

1/8/19 AGENDA, ITEM 1 - WRITTEN COMMUNICATION
SUPPLEMENTAL EMAIL AND ATTACHMENTS SUBMITTED TO THE CITY CLERK'S OFFICE BY CHRIS MILLER
ON 1/7/19 AT 9:26 A.M.

From: Chris Miller <chrismillerphotography4@gmail.com>
Sent: Monday, January 7, 2019 9:26 AM
To: City Clerk <cityclerk@hermosabch.org>
Subject: Concerns about the Final EIR -proposed North School

January 7, 2019

Elaine Doerfling,
Hermosa Beach City Clerk

Here we go again, the Hermosa Beach City School District released the final EIR for the proposed North School site just days after Christmas. With all public review supposed to be achieved by January 7, 2019.....Smack in the middle of the holidays. With little or no time to review, incomplete documents posted on the District site and the Library; the District is racing to certify the FEIR and release the RFP for Contractors at their next regular school board meeting in 3 days time on January 9, 2019.

What is clear to me is that District staff has no interest in hearing the concerns of Hermosa Beach residents and/or city staff as to the impact this project will have on the entire City and the children they say they are "helping with a new school".

This is not how it's done in Hermosa Beach! Transparency, facts and public input has always been the foundation that creates workability in this small one square mile city. At least that is how it's been in the past!

Hermosa Beach School District Board Resolution #06:18/19 Exhibit A (scheduled for adoption on January 9, 2019)

CEQA Findings of Facts: ***Areas of concern:***

1.The fact that there is currently only 290 3rd-4th grade students enrolled in Hermosa Beach School District and this school is being built for 510 students! What exactly is the purpose of building a school of this size on property that is half the size (2.4 acres) all other school properties(4.2) in the city of Hermosa Beach? How will this not over crowd this school?

(Page 1 of 80, last paragraph)

2. The Draft EIR was available for public comment from Thanksgiving 2017 through New Year's Day 2018. This was the busiest time for most people with family and friends and certainly seriously impacted their ability to review.

(Page 2 of 80, *B. Environmental Review Process*)

3.The final EIR (FEIR) was supposed to be made available December 28, 2018 until January 7, 2019, for review. It should be noted that at the time of writing this letter; the

complete FEIR is still not posted on the District websiteonly the FEIR (containing only responses to comments made on the DEIR) was posted on the District website and at the Library on December 28, 2018. When the missing DEIR (Vols 1 & 2) and Recirculated DEIR that the FEIR continuously references was brought to Superintendent Escalante's attention she begrudgingly posted Volume 1 of the DEIR on the District website on January 4, 2019. Volume 2 and the Recirculated DEIR is still not posted as of January 6 making it impossible to review the FEIR. It should also be noted that the only document that was available at the Library on Friday January 4 for review was the FEIR which only contains responses to comments received on DEIR in 2017. Consequently; it was impossible to review the FEIR. Where is the transparency due the residents of Hermosa Beach?

(Page 2 of 80 , Environmental Review Process)

4. Scenic views that will be lost due to the increased height of the new proposed school were not studied from areas that will be impacted for example, Hermosa View Drive, El Oeste Drive and Gould Terrace who currently have views (including public views) that will be effected by this project.

(Page 4 of 80, Scenic Vistas)

5. Residents on the North side of 26th street will be impacted by the new multi purpose building forever; losing property value as they will now look onto a two story 34,000 square foot building which will block light and natural fresh air currents from/to their homes forever.

According to FEIR....."DEIR Section 5.1 analyzes visual impacts to scenic vistas and corridors, determines if the project would degrade the character and quality of the site and surrounding area, and analyzes if the project would create glare and light that could affect views in the area." What the DEIR DOES NOT analyze is the impact to air flow currents and availability of natural light that the "Replacement of the three 1-story buildings on 25th Street with one 2-story, 32-foot tall building" will have on the existing single family residences on the north and southside of this new 2-story building?

(Page 6 of 80, "Scenic Corridors Impact 5.1-2" bottom of the page)

6. "Since the project site is developed and does not contain any sensitive species or habitat, its proposed redevelopment would not contribute to potential cumulative effects to the region's biological resources".

What the DEIR failed to acknowledge is that the proposed North School will destroy and pave over ***the last open space sand dune*** in the city of Hermosa Beach.

(Page 11 of 80, Biological Resources, Impact 5.3-2-5.3-4.)

7. The proposed 1,250 new car trips into this neighborhood on small residential streets may create dangerous conditions for children attempting to commute to school.

(Page 29,10 Impact 5/2-2)

8. "*The school's designated pedestrian loading is proposed curbside fronting 25th Street*". No on-site drop off for students attending North School. All children will be dropped off on Myrtle Avenue or on 25th Street.

(Page 32 of 80, Daily Operations)

9. *"These types of events may require additional law enforcement, and similar to existing conditions – when needed for larger events – the District will coordinate with and pay for HBPD staff to provide security services".*

Lack of additional parking for special events will result in parking overflow in the neighborhood requiring additional law enforcement provide security.

(Page 32 of 80, Special events)

10. Traffic studies were based on faulty information (eg traffic counts taken on a Sunday by unnamed/unqualified personnel).

(Page 33 of 80, Projected-Generated Traffic) (see attached letter)

11. Existing year (2017) two years out of date.

(Page 34 of 80)

12. Construction Trips, 55 per day (2,000 total: "a conservative estimate" that will use Morningside Drive as site access. "Construction staging would be in the eastern portion of the project site, with direct access from the driveway at 26th Street and Morningside Drive. The main construction entry point would be via the driveway on 26th Street at Morningside Drive. Based on the City's designated truck routes, including Pacific Coast Highway and Artesia Avenue (which is the continuation of Gould Avenue east of PCH), most construction vehicles would access the project site from the intersection at Morningside Drive and Gould/27th Avenue."

Yet in the FEIR (Page 2-117 & 118) *"District Staff determined on-site loading/off-loading of children was not an option because of:*

- *Tight turning-circle at the egress on 26th Street, due to the street's narrow width.*
- *Increased queueing at the ingress driveway on 25th Street due to potential conflicts with vehicles accessing parking stalls, accessing the loading area, as well as caused by vehicles having difficulties exiting on 26th Street.*
- *Increased queueing on 25th Street, near the driveway, that might disrupt traffic flow on 25th Street.*
- *Increased traffic-pedestrian conflicts for pedestrians coming from west of the school and crossing the busy school driveway on 25th Street.*

(page 35, Construction page 53, Noise)

13. Many streets leading to the North School site do not have sidewalks children will be forced into the street to get to school.

(page 36, Pedestrian and Bicycle Facilities)

14. There is an oral report from longtime and current Hermosa resident Bill Schneider who found Gabrieleno/Tongva tribe artifacts i.e. pottery and arrow heads in the area of North School and Valley Park.

(page 38 of 80, Tribal Cultural Resources, Impact 5.13-1 and page 50 of 80, Cultural Resources)

15. *Mitigation measures regarding the increased traffic to the new school are not under the purview of the District. Who is responsible for the mitigation's planned by the district for the city of Hermosa Beach?*

(page 58, transportation and Traffic Impact 5.12-1b)

16. Peak analysis traffic counts at intersections for example, at Valley Drive/Gould Avenue were done before the Skechers and Strand & Pier projects were approved. Also it is reported that the traffic studies were conducted on Sunday. (see attached)

(page 59, Intersections)

17. Request to widen intersection, one of the mitigating options with a traffic light would cost the city over \$500,000.

(page 60, Traffic Signalization Mitigating Option)

18. The peak traffic impacts the intersection of Valley/Gould will remain significant and avoidable. Especially since many of the traffic counts were done on a Sunday. How can these number she used for this project. See attached pages.

(page 61, Traffic Control officers Mitigating Option)

19. *"Proposed changes to the parking in the North School neighborhood are all on city/public streets. With recommendations by the district to have the city of Hermosa Beach consider restricting 26 parking spaces with an additional 17 spaces to be designated passenger loading only. For a total of 43 residential parking places. "* Where will these residents park after these changes are made? Are the residents aware of this as a part of this proposed school plan by the district to change public parking in their neighborhood?

(Page 64 of 80, Modified Parking Restriction Mitigating Option)

20. *"The widths of the streets near the project site are narrow and cannot readily accommodate both directions of traffic flow, particularly when vehicles are parked on both sides of the street. Vehicular circulation to and from the school site would be constrained during peak arrival and departure times at the beginning and ending of each school session as parents drop off and pick up students. The narrow streets would be an inconvenience for motorists and surrounding residences and would result in reduced vehicle speeds. Field observations made by the traffic engineer indicate that there are sufficient pull-out opportunities for vehicles traveling in opposite directions to pass when one of the drivers pulls over to an open curb (where no vehicles are parked) or a driveway to allow oncoming vehicles to pass. Due to site constraints, including narrow roadways and an awkwardly shaped property, the District has designed the school's main passenger **loading zone on 25th Street.** "*

No on site drop off for young students.

(Page 67 of 80, Operation: Narrow street Widths)

21. Pages 68-69 are a large red flag. Parents will not be comfortable allowing their 7-8 year old children to ride bicycles to and from North school. The majority of these mitigation measures depend on the City of Hermosa Beach agreeing and paying for all of the districts requests. Changes in parking, converting streets to one-way, creating signage and in the end students will be dropped off on these same streets.

22. There has been no response to the request by the city manager of Hermosa Beach to create an onsite drop off for these young children. In fact it appears the EIR Consultant has merely dismissed this request because "District staff do not feel it will work".

(page 71, Passenger loading)

Pages 72-76 are all mitigation measures that the district plans to "work on some time in the future with City staff".

The City of Hermosa Beach is liable for the safety of children arriving to and from school property until a student crosses onto school property when their safety becomes the district's responsibility. Having ensured an onsite parking lot for 41 District staff cars to accommodate teachers and staff, while dictating that the city restrict or eliminate onstreet parking for 43 residents vehicles; it appears that the district has no intention of shouldering any of the responsibility for the safety of its own student population or the parking needs of their neighbors.

In its current design there is no on site drop off for its own students. **CONCERN FOR THE SAFETY OF THE CHILDREN SHOULD BE EVERYONE'S NUMBER ONE PRIORITY ESPECIALLY THE SHOOOL DISTRICT.** If the District's Architect for this proposed North School project cannot find a way to ensure onsite drop-off (as has been requested by both residents and the city of Hermosa Beach on numerous occasions) what chance will there ever be? Before the District races to certify this FEIR.....pay attention and heed the wise advice given by our current City Manager when she pleaded that all District proposed traffic mitigation measures should be addressed in meetings with residents **BEFORE** the EIR is certified.

All liability with respect to the safety of North School children as they attempt to reach the school grounds will be on the City of Hermosa Beach if this project is allowed to go forward without changes to the current plan. The district is planning on certifying North School FEIR and circulating the RFP for Contractors on Wednesday, January 9, 2019 at 7pm.

Who can parents sue in the future when God forbid a child is injured or killed, AALR (who originally contracted with Placeworks/Richard Garland) to prepare the North School EIR or the School District's new Attorney "The Terry Tao Firm" who is named as Certificate Holder on Placework's Liability Insurance Certificate? After 27 years Mr Tao has decided to leave AALRR (the firm he was a Partner in) a month before an EIR that he spearheaded with AALRR for the largest project (paid for with residents tax dollars) in the history of Hermosa Beach is about to be certified by Hermosa Beach School

District?!?! I really want to know who will be held responsible for this North School EIR.....AALRR or Mr Tao who's new office address is a UPS store in La Habra?

Too many unanswered questions and areas of concern to warrant going forward with this faulty EIR!

And to think, all this could have been avoided if the school district and the City of Hermosa Beach had honored the MOU (Exhibit B of the School Board Resolution of Intent to Sell PAS adopted by the School Board in 1977) which required the reopening of Pier Avenue as a school, when enrollment increased to 1,266 as it did in 2010. Tom Bakaly (ex-City Manager) and elected officials of Hermosa Beach who should represent all the residents could not work together to find a solution to share the facilities a promise made to the residents but not upheld by the current council or school board. This decision will cost Hermosa Beach tax payers \$130 million dollars over the life of the current school bond.

One can only imagine how these millions of dollars could be spent to build/repair our joint use facilities an idea that is encouraged by the State of California and the CDE. Pier Avenue School or currently known as the Community Center on can envision a new city library being built with these monies. Upgrades to the theater, gymnasium and other facilities shared with the community and the students of Hermosa Beach. There are also matching funds available from the state when joint use is a factor.

But, the biggest cost of all will be if one student does not arrive to North School or home one day because of the failed "traffic mitigation measures" proposed for this school prepared without acknowledging the problems before the EIR is certified. To build a school that is which is far too big 200 students than enrolled in the city in a small residential neighborhood without adequate streets for access. All built on a foundation of little or no integrity by the current Hermosa Beach City school district.

Sincerely,
Chris Miller

Attached:
Resolution_061819_Exhibit A
Letter from Hermosa Beach City manager to Hermosa Beach School district with highlights of concerns not addressed
Letter from Miyo Prassas

Resolution #06:18/19 Exhibit A

**CEQA FINDINGS OF FACT
REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
HERMOSA BEACH CITY SCHOOL DISTRICT
NORTH SCHOOL RECONSTRUCTION PROJECT
STATE CLEARINGHOUSE NO. 2017021031**

I. BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project, pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA and adopted by the Board of Trustees of the Hermosa Beach City School District (District) in Resolution No. 06:18/19.

A. Project Summary

Project Location

The project is at 417 25th Street in Hermosa Beach, Los Angeles County, California. The property is known as the North School site.

Project Description

The proposed project is the reconstruction of the North School site for its reuse as a public school. The project entails demolition and removal of existing structures and vegetation onsite, extending the development footprint eastward over a vegetated slope, and constructing new school facilities. The proposed improvements would be funded by Measure S, which was approved by the District's constituents in June 2016.

The proposed improvements include construction of a two-story classroom and administration building (main building), multipurpose building, loading and parking areas, play areas, and associated school improvements. The school would have a maximum enrollment capacity of 510 students. An asphalt playground would be developed between the two buildings, and a natural turf field would be installed in the eastern portion of the site; the field would be supported above the grade of the hillside by a retaining wall. A surface parking lot with 41 stalls would be developed in the western portion of the site, and vehicular access to the site would be provided from 25th and 26th Streets.

The proposed school would accommodate the District's third- and fourth-grade students. Hermosa View Elementary School program would shift from grades K-3 to K-2. Hermosa Valley School would shift from grades 4-8 to 5-8.

B. Environmental Review Process

In conformance with CEQA, the State CEQA Guidelines, the District conducted an extensive environmental review of the proposed project.

- The District determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP) and Initial Study on February 10, 2017. The public review period extended from February 10, 2017 to March 13, 2017.
- The District prepared a DEIR, which was made available for a 45-day public review period beginning November 13, 2017, and ending January 2, 2018.
- In accordance with Section 15088.5 of the CEQA Guidelines, the District recirculated the DEIR because significant new information was added to the analysis after the first DEIR public review period. The recirculated DEIR was made available for a 45-day public review period beginning August 3, 2018, to September 17, 2018.
- The District prepared a Final EIR (FEIR), including the Responses to Comments to the DEIR, which contain comments on the original and recirculated DEIR, responses to those comments, and revisions to the DEIR made available on December 27, 2018.

C. Record Of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the District in conjunction with the proposed project
- The DEIR for the proposed project
- The recirculated DEIR for the proposed project
- The FEIR for the proposed project
- The reports and technical memoranda included or referenced in the EIR
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR and the recirculated DEIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR and the recirculated DEIR

- All written and verbal public testimony presented during a noticed public hearing for the proposed project and comments received after the close of the comment period and responses thereto
- The Mitigation Monitoring and Reporting Program
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR
- The Resolutions adopted by the District in connection with the proposed project, and all exhibits and documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto
- Matters of common knowledge to the District, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

D. Custodian and Location Of Records

The documents and other materials that constitute the administrative record for the District's actions related to the project on which these findings are based are maintained at the Hermosa Beach City School District Office, 1645 Valley Drive, Hermosa Beach, California, 90254. The Hermosa Beach City School District Business Manager is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the front desk at the Hermosa Beach City School District Office. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

II. FINDINGS AND FACTS REGARDING IMPACTS

A. Impacts Determined to Have No Impact

Initial Study

An Initial Study was prepared by the District to identify the potential significant effects of the project. The Initial Study was completed and distributed with the Notice of Preparation for the proposed project, dated February 10, 2017, and is included in the Draft EIR as Appendix A. The Initial Study determined that the proposed project would not result in impacts to the following resources:

- Agriculture and Forestry Resources
- Mineral Resources

- Population and Housing
- Recreation

All other topical areas of evaluation included in the Environmental Checklist were determined to require further assessment in the Draft EIR.

B. Impacts Determined to Be Less Than Significant

This section identifies impacts of the proposed project which the Draft EIR determined to be less than significant without implementation of project-specific mitigation measures.

1. Aesthetics

Impact 5.1-1: The proposed project would not substantially alter public views of scenic vistas or scenic corridors.

Scenic Vistas

Due to its dense development and varying topography, there are limited expansive scenic views of City-designated visual features. The only visual resource that can be observed at and near the project site is the Pacific Ocean. Figure 5.1-3, *Scenic Corridors and Viewpoints*, page 5.1-13 of the Draft EIR, shows the City-designated uninterrupted viewing areas of the beach and directional public viewpoints of City-designated visual features toward the ocean and the Santa Monica Bay and mountains. In addition to the City-designated viewpoints, other public viewpoints close to the project site are along 27th Street, 26th Street, and 25th Street. The views from these locations are of the ocean. Figure 5.1-4, *Scenic Features from Public Viewpoints*, page 5.1-15 of the Draft EIR, shows the views of the ocean from these public viewing areas. There are no other views of City visual features nearby the project site.

- **27th Street.** Views of the ocean are available on 27th Street west of Morningside Drive. There are no views of the ocean on the segment of Gould Avenue just east of Morningside Drive and adjacent to the park. Due to the intervening residential structures between the project site and 27th Street, project implementation would not block public views of the ocean from this public viewpoint.
- **26th Street.** The ocean can be seen along the entire stretch of 26th Street fronting the project site. This area would be developed with the new multipurpose building in the northeast portion and the school's surface parking lot on the northwest. Although the proposed building would be 28 feet tall, it would not obstruct views of the ocean. The area immediately east of the building would be the school's new playground area, and the remaining District-owned property of vegetated hillside and grass field, which is downhill from the project site and does not provide any views of the ocean. Therefore, project implementation would not block public views of the ocean on 26th Street.
- **25th Street.** Along the school's frontage, views of the ocean are available starting near the southwest corner of the existing school building. As the proposed two-story school building on

25th Street would be constructed within the general footprint of the existing structures and would be eastward of the area where views of the ocean become visible, project development would not obstruct public views of the ocean on 25th Street.

Scenic Corridors

Scenic corridors provide visually appealing views of man-made and/or natural features. Figure 5.1-3 shows designated scenic corridors near the project site that have been identified in various City documents. They include Ardmore Avenue and Valley Drive, approximately 800 feet and 650 feet east of the site, respectively; Pacific Coast Highway (PCH), 0.5 mile farther east; and Hermosa Avenue, 0.1 mile west. Due to the distance, topography, and intervening development between the project site and PCH and Hermosa Avenue, no views of the project site are available from these two roadways, and project implementation would not change views of these corridors or affect their scenic qualities.

Ardmore Avenue and Valley Drive, however, are closer to the project site. The easternmost portion of the District-owned property (i.e., vegetated hillside and grass field next to Valley Park)—not including the project site—is within the corridor's viewshed.

- Ardmore Avenue in the vicinity of Valley Park is at a slightly higher elevation than Valley Drive. Westward views include the Hermosa Valley Greenbelt and building rooftops; eastward views are of residences. Due to the topography and vegetation within the greenbelt, most of the views of the project site, if any, are limited. Therefore, project implementation would not be easily discernable, and any visual affects to the quality of this corridor would be less than significant.
- Valley Drive provides eastward views of the Hermosa Valley Greenbelt and westward views of Valley Park, existing community buildings on Valley Drive within the park, and residences. Most of Valley Park is below the elevation of Valley Drive. Due to the lower topography of the park, views of the park are mostly of thick canopies of ornamental trees along its perimeter. Views of the project site are mostly obstructed by the trees' canopies, community buildings, and homes. Therefore, project implementation would not significantly affect the scenic qualities of Valley Drive.

Project implementation would alter the visual characteristics of the eastern boundary of the site by replacing the existing school building with open playground space, and a black wire fence would replace the existing metal chain-link fence along the eastern perimeter. Removal of the existing building would expand westward views from areas east of the project site. As discussed, and shown in Figure 5.1-5, *Views from Ardmore Avenue and Valley Drive*, page 5.1-17 of the Draft EIR, the proposed improvements would not be easily observed from these designated scenic corridors, and the project's impact on the corridors would be less than significant.

Impact 5.1-2: The proposed project would alter the visual appearance of the site but would not substantially degrade its character or quality or that of the surrounding area.

Project implementation would alter the existing appearance of the project site both during and after construction. Construction activities include the demolition and removal of all improvements,

vegetation, and debris on the property. Until the start of building construction, the site would be vacant with exposed soil, without structures and vegetation. A chain-link fence with a tarp would be installed around the project site boundaries to limit views into the construction worksite. Construction staging would be set up in the eastern portion of the site, closest to the designated vehicle access point at the intersection of Morningside Drive and 26th Street. The fence and tarp would appear similar to those at neighboring residential construction sites and would remain on the property until construction of the proposed new campus is completed. The fence and tarp would reduce views of the worksite, which could be in disarray.

After construction, the appearance of the project site would be enhanced with new, modern school facilities (see Figure 4-2, *Visual Simulations, Main Building*, page 4-5 of the Draft EIR) designed in a modern coastal architecture style, similar to the more recently renovated residences near the project site. The exterior walls of the new buildings would include a combination of stucco and horizontal lap-siding materials, large windows, and both flat and sloped metal-seam roofs. Figure 5.1-6, *North School Rendering*, page 5.1-21 of the Draft EIR, shows a 3D rendering of the proposed design.

As viewed from the adjacent streets, the most noticeable visual changes would be:

- Construction of a new multipurpose building in the northeast corner of the project site. The existing black asphalt surface parking lot with perimeter chain-link fencing would be replaced with a 28-foot-tall building. Figure 5.1-7, *View of 26th Street at Morningside Drive*, page 5.1-23 of the Draft EIR, provides side-by-side views of the existing parking lot and a rendering of the proposed multipurpose building.

The multipurpose building would not have a second floor, the interior would have a high-ceiling, and the building's roofline would be at a similar height as residential structures on 26th Street. The existing driveway at Morningside Drive would remain for emergency vehicle access onto the site, and a new 6-foot-high, ornamental black wire gate would be installed. The multipurpose building would also be set back from 26th Street at a distance similar to the residences on the south side of the street. Trees and shrubs would be planted in front of the new building, next to the sidewalk.

As shown in Figure 5.1-7, the proposed improvements would not substantially degrade the visual character or quality of the project site or that of the surrounding residences.

- Conversion of the asphalt-covered playground in the western end of the site to a surface parking lot. The existing building in this area would be demolished and replaced with new asphalt for use as a parking lot. The existing grade separation of this area from Myrtle Avenue and 26th Street would remain, and the existing 6-foot-tall chain-link fence would be replaced with a 4-foot-high black cable rail fence with dense vegetation. As shown in Figure 5.1-8, *View of Myrtle Avenue and 26th Street*, page 5.1-25 of the Draft EIR, the proposed conversion of the playground space into a parking lot would not substantially degrade the visual character or quality of the western portion of the site or that of the surrounding residences.
- Replacement of the three 1-story buildings on 25th Street with one 2-story, 32-foot tall building within the buildings' general footprints. The new building would follow the curvature of the

segment of 25th Street that it fronts. The center of the building would be angled, and the dimensions of the eastern and western wing frames would be symmetrical. Although the building would generally have block massing, the fold in the center, varied exterior building materials, extended roofline, and shade awnings over the windows on the second floor—see Figure 4-2, of the Draft EIR—would give the building façade texture and minimize its bulkiness.

