvements to existing buildings on the Project Site, most of these buildings and windows are set back from the edges of the Project Site and are not visible from public roadways or viewpoints. The development of the proposed ticketing and concession area on the southwestern portion of the Project Site would include new windows but would utilize non-reflective glass. In addition, according to the *Lighting Technical Report*, the Proposed Project's new lighting would result in less glare compared to existing conditions at all sensitive receptor sites except Receptor 6 (located along the eastern property edge). Glare at most of the sensitive receptor sites would be less than 100 candela per square meter (cd/m^2), which is less than that of a standard convenience store sign (see Appendix A). Due to the nearby location of proposed softball field light sources, glare at Receptor 6 would be 2502.5 cd/m^2; however, this luminance would be less than that of a standard residential incandescent light bulb (see Appendix A). Therefore, potential light and glare impacts during project operation would be less than significant.

Mitigation Measure

MM-AES-1. Construction Lighting. During nighttime construction activities, the construction contractor(s) shall provide evidence to the District and the City that all temporary nighttime lighting shall be downfacing and shielded to prevent light spillage outside of the Project Site boundaries.

References

California Department of Transportation (Caltrans). 2019. California Scenic Highway Mapping System Map. Available at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed December 2022.

City of Inglewood. 1995. General Plan Open Space Element. Available at: https://www.cityofinglewood.org/DocumentCenter/View/131/Open-Space-Element, accessed December 2022.

City of Inglewood Public Works Department. 2021. Designated Truck Route Map. DESIGNATED-TRUCK-ROUTE-MAP-Pub-Dec-2021 (cityofinglewood.org), accessed December 2022.

Agricultural and Forest Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
2. AGRICULTURAL AND FOREST RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Project Site is located in an urbanized area on existing school campuses. According to the California Department of Conservation's Los Angeles County Important Farmland Map, the Project Site is classified as "Urban and Built-Up Land," which does not contain any agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2018). Therefore, the Proposed Project would not convert farmland to a non-agricultural use and no impact would occur.

b) **No Impact.** As noted above in threshold (a), the Project Site is currently developed as a high school and a former elementary school within an urbanized area and does not contain any agricultural land (California Department of Conservation 2018). The Project Site is zoned as R-1, Residential Single Family, which does not permit agricultural uses (City of Inglewood 2014, City of Inglewood 2019). There are no Williamson Act contracts in the vicinity of the Project Site (California Department of Conservation 2022). Therefore, the Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract and no impact would occur.

c) **No Impact.** As noted above in thresholds (a) and (b), the Project Site is located within an urbanized area on existing school sites. The Proposed Project Site is zoned as R-1, which does not include forest lands, timberlands, or timberland zoned Timberland Production (City of Inglewood 2022). Therefore, the Proposed Project would not conflict with existing zoning for forest land and no impact would occur.

d) **No Impact.** As noted above in threshold (c), the Project Site is currently developed as a high school and, according to the City of Inglewood General Plan and Municipal Code, is not designated as forest land (City of Inglewood 2014, City of Inglewood 2022). Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impact would occur.

e) **No Impact.** As noted above, construction and operation of the Proposed Project would have no impact on agriculture or forest resources. Additionally, there would be no need for land acquisitions to implement the Proposed Project. No other changes in the existing environment, which, due to their location and nature, would result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use under the Proposed Project. Therefore, no impact would occur.

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Air Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. 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?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) **Less-Than-Significant Impact.** The Proposed Project is located within the 6,745-square-mile South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. The Basin is subject to SCAQMD's Air Quality Management Plan (AQMP), which was created to meet the to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions from stationary sources and on-road and off-road mobile sources and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). As part of its air quality planning, SCAG is responsible for preparing the Regional Transportation Program/Sustainable Communities Strategy (RTP/SCS), these plans provide the basis for the land use and transportation components of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. The AQMP is based, in part, on projections originating with County of Los Angeles and City of Inglewood general plans. The Proposed Project would be subject to the SCAQMD's AQMP.

SCAQMD's 2016 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy (SCAQMD 2016). SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment for the NAAQS (e.g., ozone [O_3], and particulate matter 2.5 microns in diameter or less [PM2.5]). Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the associated

growth with the projects are included in the projections utilized in the formulation of the AQMP. Projects that are consistent with the projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP. SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS and includes transportation control strategies designed to reduce vehicle miles traveled (VMT). SCAQMD's 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG through 2040. When determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and growth trends. Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. While SCAG's Regional Council adopted the 2020–2045 RTP/SCS on September 3, 2020, SCAQMD's 2016 AQMP is based on growth projections and control strategies from the 2016–2040 RTP/SCS. The SCAQMD adopted the 2022 AQMP on December 2, 2022, which bases its analyses on the 2020–2045 RTP/SCS (SCAQMD 2022a). However, until the 2022 AQMP is adopted by the USEPA and CARB and incorporated into the State Implementation Plan, consistency with the 2016–2040 SCAG RTP/SCS is appropriate when discussing a project's consistency with the SCAQMD's 2016 AQMP and is therefore used in the consistency analysis below.

The Proposed Project's consistency with applicable air quality plans is provided below. There are no applicable numerical thresholds of significance for this consistency analysis. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Proposed Project's consistency with SCAQMD's 2016 AQMP:

- Criterion 1: Will the project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the project exceed the assumptions utilized in preparing the AQMP?

The Proposed Project's potential impacts with respect to these criteria are discussed below to assess the Project's consistency with the SCAQMD's 2016 AQMP.

Criterion 1

Consistent with the first criterion, the Proposed Project would not conflict with the ability of federal, State, and local agencies to implement fair-share emissions strategies or achieve compliance with criteria pollutant standards or other federal requirements. Specifically, the Proposed Project's volatile organic compound (VOC), nitrogen oxides

(NO_X), carbon monoxide (CO), sulfur dioxide (SO_2), respirable particulate matter (10 microns or smaller in diameter, PM10), and fine particulate matter (2.5 microns or smaller in diameter, PM2.5) emissions resulting from construction and operation were analyzed to ascertain any potential effects on regional and localized concentrations and determine the potential for such emissions to cause or contribute to a violation of the ambient air quality standards. As discussed under the response to threshold 3(b) and the response to threshold 3(c) below, the Proposed Project's construction and operational emissions would not exceed the SCAQMD's regional mass emissions thresholds for VOC, NO_X, CO, SO2, PM10 or PM2.5 or the localized significance thresholds (LSTs) for NO_X, CO, PM10 or PM2.5, or generate roadway traffic congestion at an intersection that would result in a CO hotspot in excess of the ambient air quality standards as a result of project motor vehicle operations. The Proposed Project's emissions would therefore not increase concentrations of criteria pollutants or their precursors in a manner that would conflict with or obstruct SCAQMD's efforts to achieve attainment of ambient air quality standards for any criteria pollutant for which it is currently not in attainment or jeopardize the current attainment status of the Basin for other criteria pollutants. Therefore, in response to Criterion 1, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emissions reductions specified in the 2016 AQMP.

Criterion 2

With respect to the second criterion for determining consistency with the 2016 AQMP growth assumptions, the projections in the 2016 AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these criteria.

Air Quality Management Plan Consistency

The Proposed Project would not obstruct implementation of the 2016 AQMP for, as discussed below, its construction and operational emissions would be less than significant.[1] The Proposed Project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 California Code of Regulations, Section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2016 AQMP. As discussed above, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. As discussed below, compliance with the

[1] Note the SCAQMD adopted the 2022 AQMP on December 2, 2022, however, the 2022 AQMP still requires CARB and USEPA Final Approval. For this reason, consistency with the 2016 AQMP remains the appropriate version when discussing a project's consistency with the SCAQMD's AQMP.

applicable required fleet rules and control strategies and requirements would render the Proposed Project consistent with the 2016 AQMP as the Proposed Project would meet or exceed the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Proposed Project's criteria pollutant emissions would not cause the Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5),[2] or to cause the Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

Construction

Control Strategies

During the construction phase, the Proposed Project would comply with applicable regulatory measures, including CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations, such as SCAQMD Rule 403 for controlling fugitive dust and SCAQMD Rule 1113 for controlling VOC emissions from architectural coatings. Compliance with these regulatory measures and requirements would ensure the Proposed Project would be consistent with the 2016 AQMP and would meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Growth Projections

The Proposed Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool who travel among construction sites within the region. Moreover, these construction jobs would be relatively small in number and temporary in nature. Therefore, the Proposed Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

Operation

Control Strategies and Policy Consistency

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. As mentioned above, for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving

[2] The Los Angeles County portion of the Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference refer to South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and employment growth trends.

As mentioned in the Project Description, the Project Site is zoned as R-1, Residential Single Family and the Proposed Project would not alter the zoning designation. According to the City of Inglewood General Plan, the Project Site has a land use designation of Low-Density Residential (LDR), which is consistent with its use as a school. By state law, public school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094. The Project Site is located within a suburban residential neighborhood comprised primarily of single-family (one- and two-story) homes, along with some commercial uses and other educational facilities.

Growth Projections

As described in Chapter 2, Project Description, the Proposed Project would involve the demolition of the existing Woodworth Elementary School campus and improvements to the existing Morningside High School, including the demolition of buildings and hardscape and the construction of various recreational facilities. The Proposed Project would allow for Morningside High School to continue to operate as a school and would not result in a change in existing land uses. As Woodworth Elementary School is no longer operational, the demolition of buildings on the Woodworth Elementary School campus would not alter the existing land use of this vacant portion of the Project Site.

The Proposed Project would not increase school capacity and would not result in an increase in staff or students at Morningside High School. Rather, the Project would provide infrastructure improvements to serve the existing student body and staff. However, the Project would result in an increase in vehicle trips generated due to the additional stadium seating and softball field seating created under the Proposed Project as described in the *Transportation Impact Study* (TIS) prepared for the Proposed Project (LLG, 2022, Appendix K) (as analyzed in threshold 3(b) below). The Project would not generate an increase in area housing. As shown under thresholds 3(b) and 3(c), emissions from Project operational activities would be less than SCAQMD thresholds. As such, the Proposed Project would not conflict with or obstruct the implementation of the AQMP. In addition, since no new employees would be generated by the Proposed Project, the Proposed Project falls within SCAG's employment growth assumptions for the City of Inglewood. SCAG predicted the City of Inglewood's employment growth between 2012 and 2040 to be 6,300 jobs (SCAG 2016). As discussed in Section 17 (*Transportation)* below, the Proposed Project would not have a significant impact on transportation. Mobile source emissions associated with the Project Site were calculated and are discussed in threshold 3(b), below.

Projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality reductions identified in the AQMP. Based on the above, the

Proposed Project would not conflict with growth projections in the 2016 AQMP and impacts would be less than significant.

b) **Less-Than-Significant Impact.** As indicated above, the Project Site is in the South Coast Air Basin. State and federal air quality standards are exceeded in many parts of the Basin for ozone (O3) and PM2.5, including those monitoring stations nearest to the Project Site, and the Basin is designated a State and federal non-attainment area for these pollutants. The Basin is also designated as a State non-attainment area for PM10. The Proposed Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary activities) and operation. However, based on the following analysis, construction and operation of the Proposed Project would result in less-than-significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

The Project's daily regional construction and operational ozone precursor and criteria pollutant emissions (VOC, NOX, CO, SO2, PM10, and PM2.5) were estimated using the California Emissions Estimator Model (CalEEMod) (Version 2020.4.0) software, an emissions inventory software program recommended by SCAQMD. CalEEMod is based on outputs from the CARB OFFROAD model and the CARB on-road vehicle emissions factor (EMFAC) model, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Emissions from on-road vehicles were estimated outside of CalEEMod using EMFAC2021 emission factors for haul and material vendor trucks and worker vehicles, since the most current version of CalEEMod uses EMFAC2017.

Construction. Construction activities associated with the Proposed Project would generate temporary and short-term emissions of VOC, NOX, CO, SO2, PM10, and PM2.5. Construction related emissions are expected from demolition, site preparation, grading, paving, building construction, and architectural coating activities. During the demolition phase approximately 89,600 cubic yards (cy) of demolition debris would be generated. During the grading phase approximately 30,700 cy of soil would be exported. Proposed Project construction is expected to commence in Summer 2023 and would last approximately 2 years. Construction duration by phase is provided in **Table 3**, *Estimated Construction Schedule*. If project construction commences later than the anticipated start date, air quality impacts would be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. Therefore, air quality impacts would generally be less than those analyzed herein due to the likelihood of less emissions generated in a day.

The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. The specific construction fleet may vary due to specific needs at the time of construction. The duration of construction activity and associated construction equipment was estimated

based on consultation with the District and CalEEMod default assumptions. A detailed summary of construction equipment assumptions by phase is provided in the modeling files in Appendix B of this IS/MND.

The maximum daily regional emissions from these activities are estimated by construction phase and compared to the SCAQMD significance thresholds. Maximum daily criteria pollutant emissions are shown in **Table 4**, *Maximum Regional Construction Emissions – Without Mitigation (Pounds per Day)*, emissions resulting from Proposed Project construction would not exceed any criteria pollutant thresholds established by the SCAQMD (SCAQMD 2015). Therefore, impacts would be considered less than significant, and no mitigation is required.

TABLE 3
ESTIMATED CONSTRUCTION SCHEDULE

Activity	Start Date	End Date	Duration (Work Days)
Demolition	6/1/2023	8/16/2023	55
Site Preparation	8/17/2023	9/7/2023	16
Grading/Excavation	9/8/2023	10/31/2023	38
Building Construction	11/1/2023	4/22/2025	385
Paving	4/23/2025	5/31/2025	28
Architectural Coatings	4/23/2025	5/31/2025	28

SOURCE: ESA 2022, in consultation with the IUSD

TABLE 4
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS – WITHOUT MITIGATION (POUNDS PER DAY)

	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM10	PM2.5
Construction Phases						
Demolition	5	89	67	<1	20	5
Site Preparation	3	31	22	<1	9	5
Grading	5	70	54	<1	10	4
Building Construction	4	45	76	<1	13	4
Paving	1	9	15	<1	1	<1
Architectural Coatings	64	2	8	<1	2	1
Maximum Daily Regional Emissions	***64***	***89***	***76***	***<1***	***20***	***5***
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix B of this IS/MND for details.
SOURCE: ESA 2022

Operation. After construction, operation of the new modernized school buildings with interior improvements would not meaningfully change compared to existing conditions. As such, this analysis assumes with the interior improvements these school building uses would generate similar, if not lower operational air quality emissions and were, therefore, not included in operational emissions modeling. Operation of the proposed buildings, exterior improvements, and recreational facilities would generate long-term regional emissions of criteria air pollutants and ozone precursors associated with new and modernized building operations, as well as area sources related to the applications of architectural coatings (i.e., periodic repainting) and consumer products (i.e., cleaning products) and landscaping. As described above, the Proposed Project would serve the existing capacity and would not result in an increase in student capacity and staff at the school; however, there would be mobile source emissions from Project operations due to the increase in vehicle trips that would be generated due to the proposed additional stadium seating and softball field seating.

Daily emissions associated with operation of the Proposed Project were compared to the relevant thresholds. Operations-related emissions (area and energy sources) were modeled for the Proposed Project using CalEEMod (2025 Project buildout). Refer to Appendix B of this IS/MND for compiled detailed assumptions, calculations, and modeling outputs.

Operation of the Proposed Project would also include use of landscaping equipment such as lawnmower and trimmers to maintain the proposed landscaping improvements throughout the Project Site. The CalEEMod tool uses landscaping equipment greenhouse gas (GHG) emission factors from the CARB OFFROAD model and the CARB Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (CARB 2003). The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the Basin. Emissions of VOCs from the use of consumer products and architectural coatings are based on SCAQMD-specific emission factors for land uses in the Basin.

Operational-source emissions are summarized in **Table 5**, *Maximum Unmitigated Regional Operational Emissions (Pounds per Day)*.[3] As shown, operational-source emissions would be below the applicable SCAQMD regional thresholds of significance (SCAQMD 2015). Therefore, impacts would be considered less than significant, and no mitigation is required.

[3] Project operational emissions in Table 5 do not include subtracting emissions associated with the 12 existing classroom buildings to be demolished as part of the Proposed Project (Buildings I, J, K, V, W, W5, a service building, and five portable buildings). Therefore, operational emissions would be lower than those presented and the Proposed Project's operational air quality emissions are conservatively considered as new.

TABLE 5
MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

	Emissions (pounds per day)					
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
Area (Consumer Products, Landscaping)	1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	4	6	36	<1	9	2
Total Project On-Site and Off-Site Emissions	**5**	**6**	**36**	**<1**	**9**	**2**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix B of this IS/MND for details.
SOURCE: ESA 2022

SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. As discussed earlier, SCAQMD has developed a comprehensive plan, the 2016 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Basin is currently in non-attainment for ozone (federal and State standards), PM10 (State standards only) and PM2.5 (federal and State standards); therefore, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and SCAQMD. In particular, CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(3) states in part that:

> *A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency …*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Proposed Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2016

AQMP. As discussed previously under threshold 3 (a) above, the Proposed Project would be consistent with the 2016 AQMP and would not have a cumulatively considerable air quality impact.

As the Proposed Project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As shown in **Table 4** and **Table 5** above, peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, even though implementation of the Proposed Project would result in an addition of criteria pollutants, in conjunction with related projects in the vicinity of the Project Site (refer to Table 3-4 in the TIS [Appendix K] for the list of related projects), cumulatively significant impacts would not occur. Therefore, the emissions of non-attainment pollutants and precursors generated by the Proposed Project would be less than significant and would not result in a cumulatively considerable air quality impact.

c) **Less-Than-Significant Impact with Mitigation Incorporated.** According to the SCAQMD CEQA Air Quality Handbook, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The localized effects from the on-site portion of the Project's emissions were evaluated at nearby sensitive receptor locations potentially impacted by the Proposed Project according to the SCAQMD's Localized Significance Threshold Methodology (June 2003, revised July 2008), which relies on on-site mass emission rate screening tables and project-specific dispersion modeling, which may be used for sites greater than 5 acres or for projects that exceed the screening tables, as appropriate (SCAQMD 2008). LSTs represent the maximum emissions from a Project Site that are not expected to result in an exceedance of a NAAQS or CAAQS.

The LSTs are applicable to NO_X, CO, PM10, and PM2.5. For NO_X and CO, the thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the LSTs and, therefore, would not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor (e.g., residences, schools, hospitals). For the Proposed Project, the appropriate Source Receptor Area (SRA) for the LSTs is the South Los Angeles County Coastal monitoring station (SRA 3).

The nearest sensitive receptors to the Proposed Project are the adjacent residential uses to the south along West 108th Street, and residential uses to the north along West 104th Street, and to the west along Yukon Avenue South. Additionally, Woodworth-Monroe TK-8 Academy is adjacent to the school to the east. Operation of school facilities (both existing facilities and those proposed by the Proposed Project) place students within the Project Site, when school is in session. The adjacent offsite residences, Woodworth-Monroe TK-8 Academy, as well as the school itself, are considered sensitive receptors for the purposes of this air quality analysis. Since the total acreage disturbed is greater than 5 acres,[4] the LST analysis were based on the SCAQMD's look-up tables for a 5-acre site in SRA 3 with sensitive receptors located approximately 25 meters (approximately 82 feet) from the Project Site (June 2003, revised July 2008).[5]

The localized effects from the on-site portion of the Proposed Project's daily emissions were evaluated at the sensitive receptor locations that would be potentially impacted by the Proposed Project according to the SCAQMD's LST methodology. SCAQMD's Methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered, plus the truck idling emissions (e.g., haul trucks and vendor trucks) that were calculated separately using the EMFAC emission factors for heavy-heavy-duty (HHD) vehicles. Daily localized emissions caused by the Proposed Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards.

Construction. As presented in **Table 6**, *Maximum Daily Localized Construction Emissions* below, the localized emissions from on-site equipment during the construction of the Proposed Project without mitigation, at a distance of approximately 25 meters (approximately 82 feet) north of the Project Site would not exceed the LSTs.

4 Using the screening criteria applicable for a 5-acre site is conservative because the localized significance thresholds are project site dependent and the allowable thresholds increase with increasing project size. Therefore, using a 5-acre site threshold instead of the Project Site's full 54 acres during construction and 31 acres during operations yields a more stringent analysis.

5 SCAQMD's Localized Significance Threshold Methodology (refer to page 3-3) states for project boundaries located closer than 25 meters (82 feet) to the nearest receptor, such as the Proposed Project where the nearest receptors are located within the Project Site itself and adjacent to the southern boundary of the Project Site, should use the LSTs for receptors located at 25 meters.