The building would also be set back from 25th Street, at a distance similar to the existing buildings' footprints, which is farther from the street than residences on the north side of 25th Street, east and west of the school. The curb and sidewalk would be pulled in towards the lawn to create a new vehicle loading lane. A slightly smaller grass lawn with trees would be installed.

As shown in Figure 5.1-9, *View from 25th Street*, page 5.1-29 of the Draft EIR, the improvements would alter the visual appearance of the site. However, they would not substantially degrade the visual character or quality of this area.

As discussed above and shown in Figures 5.1-7 through 5.1-9, project implementation would alter the appearance of the site. However, the architectural design and height of the proposed buildings would be similar to and compatible with the surrounding residences. The proposed buildings' setback from the adjoining roadways and varied architectural features help break up the buildings' mass, so that they are compatible in scale as the surrounding developments. The proposed features would reduce the buildings' appearance as bulky, overbearing, and/or out-of-place. They would be architecturally interesting, compatible with the overall visual characteristics of the surrounding coastal neighborhood.

Impact 5.1-4: The proposed structures would not create prolonged periods of shade and shadow at a public gathering area.

The proposed main school and multipurpose buildings would be approximately 32 feet and 28 feet tall, respectively. Both buildings would cause shade and shadow effects. The project site is surrounded by residential uses to the north, west, and south. Valley Park is to the east.

Due to the movement of the sun in the northern hemisphere, the buildings would cast westward shadows in the morning, west-northward at noon, and north-eastward in the afternoon. Figure 5.1-10, *Shadows, Winter Solstice*, page 5.1-33 of the Draft EIR, and Figure 5.1-11, *Shadows, Summer Solstice*, page 5.1-35 of the Draft EIR, are diagrams of the shadows that would be cast by the proposed building during the winter solstice (around December 22), when the sun's path is lowest in the sky, and the summer solstice (around June 21). As illustrated in the figures, the shading effects would be greatest during winter, and there would be limited shading effects during the summer months.

Under the worst-case scenario at the winter solstice, the shading caused by the project's structures would not intrude into Valley Park (see Figure 5.1-12, *Shadow Impacts on Massing*, page 5.1-37 of the Draft EIR). However, due to the dense nature of the surrounding development, the proposed structures would cast shadows on some of the residential properties to the north. The southern face of the residential structures immediately north of the multipurpose building on the north side of 26th Street would be slightly shaded in the morning. The southern end of the residential properties on the south side of 26th Street would be shaded by the main school building until noon. The main school building would cast a shadow on the southern walls of the two residential structures closest to the

main school building. Since these buildings are taller than the proposed school building, their rooftops would not be shaded by the school building. The backyard of the property on the south side of 26th Street closest to the multipurpose building would be shaded in the morning, but the shadow would be gone by noon.

Cumulative Impact

The geographic context for the analysis of cumulative aesthetics and visual resources impacts includes developments in Hermosa Beach and South Bay communities. The proposed project's impacts are mostly localized—that is, the buildings are not substantially taller or wider in mass than others surrounding the project site and in the City. Alone and/or combined with proposed developments in the area, the proposed structures would not substantially alter public views of scenic vistas or scenic corridors or create shadow effects on open space areas. The stationary lighting proposed would be similar to the existing surrounding uses. Exterior lighting would have motion sensors, and no high-intensity exterior field lighting would be installed. Therefore, nighttime lighting at the project site would be limited, and the project would not significantly contribute to regional nighttime illumination.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with adverse effects on scenic vistas, degrading the existing visual character or quality of the site and surroundings, or exposing people on- or off-site to substantial light or glare.

Air Quality

Impact 5.2-1: Construction activities associated with implementation of the proposed project would not generate short-term emissions that exceed the South Coast Air Quality Management District's regional construction thresholds.

Construction activities produce combustion emissions from various sources, such as onsite heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions (PM₁₀ and PM_{2.5}) from grading and excavation and from demolition. Air pollutant emissions from construction activities onsite would vary daily as construction activity levels change.

Construction activities for the proposed project would temporarily increase PM₁₀, PM_{2.5}, VOC, NO_x, SO₂, and CO regional emissions in the SoCAB. Activities would include demolition, grading, utility trenching, school facilities construction, architectural coating, and asphalt paving. Construction emissions were estimated using CalEEMod 2016.3.1 based on the project's preliminary construction schedule, phasing, and equipment list provided by the District. The construction schedule and equipment mix are based on preliminary engineering and subject to changes during final design and as dictated by field conditions. Estimates of maximum daily construction emissions are provided in Table 5.2-10, *Maximum Daily Regional Construction Emissions*, page 5.2-21 of the Draft EIR. As shown in the table, air pollutant emissions from construction-related activities would be less than their respective SCAQMD regional significance threshold values.

Impact 5.2-2: Long-term criteria air pollutant emissions associated with the proposed project would not exceed the South Coast Air Quality Management District's regional operational significance thresholds.

Buildout of the proposed project would result in criteria air pollutant emissions from area sources (e.g., fuel use for landscaping and lawn maintenance, aerosols, and architectural coatings); energy use (natural gas) associated with the proposed school facilities; and project-related vehicle trips. The proposed project would generate 1,250 average daily trips during a weekday, which is a net increase of 100 additional average daily trips from existing conditions. Criteria air pollutant emissions were modeled using CalEEMod. Table 5.2-11, *Net Increase in Maximum Daily Regional Operational Emissions*, page 5.2-22 of the Draft EIR, identifies criteria air pollutant emissions from operation of the proposed project. Project-related long-term air pollutant emissions would not exceed SCAQMD's regional significance thresholds; therefore, the proposed project would result in less than significant impacts.

Impact 5.2-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.

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

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area. The nearest sensitive receptors to the project site are the residential land uses that protrude into the site on 26th Street and at the corner of Myrtle Avenue and 25th Street.

Air pollutant emissions generated by construction activities are anticipated to cause increases in air pollutant concentrations. Table 5.2-12, *Localized Construction Emissions*, page 5.2-24 of the Draft EIR, compares the maximum daily construction emissions (pounds per day) onsite with the SCAQMD's LSTs and shows that construction activities would not exceed the LSTs.

Operation LSTs

Operation of the proposed project would not generate substantial emissions from onsite, stationary sources. The proposed school facilities would be constructed to be Zero Net Energy (ZNE) buildings. Operation of the proposed project would entail the occasional use of landscaping equipment for project site maintenance, but air pollutant emissions generated from these activities would be below the SCAQMD LST thresholds, as shown in Table 5.2-13, *Localized Operation Emissions*, page 5.2-25 of the Draft EIR.

Carbon Monoxide Hotspots

Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact. Trip generation for the proposed project would be significantly less than these volumes—i.e., up to 1,250 average daily trips. Furthermore, the SoCAB is designated as attainment under both the National and California AAQS for CO. The project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site.

Health Risk Assessment

Construction activities would result in short-term emissions of diesel PM, which is a TAC. The exhaust of off-road heavy-duty diesel equipment would emit DPM during site preparation, grading, and other construction activities.

The proposed project would be developed in approximately 14 months, which is less than the 30-year exposure period for DPM or risk accumulated over a 70-year lifetime and would limit the exposure of onsite and offsite receptors. SCAQMD uses the construction LST analysis as an indicator of potential health risk. As shown in Table 5.2-12, construction activities would not exceed LST significance thresholds. For these reasons, construction emissions are not anticipated to pose a threat to onsite and offsite receptors. Additionally, operation of the proposed project would not involve the operation of significant sources of TACs, and therefore a health risk assessment is not warranted.

Cumulative Impact

In accordance with SCAQMD's methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth in the area. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted by cumulative project emissions (i.e., the SoCAB), SCAQMD considers a project cumulatively significant when project-related emissions exceed the SCAQMD regional emissions thresholds shown in Table 5.2-5, page 5.2-17 of Draft EIR.

The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, and nonattainment for PM₁₀ under the California AAQS (CARB 2016b).⁷ Construction of cumulative projects would further degrade the regional and local air quality. However, implementation of SCAQMD regulations and mitigation for related projects would reduce cumulative impacts. Construction of the project would not result in emissions in excess of the SCAQMD regional emissions thresholds.

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by SCAQMD to be a substantial source of air pollution and does not add significantly to a cumulative impact. Operation of the project would not result in emissions in excess of the SCAQMD regional emissions thresholds. No significant cumulative impacts were identified with regard to CO hotspots.

In consideration of the preceding factors, the project's contribution to cumulative air quality impacts would be less than significant, and project impacts would not be cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with the exposure of sensitive receptors to substantial carbon monoxide pollutant concentrations, toxic air contaminant concentrations during Project construction and operation, and exposure of a substantial number of people to objectionable odors during construction and operations.

Biological Resources

Impact 5.3-2: Implementation of the proposed project would not cause the loss of or impact to riparian habitat, sensitive natural communities, and federally protected wetlands.

According to the biological resources assessment, the site is void of wetland vegetation, drainages, bed and bank, soils, and other features indicative of the presence of jurisdictional wetlands. No features were observed that would be considered jurisdictional by the Corps, CDFW, and RWQCB. Additionally, the site does not support any drainage features or ephemeral wetland vegetation as defined by Section 404 of the CWA.

Impact 5.3-3: The proposed project would not affect any wildlife corridors.

The project site is in an urbanized residential community and is not within or adjacent to a designated local or regional wildlife corridor or environmental preserve area. Although the project site is near Valley Park and the Hermosa Greenbelt, both of these areas are highly disturbed from frequent human activity.

Impact 5.3-4: The proposed project would not conflict with local policies and ordinances protecting biological resources.

Project implementation would not require the removal of any trees within the public right-of-way, which are protected by Chapter 12.36 of the Hermosa Beach Municipal Code. All trees proposed for removal are within District property and not within the public right-of-way. Additionally, the proposed project would increase the amount of useable green space on the project site with the creation of a natural-turf field, which would be available for community use via the Civic Center Act.

Impact 5.3-5: The proposed project would not conflict with adopted habitat conservation plans.

The project site is in the City of Hermosa Beach, which is not within a local or regional habitat conservation plan, natural community conservation plan, or other related habitat or wildlife conservation plan. Additionally, there are no Significant Ecological Areas designated by Los Angeles County on or near the site.

Cumulative Impact

The geographic context for the cumulative impact analysis on biological resources includes Hermosa Beach and the surrounding South Bay cities, such as Manhattan Beach and Redondo Beach, that

share similar coastal biological resources. Since the project site is developed and does not contain any sensitive species or habitat, its proposed redevelopment would not contribute to potential cumulative effects to the region's biological resources. The project's potential impact to nesting migratory birds is localized and will be fully mitigated with the implementation of Mitigation Measure BIO-1. Therefore, project impacts to biological resources would not be cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with loss or impacts to riparian habitat, sensitive natural communities, and federally protected wetlands; wildlife corridors; local policies and ordinances protecting biological resources.

Cultural Resources

Impact 5.4-1: Development of the project would not impact historic resources.

A resource is considered "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1, 14 CCR Section 4852). CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below. The NRHP criterion letter (A, B, C, and D) is followed by the corresponding CRHR number (1, 2, 3, and 4).

- A/1 Is associated with events that have made a significant contribution to the broad patterns of our history; or
- B/2 Is associated with the lives of persons significant in our past; or
- C/3 Embodies the distinctive characteristics of a type, period, or method of construction or that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D/4 Yields, or may be likely to yield, information important to prehistory or history.

Historic Resource Determination

Main Building—1924/1934

The Main Building of North School has retained the levels of integrity of location and setting necessary to convey it as an elementary school building in Hermosa Beach. However, due to the reconstruction of the building in 1934 after the Long Beach earthquake, the main North School building lost the majority of the Neo-Classical architectural elements and features of design, materials, workmanship, and feeling that would have conveyed the building's original appearance and its association with Hermosa Beach of the mid-1920s.

Criterion A/1

The North School Main building is not individually eligible for listing the National Register or California Register under Criterion A/1 for its association with significant events or trends because it was constructed after Ocean View School (1904) and Pier Avenue School (1911), to address the

growing student population in the City; and North School did not make a significant contribution to the education of children during its existence above what would be expected of a neighborhood elementary school.

Criterion B/2

The Main building is not eligible for listing under Criterion B/2, based on the property's direct association with the lives of persons important to the history of Hermosa Beach, Los Angeles County, California, or the nation. None of the educators at North School were of historical importance or developed innovative methods of education while employed at North School. No evidence was found to support that persons important to the history of Hermosa Beach were influenced by North School during the productive or innovative periods of their lives.

Criterion C/3

The Main building is not individually eligible for listing in the National Register or California Register under Criterion C/3 as an example of Art Deco Moderne style school architecture. The Main building was originally constructed in a Neo-Classical style of architecture, and the exterior facades were replaced with a layer of gunite and steel webbing wall system. The original Neo-Classical architectural design was lost in the earthquake repairs, and the retrofitted walls incorporate a slight reference to Art Deco or Moderne style. Additionally, the Main building was not designed in a collaborative manner by an architect and school district. The Main building was repaired as quickly and cost-effectively as possible, as does not appear as though it was reconstructed in an attempt to create a state-of-the-art educational facility of the mid-1930s. The Main building does not possess the architectural attributes to have been an influence on the work of subsequent school designers in California or the United States. Additionally, the building does not appear to be an important example of Art Deco/Moderne architecture on a local, state, or national level.

Criterion D/4

The Main building of North School does not appear to have the capacity to yield information important to the history of education in Hermosa Beach, Los Angeles County, or California; therefore, the building would not appear to be individually eligible for listing in the National Register or California Register under Criterion D/4.

Kindergarten and Classroom Buildings—1939

The two buildings constructed in 1939 were financed from funds from a federal program signed into law by President Franklin D. Roosevelt in 1933 and were part of his "New Deal" platform. Both the Public Works Administration (PWA) and the Works Progress Administration (WPA) Program were responsible for investing over \$540 million for the erection of new school buildings and extension/additions and repairs to existing schools around the United States.

Criterion A/1

The buildings do not appear eligible for listing in the National Register or California Register individually or collectively under Criterion A/1. Although the PWA program was an important aspect of Roosevelt's New Deal administration, an association of historic events is not enough to qualify the buildings as significantly historic. According to the HRAR, the two 1939 buildings have

not been found to have been significant in the history of grammar school education in the United States, California, or Hermosa Beach.

Criterion B/2

The two 1939 buildings do not appear to be eligible for listing based on direct association with the lives of persons important to the history of Hermosa Beach, Los Angeles County, California, or the nation. The research conducted for the HRAR did not determine that any educators of importance taught in the 1939 kindergarten and classroom buildings, and no direct links between persons important to the history of Hermosa Beach during their productive life were found.

Criterion C/3

The 1939 buildings do not appear eligible individually or collectively for listing in the National or California Register under Criterion C/3 as examples of early (pre–World War II) International-style architecture, which, according to the HRAR, appears to be out of character with its immediate beach bungalow surroundings. The International style may have been chosen for the new North School buildings because of its minimalist exterior, which would help reduce the cost of the buildings' construction. Although the 1939 Kindergarten building presents some conservative design features, the 1939 classroom building is a utilitarian structure almost devoid of style. The buildings do not appear to possess the necessary architectural attributes to have influenced subsequent architects' work in California or the United States, and the buildings do not appear to be important examples of this style of architecture in the City of Hermosa Beach, California, or the nation.

Criterion D/4

Neither of the 1939 buildings appear to have the capacity to yield information important to the history of Hermosa Beach, Los Angeles County, or beach-front communities, and neither appear eligible individually or collectively for listing in the National Register or California Register under Criterion D/4.

Classroom and Kindergarten Buildings—1958

Criterion A/1

The two buildings constructed in 1958 do not appear eligible individually or collectively for their association with events that have made a significant contribution to the broad pattern of history in Hermosa Beach or Los Angeles County or to the cultural heritage of the United States. Neither building is associated with any events important to the history of the education of children outside of their primary goal of providing an enclosed space for the instruction and activities of grammar school children.

Criterion B/2

Neither of the 1958 buildings has any direct association with the lives of persons important to the history of Hermosa Beach, Los Angeles County, California, or the United States. No evidence was found indicating that the buildings meet the guidelines to be listed individually or collectively in the National or California Register under Criterion B/2.

Criterion C/3

The two 1958 buildings do not appear eligible for listing in the National or California Registers as examples of classroom buildings constructed in 1958 and designed in the Contemporary style of architecture. The buildings are not significant examples of school-building architecture in California or the United States, nor have they been found to be important examples of work of the architectural firm KWW. The 1958 buildings do not appear individually or collectively eligible for listing in the National Register or California Register under Criterion C/3.

Criterion D/4

The two 1958 buildings have not yielded, nor do they appear to have the potential to yield, important information about the history of the local area, California, or the United States. The buildings do not appear to be individually or collectively eligible for listing in the National Register or the California Register under Criterion D/4.

Historic District

The project site contains five structures that were constructed between 1924 and 1958. The five buildings do not represent a cohesive set of buildings united by an intentional campus plan or architectural theme, which is a requirement to form a historic building district. While they share the same function of educational facilities, the architectural styles of the buildings represent three different periods of modern architecture. The original North School building was rehabilitated with an Art Deco/Moderne-influenced façade covering the original 1924 Neo-Classical brick façade. The two 1939 buildings were constructed in the International style, and the two 1958 buildings in the Contemporary style. The five buildings do not present any architectural elements that visually link or associate them into a single campus unit.

Cumulative Impact

Based on the HRAR, the project site and built structures are not historically significant, nor are they a part of a historic district. Project implementation would not result in an individual project impact and/or contribute to a potentially significant cumulative effect to historical resources.

Additionally, based on reviews of record searches and observations of the developed urban nature of the project site and surrounding area during site visits, it does not appear that subsurface cultural resources would be discovered. However, archaeological and paleontological resources are typically isolated. Project implementation would require mitigation measures to minimize impacts related to any accidental discoveries during ground-disturbing activities. As with the proposed project, related development would be required to comply with CEQA Guidelines Section 15064.5, which requires the lead agency to determine if discovered resources are unique or historically significant, and if so, to treat them in accordance with the provisions of PRC Section 21083.2. Therefore, the proposed project's contribution to cumulatively impact subsurface cultural resources would not be considerable and impacts would be less than significant.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with historic resources.

Geology and Soils

Impact 5.5-1: Occupants and structures on the project site would experience seismic ground-shaking, but would not be subject to significant risk from such an event.

The CBC provides the appropriate building design criteria needed to protect the structural integrity of structures and infrastructure against damage and collapse. A geotechnical report was prepared, by a California Registered Civil Engineer and Certified Engineering Geologist, and recommendations of the report have been incorporated into the design and construction of the proposed North School project.

Seismic design criteria and requirements in the CBC require structures and infrastructure to withstand seismic ground shaking and reduce hazards to persons and property. The CBC also requires that the recommendations of the geotechnical report, prepared by registered professionals (i.e., registered civil engineer or certified engineering geologist), be incorporated into the design and construction of the project. Compliance with the recommendations and structural design would ensure that the proposed project would not expose people or structures to potential substantial adverse effects from ground-shaking hazards.

Impact 5.5-3: Project development would not cause substantial soil erosion or loss of topsoil.

Construction would result in the demolition and removal of existing development and landscaping, and expose soil susceptible to erosion, especially during heavy rains. However, once constructed, all exposed grounds would be restored and covered with vegetation, and potential soil erosion and loss of topsoil would be limited.

Project development would require grading and the removal of approximately 1,000 cubic yards of topsoil to accommodate building foundations and structural footings. Since the proposed project would affect an area greater than one acre, the project would be required to obtain a Construction General Permit under the NPDES Program that would require the preparation of and adherence to a project-specific SWPPP. The SWPPP would include a strategy for construction activities to comply with stormwater regulations to minimize sediment and other pollutants in stormwater runoff, as well as BMPs to control erosion and sediment loss, runoff, and contain sediment transport within the project site that would limit soil erosion and the loss of topsoil from the site. Section 5.8, *Hydrology and Water Quality*, of the Draft EIR, includes additional information on the project's SWPPP.

Cumulative Impact

Impacts relating to soils and geologic influences are site specific and usually cannot be considered in cumulative terms, such as in the case of the proposed North School Reconstruction project. Mitigation of geologic, seismic, and soil impacts of development projects are specific to the site. The proposed project and other new development projects in the City of Hermosa Beach are required to comply with applicable federal, state, and local requirements, including CBC standards and the NPDES program. Each project's geologic and soil impacts would be reduced to a less than significant level on an individual basis and would not be cumulatively additive. Therefore, the proposed project would not significantly contribute to cumulatively considerable geological and soil impacts.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with seismic ground-shaking, and topsoil loss and soil erosion.

Greenhouse Gas Emissions

Impact 5.6-1: Development of the proposed project would not result in a substantial increase of GHG emissions that would exceed the South Coast Air Quality Management District's significance criteria.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

The proposed project would generate GHG emissions from vehicle trips generated by the project, energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., equipment used on-site, consumer products, coatings), water/wastewater generation, and waste disposal. Annual GHG emissions were calculated for construction and operation of the project. Total construction emissions were amortized over 30 years and included in the emissions inventory to account for the short-term GHG emissions from the construction phase of the project. Table 5.6-6, *Project-Related GHG Emissions*, page 5.6-22 of the Draft EIR, shows that the proposed project at buildout would generate a net of 439 MTCO_{2e} emissions per year. The total net increase of GHG emissions on-site from the project would not exceed the SCAQMD's bright-line threshold of 3,000 MTCO_{2e}.

Impact 5.6-2: The proposed project would not conflict with the California Air Resources Board's Scoping Plan or the Southern California Association of Governments' 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy.

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SCAG's 2016-2040 RTP/SCS. A consistency analysis with these plans is presented below.

CARB Scoping Plan

In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy established by AB 32, which is to return to the State's GHG emissions inventory to 1990 levels by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

The 2017 Climate Change Scoping Plan Update has adoption hearings planned for June 2017, and provides the strategies for the state to meet the 2030 GHG reduction target as established under SB 32.

The project GHG emissions shown in Table 5.6-5, page 5.6-18 of the Draft EIR, include reductions associated with statewide strategies that have been adopted since AB 32 and SB 32. The proposed project would comply with these statewide GHG emissions reduction measures. In addition, the proposed school facilities would be constructed to be Zero Net Energy (ZNE) buildings. However, the Scoping Plan itself is not directly applicable to the proposed project. Therefore, the proposed project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016-2040 RTP/SCS was adopted April 7, 2016, and identifies:

- Multimodal transportation investments: bus rapid transit, light rail transit, heavy rail transit, commuter rail, and high-speed rail
- Active transportation strategies: e.g., bike ways and sidewalks
- Transportation demand management strategies
- Transportation systems management
- Highway and arterial improvements: interchange improvements, high-occupancy vehicle lanes, high-occupancy toll lanes
- Goods movement strategies
- Aviation and airport ground access improvements
- Operations and maintenance to the existing multimodal transportation system

The overarching strategies in the 2016 RTP/SCS are to 1) allow the southern California region to grow in more compact communities in existing urban areas; 2) provide neighborhoods with efficient and plentiful public transit and abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and 3) preserve more of the region's remaining natural lands. The 2016 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecast development that is generally consistent with regional-level general plan data. The projected regional development pattern—when integrated with the proposed regional transportation network identified in the RTP/SCS—would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region. The RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS, but provides incentives for consistency for governments and developers. The proposed project would not interfere with implementation of the CARB Scoping Plan or SCAG's ability to implement the regional strategies outlined in the 2016 – 2040 RTP/SCS.

Cumulative Impact

Project-related GHG emissions are not confined to a particular project area or air basin but are dispersed worldwide. Therefore, impacts under Impact 5.6-1 are not project-specific impacts, but the proposed project's contribution to the cumulative impact of global warming. Implementation of the proposed project would result in a nominal increase in GHG emissions. Thus, the proposed project's GHG emissions and contribution to global climate change impacts are not considered cumulatively considerable, and therefore are less than significant.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with greenhouse gas emissions and conflicts with applicable GHG reductions plans, policies, and regulations.

Hazards and Hazardous Materials

Impact 5.7.1: The project site contains no recognized environmental conditions, and pesticides and lead concentrations found on the site do not pose a hazardous risk. Demolition of site building materials, however, could accidentally release lead and asbestos-containing materials into the environment.

Recognized Environmental Conditions

The site consisted of a number of parcels that have been consolidated over the years. Based on the Phase I ESA, the northwest corner of the project site at Myrtle Avenue and 26th Street had building structures (e.g., church and residences) that have been demolished; prior to their development, the northwest corner of the site was in its natural condition. The remainder of the project site was also in its native condition prior to the current school-related improvements. Other than the current school use and former structures, the project site has not been used for other purposes. There is no indication that the site had been used for agricultural purposes or was a former hazardous waste disposal site or solid waste disposal site. Additionally, based on the Phase I ESA, the surrounding areas have always been residential and park. Accordingly, there is no indication that the site contains recognized environmental conditions.

Soil Hazards: Pesticides and Lead

Although no RECs were identified in the Phase I ESA, based on knowledge of likely practices at school sites throughout the state and due to the ages of the project site's buildings – in an abundance of caution – the District conducted soil sampling around the existing buildings to determine if the historic use of pesticides – i.e., OCPs – over the years has contaminated soils, and if so, whether the level is within acceptable standards. The District also sampled for lead in the soil as it is likely that building materials older than 1978 contained lead.

Soil samples were collected at 17 locations on the project site.

Pesticides

Twenty OCP compounds were analyzed, and the following four compounds were detected at 0.5 feet bgs:

- 4,4'- DDD: dichlorodiphenyldichloroethane
- 4,4'- DDE: dichlorodiphenyldichloroethylene
- 4,4'- DDT: dichlorodiphenyltrichloroethane
- Chlordane

Although detected, concentrations for 4,4'- DDD and 4,4'- DDT were below approved screening levels. Notwithstanding, a Human Health Screening Evaluation was completed following approved DTSC guidance and using the maximum concentrations of the four compounds. A health risk assessment concluded that the estimated hazard index for the pesticides is below the benchmark level for noncancer effects and within the DTSC and EPA risk management ranges.

Lead

Lead was detected in all 17 sampled locations. Two samples collected at 0.5 feet bgs had concentrations greater than the DTSC human health screening value of 80 milligram per kilogram (mg/kg) for lead. Using the DTSC-approved 95 percent upper confidence limit (UCL), the lead concentration for the site is 53.1 mg/kg. As the 95 percent UCL value for lead is below the screening value, the report concluded that lead is below the established level of concern.

Lead-Based Paint

Due to the ages of the buildings and the result of soil samples conducted, it is assumed that all coated surfaces (paint, varnish, or glazed) contain lead. Therefore, all lead-containing material abatement/removal work will be required to comply with applicable federal, state, and local requirements, including EPA, US Occupational Safety and Health Administration, and SCAQMD regulations. Lead must be contained during demolition activities (California Health & Safety Code Sections 17920.10 and 105255). Title 29 CFR Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring.

Asbestos

Evaluation for ACM included building interiors and “as encountered” on the exterior of the facilities; it did not include all potential ACM on the exterior of the buildings. According to the study, ACM were identified within the surfacing material (plaster in kitchen storage heater room) and the 12-inch vinyl floor tile and associated mastics in the restrooms of two classrooms. Project-related demolition activities would have the potential to expose construction workers and/or the public to ACMs not already identified. Prior to the demolition of the school facilities, the District will a complete comprehensive report to determine all ACM within the interior and the exterior of the campus to ensure potential exposure to ACM is limited. ACM identified would be removed, contained, and disposed of in accordance with applicable regulations.

Impact 5.7-2: The project site is not on a list of hazardous materials sites.

California Government Code Section 65962.5 requires that the Department of Toxic Substances Control compile and update at least annually a list of all of the following:

- (1) All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- (2) All land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
- (3) All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
- (4) All sites listed pursuant to Section 25356 of the Health and Safety Code. (California Government Code Section 65962.5[a])

The Phase I ESA included a search of regulatory agency databases for documented environmental concerns on the project site and in close proximity to the site. As shown on in Table 5.7-1, page 5.7-8 of the Draft EIR, the project site is not listed within the search radii for the following databases:

- Federal NPL Sites
- Federal Delisted NPL Sites
- CERCLIS Sites
- CERCLIS-NFRAP Sites
- Federal ERNS
- RCRA non-CORRACTS TSD Facilities
- RCRA CORRACTS Facilities
- RCRA Generators
- Federal Institutional/Engineering Control Registry
- State and Tribal Equivalent NPL Sites
- State and Tribal Registered Storage Tanks
- State and Tribal Institutional Controls/Engineering Control
- State and Tribal Voluntary Cleanup Sites
- State and Tribal Brownfield Sites
- HAZNET

Although the project site was not identified on any of the above databases, other sites nearby were:

- State and Tribal Equivalent CERCLIS Sites identified a site approximately 0.6 mile southeast of the project site at Hermosa Valley School that received approval from DTSC in June 2005.
- State and Tribal Landfills and Solid Waste Disposal Sites identified a potentially hazardous landfill site within 0.5 mile of the project site. However, it was determined by the Chief Engineer

at CalRecycle that the listed site was never a landfill and is not an environmental issue for the project site.

- State and Tribal Leaking Storage Tanks identified four sites within 0.5 mile of the project site. All of the sites were given a “Case Closed” designation. Additionally, due to the distance from the project site, expected groundwater direction, substances involved, and/or regulatory status, these facilities would not present an environmental issue at the project site.
- Orphan Site List identified one site as being potentially in the area and was not mapped due to incomplete address information. Based on a review of the facility name, Mobile Refinery Manhattan Beach, the facility does not appear to be in close proximity to the project site; it is also possible that the database was referring to the Torrance Exxon Mobil Refinery, approximately four miles to the southeast of the site.

Impact 5.7-3: Other than natural gas pipelines, the project site does not contain any other pipelines that carry hazardous substances or waste to the site.

The Southern California Gas Company provides natural gas to the project site and surrounding uses, and operates pipelines under the surrounding streets. Two-inch diameter gas lines in 26th Street, Myrtle Avenue, and Morningside Drive, and a four-inch diameter line in 25th Street supply natural gas to the project site and surrounding residences. Implementation of the proposed project would require the removal of all existing gas lines in the project site and reconnection of the lines to the newly installed improvements. The affected supply lines would be turned off for a short duration during connection of the new lines, which is typical of new development and would not create a hazardous situation for the users of the project site and surrounding community. There are no other hazardous liquid or gas pipelines on or surrounding the project site.

Impact 5.7-4: The project site is not within 500 feet of a freeway or busy traffic corridor.

The boundary of the project site is not within 500 feet of the edge of a freeway or busy traffic corridor. In urban areas, freeways and busy traffic corridors are defined as roadways that on an average day have traffic in excess of 100,000 vehicles or 100,000 average daily trips (ADT) (PRC Section 21151.8[b][9]).

The project site is surrounded by residential uses. Streets within 500 feet of the project site are designated as either local roads or collector streets. The busiest segment closest to the project site—Gould Avenue between Ardmore Avenue and PCH, approximately 770 feet east of the project site—has a design capacity of 22,000 vehicles and an operating traffic volume of 13,256 ADT. PCH and I-405 are approximately 0.4 mile and 6.5 miles east of the site, respectively. PCH has a design capacity of 44,000 vehicles and an operating traffic volume of 51,437 ADT.

Cumulative Impact

The area considered for cumulative impacts from hazards and hazardous materials is the adjacent properties in Hermosa Beach. Past, existing, and planned developments in the City could pose risks to public health and safety as they relate to the use, storage, handling, generation, transport, and disposal of hazardous materials and wastes. The proposed project and other development in the

project vicinity could increase these risks if they are not remediated and/or managed properly in accordance with applicable regulations. Compliance with applicable regulations related to public health and safety and hazardous materials would ensure that impacts are reduced to a less than significant level, individually and cumulatively.

Other projects in the City of Hermosa Beach would require assessments for hazardous materials, such as assessments of structures onsite (over certain ages) for LBP, ACM, and other contamination from past uses and/or releases. Cleanup of hazardous materials in soil, soil vapor, and/or groundwater to regulatory cleanup levels for the relevant types of land uses would be required in compliance with applicable federal, state, and regional regulations, as listed in Section 5.7.5, page 5.7-16 of the Draft EIR. Therefore, the use, storage, transport, and disposal of hazardous materials by construction and operation of other projects would result in site-specific impacts and would be reduced to a less than significant level. Combined with the proposed project, impacts would not be cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with hazardous materials onsite, pipelines carrying hazardous substances, and being located within 500 feet of freeway or busy traffic corridors.

Hydrology and Water Quality

Impact 5.8-1: The project would not substantially alter the drainage pattern of the site, substantially increase the rate or amount of surface runoff, or exceed the capacity of any storm drain system.

Proposed Drainage Facilities

The project would demolish the existing facilities and renovate the project site with new drainage facilities. The surface of the site would be regraded and engineered to direct stormwater to three drainage facilities onsite: a three-foot-wide swale along the interior of the retaining wall on the eastern perimeter of the site; two planter boxes fronting the main building; and storm drain inlets installed around the site—two on the western portion of the parking lot, two in front of and behind the main building, and four near the corners of the asphalt play area. Figure 5.8-1, *Conceptual Grading and Drainage*, page 5.8-13 of the Draft EIR, shows the proposed areas for the drainage improvements. The proposed drainage facilities would be designed to capture and retain the 85th percentile 24-hour SWQDv and only volumes in excess would be discharged into the MS4.

Stormwater captured by the swale and inlets would be carried via new storm drain lines installed beneath the site to a retention system in a tank underneath the proposed parking area with a SWQDv of 3,564 cubic feet. The proposed box planters, with SWQDvs of 234 and 208 cubic feet, would treat stormwater prior to discharging onto 25th Street via underground drains. The project storm drain system would continue to discharge stormwater at the same offsite locations as existing conditions and would not change the existing offsite drainage system. The surrounding area is entirely developed, and the project would not alter any natural drainage channels or watercourse.

Construction

The potential erosion and siltation impacts would occur during the construction phase of the project. During construction, the existing structures would be demolished and the site would be cleared for grading, which would expose and loosen soil, making it susceptible to wind and water erosion. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. Prior to construction activities, a SWPPP would be prepared and submitted to the SWRCB for approval, consistent with the Municipal NPDES permit and the City's Stormwater Management and Discharge and Control Ordinance. The SWPPP would include the BMPs to be implemented during construction to ensure that erosion or siltation impacts are reduced to a less than significant level. SWPPP include debris basins, silt fences, and stabilized construction entrance/exit driveways. Runoff from these areas will flow into the storm drainage system designed for the project. Therefore, erosion potential during operation of the proposed project is less than significant.

Operation

Regrading and engineering the site would alter stormwater drainage flows from existing conditions, and the proposed improvements would accommodate stormwater with new drainage and treatment facilities. The project would result in the construction of an approximately 17,100-square-foot parking lot with 46 spaces on the western side of the site. Therefore, according to Chapter 8.44 of the municipal code, the project would be considered a significant redevelopment project, and the District would be required to implement stormwater treatment measures in compliance with the Municipal NPDES permit, including infiltration measures.

Stormwater Design Requirements

The Municipal NPDES permit would require the proposed storm drainage system to convey the peak flow rate from the design storm (from which the SWQDv is calculated), which is defined as the greater of:

- The 0.75-inch, 24-hour rain event, or
- The 85th percentile, 24-hour rain event as determined from the Los Angeles County 85th percentile precipitation isohyetal map.

According to Section 8.44.020(G) of the municipal code, the largest 85th percentile 24-hour storm event in Hermosa Beach would be 0.8 inch. Preliminary calculations indicate that the postdevelopment peak volume would result in a SWQDv of 3,564 cubic feet for the proposed infiltration tank and 234 and 208 cubic feet for the two proposed box planters, for a total SWQDv of 4,006 cubic feet for the improvements. The Los Angeles County HydroCalc calculator was used to determine if the LID strategies implemented onsite—including the installation of the underground infiltration detention tank and two pervious planter boxes—would effectively handle peak flow rates. According to the design storm calculations (see Appendix J of the Draft EIR), the proposed improvements would be adequately sized to capture and retain the runoff volume for the largest 85th percentile 24-hour storm event and would prevent flooding at the site; only volumes in excess of SWQDv would be discharged to the MS4.

Stormwater Runoff

Preliminary calculations were performed to determine the existing amount of treatment area and flow rate capture in cubic feet per second (cfs) compared to the proposed project. The results are

summarized in Table 5.8-1, *Existing vs. Proposed Runoff Volumes for 50-Year and 10-Year Storm Events*, page 5.8-12 of the Draft EIR. Project development would remove existing buildings and pavement, increasing the amount of pervious area onsite from 8,887 square feet to 32,919 square feet—about 3.7 times the area of the existing pervious surface. Through ground-cover absorption and percolation, the increase in pervious surfaces would reduce stormwater runoff. The stormwater runoff calculations show that the improvements would reduce the existing 50-year and 10-year peak runoff flow rates from 3.81 cfs to 2.34 cfs for a 10-year storm event, and from 5.50 cfs to 4.09 cfs for a 50-year storm event. Therefore, the increase in pervious surfaces and reduction in impervious surfaces would reduce the volume and rate of stormwater runoff, and the drainage improvements would be able to adequately capture stormwater on the project site. Figure 5.8-2, *Pre- and Postdevelopment Drainage Conditions*, page 5.8-15 of the Draft EIR, shows a comparison of existing and post-project site-drainage conditions.

Cumulative Impact

Construction and operation of the proposed project, in conjunction with related projects in the Santa Monica Bay Watershed, would result in increased flows that would eventually discharge into the Pacific Ocean, and the Santa Monica Bay, specifically. Related projects are those in the Santa Monica Bay Watershed that would direct stormwater flows through streams, channels, and other waterways into the Pacific Ocean. These projects would comply with their respective SWPPP and the regulations for water quality standards established by the Beach Cities EWMP. The project would result in a net reduction in the site's volume of stormwater runoff, and the project would therefore not result in a significant impact on a cumulative basis.

Although the area around the project site is entirely built out, new projects in the area, both individually and cumulatively, could potentially increase the volume of stormwater runoff and contribute to pollutant loading in the storm drain system with eventual discharge to the Pacific Ocean. However, as with the proposed project, future projects in Hermosa Beach would be required to comply with drainage and grading regulations and ordinances in Chapter 8.44 of the Hermosa Beach Municipal Code, which control runoff and regulate water quality at each development site. New development and redevelopment projects would be required to demonstrate that stormwater volumes could be managed by conveyance facilities and would not induce flooding. New projects also would be required to comply with the City's standard conditions of approval, regulations, and ordinances regarding water quality and NPDES permitting requirements. In consideration of the preceding factors, including the project's beneficial impact to water quality, cumulative water quality impacts would be rendered less than considerable, and therefore, less than significant.

The proposed project would reduce stormwater runoff from existing conditions through a series of above- and below-ground features designed to accommodate a series of storm events, as required by Chapter 8.44 of the City's municipal code. Water quality of the stormwater runoff is addressed through application of low impact development provisions of the Municipal Code and the Los Angeles County LID Design Manual. Since the project would reduce stormwater runoff from the existing condition and improve the quality of any runoff, this impact is considered less than cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with drainage patterns, surface runoff, and storm drainage system capacity.

Land Use and Planning

Impact 5.9-1: Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.

City of Hermosa Beach PLAN Hermosa

PLAN Hermosa was adopted on August 22, 2017, and is the effective General Plan for the City. Although PLAN Hermosa has been approved by City Council, it has not been certified by the CCC; therefore, the existing Local Coastal LCP is the effective regulatory document for development projects within the Coastal Zone. Portions of the site are designated as OS, according to the PLAN Hermosa Land Use Map; the remainder of the site is designated as Public Facility (PF).

The proposed OS land use designation allows for passive and active park, recreational, open space, and educational/institutional facilities land uses. The OS designation allows a floor-area-ratio (FAR) between 0.0 and 0.5. The PF land use designation, which allows for civic-related offices, community centers, operational facilities, and educational/institutional facilities land uses, allows for a FAR of between 0.1 and 1.0.

Since the proposed improvements would maintain the property as a public educational/institutional facility and would be within the allowable FAR,¹ the project would be consistent with PLAN Hermosa once it is certified by the California Coastal Commission. While the proposed PLAN Hermosa includes recommendations for update of the zoning code, no draft code has been prepared.

City of Hermosa Beach Municipal Code

There are no zoning regulations established for Unclass-designated land other than to identify School District on the zoning map. As shown in the development standards of the OS zone, the requirements of the zone are inconsistent with the list of permitted uses. Because there is no provision for school development in either the Unclass or OS zone, and as allowed by California Government Code Section 53094, the District Governing Board of Education has exempted all Measure S school facility improvement projects, including those proposed at the project site, from the City of Hermosa Beach zoning and land use ordinances.²

City of Hermosa Beach Local Coastal Plan

The Hermosa Beach Local Coastal Plan (LCP) designates the project site as Schools and Parks, but does not clearly delineate which portion of the site has which designation (see Figure 5.9-1, page 5.9-5 of the Draft EIR). The LCP also does not specify development standards for these land use designations. Therefore, the project's consistency review is based on requirements of Chapter 3,

¹ 38,000 square feet of school facilities/2.35-acre project site (102,366 square feet) = 0.37 FAR.

² Hermosa Beach City School District, Resolution 09:16/17, April 19, 2017.

Coastal Resources Planning and Management Policies, of the California Coastal Act (PRC § 30200 et seq.). Table 5.9-1, *Project Consistency with Coastal Resources Planning and Management Policies*, page 5.9-8 of the Draft EIR, lists the policies in Chapter 3 of the Coastal Act that are applicable to the proposed project and explains how the proposed project conforms to them.

The District is applying for a Coastal Development Permit (CDP) in conjunction with the preparation of this EIR. The CDP would be reviewed and considered by the CCC; its approval would verify compliance with the policies of Chapter 3 of the Coastal Act (PRC Code § 30000 et seq.). Therefore, with approval of the CDP, the proposed project would not conflict with the City of Hermosa Beach Local Coastal Plan or the policies of Chapter 3 of the Coastal Act.

Impact 5.9-2: The proposed project would not conflict with a habitat conservation plan, natural community conservation plan, or other related plan.

The project would result in the reconstruction of the North School on an already developed site. The project site is in the City of Hermosa Beach, which is not in a local or regional HCP, NCCP, or other related habitat or wildlife conservation plan.

Cumulative Impact

Development of the proposed project, in conjunction with the related developments listed in Chapter 3 of this DEIR, would not result in citywide land use and planning impacts. The proposed project would be consistent with applicable state and local plans, and after construction, the project site would continue to be used as a school. Related projects would be reviewed by the City of Hermosa Beach and CCC; if a coastal development permit is required and until PLAN Hermosa is certified by the CCC, development would be required to be consistent with adopted state and city development standards, regulations, plans, and policies. Therefore, the proposed project combined with related projects would not result in cumulatively considerable impacts to land use and planning.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with conflation of applicable plans, habitat conservation plans, and community conservation plans.

Noise

Impact 5.10-2: Project implementation would not result in long-term operation-related noise that would exceed local standards.

To determine if a project would cause a substantial noise increase from project-related traffic, consideration must be given to the magnitude of the increase and the affected receptors. In general for community noise, a noise level increase of 3 dBA is considered barely perceptible, while an increase of 5 dBA is considered clearly noticeable. An increase of 3 dBA is often used as a threshold for a substantial increase.

The increase in daily vehicle trips due to the project would generate noise associated with additional vehicles traveling to and from the project site on local roadways. However, community noise

environments would not appreciably change as a result of project implementation. The project is estimated to generate a net increase of 217 trips during the AM peak hour and 24 trips during the PM peak hour; all traffic flows on nearby roadways are intermittent and do not exhibit continuous traffic flows. Implementation of the project would increase the numbers of trips on adjacent roads, but is not expected to notably change the daily traffic flow conditions; that is, traffic flows will continue to be intermittent. Therefore, any traffic noise increases on 25th Street would not be noticeable, and the individual pass-bys for each vehicle would be comparable to existing conditions. Project-generated traffic would be a negligible increase in comparison to traffic flows on larger nearby roadways, such as Gould Avenue (13,300 ADT) and Hermosa Avenue (8,400 ADT), and would result in noise level increases of less than 1 dB. Therefore, project-generated increases in traffic noise levels would be less than significant, and no mitigation measures are necessary.

Stationary-Source Noise

Stationary noise sources would include vehicles idling during student drop-off and pick-up times, school buzzers or bells, landscaping equipment, outdoor activities, and heating, ventilation, and air conditioning (HVAC) units. The project would add new sources of stationary HVAC noise at the new buildings, but these would be comparable or quieter than other, similar sources at the existing site and would not result in notable changes to community noise environments on or near the site. For idling vehicles, school buzzers/bells, and landscaping activities, there would be no changes. Outdoor activities would be expanded, but would remain the same types of noise sources as the existing site, such as student and staff voices. Additionally, noise generated by outdoor activities would be similar to noise generated by the adjacent Valley Park. Therefore, no significant permanent stationary source noise increases would occur.

Cumulative Impact

Mobile-Source Noise

The cumulative traffic noise levels would not increase by a noticeable amount (+3 dB) along the roadways analyzed. Further, there are no other, known future projects in the vicinity of the proposed school project that would add more vehicular flows on the pertinent roadways. Therefore, cumulative increases in traffic noise levels would not occur and impacts would be less than cumulatively considerable.

Stationary-Source Noise

Unlike transportation noise sources, whose effects can extend well beyond the limits of the project site, stationary-source noise generated by the project is limited to noise impacts to noise-sensitive receptors near the project site. Noise from operation of the project would not result in significant noise impacts to the residential uses in the vicinity. Further, there are no other known, future projects in the vicinity of the proposed school project that would add more stationary sources so as to notably contribute to the nearby receptors' community noise levels. Therefore, the proposed project would not result in individually and cumulatively considerable noise impacts.

Construction Noise

Like stationary-source noise, construction noise and vibration impacts are confined to a localized area of impact. Noise from construction activities would be temporary and would be less than significant after mitigation. Cumulative impacts would only occur if other projects were being constructed in the vicinity of the project at the same time as the project. There are no other, known future projects in the vicinity of the proposed school project that might add simultaneous construction activity noise (to the project's construction noise). Therefore, project construction noise impacts would not be cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with long-term operation-related noise.

Public Services

Impact 5.11-1: The proposed project would introduce new structures and occupants on the project site, thereby increasing the demand for fire protection services; however, the site's expanded operations would not necessitate the construction of a new fire department facility.

Short-Term Construction Impacts

During construction, the presence of heavy construction equipment and demolition of structures could create a potential short-term demand for fire protection services. Demolition of structures and construction of the improvements would comply with the requirements of the 2016 California Fire Code, including the CFC Chapter 33, Fire Safety During Construction and Demolition. Chapter 33 prescribes minimum safeguards to prevent fires and provide reasonable safety to life and property during construction and demolition.