TABLE 6
MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS

	Emissions (pounds per day)			
	NO_X	CO	PM10	PM2.5
Construction Phases				
Demolition	25	23	11	3
Site Preparation	31	22	9	5
Grading	38	31	5	3
Building Construction	15	17	1	1
Paving	9	15	<1	<1
Architectural Coating	2	2	<1	<1
Project Maximum Daily Emissions	***38***	***31***	***11***	***5***
SCAQMD LST Significance Thresholds	*197*	*1,796*	*15*	*8*
Exceeds Thresholds	***No***	***No***	***No***	***No***

Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix B of this IS/MND for details.
SOURCE:ESA 2022

Operation. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources. With regard to on-site sources of emissions, the Proposed Project would generate emissions from area sources located on-site such as natural gas combustion from water heaters, landscaping equipment, and use of consumer products. As presented in **Table 7**, *Maximum Daily Localized Operational Emissions* below, the unmitigated localized emissions from on-site equipment during the operation of the Proposed Project would not exceed the LSTs.

TABLE 7
MAXIMUM DAILY LOCALIZED OPERATIONAL EMISSIONS

Operational Activity	NO_X	CO	PM10	PM2.5
Area	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Project Maximum Daily Emissions	***<1***	***<1***	***<1***	***<1***
SCAQMD LST Significance Thresholds	*197*	*1,796*	*4*	*2*
Exceeds Thresholds	***No***	***No***	***No***	***No***

Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix B of this IS/MND for details.
SOURCE: ESA 2022

CO "Hot Spot" Analysis

The potential for the Proposed Project to cause or contribute to CO hotspots was evaluated by comparing intersections (both intersection geometry and traffic volumes) in the vicinity of the Project Site with prior studies conducted by the SCAQMD in support

of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Proposed Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

SCAQMD maintains a network of air quality monitoring stations located throughout the Basin to measure ambient pollutant concentrations. The Project Site is located in SCAQMD Source Receptor Area (SRA) 3; therefore, the monitoring station most representative of the Project Site is the Southwest Coastal LA County Monitoring Station. Criteria pollutants monitored at this station include ozone, NO_2, CO, SO_2, lead, and PM10. Based on monitoring data available from the SCAQMD for these monitoring stations, CO levels in the Project Site area are substantially below the federal and the State standards. Maximum CO levels in recent years were 1.8 ppm (one-hour average) and 1.5 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average) (SCAQMD, 2021). No exceedances of the CO standards have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS (SCAQMD 2013).

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day (SCAQMD 2003). This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue. Therefore, projects that result in traffic at any intersection of less than 100,000 vehicles per day would be considered to be less than significant (SCAQMD 2003).

Based on the Proposed Project's traffic volumes, under the Future with Project Conditions (2025), the segment of Century Blvd west of Yukon Avenue would have a maximum traffic volume of approximately 29,520 average daily trips under the Project buildout scenario (LLG, 2022). As the Proposed Project does not result in 100,000 vehicles per day at any study area intersection, this comparison demonstrates that the Proposed Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. Therefore, the Proposed Project would result in a less-than-significant impact with respect to CO hotspots.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs), are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

Intermittent construction activities associated with the Proposed Project would result in short-term emissions of diesel particulate matter (DPM), which the State has identified as a TAC. During construction, the exhaust of off-road heavy-duty diesel equipment would emit DPM during general construction activities, such as excavation, materials transport and handling, and building construction. Operational activities are primarily limited to passenger vehicle trips to and from the school and thus not a substantial contributing source to TAC emissions and health risks.

DPM poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance), which was updated in 2015 with new exposure parameters including age sensitivity factors (OEHHA 2015). Sensitive receptors include the adjacent residential uses to the south along West 108th Street, and residential uses to the north along West 104th Street, and to the west along Yukon Avenue South. Additionally, Woodworth-Monroe TK-8 Academy is adjacent to the school to the east. Operation of school facilities (both existing facilities and those proposed by the Proposed Project) place students within the Project Site, when school is in session. The adjacent offsite residences, Woodworth-Monroe TK-8 Academy, as well as Morningside High School itself, are considered sensitive receptors.

Construction. Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. According to OEHHA and the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, (SCAQMD 2003b) health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary and short-term construction schedule (approximately 24 months), the Proposed Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of construction activities.

The Proposed Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Proposed Project would comply with regulatory control measures including the CARB Air Toxics Control Measure (ATCM) that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that requires fleets to retire, replace, or repower

of older, dirtier engines with newer emission-controlled models; compliance with these would minimize emissions of TACs during construction. SCAQMD recommends that construction health risk assessments be conducted for substantial sources of DPM emissions (e.g., earth-moving construction activities) in proximity to sensitive receptors and has provided guidance for analyzing mobile source diesel emissions. Although, sensitive receptors within and adjacent to the Project Site, localized DPM emissions (strongly correlated with PM2.5 emissions) are less than significant (as shown in **Table 6**, above). Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. The low level of PM2.5 emissions coupled with the relatively short-term duration of construction activity anticipated at approximately 24 months resulted in an overall low level of DPM concentrations in the Proposed Project area. Furthermore, compliance with the aforementioned CARB ATCM anti-idling measure further minimizes DPM emissions in the Proposed Project area. Thus, although there are sensitive receptors located within proximity to the Project Site, compliance with regulatory control measures and the limited duration of construction activities would minimize exposures. Construction activities would occur on the Project Site over approximately 24 months. For potential health risks, the construction duration is also significantly lower than the 30-year exposure period typically associated with chronic cancer health risks. However, due to the revision in health risk methodology and the increased risk to young children, the OEHHA, recommends a health risk assessment (HRA) be conducted for any activities lasting more than two months or disturbing more than one acre (OEHHA 2015). Accordingly, a quantitative construction HRA was conducted for the Proposed Project to determine the potential health risk to on-site (school uses) and off-site (residential and school uses) receptors from exposure to diesel particulate matter (DPM) in the exhaust from the use of construction equipment.

Table 8 summarizes the carcinogenic and non-carcinogenic risk for the maximum impacted sensitive residential and onsite school receptors without and with the incorporation of mitigation measure **MM-AIR-1** as described below. Detailed assumptions and methodology are included in Appendix B.

As shown in **Table 8**, the maximum chronic health risk hazard index (HI) from the Proposed Project unmitigated construction risk is estimated at 0.05, which is below the significance threshold of a chronic risk HI of greater than 1. However, as shown in **Table 6**, the maximum incremental increase in cancer risk would be up to approximately 13-in-one-million for residences and 18-in-one-million for on-site Morningside High School students and 7.9 for the nearby off-site students, which would exceed the SCAQMD significance threshold of 10-in-one-million, and therefore, would have a potentially significant carcinogenic health risk. However, with the incorporation of mitigation measure **MM-AIR-1**, carcinogenic risk would be reduced to 5.9 for residents and 3.2 for students, which is below the 10-in-one-million regulatory threshold. [6] With the

[6] Based on SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, the Proposed Project would cause a significant impact by

implementation of mitigation measure **MM-AIR-1**, health risk impacts from Project construction activities would be less than significant.

TABLE 8
INCREMENTAL INCREASE IN CARCINOGENIC RISK AND HAZARDOUS INDEX FROM CONSTRUCTION ACTIVITIES

Sensitive Receptor	Maximum Cancer Risk (# in one million) [a]	Chronic Risk Hazard Index (HI)[b]
Unmitigated Risk		
Residential	13.4	0.05
School (offsite)	7.9	
School (onsite)	18.3	
Worker (onsite)	3.2	
Maximum Individual Cancer Risk Threshold[c]	10	10
Exceeds Threshold?	**Yes**	No
Risk with Mitigation Measure AIR-1 Incorporated		
Residential	5.9	0.02
School (offsite)	1.1	
School (onsite)	3.2	
Worker (onsite)	1.1	
Maximum Individual Cancer Risk Threshold[c]	10	1
Exceeds Threshold?	No	No

[a] Cancer risk values based on a 30-year exposure of maximum levels of DPM. Residential construction risk was calculated assuming a child was born at the beginning of the Project construction and be exposed throughout Project construction. School related construction risk assumes the school is closed during the summer (approximately 3-month period) and that the same children are present throughout the entire construction period when school is in session (approximately 9-month period).

[b] Chronic risk HI values based on the annual maximum levels of DPM divided by the corresponding DPM reference exposure levels (RELs) and was taken at the maximum sensitive receptor.

[c] See text below for explanation of thresholds

See Appendix B for additional details and modeling data.

SOURCE: ESA, 2022.

Operation. SCAQMD recommends that HRAs be conducted for substantial sources of operational DPM emissions (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions (SCAQMD 2003b). The Proposed Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as periodic delivery trucks and occasional maintenance. The primary source of emissions would be from passenger vehicle trips to and from Morningside High School, which are not significantly contributing sources of

exposing sensitive receptors to toxic air contaminants if any of the following would occur: the Proposed Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0. Acute and chronic hazard index represent the one-hour and lifetime health impacts respectively

TAC emissions. Furthermore, trucks would be required to comply with the applicable provisions of 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NOX emissions from existing diesel trucks. Therefore, Project operation would not be a substantial source of DPM. Since the Proposed Project is a high school modernization project and the Proposed Project would increase the capacity at the recreational facilities, but would not increase the Morningside High School's current number of students and staff, with respect to area sources located on-site such as natural gas combustion from water heaters, landscaping equipment, and use of consumer products the use of consumer products, and architectural coatings, the Proposed Project's new buildings, improvements and recreational uses would be expected to generate minimal emissions from these sources. Therefore, impacts would be less than significant. Furthermore, typical sources of hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Proposed Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). Project operations would only result in minimal emissions of TACs from the use of architectural coatings and other products. The Proposed Project's land uses would not include installation of industrial-sized equipment (i.e., paint booths) or require extensive use of commercial or household cleaning products. Based on this, the Proposed Project is not expected to release substantial amounts of TACs.

Therefore, based on the limited activity of TAC sources and TAC concentrations at on-site and off-site sensitive receptors relative to existing conditions, the Proposed Project would not warrant the need for an operational HRA associated with on-site activities, and potential TAC impacts would be less than significant.

Mitigation Measure

MM-AIR-1: Equipment Emission Standards. The construction contractor shall utilize off-road diesel-powered construction equipment that meet or exceed the CARB and USEPA Tier 4 off-road emissions standards for all equipment rated at 50 horsepower (hp) or greater during Project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SDAPCD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

d) **Less–Than-Significant Impact.** Potential sources that may emit odors during construction activities include construction equipment exhaust and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Further, construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Architectural coasting and solvents would only be used during certain phases of construction, and would not be used during the entire 24 month construction period. Through adherence with mandatory compliance with

SCAQMD Rules, construction activities or materials would not create objectionable odors or generate significant nuisance odors at nearby on-site and off-site sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Proposed Project does not include any of the land uses associated with odor complaints.

Furthermore, as discussed in threshold 3 (b), above, construction and operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO2), which may result in odors.

Therefore, impacts related to other emissions, including those that would lead to odors adversely affecting a substantial number of people, would be less than significant.

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Biological Resources

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

Discussion

a) **Less-Than-Significant Impact.** The Project Site is developed with school campuses and is either paved, graded, or landscaped to support school building facilities, parking, and athletic facilities. There are undeveloped areas adjacent to the existing athletic fields comprised of non-native grass and ruderal vegetation. There is no native vegetation is located on the Project Site. Ornamental landscaping is also present throughout the Project Site, including along the periphery of the existing parking lot and internal sidewalk and in courtyards between classrooms. Ornamental vegetation including trees occurring within the Project Site may provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, which prohibit the take or destruction of migratory birds/raptors, their nests, and/or eggs.

Construction. Construction of the Proposed Project would include removal and replacement of some ornamental trees. In addition, construction activities may result in noise and vibration that could indirectly impact nesting birds within the Project Site. Construction is anticipated commence in Summer 2023 and take approximately 24

months. Therefore, construction is expected to overlap the avian breeding season (generally January 15 through September 15). To the extent feasible, tree and vegetation removal would take place outside of the general avian breeding season; however, if these activities occur within this season, the District and construction contractor(s) would be required to comply with federal law and the MBTA. In compliance with federal law, a nesting bird survey would be performed by a qualified biologist within 72 hours of any construction activities including ground disturbance, tree removal or vegetation trimming during the nesting season. If active nests are identified during the survey, the qualified biologist will establish appropriate measures to avoid impacts on active nests, which may include a buffer around designated nests or other avoidance measures. The biologist will continue to monitor the nest throughout the duration of the construction activities within the vicinity of the nest, and the measures will remain in place until it has been determined the young have fledged or the nest has been abandoned.

With compliance with applicable laws and regulations protecting nesting and migratory birds, construction impacts to candidate, sensitive, or special-status species would be less than significant.

Operation. After completion of construction, operational activities associated with the school and athletic facilities would continue similar to existing conditions. Indirect impacts to nesting birds during operation of the Proposed Project may result from additional stadium lighting and additional stadium noise. While the proposed stadiums for track and football/soccer field would include additional stadium lighting and PA systems, field lights and building lights would be shut off each night and the PA system would only be utilized during events. If present onsite, nesting birds utilizing the ornamental landscaping are already adapted to living in an urbanized setting with the existing night lighting and event noise on-site, as well as from the adjacent residential and commercial areas and traffic along roads. Portions of the Project Site that would have an increase in noise and lighting during hours of outdoor athletic activities would be focused on the track and football/soccer field, which does not contain habitat. Furthermore, lighting fixtures would be designed to prevent unwanted spill light, uplight, or glare. Therefore, impacts to habitats or sensitive species would be less than significant.

b) **No Impact.** The Project Site is currently developed as an operating high school and a vacant elementary school which is paved, graded, developed or landscaped. Vegetation within the Project Site is comprised of non-native grass for athletic field use and ornamental landscaping. There is no wetland or riparian habitat or other sensitive natural community on or adjacent to the Project Site. Therefore, there would be no impacts to riparian habitat or sensitive natural communities.

c) **No Impact.** As described in threshold 4(b), there are no state or federally protected wetlands within or adjacent to the Project Site. The Proposed Project would occur entirely within the existing developed school campuses. Therefore, the Proposed Project would not affect any state or federally protected wetlands either directly or indirectly. Thus, no impact would occur.

d) **No Impact.** The Project Site is located in an urbanized and developed area surrounded by residential, commercial, and educational/institutional development. The Project Site is developed as an operating high school and vacant former elementary school and is either paved, graded, or landscaped. The Project Site is currently used for administrative, educational, and recreational activities and is also entirely surrounded by fencing. The Project Site and surrounding area do not contain any streams or bodies of water that may be inhabited by any native resident or migratory fish species. Because the Proposed Project would occur on existing developed school campuses within a developed suburban area, the Project Site is not considered a migratory wildlife corridor. Therefore, the Proposed Project would not result in the interference of the movement of any native or migratory species, wildlife corridors, or the use of native wildlife nursery sites. Thus, no impact would occur.

e) **Less-Than-Significant Impact.** A significant impact could occur if a project were inconsistent with local regulations pertaining to biological resources, such as the City Protected Tree Ordinance (Section 12-113). The City of Inglewood Municipal Code protects trees having a minimum trunk diameter of eight inches measured fifty-four inches above the ground and 13 specific tree species that have reached a minimum of four inches diameter trunk size. Construction of the Proposed Project would require removal ornamental trees within the Project Site; however, none of these trees fall under the category of a protected tree per the City's Municipal Code. The Proposed Project would protect the existing palm trees on the Project Site. In addition, the Proposed Project includes planting plans to replace the ornamental trees proposed to be removed and would include additional landscaping throughout the Project Site. Therefore, the Proposed Project would not conflict with any local policies or ordinances related to the protection of biological resources and impacts would be less than significant.

f) **No Impact.** The Project Site is fully developed in an urbanized area of the City. There are no habitat conservation plans or similar plans for the protection of biological resources that apply to the City. Therefore, the Proposed Project would not conflict with applicable conservation plans, and no impact would occur.

References

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Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Discussion

The analysis of impacts to cultural resources is based on the *Cultural Resources Assessment Report* prepared by ESA in December 2022 and the *Historic Resources Assessment* prepared by ESA in February 2023. These reports include evaluations of Morningside High School and Woodworth Elementary School for inclusion in the California Register of Historical Resources (CRHR), a records search conducted at the California Historical Resources Inventory System (CHRIS) South Central Coastal Information Center (SCCIC), and a review of historical topographic maps and aerial photographs. These reports are included as Appendix C of this IS/MND.

a) **Less-Than-Significant with Mitigation Incorporated.**

Indirect. The Proposed Project was analyzed to determine if it would result in a substantial adverse change to the integrity of potentially eligible historical resources within the immediate surroundings of the Project Site. Currently, there are no National or California register-listed historic resources located adjacent to the Project Site. There were three identified potential historic resources within a 0.5-mile radius of the Project Site, including: 10701 S. 10th Avenue, Los Angeles County Fire Department City of Inglewood Fire Station 170; 3620 102nd Street, Aku Aku Polynesian; and 3921 and 3947 W. 104th Street, Lockhaven Christian School. These three potential resources are described earlier in the report, and none would have views of the Project Site nor would they be physically impacted by the Proposed Project. As such, indirect impacts would be less than significant.

Direct. ESA conducted an in-depth evaluation of the Morningside High School campus and Woodworth Elementary School campus for inclusion in the CRHR. The evaluation included archival research and a historic architectural resources survey of the campuses. Based on the results of the archival research and survey, ESA determined the Woodworth Elementary School campus is ineligible for listing in the CRHR. Therefore, the Woodworth Elementary School does not qualify as a historical resource and changes to the campus, including demolition, as a result of Project implementation would not constitute a significant impact.

Based on the results of the archival research and survey, ESA determined the Morningside High School campus is eligible for listing in the CRHR. The Morningside HS campus was identified as potentially eligible for listing as a historic district under National Register Criteria A and C, for its association with events that have made contributions to the broad patterns of California and Inglewood's history and cultural heritage, as well as for its architectural merit as a post-World War II (Mid-Century Modern) Modern school in Inglewood that was designed by two prominent Los Angeles area architectural firms, C. Flewelling and Walter L. Moody Architects and Balch Bryan Perkins Hutchison Architects. The potential historic district includes 16 extant buildings (Buildings B, C, D/E, F, G/U, H, I, J, K, L, M, N, Q, R, S, and T) and its surrounding site (campus landscape and playfields).

Proposed work that would have a direct impact on contributing buildings and features include the demolition of Buildings I, J, K, and L, the new Building L that would replace the existing Building L, changes to .Building U, Auditorium which is a prominent architectural feature and a public gathering space, demolition of existing campus playfields and associated site features including some covered walkways, and interior improvements to modernize Buildings G/U and H.

Of the total 16 contributors that comprise the potential district, 4 would be demolished under the Project, and 12 contributors would remain. Therefore 75% of the original campus as constructed between 1950 and 1956 would remain intact. The Project is largely in conformance with the Standards, but would not fully conform with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing, Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (Standards) because 4 contributing buildings would be demolished and the Building U, Auditorium which is a prominent architectural feature and a public gathering space would be potentially altered. For a detailed discussion of the Project's conformance with each of the Standards, refer to Appendix C. Therefore, mitigation measures are required to reduce potential impacts to less than significant. With implementation of Mitigation Measures MM-HR-1 through MM-HR-4, impacts would be less than significant.

In order to preserve the records of this potential historic district, this resource shall be documented in a recordation report in accordance with the Historic American Building Survey (HABS) guidelines (**MM-HR-1**). As future exterior and interior plans for the modifications to Building U, Auditorium are not finalized, once final design and 90-100% construction plans become available for Building U, Auditorium these plans shal be reviewed by a qualified architectural historian for conformance with the Standards (**MM-HR-2**). In addition, for features that would be removed or altered in Building U, Auditorium, they shall be considered for salvage, reuse and/or interpretation, and that an interpretation program such as a permanent on-campus exhibit shall be developed to preserve the significant history of the school for educational purposes (**MM-HR-3**). Demolition activities and unforeseen circumstances that may arise during construction

have the potential to damage character-defining features of the potential historic district and of Building U, Auditorium. Therefore, construction monitoring by a qualified preservation consultant shall be conducted to ensure potential damage would be avoided and that the Project would be completed in conformance with the Standards. Additionally, during construction relevant final finish details and preservation treatment decisions may still need to be determined and shall be reviewed for conformance with the Standards (**MM-HR-4**). With the incorporation of mitigation measures **MM-CUL-1** through **MM-CUL-4** potential impacts to historic resources would be reduced to a less-than-significant level under CEQA.

Mitigation Measures

MM-HR-1: Historic American Building Survey Recordation. Prior to the issuance of a building permit for the Proposed Project, a recordation document that shall record the 16 eligible buildings and associated campus landscape and playfields within the identified potential historic district shall be commissioned by the District and prepared in accordance with Historic American Buildings Survey (HABS) Level III requirements. The recordation document shall be prepared by a qualified architectural historian who satisfies the Secretary of the Interior's Professional Qualification Standards for Architectural History pursuant to 36 CFR 61. This document shall include a historical narrative on the architectural and historical importance of the building and its contributions to the history of the area and educational institutions. The document shall also record the existing appearance of the buildings in professional large format photographs. The buildings' exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views will be documented. The report shall record the history of the subject property and its physical condition, both historic and current, through site plans, historic maps, and photographs, as well as current photographs, written data, and text. The documentation will be organized in the HABS "short form" format to include the following sections: name, location, significance, description, history, sources, historians, project information, sketch map, and index of photographs. Selected photographic copies or original photographic prints (pursuant to HABS guidelines) of historic images showing the subject property and original surroundings will be included. Archival copies of the completed report shall be distributed to 1) the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, 2) the Inglewood Public Library, and 3) the Morningside HS Library.

MM-HR-2: Design Plan Review (Building U). The District shall retain a qualified Preservation Professional, meeting the Secretary of the Interior's Professional Qualifications Standards Architectural History, Architecture, or Historic Architecture pursuant to 36 CFR 61 and who has at least 10 years of experience in design review and collaboration applying the Standards (Qualified Preservation Professional) to review the final plans for all new proposed construction for Building U, Auditorium, to ensure conformance with the Secretary of the Interior's Standards for Rehabilitation (Standards). Once the final design and the 90-100% construction plans become available, respectively,

they shall be reviewed by a Qualified Preservation Professional for conformance with the Standards for Rehabilitation. Upon completion of the final design plans, and upon completion of the 90-100% construction plans, respectively, the Qualified Preservation Professional shall submit a draft report to and shall make recommendations necessary to bring the design into conformance with the Standards as far as feasible. After the applicant has made the final revisions, the Qualified Preservation Professional shall review the final construction plans and prepare a final report documenting conformance with the Standards. The final plan review report shall be submitted to the District along with the final plan set prior to project approval and issuance of a grading permit and/or building permit.

MM-HR-3: Salvage and Interpretation Program (Building U). The District shall commission a qualified architectural historian to complete and assist with implementation of a salvage and interpretation program. The architectural historian shall prepare a salvage inventory of character-defining features that would be removed or altered in Building U, Auditorium, that would be appropriate for salvage and reuse and/or interpretation. The applicant shall review the salvage inventory to determine which items may be feasible for reuse as a part of the Proposed Project. Selected items identified for reuse shall be incorporated into the project plans and reviewed for conformance with the Standards. The District shall also consider whether any of the items identified for salvage can be included in an interpretation program or in an on-campus exhibit. The remaining items shall be donated to a local history museum or other appropriate repository or donated to the public. Any remaining items shall then be disposed of. In addition, the District shall commission development and installation of an interpretive exhibit such as a permanent on-campus exhibit to display and explain the significant history of the school for educational purposes.

MM-HR-4: Construction Monitoring. The District shall commission a Qualified Preservation Professional meeting the Secretary of the Interior's Professional Qualifications Standards Architectural History, Architecture, or Historic Architecture pursuant to 36 CFR 61 and who has at least 10 years of experience in design and construction review to conduct construction monitoring to ensure potential damage would be avoided and that the Project would be completed in conformance with the Standards. Additionally, during construction relevant final finish details and preservation treatment decisions shall be reviewed for conformance with the Standards. The Qualified Professional shall conduct a kick off meeting with the demolition contractor, architect and general contractor prior to commencement of construction to review the demolition plan, methods and protection measures. Once demolition is complete, the Preservation Professional shall conduct monitoring visits at pertinent intervals when construction activities have a potential to affect character-defining features, materials or finishes. The Preservation Professional shall address questions about preservation treatment and Project details that arise during construction and provide treatment recommendations for conformance with the Secretary of the Interior's Standards for Rehabilitation. Each monitoring visit shall be documented in a monitoring report that shall be provided to the applicant's architect and contractor, and to the District. Once construction has been

completed, the Preservation Professional shall conduct a final site walk and prepare a substantial completion report that shall document project conformance with the Standards.

b) **Less-Than-Significant with Mitigation Incorporated.** The SCCIC records search did not identify the presence of cultural resources within the Project Site or a 0.5-milue radius around the Project Site. Geologic mapping indicates the surface of the Project Site is underlain by Quaternary older alluvium sediments dating to the Pleistocene (2,588,000 to 11,700 years ago). These conditions suggest that the Project Site likely lacks the potential to contain subsurface deposits dating to the latest Pleistocene and Holocene (11,700 years ago to present) – the period for which there is widely accepted evidence for people in Southern California. Additionally, if any prehistoric resources once existed in the Project Site, these are expected to have remained at or near the surface. Past disturbances, including grading and the construction of the existing school, have likely displaced or destroyed resources if any once existed. Therefore, ESA considers the Project Site to have a low sensitivity for buried prehistoric archaeological resources.

The archaeological sensitivity assessment concluded that there is a low potential for encountering subsurface prehistoric and historic-period archaeological resources during Project-related ground-disturbing activities. However, since the Project includes ground-disturbing activities, there remains a possibility that buried archaeological resources or human remains could be encountered. the SCCIC records search did not identify the presence of archaeological resources within the Project Site. Additionally, the likelihood for unknown subsurface archaeological resources to underlie the Project Site is low as the majority of the Project Site has been disturbed from previous development. However, Project implementation involves additional ground disturbing activities. These activities have the potential, albeit low, to disturb archaeological resources and cause a substantial adverse change in the significance of an archaeological resource, if found during construction. With the incorporation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, impacts to unknown archaeological resources would be reduced to a less than significant level.

MM-CUL-5: Retention of Qualified Archaeologist. Prior to start of ground-disturbing activities, the Inglewood Unified School District (District) shall retain a Qualified Archaeologist (defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology) to prepare cultural resources sensitivity training for construction personnel. The Qualified Archaeologist, or their designee, shall instruct all onsite construction personnel on the types of archaeological resources that may be encountered and the procedures to follow in the event of an inadvertent discovery of archaeological resources or human remains. The District shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM-CUL-6: Unanticipated Discoveries. In the event of the unanticipated discovery of archaeological materials, the District or its contractor shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by the Qualified Archaeologist. Construction shall not resume until the

Qualified Archaeologist has conferred with the District on the significance of the resource. If it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the Qualified Archaeologist that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The District shall consult with the appropriate Native American tribal representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. The treatment plan shall include provisions for the final disposition of the recovered resources, which may include onsite reburial, curation at a public, non-profit institution, or donation to a local Native American tribe, school, or historical society.

c) **Less-Than-Significant Impact.** No known human remains exist within the Project Site and the Project Site has been previously developed. However, the Project involves ground disturbance that, while unlikely, has the potential to encounter buried human remains. Should Project-related ground disturbance unearth, expose, or disturb previously unknown human remains, the statutes of PRC Section 5097.98 and Health and Safety Code Section 7050.5 should be followed in accordance with State law. Due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards cited above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

References

ESA. 2022. *Cultural Resources Assessment Report for the Morningside High School Upgrade Project*. Prepared for the Inglewood Unified School District by ESA. December 2022.

ESA. 2023. *Historic Resources Assessment for the Morningside High School Upgrade Project*. Prepared for the Inglewood Unified School District by ESA. February 2023.

Energy

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) **Less-Than-Significant Impact.** This section analyzes impacts on energy resources due to construction and operation of the Proposed Project. Project construction would consume energy primarily from on- and off-road vehicle fuel consumption in the form of diesel, gasoline, and electricity from water conveyance for dust control. Project operations would consume energy in the form of electricity for lighting and water conveyance, and natural gas for heating/cooling of new buildings and recreational facilities.

Construction. Construction of the Proposed Project would result in energy demand primarily from off-road equipment and on-road vehicle fuel consumption (diesel and gasoline) and secondarily from electricity for conveying water used for dust suppression and for a temporary on-site construction office/trailer. The analysis below includes the Proposed Project's energy requirements and energy use efficiencies by energy type for each stage of the Proposed Project.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model. The estimated fuel usage for on-road vehicles is based on the number of trucks and employee commute trips that would occur during construction activities and per mile fuel consumption factors from the CARB on-road vehicle emissions factor (EMFAC) model. Electricity used for a portable construction office was calculated using energy intensity factors from CalEEMod and electricity from water conveyance for dust control was calculated using assumptions for gallons used per acre per day and CalEEMod water conveyance intensity factors applied to calculate total construction electricity consumption. Construction activities typically do not involve the consumption of natural gas. **Table 9**, *Summary of Energy Consumption During Project Construction*, summarizes the Proposed Project's total and annual fuel and electricity consumption from construction activities.

TABLE 9
SUMMARY OF ENERGY CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity
Gasoline	**Gallons**
On-Road Construction (Workers)	206,734
Total Gasoline (24 months)	***206,734***
Diesel	**gallons**
On-Road Construction Equipment	250,960
Off-Road Construction Equipment	88,780
Total Diesel (24 months)	***339,740***
Electricity	**MWh**
Construction Trailer	52.0
Water Conveyance for Dust Control	7.5
Total Electricity (24 months)	***59.5***
Annualized Gasoline Use (gal)	**103,367**
Annualized Diesel Use (gal)	**169,870**
Annualized Electricity (MWh)	**29.7**

a. NOTES:
b. gal = gallons; MWh = megawatt-hours
SOURCE: ESA 2022

As shown in **Table 9,** annual average construction electricity usage would be approximately 29.7 megawatt-hours (MWh). This amount is within the supply and infrastructure capabilities of Southern California Edison (SCE), the electricity provider for the Project Site, which had a net energy load of 82,048 gigawatt-hours (GWh) in 2021 (SCE 2022).[7] The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Proposed Project's annual operational electricity. Construction electricity usage of the Proposed Project would consume approximately 0.00004 percent of SCE's total load and would not cause additional strain on SCE's electricity load. Therefore, impacts from construction electrical demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

The energy use summary provided above in **Table 9** represents the amount of energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in **Appendix D** of this IS/MND. As shown, on- and off-road vehicles would consume an estimated annual average of 103,367 gallons of gasoline and approximately 169,870 gallons of diesel fuel throughout the Proposed Project's

7 The most recent year that SCE data was available.

construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.0034 percent of the 2021 annual on-road gasoline-related energy consumption and 0.038 percent of the 2021 annual diesel fuel-related energy consumption in California. Therefore, impacts from construction fuel demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Operation. After construction, operation of the new modernized school buildings with interior improvements would not meaningfully change compared to existing conditions. As such, the Proposed Project with the interior improvements for the school building uses would consume similar if not less energy compared to the existing buildings that would be demolished and were therefore, not included in operational modeling. The proposed new buildings, hardscape, landscaping, and recreational facilities were modeled, as these buildings and recreational facilities would consume energy from electricity for lighting and water conveyance, and natural gas for heating/cooling (see Chapter 2.3, Proposed Project Characteristics, for additional details). During operation of the Proposed Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and appliances for the new buildings and recreational facilities. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. **Table 10**, *Project Operational Energy Usage*, summarizes the Proposed Project's operational energy consumption.[8]

The Proposed Project would increase demand for electricity including what is needed to support building operations. As shown in **Table 10**, the Proposed Project would result in an annual consumption of electricity of approximately 1,020 MWh per year, which would represent approximately 0.001 percent of SCE's total sales of 82,048 GWh in 2021 (SCE 2021). In addition, the CEC forecasts that SCE's peak demand in the Project buildout year of 2025, would be approximately 25,046 MW (CEC 2022a). Under peak conditions, the Project would consume a net increase of 1,020 MWh on an annual basis, which is equivalent to a peak of 0.12 to 0.23 MW (assuming 8,760 hours or 4,380 hours per year of active electricity demand). In comparison to the SCE power grid base peak load of 25,046 MW for 2025, the Project would represent approximately 0.0005 to 0.0009 percent of the SCE base peak load conditions. Thus, per CEQA Guidelines Appendix F, the impacts related to electrical supply and infrastructure capacity and the Project's effect on peak and base period demands would be less than significant.

[8] Project operational energy consumption in Table 10 does not include subtracting energy consumption associated with the 12 existing classroom buildings to be demolished as part of the Proposed Project (Buildings I, J, K, V, W, W5, a service building, and five portable buildings). Therefore, the Proposed Project's operational energy consumption would be lower than presented and the Project's operational energy consumption is conservatively considered as new.

TABLE 10
PROJECT OPERATIONAL ENERGY USAGE

Energy Type[a]	Annual Quantity[b,c]
Electricity	
Proposed Project:	
Building Energy	645 MWh
Water Conveyance	374 MWh
Total Electricity	***1,020 MWh***
Natural Gas	
Proposed Project:	
Building Energy	0.17 million cf
Total Natural Gas	***0.17 million cf***
Transportation	
Proposed Project:	
Gasoline	16,099 gallons
Diesel	2,879 gallons
Natural Gas	325 gallons

a. MWh = megawatt-hours; million cf = million cubic feet
b. Detailed calculations are provided in Appendix D of this IS/MND.
c. Totals may not add up due to rounding of decimals.
SOURCE: ESA 2022

The Proposed Project has been evaluated for consistency with the Inglewood Energy and Climate Action Plan (ECAP). According to the ECAP, the City is in the process of implementing strategies to reduce energy consumption across sections, which includes increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste (City of Inglewood, 2013). Consistent with this strategy, the Proposed Project would install lighting and a ventilation system that conforms to the CALGreen Code and 2019 Title 24 Standards. In addition, the Proposed Project would include parking improvements and 25 electric vehicle (EV) parking spaces. These features would be consistent with energy reduction strategies in the City's ECAP. Therefore, with the incorporation of these features, operation of the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of electricity, and impacts would be less than significant.

The Proposed Project would increase the demand for natural gas resources. As shown in **Table 10**, the Proposed Project's estimated operational natural gas demand is 0.17 million cubic feet, which represents 0.00002 percent of Southern California Gas Company's (SoCalGas's) projected supply of 2,342 million cubic feet per day in 2025 (California Gas and Electric Utilities 2020). As would be the case with electricity, the Proposed Project would comply with the applicable provisions of Title 24, City of Inglewood's ECAP, and the CALGreen Code in effect at the time of building occupancy to minimize natural gas demand. Therefore, with the incorporation of these features,

operation of the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of natural gas, and impacts would be less than significant.

As described above, the Proposed Project would serve the existing capacity and would not result in an increase in student capacity and staff at the school; however, there would be an increase in vehicle trips from Project operations due to the increase in trips that would be generated due to the additional stadium seating and softball field seating. (LLG, 2022). The Proposed Project's annual gasoline consumption would be approximately 16,099 gallons, which represents 0.0005 percent of Los Angeles County's 2021 consumption of 3.1 billion gallons (CEC 2022b). The Proposed Project's annual diesel consumption would be approximately 2,879 gallons, which represents 0.0006 percent of Los Angeles County's 2021 consumption of 450.7 million gallons (CEC 2022b).

The Project Site is located adjacent to a variety of existing transportation facilities. The Project Site is served by one public transit route, Long Beach Transit Route 4, which provides connections to the Los Angeles Metropolitan Transportation Authority (Metro) J Line bus rapid transit at Carson Station and the Metro A Line light rail at Del Amo Station. Furthermore, as described in Section 17 (*Transportation*) below, implementation of the Proposed Project would not remove or impede access to existing bicycle facilities, sidewalks, or transit services adjacent to the Project Site, resulting in additional fuel consumption.

Based on the above, operation of the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of transportation fuel, and impacts would be less than significant.

b) **Less-Than-Significant Impact.** Construction equipment would comply with applicable federal, State, and regional requirements described below. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type (USEPA 2011). USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type (USEPA 2016). The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of 5 minutes at a location and the

phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

The State and the City have implemented energy policies relevant to the Proposed Project. The California Renewables Portfolio Standard (RPS) was established in 2002 and required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2013. Senate Bill (SB) 100 is the most recent update to the State's RPS requirements. The RPS requires publicly owned utilities and retail sellers of electricity in California to procure 44 percent of their electricity sales from eligible renewable sources by 2024, 52 percent by the end of 2027, 60 percent by the end of 2030 and 100 percent by the end of 2045. The Proposed Project would comply with the applicable provisions of the 2019 Title 24 standards and the CALGreen Code in effect at the time of building permit issuance, which would minimize energy demand.

As discussed above, the Proposed Project would comply with the applicable provisions of 2019 Title 24 Standards, City of Inglewood's ECAP, and the CALGreen Code in effect at the time of building occupancy. As such, the Proposed Project would minimize energy demand. As discussed in Section 17 (*Transportation*) below, the Proposed Project would not have a significant impact on transportation. Additionally, the Proposed Project would not result in an increase in student capacity and staff at the school, and is therefore consistent with SCAG growth projections and would comply with State and local regulations to reduce energy consumption. The Proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

References

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Geology, Soils, and Seismicity

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
7. 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.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

a) **Less-Than-Significant with Mitigation Incorporated.**

i) **Less-Than-Significant Impact.** Similar to all of southern California, the Project Site is in a known seismically active region as a result of being located near the active margin of the North American and Pacific tectonic plates, where the potential of seismic hazards exists. According to the *Limited Geotechnical Investigation Report* (Koury Engineering & Testing, Inc. 2020) prepared for the Project and provided as Appendix E of this Draft IS/MND, the Project Site is not located within an Alquist-Priolo Fault Zone. The nearest Alquist-Priolo Fault Zone is associated with the Newport-Inglewood fault, located approximately 1,000 ft to the northeast of the Project Site. Therefore, there is not a risk of fault rupture of a known Alquist-Priolo fault on the Project Site, and impacts would be less than significant.

ii) **Less-Than-Significant with Mitigation Incorporated.** All of Los Angeles County, including the Project Site, is located within a known seismically active region and is subject to ground shaking. As described above, the nearest active Alquist-Priolo fault zone is the Newport-Inglewood fault located approximately 1,000 ft northeast of the Project Site. Other active faults in the vicinity of the Project Site include the Palos Verdes fault approximately 13 miles south, the Whittier fault zone approximately 19 miles east, the Redondo Canyon fault approximately 9.5 miles southwest, the Santa Monica fault approximately 10 miles northwest, the Hollywood fault zone approximately 11 miles north, the Puente Hills (LA) fault approximately 5 miles northeast, the Puente Hills (Santa Fe Springs) fault approximately 11 miles southeast and the Compton fault approximately 8.25 miles southwest of the Project Site. A seismic event on the Newport-Inglewood fault (or other nearby faults) could cause significant ground shaking on the Project Site. According to the *Limited Geotechnical Investigation Report* (Appendix E), the largest magnitude earthquakes anticipated along these faults would be a magnitude 7.3 (Mw) earthquake along the Palos Verdes fault and a 7.2Mw earthquake along the Newport-Inglewood fault. Due to the proximity of the site to the Newport-Inglewood Fault, near field effects from strong ground motion associated with a large earthquake along this fault may occur at the Project Site. These near field effects, including "fling" and directivity of strong ground motion, may result in significantly higher accelerations at the site.

Construction of the proposed improvements and recreational facilities would be required to comply with the recommendations provided in the *Limited Geotechnical Investigation Report* per mitigation measure **MM-GEO-1**. In addition, the Proposed Project would be required to comply with all seismic-safety development requirements, including the Title 24 standards and Earthquake Design Regulations of Chapter 16A of the California Building Code under the direction and approval authority of the Division of the State Architect (DSA). As described above, the preliminary project plans were approved by DSA and DSA will be responsible for final design review and construction oversight. Conformance with all project-specific geotechnical recommendations through mitigation measure **MM-GEO-1** and applicable seismic-safety development requirements would minimize seismic ground shaking effects in the event of a major earthquake and ensure that the potential seismic or geologic hazard impacts are not significant. Therefore, impacts related to seismic ground shaking effects would be reduced to a less-than-significant level.

Mitigation Measure

MM-GEO-1: Geotechnical Report Recommendations. Prior to the issuance of grading or building permits, the District shall ensure the recommendations of the *Limited Geotechnical Investigation Report* prepared by Koury Engineering & Testing, Inc. 2020, or subsequent project-specific geotechnical report, are incorporated into the final design and construction specifications for the Project. The District shall incorporate the

recommendations provided within the 2020 report as conditions of approval for the Project. If a more recent, soils engineering investigation or geotechnical report is prepared, the recommendations of the most recent soils or geotechnical report shall supersede those of the earlier report to the satisfaction of the District and the DSA, who will approve the final design plans and provide construction oversight.

iii) **Less-Than-Significant Impact.** Liquefaction occurs when saturated, loose to medium dense, cohesionless soils are densified by ground shaking or vibrations. According to the *Limited Geotechnical Investigation Report* (Appendix E), the Liquefaction Hazards Zone on the State of California *Seismic Hazards Zones Map* indicates that the Project Site is not located in a liquefaction susceptibility zone. In addition, due to the absence of shallow groundwater and the presence of clayey soils and some medium dense to dense sands, it was determined the potential for liquefaction at the Project Site is remote. Furthermore, the potential for dry seismic settlement on the Project Site was evaluated. With an estimated peak ground acceleration of 0.898g, differential settlement on the Project Site is anticipated to be on the order of 0.25 inch in 40 feet for the design seismic event. With implementation of the design and construction recommendations provided in the *Limited Geotechnical Investigation Report*, the proposed structures would be designed in consideration with the settlement potential on the Project Site. As a result, the Proposed Project would not expose people or structures to potentially substantial adverse effects related to liquefaction or seismic settlement, and impacts would be less than significant.

iv) **No Impact.** According to the *Limited Geotechnical Investigation Report* (Appendix E), the Project Site not located in a Landslide Hazard Zone on the State of California Seismic Hazard Zones Map. In addition, no evidence for landslides were observed on or in the immediate vicinity of the Project Site at the time of the field exploration conducted in support of the geotechnical investigation. Based on topographic conditions of the Project Site, which is graded and relatively flat with elevations ranging from 88 to 112 feet above meal sea level, landsliding is not considered a potential hazard at the Project Site. No impact would occur.

b) **Less-Than-Significant Impact.** The entire Project Site has been disturbed through prior development of the existing school campuses. The subsurface soil profile consists of fill underlain by alluvial deposits. Fill depths on the Project Site range from 2 to 5 feet and asphalt thickness ranges from 3.5 to 6 inches. Fill material on the Project Site generally consists of firm to stiff sandy lean clay that is considered moist to very moist. The underlying alluvium is also predominantly sandy lean clay considered moist to very moist.