Additionally, the construction staging area is proposed on the playfield area on the east side of the site. Construction and delivery vehicles would mostly enter the staging area from the driveway near the intersection of 26th Street and Morningside Drive, but may occasionally make deliveries to different areas around the site. Any street or lane closure required for construction would be temporary and would be coordinated with the City of Hermosa Beach. Moreover, construction-related traffic volumes would not result in significant traffic impacts, as discussed in Section 5.12 of the recirculated EIR, *Traffic and Transportation*. Therefore, implementation of the proposed project would not obstruct or impede response times for the fire department or result in traffic pattern changes to the area circulation system.

Long-Term Operational Impacts

The project would change the emergency access onsite and would reconfigure the onsite structures, increasing the building area from approximately 28,900 square feet to 38,000 square feet. Project development would result in an increase in the student capacity of the onsite structures from 301 students between Children's Journey and the South Bay Adult School programs to a maximum of 510 students for the proposed reopened North School, for a total increase in capacity of 209 seats.

Building Design and Emergency Access

The design of the proposed improvements is within the purview of the Division of the State Architect (DSA), who will review and evaluate building plans for their compliance with state fire and building codes to minimize fire hazards. The new structures would be serviced by new electrical systems that would be safer and more efficient than the existing utility connections; they would also have improved fire protection features. The existing fire hydrants at the northwestern and northeastern sidewalk would remain, and the southeastern hydrant would be moved to accommodate the 25th Street curb improvements.

The site would be regraded to a continuous flat grade; site occupants and emergency responders would have unimpeded access between the buildings, parking area, and field area. Emergency vehicles would be able to access the site from the driveway on 25th Street and the driveway at the intersection of 26th Street and Morningside Drive (see Figure 5.11-1, *Fire Access Plan*, page 5.11-9 of the Draft EIR). The driveway on 26th Street would allow for a 20-foot-wide access lane with a 100-foot turnaround, north of the Main building. The improvements would improve emergency access at the site.

DSA will also require the local fire authority to review certain project elements in order to clarify local procedures for documenting acceptance of water flow for firefighting and building exposure protection (fire flow, fire hydrant locations, and distribution). Project development can occur only if DSA approves the project, which will be predicated on HBFD's review of the site's ingress/egress, fire flow, fire sprinkler systems, fire hydrants, driveway widths and turning radii, and emergency access plans, including to the second story of the main building. Compliance with established standards and DSA recommendations would minimize fire and life safety risks and facilitate emergency response and evacuation.

Demand of Fire Protection Services

Similar to the site's existing operations, operation of the proposed North School facilities would not involve the use, manufacturing, or storage of hazardous materials other than limited quantities of cleaning supplies, paints, solvents, etc., used for janitorial and maintenance purposes. Although the project would increase the operational capacity of the site, the students that would attend North School are currently enrolled at two nearby District schools; therefore, the project would not directly increase population in the HBFD service area. Additionally, the project site would maintain the site's existing educational use, and the new facilities would generate a similar volume and type of fire service calls that currently occur at the site. Demands for fire protection services for the proposed project would not substantially increase from what is currently experienced at the site.

Emergency Response

The HBFD currently provides adequate fire protection service by arriving at the incident location in an average response time of 5 minutes for emergency medical services and 7.3 minutes for fire, although the actual travel times are impacted by factors such as traffic, topography, road width, public events, and unspecified incident locations. Additionally, the automatic aid agreement with MBFD and Rbfd and the mutual aid agreement with Los Angeles County, Torrance, and El Segundo would address any deficiency of the HBFD for a given call to the project site. Considering that the project site is in an urbanized area with easy access to fire hydrants and streets, and is a short

distance (0.7 mile) from the nearest fire station with manageable traffic conditions, fire service would not be negatively affected. Moreover, the project site is already being served by HBFD. Although the number of students and building square footage would increase at the site, the proposed facility would be fully sprinklered with adequate fire flow and access in accordance with the latest CFC requirements, as checked by DSA and HBFD. The project would not substantially impact response times and would not necessitate the construction or expansion of fire facilities.

Impact 5.11-2: The proposed redeveloped site would expand site operations; however, the corresponding incremental increase in the demand for law enforcement would not warrant the development of a new or the expansion of the existing police facility.

Short-Term Construction Impacts

Law enforcement will be required during project construction to address potential crimes and public complaints. Common crimes may include trespassing, theft, burglary, and vandalism; and complaints may include noise, dust, traffic, and construction hours. Law enforcement may be required to respond to serious injuries to workers, spills, fires, traffic control and criminal activity.

Construction of the proposed project would not be atypical. Although the project site is larger than most of the surrounding parcels, development of the proposed improvements would not be substantially different from other construction projects currently occurring nearby, and the need for law enforcement services during construction of the project would not be substantially different and/or greater than the other construction sites.

The District and its construction contractor will comply with applicable laws and regulations and will implement BMPs that would reduce the demand for law enforcement services. The construction site will have motion sensor security lights and cameras, which would decrease the likelihood of theft, burglary, trespass, and vandalism. The District will comply with air quality and water quality regulations, by implementing measures such as watering areas of exposed soil to reduce fugitive dust and installing soil erosion controls to reduce storm water run-off. Such practices would minimize offsite impacts. A construction worksite traffic control plan will be prepared, and a designated construction access point will be used to limit construction-traffic effects. Construction flaggers will be hired to control traffic, and all construction activities will comply with OSHA requirements, which will ensure worker safety and minimize work injuries.

Project approval would also require the District and its construction contractor to comply with Mitigation Measures N-1 and N-2, included in Section 5.10, *Noise*, of the Draft EIR. These mitigation measures establish procedures to address potential complaints during construction and will result in a reduction noise and vibration levels by requiring the contractor to conduct work during certain hours, operate and maintain construction equipment in accordance with the manufacturer's manuals, and to the extent feasible limit construction activities that are directly adjacent to residences.

Long-Term Operational Impacts

Potential law enforcement needs during operation of the proposed elementary school may include calls concerning child abuse, student truancy, mental health issues, assaults, thefts, vandalism, custody

issues, and traffic related matters. Although the site has been operating with the South Bay Adult School and Children's Journey Learning Center programs, operation of the proposed elementary school would incrementally increase the demand for law enforcement at and near the project site, as proposed operation would enroll more students than the combined enrollment of the existing uses. Notwithstanding, the proposed elementary school would maintain similar hours as the existing uses and the property would continue to operate as an educational facility. Therefore, the type of law enforcement services required for the proposed elementary school would not be substantially different from that of the current need.

Daily Operations

Increased traffic and pedestrian activities are inevitable at the start and end of the school day. However, similar to the District's two other schools, the District will implement drop-off and pick-up procedures at the proposed North School campus to minimize potentially significant disruptions to the community. School site personnel and volunteers at the proposed North School campus will coordinate drop-off and pick-up activities.

The design of the proposed campus also takes into consideration the needs of student drop-off and loading activities. The proposed site plan identifies three entry points into the campus: in the southwest corner, near the administration building; in the northeast corner at the intersection of Morningside Drive and 26th Street; and in the southeast corner at the Morningside Drive cul-de-sac. The school's designated pedestrian loading is proposed curbside fronting 25th Street. The proposed design shows the curb pulled into the school's property so that stopped vehicles will be removed from the roadway thru-lane. Student/pedestrian loading activities may also occur on Gould Avenue and Valley Drive; vehicles could park next to Valley Park, and students may walk to the campus via the southern sidewalk on Gould Avenue, eastern sidewalk on Morningside Drive, and along an existing walkway on the southern perimeter of Valley Park from Valley Drive.

Special Events

The proposed reopened North School would hold nighttime events such as back-to-school night, open house, talent shows and other performances, and awards ceremonies. The school would also be available for community use through the Civic Center Act. These types of events may require additional law enforcement, and similar to existing conditions – when needed for larger events – the District will coordinate with and pay for HBPD staff to provide security services.

Cumulative Impact

The geographic area for cumulative analysis for fire and police protection services is the service area for the HBFD and HBPD. The project is in a residential beach community, and the proposed project would not directly contribute to population growth because North School students would come from existing District schools. The site is already developed with school uses and would continue to operate as a school. Similar to the proposed project, related projects in Hermosa Beach would be constructed to meet CBC and CFC requirements, and each project would mitigate its impacts to fire and police protection services. The proposed project would not significantly contribute to cumulative impacts that would result in the need for new or expanded fire and police facilities.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts and less than cumulatively considerable impacts associated with fire and police services.

Transportation and Traffic

Impacts 5.12-1a: The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for standard performance of the City of Hermosa Beach circulation system during the morning one-hour peak period.

School Operations

Project-Generated Traffic

The trip generation rates and the anticipated volumes of traffic that would be generated by the project are shown in Table 5.12-3, page 5.12-15 of the recirculated EIR.

Although the trip generation rates and traffic volumes shown in the table are based on the number of students at the proposed school, the data represent the total number of vehicle trips generated by the site, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries.

Table 5.12-3 also shows the volumes of traffic generated by the land uses that would be displaced by the proposed elementary school, which include a 210-student preschool and a 91-student “mommy and me” program operated by the adult school. The traffic counts taken for the peak one-hour analysis accounted for trips generated by these uses. Consequently, these traffic volumes were subtracted from those that would be generated by the proposed North School project to quantify the net increase in traffic as a result of the project. Traffic counts were also taken at the project site to determine if the trip generation rates from the manual were representative of the actual traffic volumes at the school.

Taking the existing uses into consideration, the project would generate a net increase of 217 trips during the morning peak hour (123 inbound and 94 outbound), 24 trips during the afternoon peak hour (6 inbound and 18 outbound), and 100 vehicle trips per day. It should be noted that the volumes of traffic that would be generated by the proposed project do not necessarily represent new traffic on the overall street network; instead the trips associated with the project represent traffic that would be redirected to the project site from Hermosa View School (for 3rd graders) and Hermosa Valley School (for 4th graders). However, for the traffic impact analysis, it has been assumed that the site-generated traffic represents new traffic.

Trip Distribution and Assignment

The trips generated by the proposed school were distributed onto the street network based on the anticipated geographical distribution of the students’ residences and the observed traffic patterns on the study area street network. Figure 4 in Appendix M-1, of the recirculated EIR, shows the assumed geographic distribution of project-generated traffic.

Traffic Impact Analysis

Traffic impacts of the proposed school were evaluated for 14 roadway intersections and 11 street segments under two baseline conditions: 2017 (Existing) and 2019 (Future). The 2019 year represents the target year of the school's initial operation.

Roadway Intersections

Existing Year (2017)

The existing intersection operations without and with project trips are summarized in Table 5.12-4, page 5.12-18 of the recirculated EIR. The table shows the existing traffic conditions, the traffic conditions with the addition of the proposed elementary school traffic, and the increase in delay values associated with the project. The final column indicates whether the intersection would be significantly impacted by the proposed school project according to the significance criteria in Section 5.12.2, *Thresholds of Significance*, page 5.12-13 of the recirculated EIR.

Table 5.12-4 indicates that 13 of the 14 intersections would continue to operate at acceptable levels of service (LOS A through C) when the school is operating. The intersection of Ardmore Avenue|Gould Avenue would continue to operate at LOS D for existing conditions and for the scenario with the proposed school. The total volume of traffic that would travel through the intersection would increase by 3 percent because of the project. However, this increase would be well below the significance threshold of 10 percent, and none of the study intersections would exceed the City's established significance threshold during the AM peak one hour.

Opening Year (2019)

Impact analysis for the opening year of 2019 requires forecasting the ambient traffic conditions for 2019 without project trips. Forecasting requires the addition of regional area growth to the 2017 conditions, including a regional area growth factor, per Metro, of 0.26 percent per year (which equates to a four-year growth factor of 1.04 percent) and anticipated traffic generated by future developments in the study area (See Table 3-2, *Related Cumulative Projects*, page 3-17 of the Draft EIR. Additional discussion on the 2019 baseline level is provided in the traffic study (Appendix M-1, of the recirculated EIR).

The comparative delay values and levels of service for the year 2019 are shown in Table 5.12-5, page 5.12-19 of the recirculated EIR. As shown, none of the study area intersections would be significantly impacted by the proposed school project during the morning peak hour. It should be noted that the LOS analysis summarized in Tables 5.12-4 and 5.12-5 is based on the peak hour traffic volumes, which is the typical approach for a traffic impact analysis. Because a school generally experiences intense traffic flow for approximately 15 or 20 minutes within the peak one-hour study interval, there would likely be short intervals at the beginning and ending of each school session when the levels of service would be worse than the values shown in the tables. This is typical of school operations and is not considered a significant impact if the peak one-hour period of traffic flow would be accommodated at an acceptable LOS and/or below the threshold of significance.

Street Segments

The results of the one-hour morning peak street segment impact analyses for existing 2017 conditions and future 2019 conditions are summarized in Table 5.12-6 and Table 5.12-7, pages 5.12-

20 and 5.12-21 of the recirculated EIR, respectively. The tables show the capacity value, the traffic volume (vehicles per hour), the V/C ratio, and the LOS for each study area street segment. As concluded in both tables, the proposed project's trips generated during the AM peak hour would not exceed the significance criteria on the study street segments under the existing 2017 and future 2019 conditions.

Construction

The main construction entry point would be via the driveway on 26th Street at Morningside Drive. Based on the City's designated truck routes, including Pacific Coast Highway and Artesia Avenue (which is the continuation of Gould Avenue east of PCH), most construction vehicles would access the project site from the intersection at Morningside Drive and Gould/27th Avenue.

Table 5.12-8, *Construction Trips*, page 5.12-22 of the recirculated EIR, shows the anticipated daily vehicle trips based on the proposed construction schedule and activities. The number of trips is conservative and accounts for workers, vendors, and hauling, if required, throughout the construction workday between 8:00 AM and 6:00 PM, Monday through Friday, and 9:00 AM to 5:00 PM on Saturdays.

As shown in Table 5.12-8, the highest number of trips would occur during the building construction phase, with a maximum of 55 daily trips. This number is less than the number of average daily trips (or even AM peak hour trips) that would be generated by the proposed project (see Table 5.12-3). Since operational traffic impacts would not exceed established thresholds, and since construction trips would be fewer than operational trips, it is unlikely that construction traffic would exceed thresholds. Therefore, construction traffic impacts would be less than significant.

Impact 5.12-2: Project-related trips in combination with ambient traffic and trips from related developments would not exceed CMP performance standards during the AM one-hour peak period.

The closest CMP arterial route to the project site is Pacific Coast Highway (State Route 1), and the closest CMP intersection is Pacific Coast Highway at Artesia Boulevard (State Route 91), which is the continuation of Gould Avenue east of PCH.

The traffic study assumed that approximately 20 percent of the project-generated traffic would travel through this intersection, which is approximately 43 vehicles during the morning peak hour. As this is below the CMP threshold of 50 trips per hour, a detailed CMP intersection analysis is not required, and the project would not have a significant impact at a CMP intersection. The project would not have an adverse impact during the afternoon peak hour because the proposed elementary school would generate little or no traffic during the afternoon commuter peak period on a typical day of operation.

The traffic study also assumed that approximately 5 percent of the proposed school traffic would use any particular freeway segment as an access route, which equates to approximately 6 inbound and 5 outbound trips during the morning peak hour. As this volume is well below the CMP threshold of 150 trips for freeways, a detailed CMP freeway analysis is not required, and the proposed project would not have a significant impact on the freeway network.

Impact 5.12-4: The project is designed to provide adequate emergency access and would not impede emergency access in the surrounding area.

On-Site Emergency Access

The project will comply with Title 19, California Fire Code, Chapter 5, to provide adequate emergency access. The driveways into the school's parking lot and near the multipurpose building will be designed to accommodate emergency access onto the proposed campus by fire trucks, police units, and ambulance/paramedic vehicles. On January 11, 2018, the County of Los Angeles Fire Department, Fire Prevention Division, approved the site plan for life safety; all access features are subject to and must satisfy design requirements of the Division of the State Architect (DSA). Figure 5.11-1, page 5.11-8 of the Draft EIR, in Section 5.11, *Public Services*, shows the proposed fire access plan.

Off-Site Emergency Access

Additionally, in a letter response to the EIR scoping process (see page L-6 in Volume 2 of the DEIR), the City of Hermosa Beach Fire Marshal, James Crawford, indicated that the proposed "new construction will have many new requirements for fire and life safety" and that the facility would be "fully sprinklered with adequate fire flow and access." The Fire Marshal also stated that the proposed project would *not* have a significant impact on the department's ability to maintain adequate level of fire protection to the surrounding area. Moreover, implementation of Mitigation Measures TRAF-3 and TRAF-4, which would restrict parking on the north side of 25th Street, between Myrtle Avenue and the site's eastern boundary; the east side of Myrtle Avenue, between 25th and 26th streets; and the south side of 26th Street, between Myrtle Avenue and Morningside Drive, would improve traffic circulation by creating a continuous, unobstructed route from the passenger loading areas to the intersection of Gould Avenue|Morningside Drive. Assuming Mitigation Measures 3 and 4 are implemented and that drivers will comply with existing law, including the requirement to yield the right-of-way to police vehicles, fire engines, ambulances, or other emergency vehicles using a siren and red lights, the proposed project would not result in inadequate emergency access on streets surrounding the project site.

Impact 5.12-5: The proposed project would conform with adopted policies, plans, and programs for alternative transportation modes, and the project would not decrease their performance or safety.

Pedestrian and Bicycle Facilities

The proposed project would not eliminate existing pedestrian and bicycle facilities. However, the proposed school would generate nonmotorized travel with students walking or riding their bicycles to school. The District encourages students to walk to school each day to alleviate traffic in the community and promote healthy living. The proposed site plan identifies four pedestrian access points for easy access onto the proposed campus; the school would also provide bike racks to encourage students to bike to school.

PLAN Hermosa acknowledges that sidewalks in the city are not continuous and that there are sidewalk obstructions, missing curb ramps, and steep driveways; this affects the entire city, not just the close vicinity of North School. The City has a Safe Routes to School Network Map, which

identifies biking and walking routes to all schools within the City, including the project site. As shown in Figure 5.12-7, *Safe Routes to School Network*, page 5.12-61 of the recirculated EIR, safe routes have been identified for three of the four access points. Streets near the project site that do not have sidewalks are not identified routes—24th Street, 24th Place, 25th Street between Park Avenue and Valley Drive, and parts of Morningside Drive north of 25th Street. As they currently do at Valley and View schools, the District will provide students and parents of North School with the City's Safe Routes to School Map and encourage them to use the City-identified safe routes. The use of and compliance with City-designated safe routes to the proposed North School site would direct students away from streets with inadequate sidewalk facilities. Not only would this limit traffic safety hazards, as discussed in Impact 5.12-3, the proposed project would also be consistent with the City's adopted program on pedestrian and bicycle routes.

Mass Transit

Several bus companies operate routes in the vicinity of the school site. Metro operates Metro Lines 130 and 232 along Pacific Coast Highway, approximately one-half mile east of the school site; Beach Cities Transit operates Route 109 on Hermosa Avenue, which is three blocks west of the school site; and the Los Angeles Department of Transportation runs Commuter Express Route 438 along Hermosa Avenue. Project improvements would occur on the project site and would not directly impact existing mass transit facilities. Additionally, the construction traffic management plan would address any potential temporary road closures and limit the impacts to bus routes.

Impact 5.12-7: The project would not result in a substantial increase in VMT.

As discussed under SB 743 in Section 5.12.1.1, *Regulatory Background*, page 5.12-3 of the recirculated EIR, VMT has been proposed as replacement metrics for motor vehicle LOS. It is anticipated that VMT will become a basis for findings of significant impact under CEQA in the future. However, methods for calculating VMT and thresholds of significance have not been adopted by the City of Hermosa Beach or the County of Los Angeles. As the use of VMT metrics to evaluate transportation impacts is not required until January 2020 and thresholds of significance based on VMT are still under development, the evaluation of VMT conducted in this EIR is strictly an informative exercise and will not be compared to any impact threshold.

In addition, the City of Hermosa Beach does not currently have VMT capabilities incorporated into its travel demand forecasting model. For the PLAN Hermosa EIR, the City used the 2012 SCAG RTP model to estimate VMT. The SCAG model is not appropriate for VMT analysis at the project level, such as this proposed project because it provides traffic forecasts at a regional level, and provided limited detail at a local, street-block level.

Moreover, home-to-school trips already occur in the city because parents drive their children to the existing schools in the area. Trip distances and mode choice (car, walk, bike) would be affected based on the distance from home to school. For example, students who live within walking distance of their existing school may be driven to the project site. On the other hand, students who live near the project site and currently drive to their school may walk to the project site. The proposed project would result in shorter vehicle trips for some students and longer trips for others. Because the project site is near the northwest boundary of the District, implementation of the proposed project

may result in net longer trip lengths (in miles) compared to the home-to-school trip lengths that currently exist. As a result, an increase in VMT would likely occur. However, Hermosa Beach is a relatively small City of 1.3 square miles, and the distance between the existing two District schools and the project site is less than one mile. Therefore, the expected difference in trip lengths with a change in travel patterns due to the proposed project and resulting VMT would be minimal. Because any potential increase of trip lengths would be small and most trips generated by the proposed project already exist, and in light of the results of the GHG analysis's conclusion that the increase in GHG emissions would be well below the bright line threshold, it is reasonable to conclude that the project would not result in a substantial increase in VMT.

Cumulative Impact

The cumulative traffic impacts associated with the proposed school and related development projects in the City are addressed under the 2019 baseline scenario of Impact 5.12-1a and Impact 5.12-1b.

The 2019 baseline analysis captures traffic from ambient regional growth and developments in the South Bay region. As discussed in Impact 5.12-1a, cumulative traffic impacts under the one-hour AM peak condition would be less than significant. However, cumulative traffic impacts under the half-hour AM and PM peak conditions would be significant and adverse (see Impact 5.12-1b).

Neither traffic hazards nor parking effects would be cumulatively considerable. Related projects are not in close proximity to the project site (see Figure 3-6, page 3-19 of Draft EIR), and there are no anticipated developments identified in PLAN Hermosa that when combined with the proposed project would significantly impact roadway hazards or cause parking impacts.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts associated with applicable plans; ambient traffic and trips; emergency access; adopted policies, plans, and programs for alternative transportation; and the increase in VMT.

Tribal Cultural Resources

Impact 5.13-1: The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource or an object with cultural value to a California Native American tribe.

No sacred lands have been identified on the project site by the NAHC or a California Native American Indian tribe, such as the Gabrieleño/Tongva San Gabriel Band of Mission Indians or Soboba Band of Luiseno Indians, and no objects with cultural value to a Native American Indian tribe have been identified on the project site.

The project's Historical Resources Assessment Report determined that the existing facilities and project site do not display any significant architectural styles or meet any criteria that qualify the project's eligibility as national or state historical resources. Section 5.4, *Cultural Resources*, and Appendix E, of the Draft EIR, further discusses this determination. The project site is not currently listed on historic resource lists/databases, including the National Register of Historic Places, California State Historical Landmarks, California Points of Historical Interest, California Register of

Historic Resources, and City of Hermosa Beach Historic Resources Preservation Ordinance, which is the adopted local register of historic resources.

Additionally, due to the project site's distance from designated historical resources in the City of Hermosa Beach and surrounding areas, the closest of which is at least one mile south of the project site, project implementation would not indirectly impact the significance of these resources.

Cumulative Impact

As with the proposed project, each related cumulative project would be required to comply with AB 52 and Public Resources Code Section 21083.2(i), which addresses accidental discoveries of archaeological sites and resources, including tribal cultural resources. Therefore, any discoveries of TCRs caused by the project or related projects would be mitigated to a less than significant level, and therefore project impacts would not be cumulatively considerable.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts associated with tribal cultural resources.