Construction. Construction of the Proposed Project would require grading and excavation which may result in erosion during construction activities. However, previously developed and graded areas are less likely to erode and the soils on the Project Site were previously altered from the original construction and other previous improvements on the

Project Site. As stated in the Project Description above, construction would result in a net cut of materials, and approximately 30,700 cubic yards of soil would be exported off the Project Site. In compliance with the State Water Resources Board Construction General Permit, the District would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), which would include best management practices (BMPs) such as erosion control requirements during construction. Per the recommendations of the *Limited Geotechnical Investigation Report* (Appendix E), temporary excavations should be kept moist in dry weather to prevent erosion and during the rainy season, measures including berms, plastic sheeting, or other devices may be used to prevent surface water flows from eroding exposed soils. Excavations for the improvements would reach a maximum of 10 ft in depth for the installation of the stadium lights on the proposed Morningside campus. Given the shallow depth of earthwork required for the majority of the proposed improvements and the Project Site's relatively level topography, rapid storm water runoff would be limited, and would not exacerbate erosion potential with implementation of a SWPPP. Therefore, impacts would be less than significant related to soil erosion.

Operation. Following construction, the proposed Morningside High School campus would be covered completely by pavement, structures, artificial turf (fields), and landscaping, which would not leave exposed areas of bare soil susceptible to erosion. In addition, the Proposed Project would include approximately 12.7 acres of pervious surfaces and drainage improvements across the Morningside High School campus, such as underground storm-capture infiltration vaults, to ensure adequate site drainage is met and reduce the potential for erosion from stormwater. Refer to Section 10 (*Hydrology and Water Quality*) below for a detailed discussion of impacts related to erosion from stormwater. Within the portion of the existing Morningside High School campus to be leased, the existing tennis courts would be removed; however, this portion of the Project Site would largely remain undeveloped, similar to existing conditions. The Woodworth Elementary School campus would have the structures and hardscape on site demolished, leaving this portion of the Project Site with undeveloped, exposed soils. As described above, a SWPPP would be required for the Proposed Project, which would also include operational BMPs to ensure soils within all exposed soil areas of the Project Site are compacted after completion of demolition activities and maintained to avoid loss of topsoil and erosion. As such, Project operation would have a less-than-significant impact related to erosion and loss of topsoil.

c) **Less-Than-Significant with Mitigation Incorporated.** As previously discussed above, the Project Site has low potential for liquefaction, landslides, and soil erosion, and impacts are considered less than significant. Since the Project Site has been previously developed, risks for soil-related instability would be unlikely. According to the *Limited Geotechnical Investigation Report* (Appendix E), the upper soils within the football field area are relatively impervious and subject to develop "pumping" conditions once they become soaked, which may result in unstable subgrade. The *Limited Geotechnical Investigation Report* includes recommendations for the installation of an impervious liner with a drainage system to be included supporting the synthetic turf proposed for the track

and football/soccer field. Therefore, with implementation of mitigation measure **MM-GEO-1** requiring the implementation of project-specific geotechnical report recommendations, the proposed improvements would not result in conditions on the Project Site that would result in unstable soils, resulting in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and impacts would be less than significant.

d) **Less-Than-Significant with Mitigation Incorporated.** Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. According to the *Limited Geotechnical Investigation Report* (Appendix E) prepared for the Project Site, the soils onsite are shallow clayey sand and sandy clay with moderate expansion potential. Therefore, the report includes recommends regarding drainage and moisture content to address the potential for expansion. In addition, the report recommends that imported soil materials used for backfilling should also have a low expansion potential. Prior to the start of construction, the District would be required to incorporate the recommendations of the *Limited Geotechnical Investigation Report* and any other subsequent geotechnical reports prepared for the Project into the final design plans and construction specifications. The final design plans for the Project would be reviewed by DSA; consistent with the CBC. As described above, the District would be required to incorporate all recommendations from the geotechnical report into the plans per mitigation measure **MM-GEO-1**. With incorporation of the recommendations from the geotechnical investigations, expansive soil impacts associated with implementation of the Proposed Project would be reduce to a less-than-significant level.

e) **No Impact.** Morningside High School is currently developed with an existing sewer system for the disposal of wastewater that connects to the City's sewer system. The proposed improvements would not include the installation or use septic tanks or alternative wastewater disposal systems. Demolition of Woodworth Elementary School would not result in the generation of wastewater. Therefore, no impacts would occur.

f) **Less Than Significant Impact with Mitigation Incorporated.** Archival research was conducted and consisted of geologic map review, geologic literature review, and a paleontological resources database search conducted by the Natural History Museum of Los Angeles County (LACM). The results of the LACM search are provided in Appendix F of this Draft IS/MND.

Review of the geologic map indicates that the Project Site is underlain by Quaternary older alluvium (Qoa) sediments, described as "gray to light brown pebble-gravel, sand, and silt-clay" from the late Pleistocene (Dibblee and Minch 2007). Pleistocene alluvium contains a rich repository of Ice Age mammals and other animals in the Los Angeles area including mammoth, bison, horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, as well as small animals such as rodents and

lizards (Brattstrom and Sturn 1959; Graham and Lundelius 1994; Steadman 1980). As such, older Pleistocene alluvium deposits are assigned a High paleontological potential.

The LACM indicates that no fossil localities lie directly within the Project Site, but that fossil localities (LACM VP 1225, 3264, 3266, 3789, 4942, and 7332) exist nearby (approximately between 3 and 4 miles away from the Project Site) and from the same sedimentary deposits that occur in the Project site. These localities were found within Pleistocene deposits that yielded fossil specimens of mammoth, bison, hare, uncatalogued vertebrates, and elephant family (Proboscidea); some at unknown depths and others at depths between 14 and 40 feet below ground surface (Bell, 2021).

Based on the fossiliferous geologic formations that have been mapped within the Project Site and the abundance of fossil localities in same geologic formations in the vicinity of the Project Site and elsewhere in the Los Angeles Basin, the potential to encounter fossiliferous deposits within the Project Site is considered high. Should paleontological resources be encountered, the Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. However, with the implementation of mitigation measures **MM-PALEO-1** through **MM-PALEO-4**, impacts to unique paleontological resources or sites or unique geologic features would be less than significant.

Mitigation Measures

MM-PALEO-1: **Retention of Qualified Paleontologist.** The District shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The District shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM-PALEO-2: **Paleontological Monitoring.** Paleontological monitoring shall be conducted during ground-disturbing activities below 10 feet in Quaternary alluvium. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the

surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.

MM-PALEO-3: **Paleontological Resource Discovery.** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

MM-PALEO-4: **Monitoring Report.** At the conclusion of paleontological monitoring and prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the District, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

References

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Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
8. GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a,b) **Less-Than-Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The State of California defines GHGs as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, CH_4 has a GWP of 25 (over a 100-year period); therefore, 1 metric ton (MT) of CH_4 is equivalent to 25 MT of CO_2 equivalents ($MTCO_2e$). The State uses the GWP ratios available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons (MT) per year. Large emission sources are reported in million metric tons (MMT) of CO_2e.[9]

Some of the potential effects of global warming in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB 2008). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC 2001):

- Higher maximum temperatures and more hot days over nearly all land areas

[9] A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas
- Reduced diurnal temperature range over most land areas
- Increase of heat index over land areas
- More intense precipitation events

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California generated 369.2 $MMTCO_2e$ in 2020, the latest year for which data are available from CARB (CARB 2021a). Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2020, accounting for almost 38 percent of total GHG emissions in the State. This sector was followed by the industrial sector (23 percent), electric power sector (11 percent), agriculture and forestry (9 percent) and the residential emissions (8 percent) (CARB 2021a).

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Neither IUSD, nor the City of Inglewood, have adopted a threshold of significance for GHG emissions that would be applicable to this Proposed Project. In December 2008, the SCAQMD adopted a 10,000 $MTCO_2e$ per year significance threshold for industrial facilities for projects in which the SCAQMD is the lead agency. SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a project for which SCAQMD is not the lead agency, nor a uniform methodology for analyzing impacts related to GHG emissions on global climate change. In the absence of any applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Proposed Project's impacts related to GHG emissions focuses on its consistency with State, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Proposed Project's GHG-related impacts on the environment. For informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Proposed Project using recommended air quality models, as described below. The primary purpose of quantifying the Proposed Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. However, the significance of the Proposed Project's GHG emissions impacts is not based on the amount

of GHG emissions resulting from the Proposed Project. Consistent with SCAQMD guidance, total emissions from construction are amortized over an assumed project lifetime of 30 years and added to operational emissions (SCAQMD 2008).

CEQA Guidelines 15064.4 (b)(1) states that a lead agency may use a model or methodology to quantify GHGs associated with a project. In June 2021, the SCAQMD in conjunction with CAPCOA released the latest version of the CalEEMod (Version 2020.4.0). The purpose of this model is to estimate construction-source and operational-source emissions from direct and indirect sources. Accordingly, the latest version of CalEEMod has been used to estimate the Proposed Project's emissions. Construction and operations mobile emissions were estimated using EMFAC2021 (refer to **Appendix G** of this Draft IS/MND for additional details).

Construction. Construction activities associated with the Proposed Project would result in emissions of CO_2 and, to a lesser extent, CH_4 and N_2O. Construction-period GHG emissions were quantified based on the same construction schedule and activities as described above in Section 3 (*Air Quality*) above. To amortize the emissions over the life of a project, SCAQMD recommends calculating the total GHG emissions attributable to construction activities, dividing it by a 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period and included in the Proposed Project's annual operational-phase GHG emissions.

Operation. Operational activities associated with the Proposed Project would also result in emissions of CO_2 and, to a lesser extent CH_4 and N_2O. Operational sources of GHG emissions would include area and landscaping related emissions, and indirect GHG emissions from export of electricity, water consumption, and waste generation. As described above, the Proposed Project would serve the existing capacity and would not result in an increase in student capacity and staff at the school; however, there would be mobile source emissions from Project operations from additional trips generated by additional stadium seating and softball field seating (LLG, 2022).

Emissions of GHGs also resulted from the consumption of fossil fuels to generate electricity and to provide heating and hot water to the Project Site. The Proposed Project electricity demands are supplied by SCE, which indicates their renewable power accounted for 31.4 percent in 2021 (SCE 2022).

GHG emissions from solid waste disposal are also calculated using CalEEMod. These emissions calculations are based on the approximate solid waste calculated for the Proposed Project and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment.

Emissions Summary

The Proposed Project's annual GHG emissions are shown in **Table 11**, *Annual Project Greenhouse Gas Emissions*.[10] As shown, the Proposed Project's total GHG emissions would be 2,256 $MTCO_2e$. GHG emission calculations are provided in Appendix G of this Draft IS/MND.

TABLE 11
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources	CO_2e (Metric Tons per Year)a
Area	<1
Energy (Electricity, Natural Gas)	218
Mobile	1,776
Waste	10
Water	58
Construction[b]	195
Project Total GHG Emissions	***2,256***

NOTES:

a Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix G of this IS/MND for details.

b Construction emissions are amortized over 30 years.

SOURCE: ESA 2022

The City of Inglewood General Plan does not identify specific GHG or climate change policies or goals. In the absence of any adopted, quantitative threshold, the Proposed Project would not have a significant effect on the environment if it were found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including CARB's 2017 Climate Scoping Plan, SCAG's 2020–2045 RTP/SCS, and the City's Energy and Climate Action Plan (ECAP).

The Inglewood Energy and Climate Action Plan (ECAP) presents the City's community and municipal inventories, emissions forecasts, and recommended reduction targets for emissions to mitigate the City's impacts on climate change. The City is in the process of implementing strategies to reduce energy consumption across sections, which includes increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste (City of Inglewood, 2013). Consistent with ECAP Strategy 2: Increase Energy Efficiency, while this strategy specifies making commercial buildings more efficient and increasing the energy efficiency of street and traffic lights and does not specifically apply to school uses, the Proposed Project involves improvements to the existing Morningside High School buildings which would increase energy efficiency, as well as utility improvements throughout the Project Site that would

[10] Project operational GHG emissions in Table 11 do not include subtracting emissions associated with the 12 existing classroom buildings to be demolished as part of the Proposed Project (Buildings I, J, K, V, W, W5, a service building, and five portable buildings). Therefore, operational emissions would be lower than those presented and the Project's operational air quality emissions are conservatively considered as new.

make the school more energy efficient. Therefore, the Proposed Project would be consistent with the applicable GHG reduction strategies in the City's ECAP.

As shown in **Table 11** above, the Proposed Project's highest GHG contributors are from mobile and energy sources. These are highly regulated sources with measures implemented in CARB's 2017 Climate Scoping Plan to reduce GHG emissions from each sector. With respect to relevant statewide GHG reduction strategies, in January 2007, the California Governor enacted Executive Order S-01-07, which mandates the following: (1) establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt a Low Carbon Fuel Standard (LCFS) for transportation fuels in California. The LCFS was amended in September 2018 to require a reduction of at least 7.5 percent in the carbon intensity of California's transportation fuels by 2020 and a 20 percent reduction in carbon intensity from a 2010 baseline by 2030 (CARB 2021b). The 2017 Climate Change Scoping Plan also calls for increasing the mandatory reduction in carbon intensity of transportation fuels from 10 percent to 18 percent by 2030.

CARB released the final 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022. The CARB Board voted to approve the 2022 Scoping Plan at its December 15-16, 2022 meeting. The 2022 Scoping Plan expands on prior Scoping Plans and responds to more recent legislation by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan's main strategy is to achieve carbon neutrality through the aggressive reduction of fossil fuels currently used in California. Specifically, the 2022 Scoping Plan builds on and accelerates carbon reduction programs that have been in place for a decade and a half, and includes rapidly increasing zero-emission transportation, and electrifying the cars, buses, trains, and trucks.

As previously stated, the RPS requires publicly owned utilities and retail sellers of electricity in California to procure 44 percent of their electricity sales from eligible renewable sources by 2024, 52 percent by the end of 2027, 60 percent by the end of 2030 and 100 percent by the end of 2045. SCE, the utility provider for the Project Site, reported 31.4 percent of their power from renewable sources (SCE 2022). Therefore, with SCE required compliance with the RPS, GHG emissions from electricity consumption on the Project Site would decrease in future years.

Additionally, SCAG Regional Council adopted the 2020–2045 RTP/SCS on September 3, 2020. The 2020–2045 RTP/SCS includes "more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand." The Proposed Project would not conflict with the 2020–2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. While the Proposed Project would result in additional trips from

expanded stadium capacity for recreational facilities, the Proposed Project would not increase student or staff capacity and involves circulation improvements include additional parking lots with EV charging stations, fire lanes, driveways and internal vehicular and pedestrian circulation paths allow for more efficient vehicular access.

Overall, the Proposed Project would not conflict with CARB's implementation of the LCFS or use of renewable energy sources, the City's ECAP, and it would not conflict with SCAG's 2020–2045 RTP/SCS. In addition, the Project would be consistent with the 2022 Scoping Plan as the Project would encourage zero-emission transportation by providing 25 EV charging stations. Therefore, the Proposed Project would not conflict with an applicable plan, policy, or regulation to reduce GHG emissions. As such, impacts would be less than significant.

References

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Hazards and Hazardous Materials

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

Discussion

Impacts associated with hazardous materials were identified based on review of existing literature and previous environmental documentation for the Project Site. In January 2019, Ellis Environmental Management, Inc. (Ellis) prepared a *Hazardous Materials Assessment* for Proposed Project provided in Appendix H of this Draft IS/MND. The assessment identified the known presence of asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mercury as recognized environmental conditions on the Project Site.

A high-pressure natural gas pipeline operated by Southern California Gas Company (SoCalGas) is located adjacent to the Project Site at 10500 Yukon Avenue South. A *Pipeline Risk Analysis* was prepared by Groundwater & Environmental Services, Inc. (GES) for the Project Site in May 2021. The Pipeline Risk Analysis is also provided in Appendix H.

a) **Less-Than-Significant with Mitigation Incorporated**.

Construction. Project construction would require the use of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. However, any hazardous materials used on site would be removed in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials.

As described in Chapter 2, *Project Description*, the Proposed Project includes the demolition of buildings and hardscape on both the Morningside High School campus and the d Woodworth Elementary School campus. The results of the *Hazardous Materials Assessment* (Appendix H) concluded there is asbestos-containing materials (ACMs) in tile, roofing mastics, thermal system insulation, transit pipes, window putty, and ceiling wallboard in various buildings throughout the Project Site. Lead was identified in interior walls and or windows, wall tiles, exterior walkway posts, and/or gutter drains. Lead and ACMs were found in Buildings K, J, and V proposed for demolition. Lead was also found in Building F proposed for demolition. Mercury was found in thermostats and no PCBs were identified. As Woodworth Elementary School was constructed within two years of Morningside High School, the conclusions of the *Hazardous Materials Assessment* apply to the buildings within this portion of the Project Site as well.

Based on the presence of hazardous materials on the Project Site, construction of the Proposed Project would require the transport of hazardous materials off-site in order to remove the demolition debris. Trucks used during construction for the transportation of hazardous materials would utilize the City's designated truck routes, which would use Yukon Avenue to connect to Century Boulevard to regional freeways for the transport of hazardous waste to appropriate disposal facilities. The U.S. Department of Transportation Office of Hazardous Materials Safety provides regulations for the safe transportation of hazardous materials (Code of Federal Regulations Titles 40, 42, 45, and 49 and implemented by California Code of Regulations Titles 17, 19, 22, and 27), and compliance with applicable regulations as well as oversight by the appropriate federal, state, and local agencies would minimize the risk of hazardous materials exposure during transport.

In addition, implementation of the recommendations in the *Hazardous Materials Assessment*, would reduce potential impacts related to the routine transport, use, and disposal of hazardous materials and any upset or accidental conditions through mitigation measure **MM-HAZ-1**. In accordance with the recommendations, disturbance of the hazardous materials identified on the site shall be performed by a licensed abatement contractor. Demolition of thermostats, light switches and light fixtures carefully and all hazardous materials shall be handled and disposed of at a landfill in compliance with applicable regulations. Compliance with existing Cal/OSHA lead and asbestos regulations would also be required. Furthermore, all on-site generated waste that meets hazardous waste criteria shall be stored, transported, and disposed of in accordance with the California Code of Regulations (Title 22) and in a satisfactory manner for the Los

Angeles County Fire Department (LACFD). Therefore, with implementation of mitigation measure **MM-HAZ-1** and compliance with federal, State, and local regulations for hazards materials, construction of the proposed improvements at the school campus would not result in significant impacts regarding use, transport, or disposal of hazardous materials and any potential upset or accident conditions.

Operation. Hazardous materials currently used on the Project Site are typical household cleaning chemicals and substances used for building and landscape maintenance. Operation of the proposed improvements to the existing Morningside High School campus including circulation improvements and new recreational facilities would not increase the quantity or require the use additional hazardous materials. Furthermore, the total number of buildings would decrease from existing conditions, reducing the total amount of cleaning chemicals utilized on the Project Site. In addition, the installation of synthetic turf fields for the proposed athletic facilities would reduce the amount of hazardous materials currently used for landscape maintenance. Therefore, operation of the Proposed Project would not result in a significant hazard to the environment through the use, transport, or disposal of hazardous materials and impacts would be less than significant.

Mitigation Measure

MM-HAZ-1. Hazardous Materials Assessment Recommendations. Prior to construction activities, the District shall retain a licensed abatement contractor to prepare an asbestos operations and maintenance program. Until asbestos-containing materials must be removed prior to renovation/demolition, all listed asbestos materials shall be effectively managed under the asbestos operations and maintenance program, designed to repair any damage and otherwise inspect and maintain ACMs in their original condition.