Utilities and Service Systems

Impact 5.14-1: Project-generated wastewater could be adequately treated by the wastewater service provider for the project.

Short-Term Construction Impacts

The project site is currently served by the local sewer system. No sewage demands would be created during construction compared to the existing conditions because the students and staff of the South Bay Adult School and Children's Journey Learning Center would be relocated. The project would include the connection of the existing onsite sewage pipelines to the new buildings. Sewer improvements associated with the project would be coordinated with the City of Hermosa Beach Public Works Department to avoid disruption of service.

Long-Term Operational Impacts

The City of Hermosa Beach does not have sewage generation factors for different land use types. The City of Los Angeles has established the 2006 CEQA Thresholds Guide, which establishes sewage generation factors for different land uses, as these CEQA Thresholds provide a conservative approach to CEQA analysis. Additionally, due to the proximity of the City of Los Angeles to Hermosa Beach, these are applicable thresholds for sewage generation analysis for the proposed project. Table 5.14-2, *Sewage Generation Comparison*, page 5.14-8 of the Draft EIR, compares the estimated existing sewage generation with the sewage generation of the proposed project.

As shown in Table 5.14-2, the proposed project would result in an increase of approximately 1,308 gallons of sewage generated per day over existing conditions. When compared to the remaining capacity of JWPCP of 137 mgd, the project represents an increase of 0.0001 percent of JWPCP's remaining treatment capacity.

Additionally, future upgrades to sewer infrastructure used by the proposed project would be constructed in accordance with recommendations and policies of PLAN Hermosa and the Sanitary Sewer Master Plan. The project does not include improvements to offsite sewer infrastructure; therefore, this impact is considered less than significant.

Impact 5.14-2: Project-generated sewage would not exceed sewage treatment requirements of the Los Angeles Regional Water Quality Control Board.

Short Term Construction Impacts

Construction of the project would not generate sewage. During construction, portable restrooms will be used for construction workers and will be maintained in accordance with state regulations.

Long Term Operation Impacts

The project site is within the jurisdiction of the Los Angeles RWQCB (Region 4) and is subject to the waste discharge requirements of the NPDES Permit No. CAS004001 and the Los Angeles County MS4 Permit (Order No. R4-2012-0175), as amended by Order WQ 2015-0075. Sewage treatment facilities can treat sanitary domestic sewage that meets these discharge limits. The project would not change the operation of the site as an educational use; therefore, the nature and type of sewage would have similar pollutant content because existing conditions and sewage content would not change. As discussed under Impact 5.14-1, the project would result in an increase in sewage but would be adequately served by the sewage treatment facilities without causing an adverse impact. Additionally, similar to all new construction projects in the LACSD boundary, the proposed project would be required to comply with the LACSD's sewage discharge standards. Impacts from other development projects in Hermosa Beach (see Table 3-2, *Related Cumulative Projects*, were considered by the LACSD during their approval process and will be required to comply with discharge requirements. There are no plans to expand the school beyond its capacity of 510 students, and there would be no future sewer demand beyond what is shown in Table 5.14-1, page 5.14-6 of the Draft EIR. Therefore, individual project impacts would not be cumulatively considerable with other development projects in Hermosa Beach.

Impact 5.14-3: Existing water supply, treatment facilities and delivery systems are adequate to meet project requirements.

Construction

The proposed project would use water during the construction phase mainly for suppressing dust during ground-disturbing activities. The South Coast Air Quality Management District's Rules 402 and 403, as discussed in Section 5.2, *Air Quality*, of the Draft EIR, require controlling fugitive dust and avoiding emission nuisances.

Typically, trucks used to spray water over exposed soil are filled from temporary connections to fire hydrants near the site. Water trucks that would be used on a site the size of the proposed project usually hold between 2,000 and 4,000 gallons of water. Depending on the duration of construction, weather conditions, and amount of exposed soil, between 1 and 5 truckloads of water would be used daily during rough and fine grading of the site. For purposes of analysis, an average of 3 trucks per 5-day work week and 3,000 gallons per truck is assumed, which results in 45,000 gallons of water per

week, or 9,000 gallons per day. Appendix C of the Draft EIR estimates that the rough and fine grading are estimated to take approximately 36 days, or 7.2 work weeks. This brings water use to 324,000 gallons (0.99 acre-foot) for construction. When compared to the available capacity of 410 mgd of water available from the Robert B. Diemer Treatment Plant, the amount of water used during the temporary construction phase of the project represents 0.00002 percent of the remaining treatment capacity at the plant. The projected demand is less than the available capacity, and the existing water lines are adequate to serve the water trucks during construction; therefore, construction impacts on water supply and delivery systems are considered less than significant.

Operation

Water Treatment

The City of Hermosa Beach does not have established water demand factors for different land use types. Similar to the analysis of projected sewage demand (see Impact 5.14-1, above), a conservative estimate for water demand is 1.25 times sewage generation. Table 5.14-3, *Water Demand Comparison*, page 5.14-11 of the Draft EIR, compares the estimated current water demand of the site and its facilities as to the projected water demand of the proposed project.

Table 5.14-3 shows that the proposed project would result in an increase in demand of approximately 1,635 gallons of water per day. Treatment services for water distributed to the project site would be provided by the Robert B. Diemer Treatment Plant, which has a treatment capacity of 520 million gallons per day, and treats approximately 110 mgd; therefore, the Robert Diemer treatment facility has a remaining treatment capacity of approximately 410 mgd. The proposed project's increase in water demand would be less than 0.0004 percent of the remaining water treatment capacity.

Water Supply

The Cal Water Hermosa-Redondo UWMP found that purchased water would be sufficient to serve all water demands in the service boundaries through the planning year 2040 under regular, single-dry, and multiple-dry year weather conditions, and during hydrologic conditions not served by groundwater or recycled water. Additionally, the increased water demand of 1,635 gpd would be approximately 1.4 percent of the projected water demand increase in government service connections by the year 2040.

Cumulative Impact

The area considered for cumulative impacts to sewage services is the treatment and conveyance for the JWPCP, which serves 3.5 million people throughout the western and southern portions of Los Angeles County. Because the project would result in a 0.0001 percent increase in sewage generation, the impacts would be less than significant.

The MWD includes five water treatment plants with the capacity to treat 2.64 billion gpd combined. As stated in Impact 4.12-3, water for the project site would be adequately treated by the Robert Diemer Treatment Plant; the five treatment plants are cumulatively operating below capacity and would be able to provide water treatment for planned developments within the service area.

According to the Hermosa-Redondo UWMP, Cal Water ensures adequate water supply to meet annual changes in demand through water purchase agreements; there is adequate water supplies to

support planned developments within the Cal Water Hermosa-Redondo District's service area. The proposed project would construct a new school with water-efficient features and would result in a negligible increase in annual water demand in the service area. The anticipated water demand from the proposed project and planned developments in the service area boundaries falls within the Cal Water Hermosa-Redondo UWMP's projected water supplies for average weather years as well as multiple dry years. Therefore, the project would not result in a significant impact to water supplies and treatment facilities, individually or cumulatively.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts associated with the treatment of project-generated wastewater by the wastewater service provider; exceeding sewage treatment requirements of the Los Angeles Regional Water Quality Control Board; and existing water supply, treatment facilities and delivery systems.

Energy

Impact 5.15-1: Construction activities would not result in wasteful, inefficient, and unnecessary consumption of energy or have excessive energy requirements.

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would be temporary and would fluctuate according to the phase of construction. The majority of construction equipment during demolition and grading would be gas powered or diesel powered, and the later construction phases would require electricity-powered tools.

Based on the estimated VMT and duration of construction, Table 5.15-1, page 5.15-6 of the Draft EIR, provides the estimated fuel usage for construction vehicles. As discussed in Section 5.2 *Air Quality*, all diesel-fuel commercial motor vehicles must not idle for more than five consecutive minutes at any location.

As shown in Tables 5.15-2 and 5.15-3, pages 5.15-87 and 5.1-8 of the Draft EIR, the project's fuel consumption from construction would be 54,493 gallons, which would temporarily increase fuel use in the county by 0.0035 percent. Therefore, project construction would not represent a substantial increase in demand for local or regional energy supplies. Construction fuel use would cease upon completion of project construction. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or state. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than similar

development projects. Impacts related to the use of transportation energy during construction would not require expanded energy supplies or the construction of new infrastructure. Impacts would be less than significant.

Construction Materials

Construction building materials may include recycled materials and products originating from nearby sources in order to reduce the costs of transportation. The District may use recycled materials for construction of the proposed improvements, as appropriate and as available. With increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

The type of construction is conventional and similar to other schools in the District. As noted in Chapter 4.0, *Project Description*, of the Draft EIR, it is the intent of the District to construct a zero net energy (ZNE) site. Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials of recycled materials, which require substantially less energy to produce than nonrecycled materials. The incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ reasonable energy conservation practices in the interest in minimizing the cost of doing business. Construction of the school is conventional and is not expected to use unnecessary amounts of material or to use materials in a wasteful manner, since both would increase the cost of construction. Impacts to energy from construction materials would be less than significant.

Impact 5.15-2: Operation of the school does not create a land use and pattern that cause wasteful, inefficient, and unnecessary consumption of energy or create buildings that would have excessive energy requirements.

Operation of the project would create additional demands for electricity and natural gas compared to existing conditions and would result in increased transportation energy use. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, security, and control center functions; use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

Electricity and Gas

The CalEEMod model used to calculate air quality impacts also generates natural gas and electricity usage. As shown in Table 5.15-4, page 5.15-9 of the Draft EIR, the proposed project would result in less natural gas and electricity use than the existing school use. The reduction in energy use is attributed to the new building standards associated with the proposed project.

Sustainable Design Features

The proposed improvements would be designed as a ZNE site; that is, onsite energy generation would equal the energy used by the site facilities. ZNE would be accomplished by installation of the following improvements:

- Highly energy-efficient solar photovoltaic arrays on the roofs of the proposed main building and multipurpose building. The solar panels would be developed with “high transmission, low iron glass,” would use antireflective coatings, and their surfaces are roughened to diffuse reflection and minimize glare.
- The proposed buildings would be constructed with a highly efficient building envelope, including for construction of wall and roof assemblies.
- The buildings would be oriented to maximize day lighting to minimize the need for artificial lights.
- Efficient heating, ventilation, and cooling (HVAC) systems would be installed to control the climate of all interior building spaces and manage heating and cooling loads throughout the building.
- LED lighting would be installed for all interior and exterior areas of the building.
- Low-water-use plumbing fixtures would be installed in restrooms and sink areas.
- Drought-tolerant landscaping would be planted at all landscaping areas to minimize irrigation onsite.

With the reduction in energy use associated with new construction to the standards of the California Green Building Standards Code and the ZNE project components, there would be no impact to the use of energy.

Transportation Energy

The average trip lengths associated with students were determined by measuring the longest possible home-to-school trip for the two existing schools, Hermosa Valley and View Schools, approximately 0.5 and 0.6 mile south and east, respectively, and for the proposed North School site. The analysis assumes that the shortest vehicle trip would be 1,000 feet because people closer than 1,000 feet to a school are more likely to walk or ride a bike. Taking the average of the longest and shortest trips, the longest trip for North School is 1.97 miles, the longest trip for Valley School is 1.40 miles, and the longest trip for View School is 1.67 miles. The average trip lengths are 1.1 for North, 0.8 for Valley, and 0.9 miles for View. Since the existing schools are more centrally located within Hermosa Beach, the average trip lengths for these schools are shorter than the proposed North School location. These estimates were used to calculate both the existing and the proposed VMT. Table 5.15-5, page 5.15-11 of the Draft EIR, shows the VMT calculations for the proposed school, assuming a typical school day and a full, 180-day school year.

Since the student-related trips would be occurring at the existing Valley and View schools if the proposed school were not developed, the VMTs that would be removed from those schools was determined so that the net change resulting from the proposed project could be calculated. For this analysis, the existing staff would remain with their respective schools, and all new staff would be assigned to North School.

Fuel Usage

CARB publishes the EMFAC2014 Web Database, which was used to calculate fuel consumption for the 133,200 new vehicle miles traveled, as shown in Table 5.15-5. The database search was limited to Los Angeles County and assumed the 2017 calendar year and light-duty private vehicles with a range of model years and fuel types. Based on the CARB database, the average miles per gallon for vehicles in Los Angeles is 21.1. Using this estimate, the new vehicle trips associated with the school could result in use of approximately 6,313 gallons of fuel for the school year. This is a conservative figure because, as fuel efficiency in passenger cars increases, electric vehicle use expands and fuel usage will decrease. The calculated fuel use represents 0.0004 percent of the total fuel usage for light vehicles in the region over the same 180-day school year (1.55 billion gallons). This amount of increase in fuel usage represents a conservative estimate with the real use likely being less than calculated. The 0.0004 percent increase associated with additional vehicle miles travelled associated with this project are considered negligible when compared to the region as a whole.

Cumulative Impact

The proposed project will have a stable energy use over time, and as shown in Table 5.15-4, will be a reduction in energy use from the current condition. In addition, the proposed project is intended to be a zero net energy which means it will not add to the cumulative demand for power in the region. Therefore, the proposed project will have no impact on cumulative energy use.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in less than significant impacts associated with construction activities, and project operation.

C. Impacts Mitigated to Less Than Significant With Mitigation Incorporated

The following summaries describe impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the EIR, these impacts would be considered less than significant.

1. Aesthetics

Impact 5.1-3: Stationary and mobile light sources within the project site could spill into nearby properties

Construction

The proposed project's construction hours would be consistent with the City's noise hours, which would therefore limit nighttime construction activities and the need for nighttime lighting. However, for security and safety purposes, the construction site would be installed with video cameras and

lighting that would be triggered by motion. The devices would be strategically placed throughout the property. When the security lights are triggered, the level of illumination would be similar to that of security and porch lighting at nearby properties and would not blink or flash. In order to minimize potential spill light and contribute to regional nighttime glow, the security lights would be directed downward on areas that require security. Construction equipment and vehicles would also create glare during the day; the type and amount of glare would be similar to those of existing vehicles that park on and pass by on adjacent roadways. Therefore, light and glare impacts during construction would not be substantial.

Operation

Stationary Sources

Light

Similar to existing conditions, the new buildings would have interior building lighting. Unlike the existing conditions, however, the modernized site would include exterior lighting installed near walkways and around the parking lot. The proposed exterior lighting would be triggered by motion and its illumination would be similar to or less than existing porch and security lights nearby surrounding properties. No high-intensity lighting for nighttime use of the school's playfield or playground would be installed. Although lighting levels caused by stationary light sources are not expected to be substantially greater than existing surrounding conditions, due to the close proximity of the proposed development to residential uses, mitigation has been included to ensure that stationary light sources do not spill over onto surrounding properties.

Glare

The proposed exterior building materials would include a combination of stucco and horizontal lap siding, which are nonreflective. The buildings would also have windows, but they would not create any more glint and glare than windows existing at the site and surrounding residences. The northern side of the proposed buildings' rooftop would be flat and painted white; the rooftops on the southern side would be slanted toward the south and composed of a nonreflective metal-seam material. Rooftop solar photovoltaic panels would be installed atop the south-facing roofs.

The solar panels, which use anti-reflective coatings and their surfaces are roughened to diffuse reflection and minimize glare, would be developed with "high transmission, low iron glass," to absorb and capture light. Consequently, this produces smaller amounts of glare and reflectance than normal glass. Therefore, glare caused by the solar panels and other building materials would not be considered substantial.

Mobile Sources

Mobile light and glare sources would include vehicles traveling to/from and within the site. Light and glare generated by vehicles on the public rights-of-way would be similar to those already existing on the adjoining roadways and would not be substantial. Light and glare from vehicles accessing the school's parking lot proposed in the western portion of the project site would generate new sources of light and glare, since this area is currently developed with a building and playground. Vehicle glare would not be substantial; it would be similar to that of vehicles parked and passing by on the adjacent roadways. Light from vehicle headlights, however, could be a potential concern because the

proposed parking lot—similar to existing conditions—would be elevated five to six feet above the grade of Myrtle Avenue and 26th Street. Light from the headlights of vehicles traveling within and parked on the lot could be directed toward and spill into the residences across the parking lot.

The District has considered this potential significant lighting impact and contemplated construction of a solid barrier/wall along the perimeter of the parking lot. However, for security reasons, the parking lot will require visibility from the street, and a solid barrier from the floor-grade of the parking lot is not feasible. Mitigation in the form of vegetation planted along the cable rail fence would allow some visibility into the parking lot from the street level, while shielding light from vehicle headlights from entering into the windows of adjacent light-sensitive uses.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

AES-1 Prior to the use of any of the exterior stationary lights during construction and operation of the proposed project, the District and/or its construction contractor shall first test each light source at least 30 minutes after dusk to ensure that the illumination does not create glare or spill into the property lines of adjacent residential uses. All exterior stationary lights used during construction and operation of the project shall be the minimum intensity necessary, fully shielded (full cutoff), and downcast (emitting no light above the horizontal plan of the fixture). The lamp bulb shall not be directly visible from the surrounding residences.

AES-2 Prior to the first use of the finished parking lot on the west end of the project site, the District and/or its construction contractor shall plant vegetation along the perimeter of the parking lot to reduce potential glare and spill light caused by headlights of vehicles accessing the lot, from entering into the windows of adjacent residential uses. Vegetation shall be selected based the plant's ability to shield vehicle headlights while providing visibility of the proposed parking lot's floor level from the public right-of-way. The vegetation could consist of one or more types of shrubs or vines and shall be non-invasive and drought tolerant. Selection shall be based on the vegetation types' projected growth rate and maintenance, water, sun, and soil requirements. The District may also consider the visual quality of the plant, and its consistency with the proposed improvements. Examples of suitable vegetation types for the perimeter of the parking lot are provided in Table 5.1-1, *Vegetation Examples*, page 5.1-40 of the Draft EIR, and Figure 5.1-13, *Types of Shrubbery*, page 5.1-13 of the Draft EIR. Individual plants shall be in 5-gallon containers (minimum) to ensure optimum height and maximize growth potential. The final determination shall be made by a landscape architect based on the factors provided above. The plants will be trimmed and maintained in accordance with the school's landscaping schedule.

Finding:

The District beach hereby finds that implementation of Mitigation Measures AES-1 and AES-2 are feasible, and are therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2. Biological Resources

Impact 5.3-1: Development of the proposed project would not substantially affect plant or animal species identified as a candidate, sensitive, or special status. However, project implementation could impact protected nesting birds.

The project site is in an urbanized community. The site is developed with a former school campus. Nonnative landscaping improvements are planted throughout the site, including ornamental shrubs and trees on the lawn along 25th Street and vegetated slope on the eastern perimeter of the site; the slope is stabilized by nonnative iceplant. Due to its developed nature, there are no candidate, sensitive, or special status-listed plant and animal species or special vegetation communities on or adjacent to the project site, and project development would not directly take any of these species or communities.

The proposed project, however, includes removal of ornamental vegetation, including mature trees within the development footprint that may have potential to support nesting bird species that would fall under the protection of the federal MBTA and California Fish and Game Code (described in Section 5.3.1.1, page 5.3-2 of the Draft EIR). Although no active or inactive nests were detected during the site visits, it is possible they could occur during project construction.

Known special-status wildlife species in the area—California least tern and western snowy plover—have the potential to occur in the beach habitats. However, due to the distance and intervening urban development between the project site and the beach, project implementation would have limited potential to indirectly affect these two coastal bird species.

Due to the urban nature of the project site and surrounding area, project implementation would not directly or indirectly affect candidate, sensitive, or special status plant and animal species or vegetation communities. However, if project implementation occurs during the avian nesting season (February 1 through August 31), it is possible the removal of vegetation would affect nesting migratory birds.

BIO-1 A preconstruction nesting bird survey shall be conducted by a qualified biologist (i.e., one with experience conducting nesting bird surveys) to ensure potential impacts to nesting bird species do not occur during the breeding season. The survey shall comply with the conditions in the Migratory Bird Treaty Act and California Fish and Game Code with methods accepted by the US Fish and Wildlife Service and the California Department of Fish and Wildlife to protect active bird/raptor nests. To the extent feasible, vegetation/tree clearing shall take place outside the general avian breeding season (February 1 to August 31). If vegetation clearing

and/or tree removal cannot occur outside the general avian breeding season, then a preconstruction survey for avian nesting shall be conducted by a qualified biologist on the project site and within 500 feet of the site within seven calendar days prior to the start of construction. If the biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed.

If the biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified biologist: work may proceed if it is (1) at least 500 feet from raptor nests; (2) at least 300 feet from federal- or state-listed bird species' nests; and (3) at least 100 feet from nonlisted bird species' nests. Encroachment into the buffer area around a known nest shall only be allowed if the biologist determines that the proposed activity would not disturb the nest occupants. A qualified biologist shall conspicuously mark the buffer so that vegetation clearing and/or tree removal/trimming does not encroach into the buffer until the nest is no longer active (i.e., the nestlings fledge, the nest fails, or the nest is abandoned, as determined by a qualified biologist).

Finding:

The District hereby finds that implementation of Mitigation Measure BIO-1 is feasible, and is therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

3. Cultural Resources

Impact 5.4-2: Development of the project could impact archaeological resources that may be buried in disturbed soils.

The project site is entirely developed and is not a designated archaeological site, nor has it been determined to be a historical resource (see Impact 5.4-1). However, prior to its current developed condition, structures built as early as 1912 were used as a church and residence on the northwest portion of the site. These buildings were removed from the site in the 1950s. Ground disturbance near these structures, as well as near the existing structures may result in the accidental discovery of unique artifacts that are of public interest, have a particular quality (e.g., oldest or the best available example of its type), and/or are associated with a recognized important prehistoric or historic event or person.

Although archaeological resources were not identified during site surveys, it is possible that subsurface archaeological resources exist and that may be encountered during construction activities that disturb soil. If any are encountered, the District would comply with CEQA Guidelines Section 15064.5, which requires the lead agency to determine if the discovered resource is unique or historically significant, and if so to treat it in accordance with the provisions of PRC Section 21083.2.

CUL-1 Prior to the start of construction, Hermosa Beach School District shall retain a qualified archaeologist to monitor ground-disturbing activities. The archaeologist shall attend a meeting with the grading contractor, engineering geologist, grading engineer, and school authorities to establish a protocol for monitoring during all earth-disturbing activities. The meeting shall briefly summarize the prehistoric and historic use of the land, describe the types of cultural resources that may be encountered in the project area, and outline steps to follow in the event a discovery is made. The training shall be developed and presented by a registered professional archaeologist (RPA) and may run concurrently with other environmental training (biological, paleontology, safety training, etc.). The training may be videotaped or presented in an informational brochure for future use by field personnel not present at the start of the project phase. The RPA shall have the authority to stop grading or construction work within 25 feet of any discovery of potential historical or archaeological resources in order to test, analyze, and make a finding of significance under Section 15064.5 of the California Environmental Quality Act Guidelines; develop a plan for recovery, analysis, report, and curation of the recoveries, as appropriate; and report to an accredited and permanent scientific institution, such as the South Central Coastal Information Center and Natural History Museum of Los Angeles County.

Impact 5.4-3: The proposed project could destroy paleontological resources that may be buried in the geologic deposits that underlie the project site.

Project development would involve disturbance of approximately 2.35 acres of land and would involve grading and trenching into subsurface soil, which consists of fill underlain by alluvial deposits. Fill may be found 4 to 5 feet beneath the proposed buildings, and 6.5 to 8 feet beneath the proposed parking area on the western portion of the site. According to the geotechnical report prepared for the project (see Appendix G of the Draft EIR), it is recommended that excavation for installation of the main building's footings exceed by 6 feet below the proposed footings or 6 feet below the existing grade, whichever is greater. The report also recommends excavating an additional 6 feet horizontally beyond the building perimeter for the multipurpose building and by 9 feet for the classroom building. Therefore, excavation for the footings for the improvements would extend beyond the subsurface fill and could encounter native soils.

According to the paleontological records search, although the project site is underlain by young Quaternary deposits that do not present the possibility of containing paleontological resources, due to overexcavation required for construction of the improvements, it is possible that older Quaternary deposits would be encountered.

Although no paleontological resources have been identified within or in close proximity of the project site, project construction may encounter older Quaternary deposits with potential to yield significant paleontological resources, and ground-disturbing activities could damage potential resources.

CUL-2 Prior to the start of construction, the Hermosa Beach School District shall retain a qualified paleontologist to determine if grading and excavation activities will encounter older Quaternary terrace deposits. If it is determined that older Quaternary terrace deposits will not be encountered, no additional work is required.

If it is determined that construction could encounter older Quaternary deposits, the qualified paleontologist shall provide training to the construction staff, including but not limited to the grading contractor, engineering geologist, grading engineer, and school authorities to outline steps to follow in the event that a discovery is made. The paleontologist shall establish a protocol for monitoring during all earth-disturbing activities. The training shall be developed and presented by the paleontologist and may be videotaped or presented in an informal brochure for future use by field personnel not present at the start of the project phase.

During construction, the paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. If paleontological resources are discovered, the construction crew shall immediately cease work in the vicinity of the find. The paleontologist shall prepare a recovery plan in accordance with the Society of Vertebrate Paleontology guidelines (1996), which may include but is not limited to the following: a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination, and a report of findings. Necessary and feasible recommendations in the recovery plan can also be provided by the lead agency and shall be implemented before construction activities resume at the site where the resources were discovered. Any discovered resources shall be curated with the facilities at the Natural History Museum of Los Angeles County.

Finding:

The District hereby finds that implementation of Mitigation Measures CUL-1 and CUL-2 are feasible, and is therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

4. Geology and Soils

Impact 5.5-2: Development of the project site could subject persons and structures to hazards arising from unstable soils or geologic units.

Landslides

According to the geotechnical report, due to the topography of the project site and surrounding area, there are no slopes that are susceptible to potential landslides located near the project site. Additionally, expansion of the project site eastward would be engineered to support the proposed grass field and related perimeter improvements. No impacts related to landslides would occur.

Subsidence and Collapse

According to the geotechnical report, the project site is outside the northwest end of the Torrance Oil Field. The nearest active oil well is approximately 3,300 feet east, the nearest drywell is 2,900 feet northeast, and the nearest plugged well is approximately 5,200 feet southeast. The project site is not used for oil extraction and has not historically been used for such; therefore, there would be no subsidence risk from overdraft of petroleum beneath the site. However, according to the geotechnical report, subsurface soil conditions indicate the slight potential for collapse, and the geotechnical report provides recommendations for excavating and foundation and building construction techniques that would reduce impacts from unstable soil to less than significant.

Lateral Spreading and Liquefaction

The project site is not within a potential liquefaction zone. Additionally, due to the depth of groundwater—lower than 50 feet bgs—the potential for liquefaction is negligible. However, some dry settlement may occur in the upper loose to medium dense sand due to potential seismic shaking.

According to the geotechnical report, most of the settlement is anticipated to occur during construction of the project. The estimated potential for seismically induced settlement of isolated and/or strip footings under sustained loads should be 1.0 inch or less for the proposed maximum structural load. The maximum differential settlement, over a horizontal distance of 20 feet, is anticipated to be in the order of 0.5 inch for similarly loaded footings with implementation of engineering measures as recommended by the geotechnical report.

Expansive Soils

The subsurface soils beneath the project site mostly consist of poorly graded sand. These types of material generally have a low susceptibility to expansion when facing seasonal cycles of saturation and desiccation. Additionally, consolidation tests conducted for the geotechnical report did not experience swelling upon the addition of water. Subsurface soils have the slight potential for collapse and dry settlement, but do not present conditions for other potentially significant impacts from unstable soils or geologic conditions.

GEO-1 The proposed project shall be constructed in accordance with the geotechnical engineering recommendations in the Koury Engineering and Testing Inc. report, “Geotechnical Investigation and Geological Engineering Investigation Report, Hermosa North School 417 25th Street, Hermosa Beach, California 90254,” as well as any subsequent geotechnical studies prepared for the proposed project. A geotechnical representative shall review foundation plans prepared for the proposed improvements in accordance with the geotechnical report prior to construction of the improvements. A geotechnical representative shall also be present during construction operations to evaluate implementation of the report recommendations

with regard to bearing capacity, settlement, flatwork, slabs-on-grade, temporary excavations, and utility trenches.

Finding:

The District hereby finds that implementation of Mitigation Measure GEO-1 is feasible, and is therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

5. Noise

Impact 5.10-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project.

Construction of the proposed project would generate temporary noise. In typical construction projects, demolition and grading activities usually generate the highest noise levels since they involve the largest equipment. Grading will require the movement of topsoil from within the site to support the proposed field improvements on the site slope.

In general, construction equipment would be limited to relatively small- to medium-sized equipment such as loaders/backhoes, scrapers, excavators, rubber-tired dozers, graders, welders, rollers, pavers, and air compressors. Project construction would require demolition of existing buildings; site preparation and utility trenching; and construction of a new two-story classroom/administration building, multipurpose building, play areas, and parking lots.

The District recognizes that the control of construction noise is difficult and provides an exemption for this type of noise when the work is performed between 8:00 AM and 6:00 PM, Monday through Friday, and between 9:00 AM and 5:00 PM on Saturday. Construction is prohibited on Sundays and federal holidays.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment. Existing uses surrounding the project site would be exposed to construction noise.

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along site access roadways. The primary access routes for delivery and construction vehicles to the project site would be from the driveway entrance on 26th Street and the construction staging area would be on the proposed field area, on the eastern portion of the site. Additionally, there would be occasional deliveries to different areas around the site that would require the use of Myrtle Avenue and 25th Street. Project-related construction worker vehicles, haul trucks, and vendor trucks could pass by existing residential and commercial uses along these streets. The demolition and grading phases would generate the most trips due to soil haul. Note that a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dB increase in traffic-

generated noise levels in the pertinent CNEL noise level metric. As such, an increase of 3 dB is often used as a threshold for a substantial increase.

Since the construction-related trips would not double the flow rates on these streets, these project trips would not notably change the daily traffic flow conditions. In addition, these truck trips would be intermittent, spread throughout the workday, and primarily during nonpeak traffic periods. While individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, these occurrences—although potentially audible for a few seconds—would generally be infrequent. Due to the infrequency of events, their relatively short-lived durations, and their less than 3 dB increase over existing traffic noise conditions (relative to the industry-standard use of CNEL), construction vehicle movement noise would be less than significant. No mitigation is needed with respect to construction mobile source noise.

Construction Equipment

The noise produced at each construction stage is determined by combining the L_{eq} contributions from each piece of equipment used at a given time. In the construction of residential and mixed-use projects, grading and construction typically generate the highest noise levels because they require the largest equipment. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels in excess of 80 to 85 dBA at 50 feet. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given sensitive receptor. Since noise from construction equipment is intermittent and diminishes at a rate of 6 dB per doubling distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and/or shielding/scattering effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Construction Noise Levels

The pertinent properties surrounding the project site consist of residential uses. Project construction would involve demolition of existing buildings; site preparation and grading of existing land; and construction of a new classroom/administration building and a multi-purpose building. Noise levels from project-related construction activities were calculated from the simultaneous use of all applicable construction equipment at spatially averaged distances (i.e., from the center of the construction area) to the closest receptors.

The nearest sensitive uses include houses that protrude into the project site on the north (approximately 85 feet from the center of the site), adjacent houses at the corner of 25th Street and Myrtle Avenue (225 feet), houses to the east (130 feet), houses to the south across 25th Street (200 feet), houses across 26th Street (200 feet), and houses across Myrtle Avenue (360 feet). Using information provided by the District, coupled with methodologies and inputs employed in the air quality assessment, the expected construction equipment mix was estimated and categorized by construction activity. The whole of the proposed project would be completed in two phases, demolition and construction, which would begin in 2018 and end in 2019, prior to the start of the 2019-2020 school year. The noisiest portions, however (i.e., demolition and grading phases), are expected to take a total of 3 months. The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 5.10-10, page 5.10-20 of the Draft EIR.

Construction activities would increase noise levels in the vicinity of the project site. Due to the proximity, the highest expected construction-related noise levels—up to approximately 78 dBA L_{eq} —would be at the nearest residential receptors adjacent to the site to the north. All construction would occur during the City of Hermosa Beach’s allowable hours of construction, the construction duration would be temporary (i.e., 3 months for the loudest phase), and noise levels above typical ambient conditions would be sporadic and intermittent. However, construction-generated noise levels would be notably higher than ambient noise levels at the nearest receptors.

Impact 5.10-3: Construction activities would create short-term increases in groundborne vibration and groundborne noise.

Groundborne vibration and groundborne noise may be of concern during ongoing operations or during the construction phase, as discussed separately below.

Vibration during Operations

Operation of the project would not generate substantial levels of vibration because there are no notable sources of vibrational energy associated with the project. Thus, operations of the proposed project would not result in significant groundborne vibration impacts.

Vibration during Construction

Construction activities generate varying degrees of ground vibration, depending on the construction procedures, construction equipment used, and proximity to vibration-sensitive uses. Construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance. Table 5.10-11, *Typical Vibration Levels Produced by Common Construction Equipment Items*, page 5.10-22 of the Draft EIR, shows the PPVs of some common construction equipment and haul trucks (loaded trucks).

Demolition of the existing structures onsite, extending the site footprint eastward, and construction of new school facilities would be required, as well as importing 1,000 cubic yards of imported soil during grading to level the adjacent hillside with the site. Typically, demolition, grading, and construction activities include equipment such as jackhammers, dozers, and delivery/dump trucks. Generally, these types of equipment do not generate substantial levels of vibration at 25 feet. Minor grading and excavation would be necessary to install utilities and structural components for some of the proposed structures.

Vibration-Induced Structural/ Architectural Damage

The threshold at which there is a risk of architectural damage to normal houses with plastered walls and ceilings is 0.2 in/sec. Building damage is not a factor for normal construction, with the occasional exception of blasting and pile driving. No blasting, pile driving, or hard rock ripping/crushing activities are anticipated during project construction. Small construction equipment generates vibration levels less than 0.1 PPV in/sec at 25 feet away.

The nearest off-site residential structures are homes to the north, east, and west that are adjacent to the project boundary. These residences are less than 20 feet from the boundary of construction

activities.³ Operation of vibratory rollers exceeds the 0.200 in/sec PPV threshold for damage at distances of less than 30 feet, and operation of large bulldozers exceeds the threshold at distances of less than 15 feet. Therefore, the residences within 20 feet of the boundary of construction activities could potentially experience vibration levels that would exceed the threshold for architectural damage if large or vibration-intensive equipment is used near the site boundary. Other off-site structures would be a minimum of 45 feet from the site boundary, and would not experience levels in excess of the damage threshold.

Architectural-damage vibration impacts would be potentially significant.

Vibration Annoyance

The FTA's criteria (see Table 5.10-4, page 5.10-9 of the Draft EIR) are frequently used as significance thresholds for vibration-related annoyance that is due to resonances of the structural components of a building. The FTA limit for vibration annoyance at sensitive uses is 78 VdB.

Vibration is typically noticed nearby when objects in a building generate noise, such as rattling windows or picture frames. It is typically not perceptible outdoors, and therefore impacts are based on the distance to the nearest building. The effects of vibration vary depending on soil type, ground strata, and receptor building construction. They range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels.

The nearest off-site sensitive uses are the homes protruding into the north side of the site, approximately 85 feet from the center of the proposed project site (spatially averaged analysis). At this distance, vibratory rollers or similar equipment items would be expected to generate 78 VdB, and a large bulldozer would be expected to generate 71 VdB. Other nearby residences would be a minimum of 130 feet from the center of the site and would experience vibration levels below 73 VdB due to use of a vibratory roller, and below 66 VdB due to use of a large bulldozer. Even with large, vibration-intensive equipment, construction-generated vibration at the nearest residence would not consistently exceed the annoyance threshold. Because construction equipment moves around the site, and because vibration dissipates quickly with distance, the construction-related vibration levels would be less than 78 VdB for the majority of the time. Therefore, construction vibration impacts related to annoyance would be less than significant at all nearby vibration-sensitive land uses. However, there will be times when some equipment is in relatively close proximity to the project site boundary and construction-related vibration may be felt and perceived as irritating at some homes near the site boundary.

In summary, operations activities would not create substantial groundborne vibration or groundborne noise at off-site or on-site receptors. However, construction-related vibration presents potentially significant impacts, primarily with respect to damage effects.

N-1 As required by the City of Hermosa Beach Municipal Code Section 8.24.050, construction activities shall not occur outside of the allowable hours.

 Additionally, the Construction Contractor shall implement the following measures:

³ Vibration-induced architectural damage analysis typically uses worst-case distances (instead of spatially averaged distances).

- At least 30 days prior to commencement of demolition or any other construction activities, notification shall be given to all residents within 500 feet of the project site regarding the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, and the planned duration of activity. The notification shall also include the telephone number of the District's authorized representative to respond in the event of a vibration or noise complaint.
- Prior to the beginning of construction activities, a sign shall be posted at the entrance to the job site, clearly visible to the public, that contains a contact name and telephone number of the District's authorized representative to respond in the event of a vibration or noise complaint. If the authorized representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.
- To the extent feasible, route all construction-related trips (including worker commuting, material deliveries, and debris/soil hauling) so as to minimize traffic through the neighborhood.
- All heavy construction equipment used on the proposed project shall be maintained in good operating condition, with all internal combustion, engine-driven equipment fitted with intake and exhaust muffles, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.
- Where feasible, use electrically powered equipment instead of pneumatic or internal combustion powered equipment.
- Where feasible, all stationary noise-generating equipment shall be located as far away as possible from neighboring property lines.
- Prohibit unnecessary idling of internal combustion engines.
- The use of noise producing signals, including horns, whistles, alarms, and bells will be for safety warning purposes only.

All the above conditions shall be included on the permit applicant drawings with verification by the District staff. Additionally, all the above conditions shall be verified in the field by the District staff at the project site.

N-2

For demolition, construction, grading, foundation, and erection activities that would use vibration-producing equipment, the following mitigation measure shall be implemented in close coordination with District staff so that alternative construction techniques are undertaken.

Prior to the start of construction activities, the construction contractor shall document, to the extent feasible (and by access granted by individual property owners), the preconstruction baseline conditions by inspecting and reporting on the then-current foundation and structural condition of the off-site buildings and/or structures with ground-based foundations within 50 feet of any construction site boundaries.

During construction of the project, vibratory rollers shall not be operated within 30 feet of off-site buildings or other structures, and large bulldozers and loaded trucks shall not be operated within 15 feet of off-site buildings or other structures.

During construction, if any vibration levels cause cosmetic or structural damage (including, but not limited to cracks in walls or ceilings [particularly around doors and windows]) to the off-site buildings within 50 feet of the project site, District staff shall immediately issue “stop-work” orders to the construction contractor to prevent further damage. Work shall not restart until the buildings are stabilized and/or preventive measures are implemented to relieve further damage to the building(s).

Finding:

The District hereby finds that implementation of Mitigation Measures N-1 and N-2 are feasible, and is therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

6. Transportation and Traffic

Impact 5.12-1b: The peak-half-hour arrival and departure periods of the proposed school would cause significant traffic impacts at nearby intersections and street segments, and mitigation measures proposed are not within the purview and/or responsibility of the District.

Project-Generated Traffic

The anticipated traffic that would be generated by the proposed elementary school under an alternative peak half-hour traffic impact analysis is shown in Table 5.12-9, page 5.12-23 of the recirculated EIR. As shown, the projected vehicle trips are substantially higher than those used under the peak one-hour analysis (see Table 5.12-3, page 5.12-16 of the recirculated EIR). This is mainly due to higher trip generation values from the *Trip Generation Manual* (10th edition) for the elementary school land use category, which are substantially higher than those in the ITE 9th edition used for the one-hour peak analysis (see Table 5.12-3). Additionally, unlike the approach taken for Impact 5.12-1a, trip credit from the site’s most recent uses (preschool and adult school programs) were not applied for the peak half-hour analysis because traffic counts for the peak half-hour analysis were taken when the project site was vacant. Finally, the trip generation rates and projected traffic volumes generated in Table 5.12-9 represent those during the peak one-hour, even though the analysis assumes all the trips would occur during the peak half-hour periods.

The trips in Table 5.12-9 represent the total number of vehicle trips generated at the site, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries. The analysis for the peak-half-hour analysis assumes the proposed school would generate 699 vehicles trips during the morning peak hour (377 inbound and 322 outbound), 357 trips during the afternoon peak hour (161 inbound and 196 outbound), and 1,250 vehicle trips per day. The volumes of traffic shown in Table 5.12-9 assumes all of the trips generated and distributed onto the street network are new (see Figure 4 of

Appendix M-2), even though most of the trips already exist—i.e., Hermosa View School (3rd grade students) and Hermosa Valley School (4th grade students)—and would be redirected to the project site.

Traffic Impact Analysis

The peak 1-hour methodology is the typical approach used for analyzing traffic impacts of a proposed project and is the methodology used for traffic analyses for land development projects in the City of Hermosa Beach. This same peak hour methodology was adopted and used in the traffic analyses for the recently approved and adopted PLAN Hermosa.

Because schools generally experience an intense period of traffic flow for approximately 20 to 30 minutes within the peak one-hour study interval and based on public comments from the City of Hermosa Beach and community, a subsequent focused traffic analysis was conducted to evaluate the proposed school's impacts during the peak half-hour time frame. The 30-minute peak traffic consists of the highest traffic volumes in two consecutive 15-minute periods in the morning arrival and afternoon departure periods.

Traffic impacts of the proposed school were evaluated for the AM and PM peak half-hour under two baseline conditions: existing 2018 (when traffic counts were taken) and future 2019 (when the proposed school is targeted to open). The analysis quantifies the before-and-after traffic volumes for AM and PM under both baseline conditions, then determines the average delay values, levels of service, and traffic volumes at the study area intersections and street segments for “without project” and “with project” scenario.

Intersections

In the half-hour peak analysis, the proposed project would result in potentially significant impacts during the AM arrival and PM dismissal periods under both existing 2018 and future 2019 conditions at the intersections of Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue. The proposed project's contribution to the impacts at both intersections is 13.3 percent, which is based on the volume of project-generated traffic passing through the intersections divided by the total traffic volume at the intersections for the year 2019 scenario.⁴

Potential mitigation measures and project alternatives are discussed below and may include physical improvements at the impacted intersections (Nos. 1 and 2), placement of traffic control officers at the intersections (No. 3), and/or modifications of proposed school operations (Nos. 4 and 5).

1. Intersection Widening Mitigating Option

Widening of the impacted intersections would increase their capacity and improve traffic flow.

The below improvements, as illustrated in Figure 5.12-2, *Potential Intersection Widening Improvements*, page 5.12-35 of recirculated EIR, could be made at the intersections:

⁴ The project's share of the traffic volume would be 16.2 percent for the AM peak hour and 10.4 percent for the PM peak hour, the average of which is 13.3 percent. The total volume of traffic passing through the two intersections during the AM peak half-hour is 1,951 vehicles, of which 315 vehicles would be traffic generated by the school (which equates to 16.2 percent). The total volume of traffic passing through the two intersections during the PM peak hour-hour is 1,561 vehicles, of which 162 vehicles would be traffic generated by the school (which equals 10.4 percent).

- a. Valley Drive|Gould Avenue intersection:
 - i. Add a through lane in the eastbound direction on Gould Avenue, and
 - ii. Add a left turn lane in the southbound direction on Valley Drive.
- b. Ardmore Avenue|Gould Avenue intersection:
 - i. Add a through/right-turn lane in the eastbound direction on Gould Avenue.

If implemented, the capacity of both intersections would improve to LOS C or better for all of the “with project” scenarios during the AM and PM peak half-hour conditions. The Ardmore Avenue|Gould Avenue intersection would be improved from an existing LOS F to LOS D for the AM peak half-hour, and to LOS C for the PM peak half-hour.

Although the improvements would enhance traffic flow at the Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue intersections, they would also cause secondary effects. Table 5.12-18, page 5.12-34 of recirculated EIR, summarizes the environmental impacts that would occur if the intersection widening improvements were adopted.

As shown in the table, the potential mitigation to widen the Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue intersections would cause significant secondary effects under the resource areas of biological resources and land use. Additionally, the improvements are in neither the City of Hermosa Beach Capital Improvements Plan nor PLAN Hermosa. For these reasons and because the cost of the improvements is not proportionate to the short-term traffic impact that would occur only during the peak half-hour morning arrival and afternoon departure periods—and mitigation is not warranted under the standard one-hour peak period (see Impact 5.12-1a)—the City and District determined that the benefit of this potential mitigation measure would not outweigh the secondary environmental effects or its high cost to install. Therefore, this potential mitigation measure is not preferred.

2. Traffic Signalization Mitigating Option

A compound traffic signal system at the Valley|Gould and Ardmore|Gould intersections would improve the capacity of the impacted intersections and increase the level of service to LOS B at the Valley|Gould intersection for the AM and PM peak half-hour periods, LOS D at the Ardmore|Gould intersection for the AM peak half-hour, and LOS B at the Ardmore|Gould intersection for the PM peak half-hour. The LOS would be acceptable, and traffic impacts at both intersections would be reduced to less than significant. The signals would be installed on public right-of-way, and neither open space nor on-street parking would be eliminated. Existing parkway trees would also not be affected by the traffic signals, and signal installation would not cause secondary environmental impacts.

This potential improvement, however, is not identified in the City of Hermosa Beach Capital Improvements Plan or PLAN Hermosa. Additionally, the cost to install the traffic signalization system would be approximately \$550,000, and there would also be ongoing costs to maintain the traffic signals. For these reasons and because the project’s traffic impacts would occur only during the peak half-hour morning arrival and afternoon departure periods—and mitigation is not warranted under the standard one-hour peak period (see Impact 5.12-1a)—neither the City nor District believe

this proposed capital improvement option is necessary. Therefore, this potential mitigation measure is not preferred.

3. Traffic Control Officers Mitigating Option

Deployment of traffic control officers (TCOs) to direct traffic through the intersections during the proposed school's half-hour peak morning arrival and afternoon departure periods would fully mitigate traffic impacts at both Valley|Gould and Ardmore|Gould intersections to levels below significance. TCOs would enhance the flow of traffic and improve the levels of service in a manner similar to that of a traffic signal system during the times when the TCOs would be in place. No secondary, indirect environmental effects would occur from this potential mitigation measure.

According to the City of Hermosa Beach, deployment of a TCO(s) is warranted only if the impacted intersection operates at LOS F. As shown in Tables 5.12-10 through 5.12-13, pages 5.12-25 through 5.12-28 of recirculated EIR, the intersection of Ardmore|Gould would operate at LOS F only during the morning arrival period. Although the Valley|Gould intersection would operate at LOS E or better during the morning period, due to the proximity of the two intersections, it is recommended that a TCO is also deployed at this intersection during the morning arrival period for the proposed mitigation measure to be effective. Under this option, the project's fair share contribution for the cost of the TCOs would be the same as for the capital improvements discussed above: i.e., 13.3 percent. The District's contribution of 13.3 percent would be between \$945/year to \$1,676/year. This potential measure would mitigate the project's morning half-hour peak traffic impacts at the Valley|Gould and Ardmore|Gould intersections. The peak half-hour traffic impacts during the project's afternoon dismissal period would remain significant and unavoidable. This potential mitigation measure is feasible compared to others considered and has been included as Mitigation Measure TRAF-2b.