Prior to demolition or renovation of areas where asbestos is present, the District shall obtain a licensed abatement contractor to abate the ACMs. Similarly, disturbance of lead-based paints and ceramic tile, particularly those efforts involving manual demolition, mechanical abrasion, torching or cutting, shall be performed by a licensed abatement contractor. Demolition of thermostats, light switches and light fixtures shall be performed carefully and electronic components shall be disposed of separately from other demolition materials. All hazardous materials shall be disposed of at a landfill that accepts hazardous waste and the licensed abatement contractor shall provide a copy of the profile results to the accepting landfill.

b) **Less-Than-Significant with Mitigation Incorporated.** According to the State Water Resources Control Board GeoTracker database, the historical release of petroleum products from a leaking underground storage tank (LUST) at a Shell Service Station was located within a 0.25-mile radius of the Project site. However, this impacted soil only and the case was completed and closed by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 1998. The Phase I ESA did not identify underground storage tanks, aboveground storage tanks, radon, pits, ponds, lagoons, septic tanks, cesspools, wells, or cisterns. According to the *Limited Geotechnical Investigation Report* prepared for the Project, Morningside High School is located about ½ mile south of the Potrero

Oil/Gas Field and ½ mile west of the Howard Townsite Oil/Gas Field. The nearest dry hole is located approximately 1,000 feet north of the Project Site and the nearest idle hole is approximately ½ mile northwest of the Project Site. The nearest active well is located approximately 1.5 miles southeast of the Project Site. Based on the results of the subsurface exploration, no hazardous materials associated with oil fields are anticipated.

As described above, hazardous materials would be utilized during operation, similar to existing conditions. Hazardous waste would also be removed during construction due to demolition of buildings with hazardous materials. Therefore, due to the presence and removal of hazardous materials during construction activities, there is the potential for release of hazardous materials if accident conditions were to occur during demolition or transport to a proper disposal facility. However, if an accident were to occur, clean up would be conducted in accordance with state and federal regulations regarding hazardous materials, including regulations under the United States Environmental Protection Agency (USEPA), Cal/OSHA, and California Department of Toxic Substances Control (DTSC). Implementation of mitigation measure **MM-HAZ-1** would also reduce potentially significant impacts from accident conditions to a less than significant level with implementation of an operations and maintenance program for ACMs and the use of a licensed abatement contractor through construction.

In addition to the RECs identified on the Project Site, a high-pressure natural gas pipeline operated by SoCalGas is also located approximately 40 feet north of the Project Site's property line and approximately 90 feet from the nearest building on the Project Site. The risk assessment conducted by GES, Inc. (2020) concluded the pipeline is an insignificant risk and no limitations exist on new construction or modernization of existing facilities on the Project Site as a result of the pipeline. Therefore, impacts related to upset or accident conditions related to the pipeline would be less than significant.

c) **Less-Than-Significant with Mitigation Incorporated.** The Project Site itself is an existing high school campus and former elementary school campus and any hazardous materials used during Project construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. As detailed above in thresholds (a) and (b), the routine transport, use, or disposal of hazardous materials during construction on the Project Site (a school) would be conducted in accordance with the recommendations provided in the *Hazards Materials Assessment* prepared for the Proposed Project (mitigation measure **MM-HAZ-1**) and in compliance with all federal, State and local regulations regarding hazardous materials. Therefore, the handling of hazardous materials within one-quarter mile of a school site would be less than significant with implementation of mitigation measure **MM-HAZ-1**.

d) **Less-Than-Significant Impact.** Government Code Section 65962.5 requires the California EPA (Cal EPA) to develop an annually update the Hazardous Waste and Substances Sites (Cortese) List. A database search on Department of Toxic Substances EnviroStor was conducted and no listed cleanup sites were located within 1,000 feet of the Project Site. In 2006, a Phase I Environmental Site Assessment (ESA) was prepared

for a site investigation of Woodworth-Monroe TK-8 Academy (formerly Monroe Middle School), which is located directly east and south of the Project Site. According to the 2006 ESA, although there is the potential for fertilizers or pesticides to have been used on the site due to historic agricultural use, the DTSC suggests that even persistent pesticides will degrade over 50 years. The ESA also states the site vicinity shares the same agricultural history of the site and Morningside High School was also developed into a non-agricultural use more than 50 years ago with construction of the school completed in 1950. Woodworth Elementary School was also constructed more than 50 years ago in 1953. Therefore, the Project Site is not located on a Cortese List site resulting in a significant hazard to the environment, and impacts would be less than significant.

e) **Less-Than-Significant Impact.** The Project Site is located approximately 1 mile north of the Hawthorne Municipal Airport and approximately 2.5 miles east of the Los Angeles International Airport (LAX). The Project Site is not located within the Airport Influence Area for the Hawthorne Municipal Airport. However, the northwestern corner of the Project Site falls within the Airport Influence Area and 65 db CNEL noise exposure contour for LAX. According to the Los Angeles County Airport Land Use Plan, the Project Site would be compatible with the ALUP as educational facilities are considered satisfactory on the land use compatibility table within the exterior exposure noise contour range of 60-65 db CNEL (ALUP). In addition, Los Angeles World Airports invested over $60 million across two school districts, one of which was IUSD, for sound insulation treatments for classrooms, offices, and other noise-sensitives facilities at certain schools. The sound insulation improvements at Morningside High School were completed in 2020. Furthermore, the Proposed Project consists of improvements to the existing Morningside High School campus, including demolition of the existing classroom and recreational facilities and the construction of new recreational facilities, circulation improvements, and interior improvements. The maximum height of the proposed improvements would be 90 ft at the locations of the stadium lights. As the Project Site is not located within a runway protection zone, these lighting features would not represent an aerial hazard. In addition, the Project consists of the modification of an existing school and would not increase staff or students. Therefore, the Project would not expose additional people residing or working in the vicinity of the Project Site to any safety hazards or excessive noise levels within the vicinity of a private or public airport. Impacts related to safety hazards from nearby airports would be less than significant.

f) **Less-Than-Significant Impact.**

Construction. Construction and staging for the Proposed Project would also occur on-site and would not affect traffic operations on adjacent roadways. Construction activities may result in temporary lane closures and delays for curb and gutter improvements, but would not impede non-motorized travel or public transportation in the Project vicinity. During construction activities, heavy construction-related vehicles could interfere with emergency response to the Project Site (e.g., slowing vehicles traveling behind the truck). However, such delays would be infrequent and brief as drivers are required to pull over to allow an emergency vehicle on-call to pass. Furthermore, the construction specifications

would be reviewed and approved by DSA and would ensure that emergency vehicle access on area roadways would be maintained at all times. The Proposed Project may also require temporary sidewalk closures while repairs are performed on existing sidewalks and driveways along the perimeter of the Project Site. However, any delays would be temporary and not considered to be significant. Temporary traffic control during construction shall meet the requirements of the version of the California Manual on Uniform Traffic Control Devices (Caltrans 2014) that is effective at the time of construction. As a result, construction of the Proposed Project would not impair or physically interfere with an emergency response, and impacts would be less than significant.

Operation. The County of Los Angeles has an adopted Operational Area Emergency Response Plan (ERP, 1984) and an All-Hazard Mitigation Plan (AHMP, 2014). The ERP focuses on emergencies requiring multi-agency and/or multi-jurisdictional responses and the AHMP provides strategies, actions, and goals for reducing vulnerabilities to identified hazards and identifies facilities and equipment available for responses to disasters. The Project Site is located along West 104th Street and Yukon Avenue, neither of which are identified as evacuation routes according to the City General Plan. According to the Los Angeles County Department of Public Works Disaster Routes Maps for the City of Inglewood, Crenshaw Boulevard is the closest evacuation route. The Proposed Project includes demolition of a former elementary school, improvements to an existing high school campus and would not increase school capacity, resulting in additional staff or students. The Proposed Project would not result in roadway improvements or induced traffic that would physically interfere with this disaster route nor would it impair implementation of an evacuation plan. While additional vehicle trips are anticipated as a result of the additional stadium capacity, these trips would be associated with athletic events and would utilize Yukon Avenue to access the Project Site. Therefore, operation of the Proposed Project would have a less than significant impact.

The Proposed Project would not include any alterations of existing roadway features (e.g., road realignment) that would create a permanent change to access for emergency vehicles. After construction of the Project, emergency access would improve at the Project Site as a result of the proposed circulation improvements and additional parking lots on the proposed Morningside campus. As a result, the Proposed Project would not impair or physically interfere with an emergency response, and impacts would be less than significant.

g) **No Impact.** The Project Site is within a developed urbanized area that has not been identified as a wildland fire hazard area. According to the California Department of Forestry and Fire Protection's (CAL FIRE) Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Area Map, the Project Site is not located within a fire hazard severity zone (CAL FIRE 2011). Furthermore, all construction and operational activities, aside from off-site disposal of construction debris, would occur within the already developed school campus. Therefore, the Proposed Project would not expose

people or structures directly or indirectly to a significant risk of loss, injury, or death from wildfires, and no impact would occur.

References

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Hydrology and Water Quality

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

Discussion

The discussion of impacts related to hydrology and water quality provided below is based on a *Low Impact Development* (LID) Report prepared for the Proposed Project in July 2022 by BKF Engineers, which is provided in Appendix I of this Draft IS/MND.

a) **Less-Than-Significant Impact.** The Proposed Project includes improvements to the existing Morningside High School campus, including the demolition of buildings and hardscape and the construction of new athletic facilities, and demolition of the existing Woodworth Elementary School campus. Therefore, the proposed improvements would alter the existing pervious and impervious surfaces within the Project Site, which would may affect water quality during construction and operation, as described below.

Construction. During construction, exposed soil could temporarily increase the amount of sediment in runoff, which could enter the existing storm drain system. The Proposed Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management

practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Proposed Project would disturb more than 1 acre of soil, and therefore, would require the preparation of a Storm Water Pollution Prevention Plan (SWPPP) are part of the Construction General Permit requirements. Construction BMPs included in the SWPPP would include, but are not limited to, erosion control measures, sediment control measures, and hazardous materials, storage, disposal, and spill measures. Compliance under the Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the LARWQCB or other regulatory agencies.

Operation. As described above, the Proposed Project would demolish all buildings and hardscape within the 6-acre Woodworth Elementary School campus portion of the Project Site and would include the demolition of the tennis courts within the 17-acre portion of the existing Morningside High School campus. Therefore, impervious surfaces such as buildings and hardscape (i.e., tennis courts, asphalt parking areas, concrete walkways, etc.) within the 23-acres of the 54-acre Project Site would be removed by the Proposed Project and runoff and potential pollutants from onsite uses would be greatly reduced due to the decrease in impervious surfaces and removal of existing facilities. In addition, the Proposed Project would result in approximately 18.6 acres of impervious and 12.7 acres of pervious surfaces across the approximately 31-acre portion of the proposed Morningside High School campus. The LID Report prepared for the Proposed Project was prepared for operation of the 31-acre Morningside High School campus. Based on the results of the LID Report, 100 percent of stormwater runoff generated within this 31-acre portion of the Project Site (65,233 cubic feet) would be treated on site (see Appendix I).

The proposed drainage improvements and landscaping elements that would be installed throughout the proposed Morningside High School campus to ensure adequate site drainage is met. Runoff from the Project Site would be captured by storm drain inlets throughout the Project Site. The runoff would then drain into an underground storm drainpipe network that would route the runoff to proposed underground storm-capture infiltration vaults where the runoff would be retained on site. Two BMP storm capture vaults are proposed within Parking Lot D and two are proposed within the proposed athletic fields near the shotput and discus fields. As described in the LID Report, the design of the Project would also incorporate source control measures including signage for catch basins with open grates; landscape and irrigation practices to minimize water use and pest management; and building materials that minimize leached pollutants. Additional overflow would be discharged through an emergency outlet to the existing underground storm drain system southwest of the Project Site (see Appendix I). With the decrease in impervious surfaces across the entire Project Site and the operational drainage systems and BMPs proposed for Morningside High School, impacts related to surface water and groundwater quality would be less than significant.

b) **Less-Than-Significant Impact.** The Project Site is within an established urban community that is serviced by the City of Inglewood Public Works Department. The

Project does not propose to use groundwater. Additionally, all Project improvements would occur within the existing school campuses footprint. The Proposed Project would include approximately 12.7 acres of pervious surfaces and drainage improvements, such as underground storm-capture infiltration vaults, to ensure adequate site drainage is met and to avoid impacts to groundwater recharge. Therefore, the Proposed Project would not interfere with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of a basin. Therefore, a less than significant impact would occur related to a decrease in groundwater supplies or groundwater recharge.

c, i) **Less-Than-Significant Impact.** Construction of the Proposed Project would include ground disturbing activities that could temporarily alter the ground surface, consequently altering drainage patterns. Altered drainage patterns have the potential to result in erosion or sedimentation on or off site by redirecting or concentrating flows on-site. However, as described above in threshold10 (a), the Proposed Project would be required to comply with the Construction General Permit and a SWPPP. BMPs would be implemented to minimize sedimentation at the Project Site during construction activities. Drainage within the Project Site during operations would be serviced by the proposed underground storm-capture infiltration vaults and existing storm drain system. Additionally, no stream or river courses exist within the Site vicinity that could be affected by the Proposed Project. Therefore, impacts on the existing drainage pattern regarding siltation or erosion on- or off-site would be less than significant.

c, ii) **Less-Than-Significant Impact.** As previously discussed above, construction of the Proposed Project would temporarily alter the ground surface during construction demolition and grading, consequently altering the drainage pattern. Altered drainage patterns have the potential to result in increased runoff, which could result in flooding on or off site. However, as described above in threshold 10 (a), the Proposed Project would be required to comply with the Construction General Permit and a SWPPP. BMPs would be implemented to minimize runoff at the Project Site during construction, which in turn would minimize flooding. After the completion of construction, the ground surface across the Project Site would be similar to existing conditions. The existing Project Site has an average slope of 2.0% draining in the southwesterly direction. The majority of the existing drainage is captured within landscape and hardscape area drains and piped into an underground storm drain system. The northwest corner, that includes a parking lot and bus parking lot, surface drains off-site to Yukon Ave, and then south to an underground storm drain system. As described in the LID Report, the Proposed Project is considered a "Designated Project" based on the LID Manual and 100% of the storm water quality design volume (SWQDv) must be retained on-site. Drainage within the Proposed Project Site would be retained by the proposed underground storm-capture infiltration vaults and existing storm drain system. Furthermore, drainage improvements and landscaping elements would be installed throughout the Project Site to ensure adequate site drainage is met and that runoff drains away from the new structures and athletic fields. Therefore, impacts on the existing drainage pattern regarding runoff in a manner that would result in flooding on- or off-site would be less than significant.

c, iii) **Less-Than-Significant Impact.** See discussion under threshold 10 (c)(i) and (ii), above. Construction of the Proposed Project would not result in significant impacts on the existing drainage pattern due to implementation of construction BMPs that would minimize flooding and runoff. As noted above, drainage improvements and landscaping elements would be installed throughout the Project Site to ensure adequate site drainage is met and that runoff drains away from the new structures and athletic fields. The Project will retain 100% of the SWQDv Site would be retained on-site and serviced by the proposed underground storm-capture infiltration vaults and existing storm drain system. Therefore, impacts related to runoff exceeding the drainage system capacity would be less than significant.

c, iv) **No Impact.** The Project Site is not within a 100-year flood hazard area, as mapped on Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FEMA 2021). Therefore, the Proposed Project would not impede or redirect flows, and there would be no impact.

d) **No Impact.** The Project Site is located approximately 6 miles east of the Pacific Ocean. According to the California Geological Survey's Tsunami Hazard Area Map, the Project Site is not in an affected Quadrangle (CGS 2021). In addition, the Project Site is not located near a body of water, and therefore not at risk by seiche. As previously discussed, the Project Site is not within a 100-year flood hazard area, as mapped on FEMA's Flood Insurance Rate Map (FEMA 2021). As a result, there would be no impact regarding risks from seiche, tsunami, or flood hazards that would risk or release pollutants due to inundation.

e) **Less-Than-Significant Impact.** Project construction would require a maximum excavation depth of 10.5 feet; however, the Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle, Los Angeles County CA, Seismic Hazard Zone Report 029 (Department of Conservation, Division of Mines and Geology) indicates that the historic high groundwater is at least 50 feet below ground surface and no impacts to groundwater quality are anticipated (see Appendix I). Similar to existing conditions, the Proposed Project would not require the use of groundwater. The proposed infiltration system described in threshold 10(a) would ensure infiltration rates for stormwater and drainage onsite infiltrate sufficiently and are treated properly. As a result, impacts related to surface water or groundwater quality would be less than significant, and the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

References

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Federal Emergency Management Agency (FEMA). 2021. Flood Insurance Rate Map. Available at https://msc.fema.gov/portal/home. Accessed July 5, 2022.

Land Use and Land Use Planning

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
11. LAND USE AND LAND USE PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Proposed Project would occur within the existing boundaries of the school campuses. Therefore, implementation of the Proposed Project would not physically divide an established community, and no impact would occur.

b) **No Impact.** The Proposed Project is consistent with the City's General Plan land use designation (Low-Density Residential). By state law, school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094. Additionally, the Proposed Project would not result in any changes to the existing land use at the Project Site, as operations would be consistent to that of the existing campus. No habitat conservation plans or natural community conservation plans are in place or applicable to the Project Site or vicinity. No components of the Proposed Project would have the potential to conflict with adjacent land uses, and therefore, no impacts would occur.

Mineral Resources

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

Discussion

a, b) **No Impact.** The Project Site is not located in Mineral Resource Zone (MRZ) 2, which is defined as a MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled (DOC 2010). The Proposed Project involves demolition of a former school and improvements of an existing school site; no mineral extraction or other mining operations currently occur within the Project Site. The Proposed Project would not result in the loss of availability of known mineral resource that would be of value to the region and the residents of the state, or result in the loss of a mineral resource recovery site. Therefore, there would be no impact related to mineral resources.

References

California Department of Conservation (DOC). 2010. CGS Information Warehouse Mineral Land Classification Portal, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/. Accessed July 7, 2022.

Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
13. 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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Discussion

a) **Less-Than-Significant with Mitigation Incorporated.** Project construction would generate noise from the daytime operation of construction equipment on the Project Site and from haul truck trips on local roadways accessing and departing the Project Site. Project construction activities would be subject to the City's Municipal Code Article 2. Noise Regulations, which limits noise-generating construction activity to between the hours of 7:00 a.m. and 8:00 p.m. (Section 5-41. Construction of Building and Projects, Noise Regulated).

The Project Site is located within a residential neighborhood, with residences along the streets that surround the Project Site (Yukon Avenue to the north, W 108th Street to the south, W 104th Street to the north and Monroe Middle School and S 10th Street to the east). Operation of school facilities (both existing facilities and those proposed by the Proposed Project) place students within the Project Site, when school is in session. The adjacent offsite residences, Woodworth-Monroe TK-8 Academy, as well as the school itself, are considered sensitive noise receptors for the purposes of this noise analysis.

Operational noise within the City is governed by the City's Municipal Code Article 2, Section 5-27, which establishes the base ambient noise levels at the property boundaries for different land use zones, as summarized in **Table 12**, *City of Inglewood Base Ambient Noise Levels*.

TABLE 12
CITY OF INGLEWOOD BASE AMBIENT NOISE LEVELS

Receiving Land Use	Daytime 7 a.m.–7 p.m. (dBA L_{eq})	Evening 7 p.m.–10 p.m. (dBA L_{eq})	Nighttime 10 p.m.–7 a.m. (dBA L_{eq})
All residential	55	45	45
Commercial and uses not specified	65	65	65
Industrial	75	75	75

NOTES: dBA = A-weighted sound level, the sound pressure level in decibels as measured using the A weighting filter network, which de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear.