4. Staggered Bell Schedule Project Alternative Option

Staggering the proposed school's bell schedule for third and fourth grades would reduce the intensity and traffic impacts at the Valley|Gould and Ardmore|Gould intersections. This potential mitigation measure would have no secondary environmental impacts.

If a 30-minute stagger is implemented, traffic impacts would be reduced to below significance (traffic delay would be less than the 10 percent threshold for intersections already operating at LOS D, E, or F) at the intersections of

- Ardmore Avenue|Gould Avenue during the AM peak half-hour
- Valley Avenue|Gould Avenue during the PM peak half-hour

Traffic impacts would remain significant and adverse at the intersections of

- Valley Avenue|Gould Avenue during the AM half-hour peak
- Ardmore Avenue|Gould Avenue during the PM half-hour peak

The District is unsure whether implementing a 30-minute stagger is legally feasible. Existing contracts with the District's teacher's union may limit implementation of this potential mitigation measure. Additionally, a staggered bell schedule would not align with the District educational

program. The District, however, is able to stagger the bell schedule by 15 minutes. While not as effective, staggering the bell schedule by 15 minutes would also improve the level of service at the impacted intersections, though impacts would remain significant and adverse. This potential mitigation measure has been included as Mitigation Measure TRAF-2a.

5. School Bus Shuttling Option

The District considered operation of a bus to shuttle students from/to each of its schools. Under this mitigating option, the District would contract with a bus service company to shuttle student passengers from/to the District's schools, which would act as bus stops. Bus riders may include students who reside near the schools and/or those with siblings who attend the schools and are dropped off at the sibling's school to ride the bus. It would be speculative to determine ridership; however, assuming 20 students from North School used the bus shuttling program, impacts at the two intersections would remain significant and adverse. According to the City of Hermosa Beach, which currently contracts with a company to shuttle students for its STAR after-school program, the cost to hire a bus is approximately \$35,000 annually. Because the bus shuttling option would not reduce significant traffic impacts at the two impacted intersections, its cost is not proportional to its benefit (i.e., elimination of the significant traffic impacts), and mitigation is not warranted under the standard one-hour peak period (see Impact 5.12-1a), the District determined this option is not preferred.

Street Segments

The proposed project would create potentially significant impacts at six segments on 24th Street, Morningside Drive, Park Avenue, 25th Street, 26th Street, and Myrtle Avenue during the AM and PM peak half-hours, under both existing 2018 and future 2019 conditions.

Potential mitigation may include street widening, parking restriction on one side of the impacted street during the AM and PM half-hour peak periods, and/or staggering the proposed school's bell schedule. Figure 5.12-3, *Project Impacted Street Segments*, page 5.12-45 of recirculated EIR, illustrates the potentially significant street segments. As shown, approximately 6,000 linear feet of public street would be impacted.

1. Street Widening Mitigating Option

The street widening option would require the District to acquire private property, adjoining the affected street segments to expand the widths of the impacted segments, increase their operational capacities, and enhance traffic flow. The affected area is developed with public right-of-way; private property, including driveways, landscaped yards, and possibly building structures; above- and below-ground utility improvements; and City-maintained trees and facilities, such as light-poles and signs. The District would be required to widen the impacted street segments by five to eight feet.

Expanding five to eight feet of the impacted 6,000-foot length would affect an area between 30,000 and 48,000 square feet. Assuming there is no cost to use public right-of-way and public easements in this area, and for the purposes of this analysis, conservatively assuming 5 percent of the area is privately owned and the remainder is public right-of-way or public easement, the cost to acquire private property would be between \$804,492 and \$1.3 million, which is based on an estimated land cost of \$536 per square foot (see Table 5.12-19, page 5.12-41 of recirculated EIR). This cost does not include fees related to street-widening improvements and relocation of infrastructure.

This mitigating option would reduce the potentially significant short-term, half-hour peak traffic impacts at studied street segments to a less than significant level. However, it would likely have significant secondary effects on parkway trees and utilities services, and this option would be a huge undertaking for the District, as it would likely require condemnation. Moreover, the cost to implement this potential mitigation option would not be proportional to its short-term improvement to traffic congestion during the proposed school's peak half-hour morning arrival and afternoon departure periods. For these reasons and because traffic impacts at the study street segments do not occur during the standard one-hour peak period (see Impact 5.12-1a), the District and City determined that the benefits of this potential mitigating option do not outweigh its potential consequences. This potential measure is also not practical and is therefore not preferred.

2. Parking Restriction Mitigating Option

The City of Hermosa Beach Municipal Code Sections 10.32.150, Parking Adjacent to Schools, and 10.32.160, Parking on Narrow Streets, authorize the City Traffic Engineer to restrict on-street parking. Section 10.32.150 authorizes the implementation of a “no parking” zone on the side of any street adjacent to a school property, and Section 10.32.160 authorizes the implementation of a “no parking” zone on one side of a narrow street.

Under this potential mitigation measure, signage would be installed on one side of the affected street segments that restricts on-street parking during the morning arrival and afternoon departure half-hour peak periods. Assuming a 15-minute staggered bell schedule of 8:15 AM to 2:45 PM and 8:30 AM to 3:00 PM, the signage could restrict parking between 8:00 AM and 9:00 AM and between 2:30 PM and 3:30 PM. The parking restriction would increase the capacity of impacted street segments and in effect double the capacity of the streets by providing an additional travel lane.

This option would mitigate the significant impacts on the segments of 24th Street, Morningside Drive, and Park Avenue; however, traffic impacts would remain significant on the street segments of 25th Street, 26th Street, and Myrtle Avenue—closest to the project site. Figure 5.12-3, shows the street segments that would remain significant during the peak half hour even after implementation of this potential mitigating option. Tables 17 to 20 of Appendix M-2, of the recirculated EIR, quantify the improved LOS at the impacted sections.

Implementation of this potential mitigation measure would result in significant and adverse secondary parking effects. As shown in Table 5.12-20, page 5.12-43 of recirculated EIR, this option would affect approximately 148 on-street parking spaces. The City has indicated that restriction of 148 on-street parking spaces is not acceptable or realistic. Therefore, this mitigation option is not preferred.

3. Modified Parking Restriction Mitigating Option

The City will consider restricting on-street parking during the peak morning arrival and afternoon departure periods along street segments adjacent to the project site on the north side of 25th Street (between Myrtle Avenue and the site's eastern boundary), east side of Myrtle Avenue (between 25th and 26th Streets), and south side of 26th Street (between Myrtle Avenue and Morningside Drive).

Pursuant to HBMC Section 10.32.150, the City can consider restricting on-street parking on street segments adjacent to the proposed school site. A total of 26 on-street spaces, as modified by the proposed project, would be affected, including 9 spaces on 25th Street, 8 spaces on Myrtle Avenue, and 9 spaces on 26th Street. The 17 spaces on 25th Street and Myrtle Avenue would be designated passenger loading (i.e., Mitigation Measure TRAF-4).

In accordance with HBMC Section 10.32.160, the City can also consider restricting six on-street spaces on narrow streets that are adjacent to residential uses: two spaces on the north side of 25th Street at 301 25th Street, two spaces on the east side of Myrtle Avenue also adjacent to the residence at 301 25th Street, and two on-street spaces on the south side of 26th Street near 316 and 336 26th Street; Figure 5.12-4, *Affected On-Street Parking*, page 5.12-47 of recirculated EIR, shows the affected on-street spaces. Restricting parking at these six on-street spaces—in conjunction with parking restrictions of on-street spaces adjacent to the project site—would not eliminate significant traffic impacts at study street segments during the school’s half-hour peak morning arrival and afternoon dismissal periods. Impacts would remain significant and adverse; however, this mitigating option would nevertheless improve traffic circulation at the most impacted street segments. In combination with an adult monitoring valet program at the passenger loading areas (see Mitigation Measure TRAF-5c), traffic impacts and vehicle queueing on street segments approaching the loading zones would also improve, but remain significant and unavoidable.

Because the City indicated that the modified parking restriction option is more agreeable than Option No. 2, above, and will consider it, this potential mitigation measure has been included as Mitigation Measure TRAF-3.

4. Staggered Bell Schedule Project Alternative Option

This project alternative would require staggering the proposed school’s bell schedule so that the start and end times for third and fourth grades would be offset. To fully mitigate the potentially significant impact at the study street segments, the schedule would need to be staggered by 30 minutes, which would reduce the peak surge of traffic by approximately 50 percent and result in effects comparable to that of parking restrictions (see No. 2, above). Although not as effective, staggering the bell schedule by 15 minutes would also improve the level of service at the street segments, but traffic impacts would remain significant and adverse. This potential mitigation measure—whether staggering by 15 or 30 minutes—would have no secondary environmental impacts. The District would be able to implement a 15-minute staggered schedule for the proposed North School; however, a 30-minute stagger may not be feasible due to existing teacher contracts and due to the District’s educational program. This potential mitigation measure has been included as Mitigation Measure TRAF-2a.

5. Valley Park Community Building Lot Project Alternative Option

This project alternative would involve use of the parking lot behind the Kiwanis/Rotary Club building at Valley Park as an official District-operated passenger loading area. Under this alternative, the parking lot would be resurfaced and restriped, and new signs would be installed for ingress via the northern driveway and egress via the southern driveway. Additional passenger loading signs would be installed to restrict parking on school days during the morning drop-off

and afternoon dismissal periods. Since it would be a designated passenger loading area, the District would be required to improve access between the loading area and North School in compliance with California Building Code Standards and meet requirements of the American with Disabilities Act. The cost to make these improvements would be about \$200,000.

Because it would be a District-designated loading area, adult supervision may also be required; however, for the purpose of this discussion, it is assumed an adult volunteer would be available.

Use of the lot behind the Kiwanis/Rotary Club building as a secondary passenger loading area would limit vehicles from accessing the impacted study street segments and reduce traffic impacts on these streets. It would be speculative, however, to determine the number of families who would use this offsite passenger loading area and to quantify the reduced traffic effects on the impacted street segments. Assuming a staggered bell schedule is implemented and a quarter of the students who are driven to school at each bell schedule are dropped off at this loading area or on the segments of Gould Avenue and Valley Drive adjacent to the park, there would be a reduction of approximately 160 AM peak half-hour trips and 80 PM peak half-hour trips on the residential streets. Even with the reduction in trips, traffic impacts on the studied street segments would remain significant and adverse.

To limit traffic conflicts and hazards, use of the Kiwanis/Rotary Club parking lot would also require that neither club schedule meetings and activities during the morning and afternoon bell periods. Because the District does not own the Kiwanis/Rotary Club property the District would have no control over use of the property; therefore, while the District could establish a goal of entering into an agreement, the District would not be able to enforce these improvements as mitigation. It would further require the City to approve the proposed use of the parking and improvements, because the area affected is owned by the City. For these reasons, including the high cost for the proposed improvements, which is not proportional to the short-term half-hour peak traffic impacts during the morning arrival and afternoon departure periods, this alternative is not preferred and is considered economically and legally infeasible.

6. School Bus Shuttling Option

As discussed above, the District considered hiring a bus to shuttle students from each of its school sites. Although it would be speculative to project ridership, assuming 20 students from the proposed North School project used the shuttling program, traffic impacts at the potentially significant street segments would still not be fully mitigated, and impacts would remain significant and adverse. As the bus shuttling option would not reduce significant traffic impacts at the studied street segments, the cost is not proportional to its benefit (i.e., shuttling would not eliminate the significant traffic impacts), and mitigation is not warranted under the standard one-hour peak period (see Impact 5.12-1a), the District determined this option is not preferred.

Impact 5.12-3: The project would not increase hazards caused by project design features or incompatible uses, nor would the project conflict with or decrease the performance or safety of alternative transportation modes. However, mitigation measures proposed are within the purview and/or responsibility of the City of Hermosa Beach.

Site Plan and Design

All proposed improvements, except for the school driveway into the parking lot and passenger loading area on 25th Street, would be constructed on District-owned property. The design of the proposed project does not include sharp curves or dangerous intersections that would create a public safety hazard. The main vehicular access would be the driveway on 25th Street east of Myrtle Avenue and the service driveway, which also provides fire access to the center of the campus, is proposed at the northeast corner of the site on 26th Street at Morningside Drive. As the use of the service driveway would be limited to deliveries when students are not accessing the driveway and as it would form the third leg of the intersection, the use and design of the service driveway would not pose significant safety hazards.

Visibility along 25th Street from the school's main driveway would meet sight distance standards specified in Table 201.1 of Caltrans' "Highway Design Manual" and also would not pose safety hazards. Assuming the design speed of 25th Street is the same as the posted speed limit of 25 mph, the minimum sight distance standard from the driveway on 25th Street would be 150 feet. Observations at the existing driveway on 25th Street indicate that the sight distance to the east is 340 feet and the sight distance to the west is 280 feet. Therefore, the driveway would exceed the minimum sight distance requirement per the Highway Design Manual, as well as comply with Section 14010(k) of Title 5, California Code of Regulations, which requires peripheral visibility at school driveways.

The project proposes two passenger loading zones: the main loading area at the front of the school on 25th Street and a second along Myrtle Avenue adjacent to the project site. The northern half of 25th Street adjacent to the main school building would be widened by eight feet; the sidewalk would be moved northward accordingly. The pulled-in curb would allow vehicles to stop and load/unload students in a separate lane from the thru-lane on 25th Street. The design of the main loading zone does not contain features that would cause safety hazards, and the design of the proposed school campus would be compatible with the surrounding residential and park land uses.

Roadway Hazards

Construction

Construction staging would be in the eastern portion of the project site, with direct access from the driveway at 26th Street and Morningside Drive. Due to the site's irregular shape and tight space, however, there may be deliveries and construction trucks on all sides of the site for certain work, including demolition of the existing buildings and construction of the new school building on 25th Street. Operation of construction vehicles will comply with applicable City requirements, including following the City-designated truck routes. It is also possible that certain activities may require temporary roadway or sidewalk closures and/or traffic detours that could increase roadway hazards. Mitigation Measure TRAF-6 has been proposed to limit potential roadway hazards caused by construction activities, and would reduce impacts to less than significant.

Operation

Narrow Street Widths

The widths of the streets near the project site are narrow and cannot readily accommodate both directions of traffic flow, particularly when vehicles are parked on both sides of the street. Vehicular circulation to and from the school site would be constrained during peak arrival and departure times at the beginning and ending of each school session as parents drop off and pick up students. The narrow streets would be an inconvenience for motorists and surrounding residences and would result in reduced vehicle speeds. Field observations made by the traffic engineer indicate that there are sufficient pull-out opportunities for vehicles traveling in opposite directions to pass when one of the drivers pulls over to an open curb (where no vehicles are parked) or a driveway to allow oncoming vehicles to pass. Therefore, with reduced vehicle speeds, traffic hazards due to the narrow roadways would be less than significant.

Passenger Loading

Due to site constraints, including narrow roadways and an awkwardly shaped property, the District has designed the school's main passenger loading zone on 25th Street with a pull-in curb. This segment of 25th Street would be widened by eight feet, which would allow vehicles to get out of the westward thru-lane on 25th Street, stop, and load/unload students while other vehicles can pass through on 25th Street. Students who use this loading zone would access the school from the main walkway, east of the school's driveway. Students would not be required to cross streets or driveways. The student loading zone on 25th Street would be 180 linear feet; assuming a vehicle takes up about 20 feet of space, it would accommodate roughly 9 vehicles.

Drop-off and pick-up areas at schools should include at least one space for every 50 students, with a minimum of 5 spaces. The proposed school has a maximum design enrollment capacity of 510 seats and would require 11 passenger loading spaces. The proposed passenger loading zone on 25th Street would accommodate 9 vehicles. The loading area on 25th Street alone would not meet the minimum spaces required, and vehicles waiting to load/unload students on 25th Street would create a queue and potential traffic hazards along 25th Street.

Mitigation Measure TRAF-4 requires use of the north side of 25th Street and east side of Myrtle Avenue adjacent to the project site as designated passenger loading areas; both areas are within City right-of-way. Students using Myrtle Avenue would access the school from a pedestrian entry on 26th Street at the east side of the parking lot and would not be required to cross streets or driveways. With the use of Myrtle Avenue and 25th Street for passenger loading, the project—as mitigated—would provide 17 passenger loading spaces, which would exceed the minimum spaces required and reduce potential traffic hazards caused by vehicles stacked on 25th Street and Myrtle Avenue. Potentially significant traffic hazard impacts caused by inadequate passenger loading space would be reduced to less than significant.

Although the proposed project as mitigated would provide adequate passenger loading, it is possible that parents drop off and pick up their students at areas not officially designated by the District for student loading. It is possible that parents of North School students will drop off/pick up students at meet-up places such as Valley Park that have safe routes to school. It would be speculative to determine the percentage of students that would be dropped off and picked up at offsite the

locations. However, assuming parents use Valley Park as a meet-up place, the streets adjoining the park—including Valley Drive, 27th Street/Gould Avenue, and Morningside Drive—would have adequate pedestrian and sidewalk facilities that would provide safe access to the project site to the school's entrance on 26th Street at Morningside Drive. The pedestrian access point from the Morningside Drive cul-de-sac (southeast portion of the campus) could also be used. There is an existing asphalt ramp that connects the Valley Park to this entrance; however, the ramp and walkways in Valley Park are unlikely to be ADA compliant. There are 44 marked on-street parking spaces on the south side of Gould Avenue, 29 marked spaces on the west side of Valley Drive, and 25 spaces in the Rotary/Kiwanis Club parking lot. Use of Valley Park and other locations would further reduce vehicle traffic and associated roadway hazards on streets south of the project site. Traffic hazard impacts related to passenger loading would be less than significant.

Vehicular, Bicycle, and Pedestrian Safety

Although the project is in the northwestern portion of the City of Hermosa Beach, it is possible that students throughout the City would walk and bike to school. Based on a survey conducted by the City of Hermosa Beach in August 2016 in support of its Safe Routes to School recommendations in PLAN Hermosa (see Appendix M-4 of the recirculated EIR), it is anticipated that some students will walk and bike to school. It can be surmised that parents would be comfortable with their children walking to and from the proposed North School site and/or drive their children to a meet-up place, such as Valley Park, where they could safely walk to and from school.

The proposed school is in a residential community and not on a major arterial street with heavy traffic; this is consistent with Title 5, CCR Section 14010(l), which states school sites shall not be on major arterial streets with heavy traffic patterns. However, there are inadequate sidewalk facilities nearby the proposed North School site. Additionally, while the site has historically operated with educational uses, including at the time the environmental process began for the proposed project, streets in the vicinity of the project site do not have traffic control devices that adequately notify drivers of the existing facility or safely facilitate student pedestrians on the local circulation system. With the projected increase in pedestrian, bicycle, and vehicular movements near the project site would be a corresponding increase in potential conflicts and hazards on nearby streets and roads.

The project's potential vehicular, bicycle, and pedestrian safety hazards on streets near the proposed school site have been identified in part by the traffic engineer and community input. Recommendations, which have been identified as mitigation, are consistent with Caltrans criteria from Part 7, Traffic Control for School Areas. Figure 5.12-5, *Proposed Traffic Hazards Improvements*, page 5.12-55 of recirculated EIR, shows where the improvements would be made. Their implementation would reduce potentially significant traffic safety hazards related to vehicles, bicycles, and pedestrians on streets surrounding the project site to acceptable standards, and impacts would be less than significant, as mitigated.

- The widths of the local streets that provide access to the school site cannot readily accommodate both directions of traffic flow, particularly when vehicles are parked on both sides of the street. Consequently, vehicular circulation to and from the school site would be constrained during peak arrival and departure times at the beginning and ending of each school session. As the narrow streets in the school area would be adversely impacted because of the substantial increase in traffic volumes associated with the school, the following measures are recommended to facilitate the flow of traffic to and from the school site.

- The District, in conjunction with the City, shall prepare a Neighborhood Traffic Management Plan (NTMP) that will address traffic concerns on neighborhood streets, improve safety, and the quality-of-life for residents.
- The District shall prepare a recommended vehicle travel routes to school map, such as Figure 5.12-6, *Recommended Vehicle Travel Routes to School*, page 5.12-59 of recirculated EIR.
- Limit traffic traveling in the opposite direction of the street segments with proposed passenger loading zones by installing signs to restrict peak hour turning at the intersections of Myrtle Avenue|25th Street, Myrtle Avenue|26th Street, and Silverstrand|25th Street. The signs would include No Right Turn on northbound Myrtle at 25th Street, No Left Turn on southbound Myrtle at 25th Street, No Left turn on westbound 26th Street at Myrtle, and No Right Turn on northbound Silverstrand at 25th Street.
- Install “Do Not Block Intersection” signs or mark “Keep Clear” on the pavements at the 25th Street|Park Avenue, 25th Street|Myrtle Avenue, and 26th Street|Myrtle Avenue intersections.
- Sidewalks near the project site are not continuous, and there are sidewalk obstructions, missing curb ramps, and steep driveways.
 - Prepare a “Pedestrian School Route Plan” to provide information for students, parents, and faculty regarding pedestrian and bicycle safety. and proposed traffic control devices, crosswalks, and pedestrian-accessways.
- To maximize the number of drop-off/pick-up spaces at the proposed school and limit vehicle stacking on adjacent streets, the following measures are recommended.
 - Designate passenger loading zones on the north side of 25th Street and the east side of Myrtle Avenue along the entire frontage of the school property by installing signs that state “Passenger Loading & Unloading Only, 8:00 to 9:00 AM & 2:30 to 3:30 PM, School Days” (or time periods deemed appropriate by the District and the City of Hermosa Beach to coincide with the proposed school’s peak drop-off and pick-up times).
 - If feasible, widen 25th Street and Myrtle Avenue by approximately 8 feet at the proposed passenger loading zones to create a separation between travel lanes and passenger loading activities.
 - As a part of the NTMP, prepare and implement a pedestrian monitoring and assistance plan that includes the assignment of adult personnel and volunteers on the north side of 25th Street and east side of Myrtle Avenue adjacent to the proposed school to control, direct, and advise students as they walk to and from the school grounds, to assist with vehicle drop-offs/pick-ups.
- Drivers and pedestrians may access streets near the school that have no school warning signs and markings.
 - Install school area warning signs to notify drivers that they are entering a school zone on 25th Street west of Myrtle Avenue, 25th Street east of the school site, 26th Street west of

Myrtle Avenue, Morningside Drive south of 27th Street/Gould Avenue, Myrtle Drive south of 25th Street, and Silverstrand Avenue south of the school site.

- Paint yellow school crosswalks at the intersections of 25th Street and Myrtle Avenue (all four legs), 26th Street and Myrtle Avenue (south leg), and 27th Street/Gould Avenue at Morningside Drive (all four legs).
- Increased vehicle and pedestrian activity will occur at the intersection of 25th Street and Myrtle Avenue.
 - In addition to crossing guards identified in the City’s safe routes to school map, the District shall work cooperatively with the City of Hermosa Beach to seek funding for circulation and safety measures, including a qualified crossing guard at the intersection of 25th Street and Myrtle Avenue.

Impact 5.12-6: Secondary effects caused by Mitigation Measures TRAF-3 and TRAF-4 would alter on-street parking. Construction-related parking impacts would be limited with mitigating construction-contract terms.

Construction

Although construction staging and parking are proposed in the eastern portion of the site, the new parking lot on the west side (when complete) may also be used, because space is limited. Most vehicles will access the site from the driveway at 26th Street and Morningside Drive. However, there could be deliveries and construction trucks on all sides of the school during certain times. Even though existing parking restrictions on the surrounding streets would be enforced, construction of the proposed school would last (on-and-off) for roughly one year. To ensure that construction parking does not create a significant impact, mitigation has been proposed.