The operational noise level limits identified in **Table 12** refer to the base ambient noise levels (BANL). Measured on the exterior of any residential property, no noise level shall exceed the following for the duration period specified:

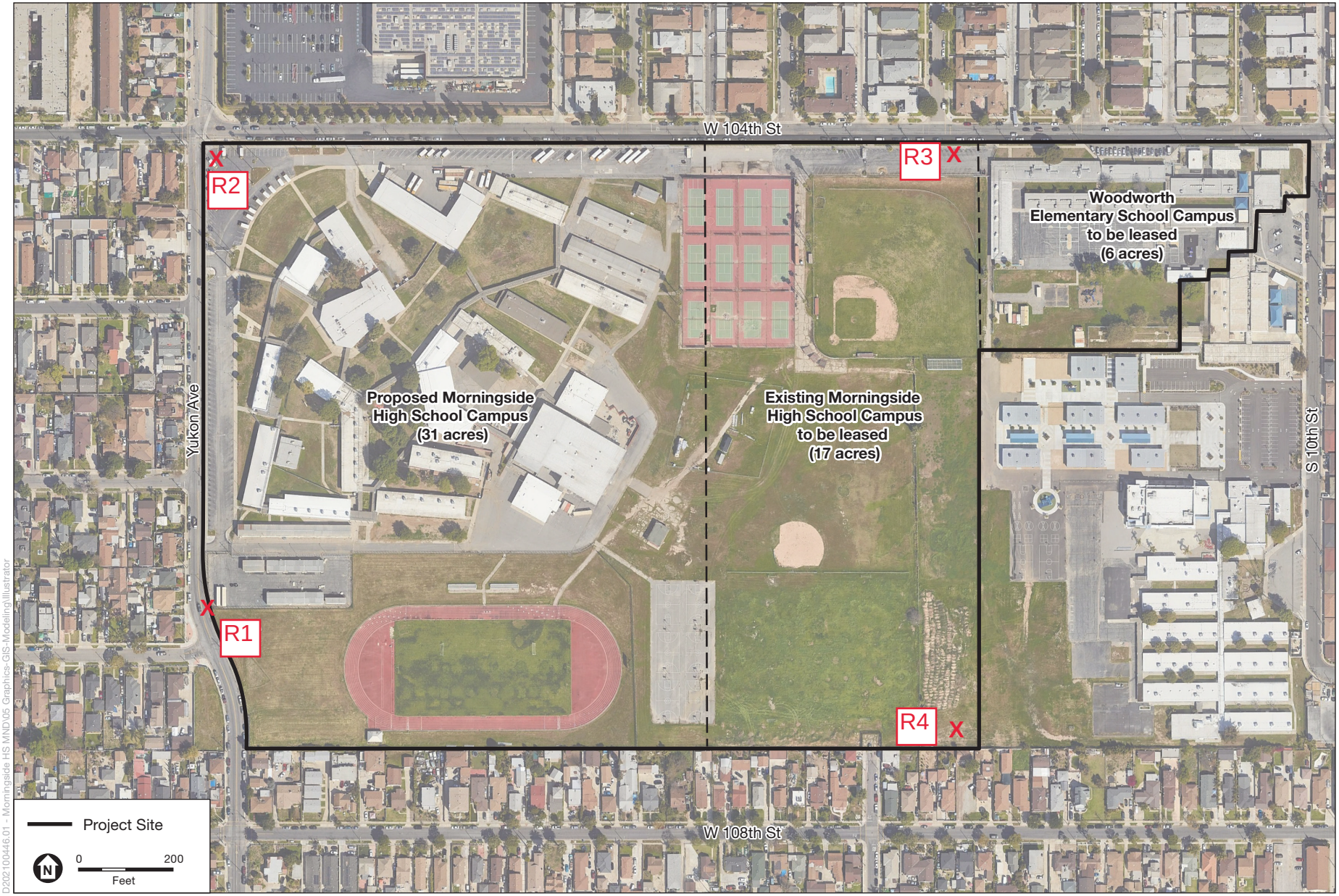
- Events lasting more than 30 minutes in any hour: BANL
- Events lasting more than 15 minutes but less than 30 minutes: 5 dBA above BANL
- Events lasting more than 5 minutes but less than 15 minutes: 10 dBA above BANL
- Events lasting more than 1 minute but less than 5 minutes: 15 dBA above BANL
- Not permitted: 20 dBA above BANL

Existing Conditions

To characterize the existing ambient noise levels at the nearest residences surrounding the Project Site, recent ambient noise measurements conducted by ESA were utilized for the Proposed Project.

Ambient Noise Measurement

To establish ambient noise levels in the vicinity of the Project Site, four short-term noise measurements (R1, R2, R3, and R4) were taken. The ambient noise measurements were taken on August 19th, 2021, using an ANSI-approved Type 1 sound level meter (Larson Davis Soundtrack LxT1) and recorded the average (L_{eq}) noise level over the given time period. **Table 13**, *Ambient Noise Measurement Summary*, shows the results of the noise monitoring and **Figure 6 (Noise Measurement Locations)** shows the exact location of the ambient noise measurement.



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SOURCE: ESA, 2022; Google Earth, 2022

Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project

Figure 6
Noise Measurement Locations

ESA

TABLE 13
AMBIENT NOISE MEASUREMENT SUMMARY

Measurement Location	Receptor	Average Noise Level (dBA L_{eq})
Southwest of the Project Site at the existing Parking Lot D (Residences on the west side of Yukon Avenue)	R1	63.8
Northwest of the Project Site at the corner of Yukon Avenue and W 104th Street (Residences on the west side of Yukon Avenue)	R2	68.1
Northeast of the Project Site near existing baseball field, along W 104th Street (Residences on the north side of W 104th Street)	R3	67.1
Southeast of the Project Site north of W 108th Street (Residences on the north side of W 108th Street)	R4	59.6

[a] Detailed measured noise data, including hourly L_{eq} levels, are provided in Appendix XX of this IS/MND.
SOURCE: ESA, 2022.

Construction. Project construction would generate noise primarily within the Project Site and to a lesser extent on adjacent roadways and surrounding uses. Construction workers would commute daily to the Project Site, and trucks transporting equipment and materials to the Project Site would incrementally add minimal traffic to the existing traffic volume on roadways on weekday mornings and afternoons. This would result in a negligible increase in noise levels on access roads to the Project Site during this commute period, as traffic volumes would have to double to result in a 3 dBA increase, which would be barely perceptible. However, the equipment and materials delivery by trucks would generate a relatively higher peak noise level on roadways during site access than commute traffic, which could cause an intermittent short-term noise nuisance (e.g., passing trucks at 50 feet would generate up to 76 dBA L_{max}).

However, the Proposed Project's contribution of construction traffic noise to existing roadway traffic noise levels, when averaged over a 24-hour period (i.e., Community Noise Equivalent Level [CNEL]), would be low due to the infrequent traffic volume. Therefore, short-term construction-related impacts associated with commuting workers and transporting equipment to the Project Site would be less than significant.

Project construction would generate noise from the use of heavy construction equipment required for demolition, site preparation, grading, building construction, paving, landscaping, and finishing activities. Based on the anticipated types and quantities of equipment needed for each construction activity, **Table 14**, *Predicted Construction Noise Levels at Nearby Sensitive-Receivers*, presents the hourly average construction phase noise levels (dBA L_{eq}) attenuated by closest distance (40 feet) from the construction phase activity to the nearby noise-sensitive receivers (i.e., the off-site residences along the streets surrounding the Project Site, and the on-site students in buildings and recess areas).

TABLE 14
PREDICTED CONSTRUCTION NOISE LEVELS AT NEARBY SENSITIVE-RECEIVERS

Sensitive Receptor	Construction Phase	Distance from Project Property Line or Existing School Building (feet)	Estimated Construction Noise Level (Leq, dBA)
R1	Demolition	40 feet	85
	Site Preparation		83
	Grading		81
	Building Construction		75
	Paving		84
	Architectural Coating		76
	Building Construction + Architectural Coating + Paving		85
	Maximum Noise Level		**85**
R2	Demolition	60 feet	81
	Site Preparation		80
	Grading		78
	Building Construction		72
	Paving		80
	Architectural Coating		72
	Building Construction + Architectural Coating + Paving		82
	Maximum Noise Level		**82**
R3	Demolition	60 feet	81
	Site Preparation		80
	Grading		78
	Building Construction		72
	Paving		80
	Architectural Coating		72
	Building Construction + Architectural Coating + Paving		82
	Maximum Noise Level		**82**
R4	Demolition	40 feet	85
	Site Preparation		83
	Grading		81
	Building Construction		75
	Paving		84
	Architectural Coating		76
	Building Construction + Architectural Coating + Paving		85
	Maximum Noise Level		**85**

SOURCE: ESA 2022

As shown in **Table 14**, the estimated construction noise levels at the closest residential property line range from 72 to 85 dBA L_{eq}, depending upon each construction phase and its construction activities. Maximum construction noise levels during overlapping phases would range from 82 to 85 dBA L_{eq} at these off-site sensitive receptors.

In order to reduce impacts, the Proposed Project would be required to implement mitigation measure **MM-NOI-1**, which would include noise reduction measures such as equipping construction equipment with properly operating and maintained muffler exhaust systems, locating noise equipment as far as possible from noise sensitive receptors, and implementing temporary noise barriers at construction noise sources. Implementation of mitigation measure **MM-NOI-1** would reduce construction noise levels at the receptors by up to 20 dBA L_{eq}. Therefore, the estimated construction noise levels of approximately 72 to 85 dBA L_{eq} at residences would be reduced to approximately 52 to 65 dBA L_{eq}. This range of construction noise levels would not exceed the clearly perceptible noise level increase threshold of 5 dBA. Therefore, noise impacts to residences would be less than significant.

In addition to off-site residential receptors, on-site structures at Morningside High School and Woodworth-Monroe TK-8 Academy were analyzed. Construction activities would not be limited to times when school is out of session, and noise from construction could affect on-site students and faculty. Woodworth-Monroe TK-8 Academy, which is immediately adjacent to the existing Woodworth Elementary School campus, and school classroom buildings on-site at Morningside High School would be as close as approximately 25 feet to Project construction activities, therefore, the construction noise would experience approximately 4 dBA higher noise levels than the off-site residential properties.[11] Project construction activities would determine when and where the construction activities would occur on-site, and whether school would be in or out of session. The active construction area would be isolated at distance from active classrooms. However, implementation of mitigation measure **MM-NOI-1** would implement temporary noise barriers between the noise source and classroom and install muffling devices on heavy duty equipment, which would reduce construction noise levels by up to 20 dBA to occupied classrooms (where students are studying), resulting in a less than significant impact.

Operation. Impacts from operation of the Proposed Project may occur from off-site traffic as well as on-site operations. Each type of operational noise impact is discussed in detail below.

Off-Site Traffic Noise

Vehicle trips attributed to operation of the Proposed Project would increase peak hour traffic volumes along the major thoroughfares within the Proposed Project vicinity, which was analyzed to determine if any traffic-related noise impacts would result from Project development. Typically, a doubling of traffic volumes increases the hourly equivalent

[11] Assumes off-site receptors are at a distance of 40 feet and accounts for distance attenuation of noise from 40 feet to 25 feet.

sound level by approximately 3 dBA (FHWA 2018). The Proposed Project would not double existing daily trips along roads leading to the Project Site and traffic noise from the Proposed Project would generate less than a 3 dBA increase. Therefore, operation of the Proposed Project would not result in a substantial increase in Project-related traffic noise levels over existing traffic noise levels in the Proposed Project vicinity. As a result, Project-related operational traffic noise impacts would be less than significant.

To predict the noise level increase due to vehicular traffic, the Federal Highway Administration's Traffic Noise Model (TNM), Version 2.5, was used to predict vehicular traffic noise levels at off-site noise-sensitive receivers based on peak hour trip rates and trip distribution from the traffic study. The estimated noise contribution from Project trips was then compared to existing noise levels. The Proposed Project noise contribution, existing noise levels, and estimated combined noise levels are shown in **Table 15**, *Predicted Existing Traffic Noise Levels*.

TABLE 15
PREDICTED EXISTING TRAFFIC NOISE LEVELS

Roadway Segment	Existing Traffic Noise (CNEL, dBA)	Existing with Project Traffic Noise Level (CNEL, dBA)	Existing with Project Increase over Existing Noise Level	Significant?
104th St between Dixon Ave and Woodworth Ave	64.2	65.0	0.8	No
104th St between Woodworth Ave and Crenshaw Blvd	65.4	65.7	0.3	No
104th St between Yukon Ave and Dixon Ave	65.9	66.2	0.3	No
104th St e/o Crenshaw Blvd	63.2	63.6	0.4	No
104th St w/o Yukon Ave	66.8	67.5	0.7	No
108th St between Lemoli Ave and Crenshaw Blvd	58.3	59.7	1.3	No
108th St between Yukon Ave and Lemoli Ave	60.4	61.7	1.3	No
108th St e/o Crenshaw Blvd	69.1	69.4	0.3	No
108th St w/o Crenshaw Blvd	54.4	54.4	0.0	No
108th St w/o Yukon Ave	61.6	62.5	0.9	No
Century Blvd e/o Yukon Ave	73.1	73.1	0.0	No
Century Blvd w/o Yukon Ave	73.3	73.3	0.1	No
Crenshaw Blvd between 104th St and 108th St	69.5	69.5	0.0	No
Crenshaw Blvd n/o 104th St	72.5	72.7	0.2	No
Crenshaw Blvd s/o 108th St	72.9	73.0	0.1	No
Dixon Ave n/o 104th St	57.0	57.0	0.0	No
Lemoli Ave n/o 108th St	48.1	48.1	0.0	No
Lemoli Ave s/o 108th St	57.8	57.8	0.0	No

Roadway Segment	Existing Traffic Noise (CNEL, dBA)	Existing with Project Traffic Noise Level (CNEL, dBA)	Existing with Project Increase over Existing Noise Level	Significant?
Woodworth Ave n/o 104th St	57.9	57.9	0.0	No
Yukon Ave between 104th St and 108th St	67.8	67.8	0.0	No
Yukon Ave between Century Blvd and 104th St	68.7	68.9	0.2	No
Yukon Ave n/o Century Blvd	56.8	56.8	0.0	No
Yukon Ave s/o 108th St	65.6	65.6	0.0	No

SOURCE: ESA 2022

n/o = north of; s/o = south of; e/o = east of; w/o = west of

As shown in **Table 15**, the predicted Project-related traffic noise level increase over existing baseline noise levels along the analyzed roadways by up to 1.3 dBA. A change of less than 1 dBA in sound levels generally cannot be perceived by the human ear and an increase of 3 dBA would be barely perceivable (Caltrans 2020). As the increase in traffic noise levels generated by the Proposed Project would not exceed the 3 dBA threshold (barely perceivable by the human ear), the Proposed Project's traffic noise impact would be less than significant.

Table 16, *Predicted Future Traffic Noise Levels*, lists the future traffic noise levels and future with Project traffic noise levels. As shown in **Table 16**, the predicted Project-related traffic noise level increase over future baseline noise levels along the analyzed roadways by up to 1.3 dBA. A change of less than 1 dBA in sound levels generally cannot be perceived by the human ear and an increase of 3 dBA would be barely perceivable (Caltrans 2020). As the increase in traffic noise levels generated by the Proposed Project under future conditions would not exceed the 3 dBA threshold (barely perceivable by the human ear), the Proposed Project's future traffic noise impact would be less than significant.

TABLE 16
PREDICTED FUTURE TRAFFIC NOISE LEVELS

Roadway Segment	Future Traffic Noise Level (CNEL, dBA)	Future with Project Traffic Noise Level (CNEL, dBA)	Future with Project Increase over Future Noise Level	Significant?
104th St between Dixon Ave and Woodworth Ave	64.5	65.3	0.8	No
104th St between Woodworth Ave and Crenshaw Blvd	65.1	65.9	0.8	No
104th St between Yukon Ave and Dixon Ave	65.8	66.5	0.7	No

Roadway Segment	Future Traffic Noise Level (CNEL, dBA)	Future with Project Traffic Noise Level (CNEL, dBA)	Future with Project Increase over Future Noise Level	Significant?
104th St e/o Crenshaw Blvd	63.3	63.7	0.4	No
104th St w/o Yukon Ave	67.2	67.8	0.6	No
108th St between Lemoli Ave and Crenshaw Blvd	58.4	59.7	1.3	No
108th St between Yukon Ave and Lemoli Ave	60.5	61.8	1.3	No
108th St e/o Crenshaw Blvd	69.2	69.5	0.2	No
108th St w/o Crenshaw Blvd	53.4	53.4	0.0	No
108th St w/o Yukon Ave	61.7	62.6	0.9	No
Century Blvd e/o Yukon Ave	74.2	74.2	0.0	No
Century Blvd w/o Yukon Ave	74.3	74.4	0.0	No
Crenshaw Blvd between 104th St and 108th St	70.0	70.0	0.0	No
Crenshaw Blvd n/o 104th St	73.1	73.2	0.2	No
Crenshaw Blvd s/o 108th St	73.4	73.5	0.1	No
Dixon Ave n/o 104th St	57.0	57.0	0.0	No
Lemoli Ave n/o 108th St	48.1	48.1	0.0	No
Lemoli Ave s/o 108th St	56.9	56.9	0.0	No
Woodworth Ave n/o 104th St	58.0	58.0	0.0	No
Yukon Ave between 104th St and 108th St	67.0	67.8	0.8	No
Yukon Ave between Century Blvd and 104th St	68.9	69.0	0.2	No
Yukon Ave n/o Century Blvd	56.8	56.8	0.0	No
Yukon Ave s/o 108th St	65.0	65.3	0.3	No

SOURCE: ESA 2022

n/o = north of; s/o = south of; e/o = east of; w/o = west of

On-Site Operational Noise

Stationary Equipment

Operation of the Proposed Project would include on-site stationary noise sources, including HVAC units on the new building and modernized buildings. The operation of HVAC equipment would be the primary operational noise source on-site associated with the proposed modernization improvements. Noise levels from HVAC equipment vary significantly depending on unit efficiency, size, and location but generally average from 45 dBA to 70 dBA L_{eq} at 3 feet (USEPA 1971). However, HVAC noise levels are typically attenuated by design, baffling, enclosures, barriers and distance. The City of Inglewood Noise Ordinance prohibits the average sound level from exceeding the applicable limits at any location in the City of Inglewood on or beyond the boundaries of

the property on which the noise is produced. However, the Proposed Project would comply with the City Noise Ordinance by designing and locating HVAC units to provide sufficient baffling, barriers, and distance such that the noise level from HVAC units and generators would be less than 45 dBA L_{eq} at the property line. Therefore, impacts would be less than significant related to operation of stationary noise sources.

Athletic Field Noise

The Proposed Project would include the construction a new track and synthetic turf football/soccer field and would expand the bleacher seating from 600 seats to 1,515 seats. A new public announcement (PA) system would be installed around the football/soccer and track field. The PA system would be designed to be within the allowable noise levels per Inglewood Municipal Code Sections 5-27 and 5-30. The intent for the PA system for the field is for proper audibility by the students, staff and observing guests but with the limitation of not disrupting the surrounding residences more than permitted (Vantage Technology Consulting Group 2021). Stadium noise was analyzed using a set of assumptions intended to capture noise levels during a sporting event for both the existing field and the new field. Field noise was calculated based on noise from people cheering in the bleachers. Noise from female adults, male adults, and children talking loudly is approximately 71 dBA, 76 dBA, and 74 dBA, respectively, at a distance of 3 feet (American Journal of Audiology 1998). As a conservative analysis, it is assumed that 75 percent of the crowd (450 people existing versus 1,136 people proposed) would be cheering simultaneously, and that half of the visitors would be adults and half would be children. Noise levels from the new field are compared to the existing field noise levels using a threshold of baseline (existing field noise) plus 5 dBA. Field noise would be intermittent and short in duration. The noise levels calculated represent maximum noise levels during short periods of crowd cheering as analyzed at the closest sensitive receptor location (R4), approximately 40 feet from the proposed football/soccer field. All other sensitive receptors are further away from this field and would experience lower noise levels than analyzed herein. **Table 17**, *Athletic Field Noise*, shows the approximate noise levels from the existing field and the new field as compared to the operational noise threshold of baseline plus 5 dBA. As shown in **Table 17**, the new field would not result in an exceedance of the threshold and impacts would be less than significant.

TABLE 17
ATHLETIC FIELD NOISE

Noise Source	Estimated Noise Level (dBA L_{eq})
Proposed Project Field	77.7
Existing Field	73.5
Threshold (Baseline + 5 dBA)	78.5
Difference	0.8
Exceeds Threshold?	No

SOURCE: ESA 2022

The Proposed Project would include the construction a softball field and would include 186 seats. A new public announcement (PA) system would be installed around the softball field. The PA system would be designed to be within the allowable noise levels per Inglewood Municipal Code Sections 5-27 and 5-30. The intent for the PA system for the field is for proper audibility by the students, staff and observing guests but with the limitation of not disrupting the surrounding residences more than permitted (Vantage Technology Consulting Group 2021). Noise from the softball field was analyzed using the same set of assumptions as described for the athletic field and the resulting noise level is compared to the ambient noise level at R4 (the closest sensitive receptor) plus 5 dBA. **Table 18**, *Softball Field Noise*, shows the approximate noise levels from the softball field as compared to the operational noise threshold of ambient noise levels plus 5 dBA. As shown in **Table 18**, the softball field would not result in an exceedance of the threshold and impacts would be less than significant.

TABLE 18
SOFTBALL FIELD NOISE

Noise Source	Estimated Noise Level (dBA L_{eq})
Proposed Softball Field	54.0
Ambient Noise Level at R4	59.6
Threshold (Baseline + 5 dBA)	64.6
Difference	-10.6
Exceeds Threshold?	No

SOURCE: ESA 2022

Mitigation Measure

MM-NOI-1: Construction Noise. The following construction equipment techniques shall be implemented by the construction contractor to reduce construction-related noise at nearby noise-sensitive receivers:

a. Construction contractor(s) shall ensure proper maintenance and working order of construction equipment and vehicles, and all construction equipment shall be equipped with manufacturers-approved mufflers and baffles.

b. Construction contractor(s) shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), when feasible. Noisy equipment shall be switched off when not in use.

c. Construction activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels, to the extent feasible.

d. The construction contractor(s) shall place all stationary construction equipment so that emitted noise is directed away from sensitive receivers nearest the Project Site.

e. Temporary noise barriers or noise blankets shall be placed to block the line-of-sight between construction equipment operation and the offsite noise-sensitive receivers including the adjacent residences (backyards) to the east at Woodworth-

Monroe TK-8 Academy, IUSD-Child Development Center, and Woodworth Imagine Learning Magnet, residences to the north along W. 104th Street, to the south along W. 108th Street (backyards), and to the west across Yukon Avenue S, respectively, during Project construction. Temporary noise barriers or noise blankets shall be installed on temporary construction fencing and must be capable of achieving sound level reductions of at least 15 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers.

f. Construction contractor(s) shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' specifications. The construction contractor(s) shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor(s) shall use muffler systems that provide a minimum reduction of 5 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor(s) shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

g. Construction contractor(s) shall ensure that all heavy-duty construction equipment, fixed or mobile, are set back at least 50 feet from receptors adjacent to the south of the Project Site. The construction contractor(s) shall designate an officer to ensure that the setback distance is enforced and monitored. The contractor(s) shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

b) **Less-Than–Significant with Mitigation Incorporated.** During Project construction, the operation of typical heavy construction equipment for demolition of buildings and pavement, earth-moving activities (excavation and grading), construction of new buildings and parking lot, modernization of buildings, and site improvements would generate localized vibration levels, which, depending upon distance, could potentially affect structures and/or annoy people. Heavy impact machinery, such as pile drivers, that could result in excessive vibration conditions, would not be used.

Construction vibration analyses are typically conducted for potential structural damage to buildings, and annoyance to humans in inhabited structures. The closest structures to the construction activities on the Project Site would be the existing portable classrooms within 25 feet of the existing school buildings (classrooms, library, cafeteria, administration) that are adjacent to various other existing school buildings. The closest off-site structures would be residential structures approximately 40 feet from the Project Site property line to the south along W 108th Street, all other off-site receptors are located further away and would be exposed to substantially less vibration levels.

Construction vibration would have a significant impact if:

- Project construction activities cause groundborne vibration levels to exceed the building damage threshold of 0.2 inches per second (in/sec) peak particle velocity

(PPV) for Building Category III Non-engineered timber and masonry buildings (FTA 2018), or 0.3 in/sec PPV structural damage threshold for Building Category II engineered concrete and masonry (no plaster) buildings (FTA 2018); and

- Project construction activities cause groundborne vibration levels to exceed the human annoyance threshold of 80 VdB at Land Use Category 2 – Residences, and 83 VdB at Land Use Category 3 – Institutional, primarily day use (FTA 2018).

The vibration levels generated by the operation of the heavy-duty construction equipment during the construction of the Proposed Project are identified in **Table 19**, *Vibration Source Levels for Construction Equipment*, in terms of PPV, expressed in/sec, and root mean square (RMS) velocity, expressed in VdB. As shown in **Table 19**, depending on the type of construction equipment used, vibration velocities could reach as high as approximately 0.210 in/sec PPV at 25 feet from the source (e.g., vibratory roller), which corresponds to a RMS velocity level of 94 VdB at 25 feet from the source. As shown in **Table 19**, operation of heavy equipment generates vibration levels less than the building damage threshold of 0.2 in/sec PPV.

TABLE 19
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate PPV (in/sec) at 40 feet	Approximate RMS (VdB) at 40 feet
Vibratory Roller	0.210	0.104	88
Large Bulldozer	0.089	0.044	81
Loaded Trucks	0.076	0.038	80
Jackhammer	0.035	0.017	73
Small Bulldozer	0.003	0.001	51

SOURCE: FTA 2018.

Structural Damage Analysis

The off-site structures closest to the Project Site boundary (residences to the south) are conservatively considered as non-engineered timber and masonry building, located approximately 40 feet from the boundary. Operation of heavy equipment within 40 feet would not exceed the 0.2 in/sec PPV structural damage threshold. Therefore, the vibration impact to residential structures from Project construction would be less than significant.

In addition to off-site receptors, on-site structures at Morningside High School and structures at the adjacent Woodworth-Monroe TK-8 Academy were analyzed. The existing structures located at Woodworth Monroe TK-8 Academy and on-site (classrooms, administration buildings, etc.) would be located approximately 25 feet from operating construction equipment during construction of the new classroom buildings and outdoor gathering area, as well as modernization improvements to existing buildings. Operation of a vibratory roller within 25 feet would potentially exceed the 0.2 in/sec PPV

structural damage threshold for Building Category III Non-engineered timber and masonry buildings (FTA 2018). Therefore, the vibration structural damage impact to on-site structures and to Woodworth-Monroe TK-8 Academy from Project construction would be potentially significant, and mitigation measure **MM-NOI-2** would be required to be implemented, as detailed further below. With implementation of mitigation measure **MM-NOI-2**, site-specific vibration studies would be conducted to ensure construction techniques are implemented in a manner that would not exceed 0.2 in/sec, specifically to avoid the use of vibratory rollers within 25 feet of existing buildings.

Human Annoyance Analysis

Construction vibration could annoy people within nearby buildings. The vibration impact threshold for human annoyance at a residential structure is 80 VdB at Land Use Category 2 – Residences, infrequent use and 83 VdB at Land Use Category 3 – Institutional, infrequent use (FTA 2018). As shown in **Table 19**, at 40 feet, the vibration generated by the operation of a vibratory roller (88 VdB), a large bulldozer (81 VdB), or a loaded haul truck (80 VdB) would exceed the residential human annoyance threshold of 80 VdB. Therefore, the operation of this equipment on-site along the Project Site boundary would exceed the vibration threshold of human annoyance at the off-site inhabited residences approximately 40 feet away and at Woodworth-Monroe TK-8 Academy and on-site students at Morningside High School approximately 25 feet away resulting in a potentially significant impact. At 80 feet, operation of the vibratory roller, large bulldozer, and loaded haul truck would not exceed the human annoyance threshold of 80 VdB. With implementation of mitigation measure **MM-NOI-2**, vibration-generating monitoring would be required, and the construction contractor(s) would be required to identify vibration-intensive equipment and limit the use of the identified equipment near sensitive receptors, to avoid utilizing construction equipment that would exceed the human annoyance threshold and schedule vibration generating activities when receptors are not present.

With implementation of mitigation measure **MM-NOI-2**, impacts would be reduced to less than significant. Therefore, the Proposed Project would not result in construction vibration-related structural damage and human annoyance impacts.

Mitigation Measure

MM-NOI-2: Construction Vibration. The following construction equipment techniques shall be implemented by the construction contractor to reduce construction-related vibration at nearby noise-sensitive receivers. The construction contractor(s) shall review all construction activity for potential vibration-generating activities from demolition, paving, and construction within 80 feet of existing inhabited buildings, and shall require site-specific vibration studies to be conducted to determine the area of impact and to identify appropriate construction techniques to reduce vibration velocities to levels not exceeding the structural threshold of 0.2 in/sec and the human annoyance threshold of 80 VdB. The studies shall, at a minimum, include the following:

- Identification of the Project's vibration-generating activities that have the potential to generate ground-borne vibration;
- A vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted;
- Maintain a monitoring log of vibrations during initial demolition activities. Monitoring results may indicate the need for a more or less intensive construction schedule; and
- Vibration level limits for suspension of construction activities and implementation of contingencies to lower vibration levels, including scheduling of construction activities during non-school operating hours to avoid annoyance to receptors at Woodworth-Monroe TK-8 Academy and on-site receptors.

c) **No Impact.** The Project Site is not located within the vicinity of a private airstrip; however, the Project Site is located within the Airport Influence Area, of the Los Angeles International Airport Land Use Compatibility Plan (ALUCP) and is located within the Noise Contours Map. The Project Site is located approximately 1 mile east of the Los Angeles International Airport, just within the 65-70 dB CNEL noise exposure contour of the Airport Influence Area (AIA). According to the Airport Land Use Plan for the Los Angeles International Airport, the Project Site would be conditionally compatible with the ALUP as school uses are conditionally compatible within the exterior exposure noise contour range of 65-70 db CNEL (Los Angeles International Airport 2015). In addition, the Proposed Project consists of the modification of an existing school and demolition of a vacant school and would not increase staff or students. Therefore, the Proposed Project would not expose people residing or working in the Proposed Project area to excessive noise levels within the vicinity of a private or public airport. Impacts would be less than significant.

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Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Project Site encompasses existing school properties in a built-out urbanized community. The proposed activities do not include new homes or businesses and would not result in the extension of public roads or other infrastructure. The proposed installation of new sewer pipelines, and new domestic and fire water line systems would occur within the Project site and would connect to existing mainlines. Due to annually decreasing enrollment at Morningside High School, the reduction of classroom capacity would be able to accommodate the existing and anticipated future student enrollment. The proposed modernization improvements would not provide additional student capacity, accommodate growth, or increase enrollment or staffing, but would rather provide infrastructure improvements to serve the existing student capacity. The existing Woodworth Elementary School campus is currently vacant after operations merged to form Woodworth-Monore TK-8 Academy. Demolition of the vacant buildings on the Project Site would not induce growth through proposed uses. Future development of any of the land on the Project Site to be leased by the District would be subject to individual environmental analysis under CEQA upon site-specific applications for future development or use of the leased land. As such, the Proposed Project would not contribute to a substantial increase in unplanned population growth, and no impact would occur.

b) **No Impact.** The Project Site encompasses existing school properties in a built-out, urbanized community. No housing exists on the Project Site, and therefore the Proposed Project would not displace a substantial number of existing housing units or people, necessitating the construction of replacement housing elsewhere. Therefore, impacts associated with these issues would not occur.

Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
15. PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☐	☒

Discussion

a) **Less-Than-Significant Impact.**

i) **Less-Than-Significant Impact.** The Project Site is currently served by the Los Angeles County Fire Department (LACFD), which operates four fire stations in the City. The closest station to the Project Site is Station 170, located 0.2 mile east at 10701 S. Crenshaw Boulevard. Implementation of the Proposed Project would serve the existing Morningside High School student body and would not increase the school capacity. Therefore, no new staff or student enrollment would result from implementation of the Proposed Project. As such, the Proposed Project would not induce population growth directly or indirectly that could increase the demand for fire protection services at the Project Site. Furthermore, the Project Site is an existing school campus where fire protection services are already adequately provided. As described in the discussion on Hazards above, construction activities may result in vehicle delays due to the presence of slow-moving and heavy construction vehicles. However, the Proposed Project would maintain adequate emergency vehicle access to the site Project Site during construction. This requirement would be included on the construction specifications, which would be reviewed and approved of by DSA during final design and monitored during construction oversight. Operation of the Proposed Project would improve emergency access to the Project Site through the construction of the circulation improvements and additional parking lots. As such, fire protection would not be significantly altered through implementation of the Proposed Project and impacts would be less than significant.

ii) **No Impact.** The Project Site is currently serviced by the City of Inglewood Police Department. The closest police station to the Project Site is the Police Community Center Beat 3, located 0.75 mile southeast at 2640 West Imperial Highway. As previously discussed, the Proposed Project would decrease the number of classrooms and no new staff or student enrollment would result from implementation of the Proposed Project. In addition, due to the temporary nature of the construction jobs that would be required for the various phases of construction, these jobs are anticipated to be filled by the local workforce. Therefore, the Proposed Project would not result in a direct or indirect increase in population that would contribute to substantial adverse physical impacts associated with police protection. As such, there would be no impact.

iii) **No Impact.** The Project Site is located on existing school campuses. As previously detailed, no increases in student or staff capacity would result from implementation of the Proposed Project. As described above, temporary short-term construction jobs generated by the Proposed Project would be from the local labor force and would not attract new workers to the region for the 24-month phased construction period. No additional schools would be required by the Proposed Project. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the need for new or physically altered school facilities. As such, no impact would occur

iv) **Less-Than-Significant Impact.** As previously mentioned, the Proposed Project would not permanently alter operations at the existing school campuses as operations at Morningside High School would continue, and operations at Woodworth Elementary School have already ceased. The Proposed Project would not directly or indirectly induce population growth requiring additional parks within the City. Construction of the Proposed Project would temporarily inhibit the use of the existing recreational facilities on the campus. Currently, the recreational facilities on the Morningside High School campus are available with a facility use permit and are not relied on by the City for general park use. In addition, the Proposed Project includes the construction of several new recreational facilities such as new a new track and football/soccer field, shotput and discuss areas, basketball and tennis courts, baseball stadium, and softball stadium, which would provide for new recreational opportunities for the proposed Morningside High School campus. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the need for new or physically altered park facilities. Impacts would be less than significant.

v) **No Impact.** As previously mentioned, no new staff or student enrollment would result from implementation of the Proposed Project. Therefore, no additional public services would be required by the Proposed Project. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. As such, no impacts would occur.

References

Los Angeles County Fire Department. 2022. Fire Station Locator. Available at: https://fire.lacounty.gov/

City of Inglewood Police Department. 2022. Staff Directory. Available at: https://www.cityofinglewood.org/Directory.aspx?DID=96

Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐

Discussion

a) **Less-Than-Significant Impact.** In addition to the existing recreational facilities on the Project Site itself (e.g., tennis courts, baseball field, football field, and basketball courts), Center Park is located approximately 0.26 mile southwest, and is the closest recreational facility to the Project Site. Darby Park is the second closest public park facility to the Project Site and is located approximately 0.76 mile north of the Project Site. Jesse Owens Community Regional Park is located approximately 0.91 mile to the northeast. Due to annually decreasing enrollment at Morningside High School, the reduction of classroom capacity would be able to accommodate the existing and anticipated future student enrollment. The proposed modernization improvements would not provide additional student capacity or accommodate growth but would instead provide recreational facilities to serve the existing student capacity. As such, the Proposed Project would not increase the use of existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

b) **Less-Than-Significant with Mitigation Incorporated.** The Proposed Project includes the addition of several recreational components and would demolish existing classroom buildings, associated walkways, and twelve existing tennis courts to provide additional open space within the campus. Proposed recreational components include the relocation of portable buildings located on the southwest portion of the campus, and the construction of a ticketing and concessions building, courtyard with lunch tables, and team rooms area; the demolition of the existing field areas and the construction a new track and synthetic turf football/soccer field; the demolition and reconstruction of the existing basketball courts and relocation of tennis courts to the east of the proposed track and football/soccer field; a new softball field; and the construction of a CIF-regulated natural turf baseball field. The proposed recreational facilities would be provided within the Project Site to serve existing and future students. However, these impacts are analyzed throughout this Initial Study/MND for adverse physical effects on the environment. With implementation of mitigation measures mentioned throughout this document, the Project's proposed recreational

facilities would not have an adverse physical effect on the environment, and impacts would be less than significant.

References

City of Inglewood. 2022. Facilities. Facilities • Inglewood, CA • CivicEngage (cityofinglewood.org) Accessed December 2022.

Transportation

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

The discussion of impacts related to transportation provided below is based on a transportation impact study prepared for the Proposed Project, which is provided in Appendix K of the Initial Study (LLG, 2022).

Discussion

a) **Less-Than-Significant Impact.** The Project Site is located in the southeastern portion of the city of Inglewood in Los Angeles County. Regional access to the Project Site is provided by I-105, approximately 0.9 mile to the south of the Project Site, I-405, approximately 1.9 miles west of the Project Site, and I-110, approximately 2.9 miles east of the Project Site. Local access is provided by W 108th Street to the south, West 104th Street to the north, Yukon Avenue to the west, and Crenshaw Boulevard to the east. Direct access to the Project Site is provided via driveways along Yukon Avenue and West 104th Street. The Project site is bound to the north by single-family residential homes to the west and south, by commercial development and multi-family residential development to the north, and by the Woodworth-Monroe TK-8 Academy to the east (see **Figure 2**). Within the Project Site, vehicle circulation is accommodated by drive aisles within the individual parking lots as well as a gated emergency access road that extends from Parking Lots D and the southernmost Yukon Avenue driveway int of the center of the Project Site, northwest of the existing gymnasium.

Construction. During the construction period, construction vehicles would use the roadways that surround the Project Site to deliver materials and haul waste. Workers' vehicles and construction vehicles could access the site from the above-mentioned local streets. Roadway users could experience temporary delays from material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the Project vicinity. In addition, trucks used to haul excavation material off-site during construction would follow the City's designated truck routes to ensure large trucks would not travel through local residential streets and would utilize W

Century Boulevard to I-405 or S Prairie Avenue or Crenshaw Boulevard to I-105 (City of Inglewood Public Works Department, 2021). Construction staging would occur on-site and would not affect traffic operations on adjacent roadways. Construction activities would not impede non-motorized travel or public transportation in the Project vicinity. The Proposed Project could, however, require temporary sidewalk closures while the two driveways along West 104th Street are reconstructed. However, any delays would be temporary and not considered to be significant. Temporary traffic control during construction shall meet the requirements of the California Manual on Uniform Traffic Control Devices (Caltrans 2021).

Operation. As proposed, modernization of the Morningside High School campus and demolition of the Woodworth Elementary School campus would not conflict with any applicable plans, ordinances, or policies establishing measures for effectiveness of the performance of the circulation system, such as the SCAG for the Final Connect SoCal (the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), City's Mobility Plan, Circulation Element, or Active Transportation and Safe Routes to School Master Plan (ATP/SRTS Master Plan).

As detailed in *Transportation Impact Study* prepared for the Project (Appendix K), the City's *Mobility Plan* also includes strategies related to congestion relief through transportation demand management programs, complete streets, and multimodal infrastructure. Similarly, the City's *General Plan* Land Use Element provides policies consistent with the Mobility Plan, promoting adequate public transportation, developing modified traffic systems to discourage traffic in neighborhood streets, and safe and adequate pedestrian circulation free from barriers for handicapped persons. The Project Site is located within a High Quality Transit Area (HQTA) as identified by Connect SoCal. As described above, the Project Site is planned to accommodate pedestrian and bicycle access via exclusive walkways which connect the site to the public sidewalks, which would support these strategies. The walkways minimize the extent of pedestrian and bicycle interaction with vehicles at the Project Site and provide a comfortable, convenient, and safe environment which in turn can encourage use of active transportation modes. The Project Site is further planned to provide bicycle parking facilities for use on-site by students, faculty/staff, and visitors to the campus, minimizing traffic on local roadways. As mentioned in the City's *ATP/SRTS Master Plan*, a total of 30 bicycle parking spaces are planned to be added along with an additional 30 racks for skateboards/scooters on campus, which would be accommodated by the Project's circulation improvements. While the Project would increase daily trips to the Project Site as a result of the expanded stadium capacity, the Project would not alter the local circulation system, and visitors to the campus would continue using the same local roadways for access to the Project Site. The Project is therefore found to be in alignment with the City's General Plan, the City's *Mobility Plan,* as well as the *ATP/SRTS Master Plan* goals related to circulation, pedestrian and bicycle safety, and appropriate and supportive active multimodal transportation infrastructure.

The Project is located adjacent to 104th Street, which is currently served by public bus transit service provided by County's shuttle system (i.e., The Link). The Project Site is within walking distance from an existing bus stop located along 104th Street at Yukon Avenue. The Project is not expected to affect access or safety at the existing bus stops, nor is it expected to hinder public transit service along 104th Street. The Project would not preclude the City from constructing bicycle facilities or pursuing bicycle network improvements along local roadways within the vicinity of the Project Site. Therefore, development of the Project would not prevent the City from completing any proposed transit, bicycle, or pedestrian facilities in support of the adopted plans, polices, and programs related to the City's transportation network.

Since the Project would not result in a conflict with adopted policies, plans, or programs, nor is it expected to negatively affect the performance or safety of existing roadways or existing or planned pedestrian, bicycle, or transit facilities, it is determined that the Project would have a less than significant impact.

b) **Less-Than-Significant Impact**. In accordance with Senate Bill (SB) 743, the CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. For the purpose of environmental review under CEQA, neither the Inglewood Unified School District nor the City of Inglewood have established VMT analysis procedures at this time; therefore, the project-related VMT impact has been assessed qualitatively based on guidance from the OPR's Technical Advisory and review of VMT policies.

The Technical Advisory provides the following potential screening criteria for certain land development projects that may be presumed to result in a less than significant VMT. A detailed transportation VMT analysis is required for all land development projects, except those that meet one of eight designated screening criteria. A project that meets at least one of the screening criteria would be presumed to result in a less-than- significant VMT impact due to the Project characteristics and/or location. By adding local serving opportunities into the urban fabric and thereby improving destination proximity, local-serving projects tends to shorten trips and reduce VMT. It is also noted that lead agencies may presume such local-serving projects create a less than significant transportation impact. Similarly, the proposed Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project will serve the local population and is a local-serving high school, thereby shortening travel distances and reducing VMT. The Project would meet the criteria for local serving projects. While the Project would create additional capacity for sporting events, it would not provide for new enrollment. Thus, the Project can be presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trip lengths, similar to local-serving retail developments and other local-serving projects. Therefore, the Project satisfies the criteria to be considered a local serving use and is screened out from further VMT analysis as it is presumed to cause less than significant transportation impacts.

c) **Less-Than-Significant Impact.** An impact would occur if the Project substantially increases roadway hazards due to a geometric design feature or the introduction of incompatible uses (i.e., farming equipment). Woodworth Elementary School is currently vacant and demolition of the existing buildings and hardscape would not alter, remove, or create new access to the Woodworth Elementary School campus. In addition, removal of the existing buildings and hardscape would also not introduce new incompatible uses to the campus, as it would remain vacant. The existing Morningside High School campus includes three contiguous surface parking lots, that partially wrap around the campus, referred to as Lot A in the northwest corner, Lot B along the northern boundary, and Lot D along the western boundary. Access to Morningside High School is currently provided by two driveways along Yukon Avenue and three driveways along West 104th Street.

As shown on **Figure 4**, the Proposed Project would include improvements to the existing parking lots, extension of the internal circulation road and creation of two stadium parking lots (Lots C1 and C2). The Proposed Project would continue to utilize the driveways along Yukon Avenue and would reconstruct two driveways along West 104th Street. The easternmost driveway on 104th Street would be eliminated. New walkways would be provided to/from Yukon Avenue and 104th Street which would interconnect with the buildings on campus. These walkways would also provide exclusive pedestrian and bicycle access to/from the existing public sidewalk along the campus frontage. The walkways thus minimize the extent of pedestrian and bicycle interaction with vehicles at the site and provide a comfortable, convenient, and safe environment for pedestrians and bicyclists accessing the building from outside the Project Site. The proposed improvements to the Morningside High School campus would not introduce any new incompatible uses and ingress and egress would remain similar to existing conditions, with the removal of one driveway that is no longer needed as a result of the proposed recreational facilities. Internal vehicle circulation and emergency access would be improved through improvements to the fire lanes and pedestrian and bicycle circulation would be improved along the campus frontage, thereby reducing hazardous conditions for pedestrians and cyclists (i.e., vehicle-pedestrian conflicts). Based on the above, hazards for vehicles and pedestrians would be reduced with implementation of the Proposed Project, and the impact would be less than significant.

d) **Less-Than-Significant Impact.** A significant impact would occur if the design of the Project would not satisfy local emergency access requirements.

Construction. During construction of the Project, heavy construction-related vehicles could interfere with emergency response to the site (e.g., slowing vehicles traveling behind the truck). However, such delays would be infrequent and brief (drivers are required to pull over to allow an emergency vehicle on-call to pass), and contract specifications for the Project would ensure that emergency vehicle access on area roadways would be maintained at all times. As such, inadequate emergency access would not occur as a result of Project construction, and impacts would be less than significant.

Operation. The Project would not include any alterations of existing public roadway features (e.g., road realignment) that would create a permanent change to access for emergency vehicles. In addition, the Project includes fire lane improvements that would maintain a 20-footwide, barrier-free emergency access route to internal campus with minimum of 50-foot turning radii. The proposed fire lane improvements are not anticipated to affect emergency vehicle access and emergency response times. If required, drivers of emergency vehicles are trained to utilize or travel in opposing through lanes to pass through and traverse crowded or tight areas. Thus, the respect entitled to emergency vehicles and driver training allow emergency vehicles to negotiate typical as well as atypical roadway conditions. Additionally, emergency circulation for pedestrians would be improved through the addition of accessible route signage and improved circulation of internal walkways. Security improvements would include the addition of secured pedestrian and vehicular gates with lockable knox boxes for emergency service providers. Therefore, impacts related to emergency access would be less than significant.

References

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Southern California Association of Governments (SCAG). 2020. *Connect SoCal* (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Adopted September 3, 2020.

State of California, Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA.* December 2018.

Tribal Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Discussion

a, b) **No Impact.** A Sacred Lands File (SLF) search request was submitted to the California Native American Heritage commission (NAHC) on July 16, 2021. The NAHC responded via letter on August 3, 2021 indicating that no Native American cultural resources are known to be within the Project Site or its vicinity (Appendix L). Furthermore, Native American tribes have not reached out to the Inglewood Unified School District (District) to be notified of projects as part of the District's CEQA review process. As a result, and pursuant to Assembly Bill 52, the District is not required to send out project notification letters to any tribes. Based on the results of the SLF search and requirements of AB 52, no tribal cultural resources have been identified within the Project Site or its vicinity. Therefore, neither construction nor operation of the Proposed Project would cause a substantial adverse change in the significance of a tribal cultural resource that is either listed or eligible for listing, or determined by the lead agency, to be significant. No impact to tribal cultural resources would occur.

Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) **Less-Than-Significant Impact.** The City's Public Works Department provides sewer service to the community through a collection system comprised of 145 miles of gravity sewer pipes ranging from four to 15 inches in diameter and 3,100 manholes (City of Inglewood 2022a). The majority of sewers tie directly into Los Angeles County Sanitation Districts' (LACSD) trunk sewers crossing through the city, which sends City wastewater out to the south to LACSD's Joint Water Pollution Control Plant (City of Inglewood 2022a). LACSD's Joint Water Pollution Control Plant currently treats the wastewater generated by the Project Site and provides both primary and secondary treatment for approximately 260 million gallons per day (mgd) of wastewater (Los Angeles County Sanitation Districts 2022a). The Plant has a treatment capacity of 400 mgd, which leaves an available capacity of approximately 140 mgd (Los Angeles County Sanitation Districts 2022b).

As previously mentioned, no new staff or student enrollment would result from implementation of the Project, and there would be no new source of wastewater generation within the LACSD service area. The Project would include the installation of new sewer pipelines that would connect to existing mainlines. As such, the Proposed Project would not require the construction or expansion of wastewater facilities, and impacts would be less than significant.

Water service is provided to the Project Site by the City, which is a member agency of the West Basin Municipal Water District (WBMWD) (City of Inglewood 2021). According to the City's 2020 Urban Water Management Plan, normal year water supply for 2025 will be 12,000 acre-feet per year, or approximately 11 mgd (City of Inglewood 2021). Construction of the Proposed Project would require the use of water for activities such as dust suppression and the mixing of concrete; however, any water usage during construction would be minimal and temporary. Operation of the Project would not result in an increase of students or staff, which would result in water usage similar to existing conditions at the Site. Additionally, the Project would include the installation of new domestic and fire water line systems that would connect to existing mainlines. Therefore, the Proposed Project would not represent a new source of water demand within the City's service area, and sufficient water supplies would be available to serve the Proposed Project. The Project would not require the construction or expansion of water facilities, and impacts would be less than significant.

As previously mentioned above in Section 10 (*Hydrology and Water Quality*), the Proposed Project would include the addition of drainage improvements and landscaping elements throughout the campus, which would reduce the rate of surface stormwater runoff. Surface runoff within the Project Site would be conveyed to and serviced by the proposed underground storm-capture infiltration vaults and existing storm drain system and would not require the construction or expansion of stormwater drainage facilities. Similarly, the Proposed Project would utilize existing connections for electric power, natural gas, and telecommunications facilities. As a result, impacts on the construction or expansion of stormwater drainage facilities, electric power, natural gas, or telecommunications facilities would be less than significant.

b) **Less-Than-Significant Impact.** As previously mentioned, implementation of the Proposed Project would increase student capacity, but would not result in an increase in enrollment at the school campus. Therefore, demand for water would not be significantly greater than what currently exists at the Project Site. As such, sufficient water supplies are available to serve the Proposed Project and impacts on water supplies would be less than significant.

c) **Less-Than-Significant Impact.** Improvements within the proposed Morningside campus at the Project Site would not increase the number of staff or students enrolling at the school. Therefore, the Proposed Project would not generate greater demand for wastewater treatment compared to existing conditions. As such, LACSD would have adequate capacity to meet the Project's wastewater demand and impacts on wastewater service would be less than significant.

d) **Less-Than-Significant Impact.** The waste generated during construction of the Proposed Project would mainly consist of general construction debris (including from demolition of the existing paving, buildings, and field uses) and worker personal waste. The construction contractor would be required to dispose of solid waste in accordance with local solid waste disposal requirements. The City of Inglewood is served by

Consolidated Disposal Services (CDS), a subsidiary of Republic Services, Inc., which provides waste and recycling collection services for residential and commercial uses (City of Inglewood 2022b). Solid waste is taken to the CDS American Waste Transfer Station in Gardena, California where it is sorted. Solid waste is then transferred to a CDS-owned facility, the Sunshine Canyon Landfill in Sylmar, California (City of Inglewood 2012). Similar to existing conditions, construction solid waste would be taken to the Sunshine Canyon Landfill, approximately 28.2 miles northwest of the Project Site. The Sunshine Canyon Landfill has a permitted throughput of 12,100 tons per day and has a remaining capacity of 77,900,000 cubic yards (California Department of Resources Recycling and Recovery 2019). The landfill's cease operation date is anticipated to be in the October 2037. Therefore, the landfill would have sufficient capacity to accommodate the Proposed Project's construction disposal needs. After completion of construction, solid waste generation would not be significantly greater than what currently exists at the Site, as the Proposed Project would not result in an increase in staff or students enrolled. The Project Site would continue to be served by Sunshine Canyon Landfill with sufficient permitted capacity to accommodate the school's solid waste disposal needs. As a result, impacts would be less than significant.

e) **Less-Than-Significant Impact.** The Proposed Project would be served by a permitted landfill capable of accommodating the school's solid waste. During construction, non-recyclable solid waste would be taken to Sunshine Canyon Landfill. During operation, the Proposed Project would continue to generate municipal solid waste that would be accepted by waste haulers and landfill operators. Additionally, the City would be required to maintain a 75 percent diversion rate required by the State for all solid waste generated. Morningside High School would continue to comply with federal, State, and local regulations related to solid waste. Therefore, impacts would be less than significant.

References

California Department of Resources Recycling and Recovery (CalRecyle). 2019. SWIS Facility/Site Activity Details: Sunshine Canyon City/County Landfill (19-AA-2000). Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702. Accessed July 8, 2022.

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Wildfire

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

Discussion

a) **Less-Than-Significant Impact**. The Project Site is within a developed urbanized area that has not been identified as a wildland fire hazard area. According to the CAL FIRE VHFHSZ in Local Responsibility Area Map, the Project Site is not located within a fire hazard severity zone (CAL FIRE 2011). Although access to the Project Site may be temporarily altered during construction of the Project, such delays would be infrequent and brief (drivers are required to pull over to allow an emergency vehicle on-call to pass), and contract specifications for the Project would ensure that emergency vehicle access on area roadways would be maintained at all times. In addition, according to the Los Angeles County Planning Department, the Project Site is not located on a designated Disaster Route for the City of Inglewood. Therefore, temporary construction activities would not impair or impede an emergency response or evacuation plan.

After construction of the Project, emergency access would improve from existing conditions with the proposed fire land improvements. Current access to the Project Site for emergency vehicles is provided through two driveways along Yukon Avenue, three driveways along West 104th Street, and one driveway along South 10th Avenue. The Proposed Project would reconstruct the two driveways along Yukon Avenue and reconstruct one driveway along West 104th Street. Internal circulation improvements including new fire lanes would provide connectivity throughout the Project Site with access from West 104th Street and Yukon Avenue and connecting the newly proposed parking lots (Lots C1 and C2). The proposed fire lane improvements would maintain a 20-foot-wide, barrier-free emergency access route to internal campus with minimum of 50-foot turning radii. As a result, the Proposed Project would not result in the impairment

of an adopted emergency response plan or emergency evacuation plan to less than significant levels.

b) **Less-Than-Significant Impact**. As detailed above in threshold 20(a), the Project Site is within a developed urbanized area that has not been identified as a wildland fire hazard area.

The Project Site is relatively flat and slopes gently to the south and southwest, with elevations between approximately 88 to 112 feet AMSL (Koury 2020). While construction would include materials that are considered flammable, such as fuels and household cleaners, the handling and storage of such materials would be conducted in accordance to applicable regulations. In addition, the Proposed Project would be designed and constructed in accordance with the California Fire Code and would be reviewed for compliance with the applicable codes and regulations by the DSA. Grading and excavation for the proposed buildings and recreational component footings would also reduce the slope of the Project Site. After completion of construction, the operational activities within the proposed Morningside campus portion of the Project Site would not change from the existing uses of a high school. The Proposed Project would occur on a relatively flat and existing developed school site, and would not exacerbate wildfire risks, and would not expose people to pollutant concentrations for a wildfire or the spread of a wildfire. Therefore, impacts would be less than significant.

c) **Less-Than-Significant Impact**. Although the Proposed Project would install new sewer pipelines, new domestic and fire water line systems, these would connect to existing mainlines. The Proposed Project would utilize existing infrastructure, including roads, water sources, and power lines surrounding the Project Site. Infrastructure is already established in the vicinity of the Project Site and additional infrastructure would not be required to support Proposed Project. Therefore, the Proposed Project would not exacerbate fire risk at the Project Site through the development of infrastructure. Thus, impacts would be less than significant.

d) **Less-Than-Significant Impact**. The site slopes gently to the south and southwest from elevations of 112ft to 88ft. As described in Section 7 (*Geology and Soils*) above, the Project Site is not considered a hillside area, is not subject to landslides, and has a relatively flat topography. All improvements that would occur within the Project Site would be subject to all requirements of the California Building Code and the California Fire Code which would reduce the extent that the Proposed Project would increase fire risk. Furthermore, the Project Site is not located within a flood hazard zone and construction of the Proposed Project would not result in significant impacts on the existing drainage pattern due to implementation of BMPs that would minimize flooding and runoff. As part of the Proposed Project, drainage patterns would be improved and designed with positive drainage away from foundations. Therefore, the Proposed Project would not expose people or structures to significant risk including downstream flooding or landslides as a result of runoff, post-fire slope stability, or drainage changes, and impacts would be less than significant.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2011. Los Angeles County Very High Fire Hazard Severity Zones in LRA. Available: https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf. Accessed April 2022.

Koury Engineering & Testing, Inc. 2020. Limited Geotechnical Investigation Report for Various Campus Upgrades at Morningside High School, 10500 Yukon Avenue South, Inglewood, CA 90303. Prepared January 22, 2020.

Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **Less-Than-Significant with Mitigation Incorporated.** As discussed in Section 4 (*Biological Resources*) above, the Project Site is developed as an operating school with a majority of the campus paved, graded, or landscaped with administrative buildings, classrooms, other educational use structures, and recreational facilities. There are no sensitive natural communities or habitats on the Project Site. Implementation of the Proposed Project may include the removal and replacement of ornamental trees, as detailed in the Project Description, which could provide suitable nesting habitat for migratory birds or urban bird species. Through compliance with federal and State regulations, including compliance with the MBTA, potential impacts to nesting and migratory birds would be less than significant. No federally protected wetlands are present on developed Project Site and the Project Site does not serve as a wildlife corridor due to the urbanized setting of the Project Site and surrounding vicinity. The Proposed Project would not result in impacts on biological resources that would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animals. In addition, as discussed in Section 5 (*Cultural Resources*) above, Morningside High School was determined to eligible for listing as a historic district under the National Register Criteria A and C. The proposed improvements would largely conform with the Standards and the majority of the potential historic district (75%) would be maintained. However, the Project does not fully conform to the Standards with the because the demolition of four

contributing school buildings and would include tenant improvements to contributing Building U, Auditorium, that may adversely affect its character-defining features. In addition, a new Building L would be constructed to replace the existing original Building L. With the incorporation of mitigation measures **MM-CUL-1** through **MM-CUL-4**, potential impacts to historic resources would be reduced to a less than significant level. In addition, ground disturbing activities may cause a substantial adverse change in the significance of an archaeological resource, if found during construction. With the incorporation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, impacts to unknown archaeological resources would be reduced to a less than significant level. Therefore, impacts would be less than significant with mitigation incorporated.

b) **Less-Than-Significant with Mitigation Incorporated.** A cumulative impact would occur if the Proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. The Proposed Project would be constructed within an urbanized area of the City, on a previously developed site, and is consistent with existing General Plan land use designations and Zoning for the Project Site. The Proposed Project could contribute to cumulatively significant impacts when considered together with other past, present, or reasonably foreseeable future projects in the vicinity of the Project Site for those areas in which a potentially significant impact has been identified. Potentially significant impacts for the Proposed Project were identified for new sources of light and glare, air quality, cultural resources, geology and soils, hazardous materials and waste, noise, and recreation.

There is only one reasonably foreseeable future project within 0.25-mile of the Project Site, which is a mini-warehouse located on West 102nd Street, which is under construction and anticipated to be completed prior to construction of the Proposed Project.[12] All other reasonably foreseeable future projects are located at distances greater than 0.25-mile from the Project Site. The Hollywood Park Project, located approximately 0.4-mile from the Project Site is also currently under construction and construction is anticipated to be complete prior to the start of construction of the Proposed Project. If construction activities of other related projects were to overlap, it is unlikely that the Project's construction impacts would contribute to a cumulatively considerable impact given the distance. In addition, with implementation of mitigation measures **MM-AES-1, MM-AIR-1, MM-CUL-1** through **MM-CUL-6, MM-GEO-1, HAZ-1, MM-NOI-1** and **MM-NOI-2**, the impacts of the Proposed Project would be reduced to less than significant levels.

Implementation of mitigation measure **MM-AES-1** would ensure nighttime construction would not spill over beyond the Project Site boundaries, and therefore would not contribute to cumulative light and glare impact. Operation of the Proposed Project in

[12] The related projects list in the TIS also identifies the 17-acres of land proposed to be leased by the District after completion of the Proposed Project. However, no formal project application has been submitted and no construction or development of this land would occur until completion of the Proposed Project and operation of any future development within this land would be subject to project-specific analysis under CEQA.

combination with other reasonably foreseeable projects would occur within an urbanized area of the City with substantial existing sources of lighting. The Proposed Project would not result in significant light spillover from the infrequent use of the stadium lights that would result in a cumulatively considerable impact.

Air quality impacts are considered within a regional context. As described above, with implementation of mitigation measure **MM-AIR-1**, the Proposed Project would not contribute to a cumulatively considerable air quality impact.

In addition, implementation of mitigation measures **MM-CUL-1** through **MM-CUL-4** would record, preserve, salvage, and monitor historic features on the Project Site to ensure compliance with the Standards and maintain the Morningside High School campus' eligibility as a potential historic district. Therefore, as the Proposed Project would not eliminate important examples of a major period of California history, the Project would not contribute to cumulative impacts to historic resources within the City. Implementation of mitigation measures **MM-CUL-5** and **MM-CUL-6** would ensure no direct impacts to archaeological during construction and therefore, the Proposed Project would not contribute to a cumulative loss or impacts to archaeological resources.

Potentially significant impacts related to geology and soils on the Project Site are site specific and implementation of mitigation measure **MM-GEO-1** would ensure the recommendations for structural foundations are implemented for development within the Project Site boundaries. Implementation of the Proposed Project in combination with reasonably foreseeable projects in the vicinity would not contribute to a cumulatively considerable impact on geology and soils.

Potentially significant impacts related to hazards would result from demolition and disposal of hazardous materials. The Proposed Project and any reasonable foreseeable projects would be required to dispose of any hazardous materials in accordance with federal, State, and local regulations. In addition, the implementation of mitigation measure **MM-HAZ-1** would require the use of licensed abatement contractor to address hazardous materials and removal for the Proposed Project. Therefore, the Proposed Project would not contribute to a cumulatively considerable impact related to hazardous materials, as the hazardous materials on the Project Site would be handled, treated, and disposed of properly.

Potentially significant impacts related to noise during construction for the Proposed Project and any other projects would be addressed through compliance with the City's Municipal Code. Furthermore, the Proposed Project is located approximately 0.2 mile from the mini-warehouse project, and construction equipment noise would not be audible at this distance. Operation of the Project would include PA systems, but noise is not anticipated to propagate beyond the Project Site. Therefore, with implementation of measures **MM-NOI-1** and **MM-NOI-2**, the Proposed Project would result in a less than significant impact and impacts would not be cumulatively considerable.

Therefore, with the implementation of mitigation measures, the Project would not result in an incrementally considerable contribution to a significant cumulative impact. Impacts would be less than significant.

c) **Less-Than-Significant Impact with Mitigation Incorporated**. As discussed above, potentially significant impacts associated with the Proposed Project would be reduced to less than significant with implementation of the mitigation measures contained in this Initial Study/Mitigated Negative Declaration. No direct or indirect significant and unavoidable impacts would occur with implementation of the Proposed Project. The Proposed Project would not result in a substantial adverse effect on human beings, either directly, or indirectly, with implementation of mitigation measures.