School Operations

Onsite Parking

The California Department of Education recommends that a school have at least 2.25 parking spaces per classroom/teaching station. Accordingly, the proposed school, with 15 classrooms, 2 labs, and 1 learning center/library—considered 18 teaching stations for a conservative analysis—would require 41 on-site parking spaces. The project proposes 41 on-site parking spaces. These spaces would accommodate faculty, staff, and visitors on a typical school day.

Offsite Parking

Offsite improvements on 25th Street and implementation of Mitigation Measures TRAF-3 and TRAF-4 would alter on-street parking on 25th Street, Myrtle Avenue, and 26th Street.

25th Street Improvements

Driveway. The project includes improvements to the right-of-way along 25th Street adjacent to the project site; no physical improvements are proposed on the segments of Myrtle Avenue and 26th Street adjacent to the project site. The project proposes widening the site’s western driveway on 25th

Street from one lane to two to accommodate ingress into and egress out of the school's parking lot. This improvement would result in the loss of one curbside space. The loss of the on-street space would be offset, however, by closure and construction of curb and sidewalk at the site's eastern driveway on 25th Street. Therefore, the project's proposed driveway alterations would result in no net change to on-street parking.

Passenger Loading. The proposed passenger loading zone on 25th Street would result in the loss of one on-street space because the two ends of the pulled-in curb would render unusable approximately 10 feet on each end, or 20 feet total, which is the length of a vehicle space. The loss of this space would be offset by the project's proposed relocation of an existing fire hydrant from this segment of 25th Street to the eastern perimeter of the project site. Parking is not allowed within 15 feet on either side of a fire hydrant; 15 feet east of the relocated hydrant would extend into an adjacent resident's driveway, 15 feet to the west would extend into the angled curb area of the loading zone. Table 5.12-21, *On-Street Parking, School Frontage on 25th Street*, page 5.12-66 of recirculated EIR, compares the existing and proposed parking restrictions and improvements along the project's approximately 250-foot street frontage on 25th Street. The table assumes Mitigation Measure TRAF-4 is approved by the City of Hermosa Beach. As shown, the project would not result in the physical loss of on-street parking on 25th Street; the project would actually increase the available supply of on-street parking, during the day, outside the peak morning and afternoon periods.

Implementation of Mitigation Measures TRAF-3 and TRAF-4 would restrict use of 29 existing on-street spaces (or 32 project-modified on-street parking spaces) during the AM and PM peak periods. Although short term, affecting only a few hours of each school day and while outside the summer peak season, the secondary effects caused by TRAF-3 and TRAF-4 to on-street parking are considered significant and adverse.

Special Events

There would be several special events throughout the year, when the demand for parking would exceed the number of spaces in the parking lot. During these events, most of the event attendees would have to find parking on the nearby streets or in parking lots in the vicinity of the school. Because parking is at a premium in the project area and unoccupied spaces are usually difficult to find, there would be a substantial parking impact during such events, which typically occur in the evenings. However, these parking situations would be temporary—a few hours—and occur only four to six times annually. Therefore, parking impacts caused by special events would not constitute a significant environmental impact.

For field trips, buses would be used to transport students to and from the school site. Because there are no designated bus parking zones at the school site, temporary arrangements would be needed for short-term bus parking. For example, buses could park in the drop-off/pick-up zone on 25th Street or Myrtle Avenue adjacent to the school; these areas could be blocked with cones after the peak drop-off period ends to reserve the curbside area for the buses. Alternatively, the buses could be parked in the circulation aisles of the school's parking lot or along Gould Avenue, Valley Drive, or another street or parking lot within walking distance of the school. This is an operational issue that is not within the purview of CEQA and would be handled by the District separately.

Mitigation:

Impact 5.12-1b

TRAF-1 The District shall develop a Transportation Management Program to emphasize use, awareness, and safety of public transit, ridesharing, walking, and bicycling to the proposed school site. The program shall consider contracting a bus service to pick up student passengers at each District school and transport them to the next school. The District shall also consider a “Walking School Bus” program to facilitate group walking of children to and from school and/or between schools with one or more adults. The District shall provide information on the availability and benefits of the various travel modes to faculty/staff, students, and parents and offer incentives to faculty/staff for using public transit or carpools.

TRAF-2 Half-hour peak traffic impacts at the intersections of Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue shall be improved by one or more of the following:

- a. Prior to the opening of the proposed school, the District shall stagger the proposed school’s bell schedule so that the starting and ending times for third and fourth grades would be offset by 30 minutes. The staggered schedule would separate arrival and departure times for the two grade levels and reduce peak traffic surge by approximately 50 percent. If the starting and ending times for the two grade levels cannot be staggered by 30 minutes, a smaller, more practical time interval such as 15 minutes shall be implemented.
- b. If the District cannot stagger the bell schedule by 30 minutes, the District shall pay an ad-hoc, fair-share contribution of 13.3 percent to the City of Hermosa Beach for deployment of traffic control officers or implementation of another economically comparable improvement at Valley Drive|Gould Avenue and/or Ardmore Avenue|Gould Avenue intersections during the morning arrival and/or afternoon departure peak periods. The traffic control officers or other economically comparable improvement shall be available and/or operable by the first day of school. Deployment of traffic control officers and/or use of another economically comparable improvement shall be reviewed and approved by the City of Hermosa Beach.

TRAF-3 In conjunction with parking restrictions required to designate City right-of-way, adjacent to the project site on 25th Street and Myrtle Avenue as student passenger loading (see TRAF-4), prior to opening the proposed school, additional parking restriction signage shall be installed on the north side of 25th Street (near 301 25th Street), east side of Myrtle Avenue (near the residence of 301 25th Street), and south side of 26th Street (near 316 and 336 26th Street) to provide a continuous, unobstructed path from the passenger loading areas to the intersection of Gould Avenue and Morningside Drive. The sign shall state, “No Parking, 8 AM to 9 AM & 2:30 PM to 3:30 PM, School Days” (or time periods deemed appropriate based on the staggered bell schedule per Mitigation Measure TRAF-2a). The signs will be subject to review and approval by the City of Hermosa Beach.

Impact 5.12-3

TRAF-1 See above under Impact 5.12-1b.

TRAF-4 The following shall be implemented to enhance passenger loading activities:

- a. Prior to opening the proposed school, the District shall work with the City to designate passenger loading zones on the north side of 25th Street and east side of Myrtle Avenue, adjoining the frontages of the proposed school site. Use of City right-of-way will be subject to review and approval by the City of Hermosa Beach.
- b. Prior to opening the proposed school, the District shall work with the City to install signs at the passenger loading zones that state: “Passenger Loading & Unloading Only, 8 AM to 9 AM & 2:30 PM to 3:30 PM, School Days” (or time periods deemed appropriate based on the staggered bell schedule per Mitigation Measure TRAF-2a). The signs will be subject to review and approval by the City of Hermosa Beach.

TRAF-5 To enhance traffic safety and awareness for vehicular, bicycle, and pedestrian movements, the following measures shall be implemented to comply with standards included in the California Manual on Uniform Traffic Control Devices, Part 7, Traffic Control For School Areas:

- a. The District shall prepare a “Pedestrian School Route Plan” to educate parents, students and staff of pedestrian and bicycle safety. The plan shall provide guidance on the preferred travel routes and locations to cross-streets based on the existing and proposed traffic control devices and crosswalks. The Pedestrian School Route Plan shall include the City-prepared School Routes Plan (Figure 5.12-7, *Safe Routes to School Network*) and shall be completed prior to the opening of the proposed school. The plan shall be distributed to students and parents at the beginning of each school year and to all new students/parents who begin school midyear. It shall also be available on the school’s website as a public outreach tool.
- b. The District shall prepare a “Recommended Vehicle Travel Routes Map” (see Figure 5.12-6, *Recommended Vehicle Travel Routes to School*) to limit two-way travel on streets in the immediate vicinity of the proposed school site. The map of vehicle travel routes to school shall be completed and available for distribution to students and parents by the first day of school; it shall be made available on the school’s website as a public outreach tool.
- c. To maximize the number of passenger loading spaces at the proposed school, limit vehicle stacking on adjacent streets, and improve pedestrian safety on streets adjoining the project site, the District shall prepare and implement a “Pedestrian Monitoring and Assistance Plan” by the first day of school that includes:

- i. Assignment of adult personnel and volunteers at the passenger loading zones on the north side of 25th Street and east side of Myrtle Avenue to control, direct, and guide students as they walk to and from school grounds.
 - ii. Procedures for the adult personnel and volunteers include but are not limited to
 - A. Directing vehicles to stop at the spaces at the front of the passenger loading zones, when unoccupied, to facilitate vehicle flow.
 - B. Creating a vehicle valet system, such as opening car doors.
 - C. Discouraging students from crossing 25th Street in front of the school, including at the intersection of Silverstrand Avenue.
 - D. Directing students using the Myrtle Avenue passenger loading zone to access school grounds from the entry on 26th Street, at the eastern perimeter of the proposed school parking lot.
 - d. The District, in conjunction with the City of Hermosa Beach, shall create a working group—including but not limited to representatives from the City and District—to prepare and implement an ongoing Neighborhood Traffic Management Plan (NTMP) to identify operational traffic concerns on adjacent streets and ways to manage them accordingly. Development of the NTMP shall begin at least nine months prior to the opening of the proposed school to ensure its timely completion prior to the opening of the proposed school. The NTMP shall be updated as needed to meet its purpose to improve pedestrian, bicycle, and vehicular safety; enhance the quality-of-life for surrounding land uses caused by speeding vehicles and careless drivers; and help the District and City to prioritize limited resources. The NTMP shall be distributed to students and parents and be available on the school’s website as a public outreach tool.
- If operational traffic safety hazards remain after all improvements identified in Mitigation Measure TRAF-5 are implemented, the NTMP working group shall consider additional ways to manage traffic safety and vehicle queuing and stacking at “problem areas,” including but not limited to:
- i. Painting curbs red at intersections, if warranted.
 - ii. Installing additional traffic control improvements, offsite loading areas, crossing guards, if needed.
 - iii. Installing additional stop and/or yield signs and other signage that restricts turning movements during peak traffic periods, as warranted.
 - iv. Restricting more on-street parking during peak traffic periods, if appropriate.
 - v. Widening the passenger loading zone on Myrtle Avenue adjacent to the proposed school by eight feet, if warranted.

- e. The District shall work with the City to install school area warning signs to notify drivers that they are entering a school zone on 25th Street west of Myrtle Avenue, 25th Street east of the school site, 26th Street west of Myrtle Avenue, Morningside Drive south of 27th Street|Gould Avenue, Myrtle Drive south of 25th Street, and Silverstrand Avenue south of the project site. The signs shall be subject to review and approval by the City of Hermosa Beach.
- f. The District shall work with the City to install yellow school crosswalks at the intersections of 25th Street and Myrtle Avenue (all four legs), 26th Street and Myrtle Avenue (south leg), and 27th Street|Gould Avenue at Morningside Drive (all four legs). The yellow school crosswalks shall be subject to review and approval by the City of Hermosa Beach.
- g. To minimize the volumes of traffic traveling in the opposite direction of street segments with passenger loading zones, the District shall work with the City of Hermosa Beach to install signage to restrict peak hour turning movements onto 25th Street and Myrtle Avenue. Sign text may include “No Right (or Left) Turn from 8 AM to 9 AM & 2:30 PM to 3:30 PM, School Days.” Signs shall be installed at the below intersections and be subject to review and approval by the City of Hermosa Beach:
 - i. **Myrtle Avenue | 25th Street:** No Right Turn on northbound Myrtle at 25th Street and No Left Turn on southbound Myrtle at 25th Street
 - ii. **Myrtle Avenue | 26th Street:** No Left Turn on westbound 26th Street at Myrtle Avenue
 - iii. **Silverstrand | 25th Street:** No Right Turn on northbound Silverstrand at 25th.
- h. To facilitate the flow of traffic to and from the school site and enhance vehicular circulation, the District shall work with the City of Hermosa Beach to either install “Do Not Block Intersection” signs or mark “Keep Clear” on the pavements at the intersections of 25th Street|Park Avenue, 25th Street|Myrtle Avenue, and 26th Street|Myrtle Avenue.
- i. In addition to crossing guards identified in the City’s safe routes to school map (Figure 5.12-7), the District shall work with the City of Hermosa Beach to seek funding for a qualified crossing guard at the intersection of 25th Street and Myrtle Avenue and for other appropriate circulation and safety measures recommended in the NTMP.

TRAF-6 To limit potential hazards caused by temporary roadway or sidewalk closures and/or traffic detours caused by project construction, the District shall require its construction contractors to submit a construction work site traffic control plan to the City of Hermosa Beach for approval prior to the start of any construction at the project site. The plan shall show all haul routes, construction hours, protective devices, warning signs, parking/staging areas, and access points to the property. The District shall encourage its contractors to limit construction-related trucks to off-peak commute

periods. Applicable transportation-related safety measures shall be implemented during construction.

Impact 5.12-6

TRAF-7 The District shall prohibit its construction contractors to park construction vehicles and equipment and employee personal vehicles on the City-classified local streets. All construction-related vehicles and equipment shall park within the project site and/or at offsite, off-street locations at the expense of the construction contractor.

Findings:

The District hereby finds that implementation of Mitigation Measures TRAF-1 through 7 are feasible, and are therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

7. Tribal Cultural Resources

Impact 5.13-2: Adverse change in Native American resource during construction activities.

The project's Historical Resources Assessment Report evaluated whether the project site and the structures on the property qualify as historical resources based on PRC Section 5024.1(c). Based on an evaluation of the history of Hermosa Beach and of documentation of the built improvements on the property, the assessment concluded that the buildings and the property itself do not meet the criteria listed in PRC Section 5024.1(c) to qualify them as historical cultural resources. Section 5.4, *Cultural Resources*, and Appendix E, of the Draft EIR, further discusses this determination.

However, it is known that Native American tribes accessed the entire Los Angeles basin prior to the urbanization of the region. The Gabrieleño/Tongva San Gabriel Band of Mission Indians identified the site as being within their geographic area and as culturally sensitive to the Gabrieleño/Tongva people. The Soboba Band of Luiseno Indians' has also indicated that the City of Hermosa Beach is within their traditional use area. As excavation for the proposed buildings' foundations and footings may encounter undisturbed soils, it is possible that construction-related earthwork may inadvertently uncover buried tribal cultural artifacts.

Although the project site was previously graded during construction of the existing site, due to the excavation required for installation of the proposed improvements, it is possible that project implementation would encounter undisturbed soils, and project implementation could potentially result in the discovery of subsurface tribal resources and cause a substantial adverse change in the significance of the resources if not mitigated.

TCR-1 In addition to implementing Mitigation Measure CUL-1, which requires a registered professional archaeologist (RPA) to monitor ground-disturbing activities for the discovery of potential historical or archaeological resources, the RPA shall also monitor for potential tribal cultural resources. If tribal cultural resources are recovered, the RPA shall contact the liaisons for the local Native American tribes,

including their Native American monitors, to assess the find and as appropriate return the artifact to the appropriate tribe(s).

Finding:

The District hereby finds that implementation of Mitigation Measure TCR-1 is feasible, and is therefore adopted (Public Resources Code § 21081[a][1], Guidelines § 15091[a][1]). Therefore, the District hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

D. Significant Unavoidable Adverse Impacts

Impact 5.12-1b: Half-Hour Peak Traffic Impacts Remain Significant and Unavoidable

The District is committed to implementing Mitigation Measure TRAF-1. However, this mitigation measure alone will not reduce potentially significant project-level and cumulatively considerable traffic impacts at the intersections of Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue and the street segments of 24th Street, Morningside Drive, and Park Avenue, 25th Street, 26th Street, and Myrtle Avenue.

Intersections

The project's peak half-hour traffic impacts at the intersections of Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue would be fully mitigated and reduced to acceptable levels of service standards at both project and cumulative levels with the implementation of a 30-minute staggered bell schedule (TRAF-2). Due to existing contracts with District teachers and the District's educational program, the District is unlikely to be able to stagger the bell schedule by 30 minutes. The District, however, is committed to staggering the bell schedule by at least 15 minutes; staggering by less than 30 minutes will not fully mitigate significant peak half-hour traffic impacts at the intersections. The District is also committed to paying their ad-hoc, fair-share contribution of 13.3 percent to deploy traffic control officers at both intersections. Deployment of the TCOs would improve the level of service to acceptable standards; however, fee payment would not fully mitigate the impact at the intersections to a "less-than-significant" level, as it is uncertain whether other funds are available to match the District's fair-share contribution and because the hiring and deployment of the TCOs are within the City's purview and City's legal responsibility. Therefore, project impacts at the Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue intersections remain significant and unavoidable.

Street Segments

As indicated above, the District is committed to staggering the school's bell schedule by 15 minutes. It is uncertain at this time whether a 30-minute stagger can be implemented by the District (TRAF-2); if it can, with the exception of studied segments along 25th Street, 26th Street, and Myrtle Avenue, traffic impacts at all other studied street segments would be reduced to levels below significance.

The City has indicated that it is not practical to restrict parking on all impacted street segments. It will, however, consider restricting on-street parking adjacent to the school site on 25th Street, 26th Street, and Myrtle Avenue (TRAF-4). The City will also consider restricting two additional on-street parking spaces on 25th Street (between Myrtle Avenue and the eastern property line), 26th Street (between Myrtle Avenue and Morningside Drive), and Myrtle Avenue (between 25th and 26th streets)—or six additional on-street spaces—for continuous, unobstructed traffic flow (TRAF-3).

As it is uncertain whether the District can implement a 30-minute bell stagger and whether the City will approve parking restrictions along 25th Street, 26th Street, and Myrtle Avenue, and as traffic impacts on the street segments of 25th Street, 26th Street, and Myrtle Avenue would remain significant and unavoidable even if the District implemented a 30-minute bell stagger, the project's impact on the studied street segments would remain significant and unavoidable. Implementation of proposed signage (TRAF-3) would occur on City right-of-way and within the jurisdiction and purview of another agency; therefore, TRAF-3 is legally infeasible, and Impact 5.12-1b remains significant and unavoidable.

Impact 5.12-3: Traffic Safety Hazard Impacts Remain Significant and Unavoidable

Short-term project construction and long-term operational traffic hazards would be reduced to less than significant with the implementation of Mitigation Measures TRAF-1, TRAF-4, TRAF-5, and TRAF-6. However, the three latter mitigation measures would need to be implemented within City right-of-way and/or are the legal responsibility of the City. Therefore, they are legally infeasible, and Impact 5.12-3 remains significant and unavoidable.

- **Mitigation Measure TRAF-4.** Implementation of this mitigation measure would allow passenger loading activities on 25th Street and Myrtle Avenue. Potential traffic hazards caused by vehicles queueing would be reduced to acceptable standards, and impacts would be reduced from potentially significant to less than significant. The proposed use of City rights-of-way adjacent to the project site and installation of passenger loading signs to indicate their designated use are the legal responsibility of the City. Therefore, traffic hazards related to passenger loading would remain significant and unavoidable.
- **Mitigation Measure TRAF-5.** Traffic control procedures and devices under this mitigation measure would be consistent with the California Manual on Uniform Traffic Control Devices, Part 7, Traffic Control For School Areas, to notify drivers of the proposed school and facilitate student pedestrians and parents/drivers on the City's local circulation system to the proposed North School site. Compliance with the MUTCD Part 7 would result in efficient and uniform traffic controls that would mitigate potentially significant operational traffic hazards on the local circulation system caused by project operation. Some of the proposed improvements would be within City right-of-way and/or are the legal responsibility of the City. Therefore, traffic hazard impacts on nearby streets and roads caused by operation of the proposed school would remain significant and unavoidable.
- **Mitigation Measure TRAF-6.** The project's construction work site traffic control plan would reduce potentially significant traffic hazards during construction of the proposed project. The

plan, however, would require approval by the City. Consequently, traffic hazards caused by project construction would remain significant and unavoidable.

Impact 5.12-6: Secondary Parking Effects Remain Significant and Unavoidable

Implementation of TRAF-7, which the District will implement, would fully reduce potentially significant parking impacts during construction of the proposed project to less than significant levels. However, while implementation of Mitigation Measures TRAF-3 (improve half-hour peak traffic circulation on 25th Street, Myrtle Avenue, and 26th Street) and TRAF-4 (use of 25th Street and Myrtle Avenue as designated passenger loading) would increase the supply of on-street parking, they would also result in the restriction of on-street parking during the morning drop-off and afternoon pick-up periods. No mitigation is available to address parking restrictions caused by TRAF-3 and TRAF-4. The District acknowledges the potential inconvenience these mitigation measures will cause, but believes the benefits of the proposed school outweigh them. The District has determined that the secondary parking effects are significant and adverse.

Finding: The District finds, based on the Final EIR, and the whole of the record, that the proposed Project will result in significant and unavoidable impacts to transportation and traffic because improvements to intersections and street segments are not within the purview and/or responsibility of the District.

III. ALTERNATIVES TO THE PROPOSED PROJECT

In preparing and adopting findings, a lead agency need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating the approval of a project with significant environmental impacts. Where the significant impacts can be mitigated to less than significant by the adoption of mitigation measures, the lead agency has no obligation in drafting its findings to consider the feasibility of environmentally superior alternatives, even if their impacts would be less severe than those of the project as mitigated.

The potentially significant impacts and the mitigation measures that can avoid or reduce them below significance, and the Hermosa Beach City School District's findings concerning them, are set forth in Section III above. The mitigation measures also are set forth in the Mitigation Monitoring and Reporting Program adopted by the Hermosa Beach City School District pursuant to Public Resources Code Section 21081.6 and State CEQA Guidelines Section 15097.

The FEIR examined a reasonable range of alternatives to determine whether they could meet the project's objectives while avoiding or substantially lessening one or more of the project's significant impacts. Based on numerous community comments, the DEIR analyzed the below 19 project alternative variations:

- Alternate 1: Modernization of Existing North School Facilities
- Alternates 2a – 2b: New School within District Property (parking lot on District property and school would use Valley Park for physical education) and Expanded onto Valley Park (parking lot in Valley Park)
- Alternates 3a – 3d: Alternative Locations

- Alternate 4: Hybrid Option (alternative sites, including possible expansion of existing schools)
- Alternate 5: New School Expanded onto Valley Park (Design Per Measure Q)
- Alternate 6: New School with Underground Parking (Design Per Measure S)
- Alternate 7: New School Expanded onto Eastern Slope (Design Per Measure S)
- Alternate 8: Reduced Intensity by Grade Configuration
- Alternates 9a – 9b: Passenger Loading in (Proposed) Western Parking Lot
- Alternates 10a – 10c: Connect Morningside Drive at 26th Street to 25th Street or Morningside Drive
- Alternates 11a – 11b: School Building on Slope and New Road in Valley Park
- Alternative A: No Project (No Development)
- Alternative B: No Project (New Permanent Classroom Facilities at Valley and View Schools to Accommodate the Existing Enrollment Capacities)

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

The Draft EIR includes thresholds of significance that are used to establish normally acceptable standards for Project impacts in the District. In many instances, the Project meets the standards without the need for modification. In some cases, mitigation measures have been required that modify the Project to reduce impacts to below the normally accepted thresholds. There are several instances where impacts cannot be reduced to a level below the normally accepted thresholds. While there are many reasons why this may occur, reasons usually fall into the following categories: the issue is much larger than the District's jurisdiction or capability to resolve; there are no feasible mitigation measures; the measures that are identified cannot be guaranteed to reduce the impact to less than significant; or the proportionate share of the mitigation for the Project is small and there is no identified source for the remainder of the funding. When an impact is above the normally accepted threshold and cannot be mitigated, the impact is identified as significant and unavoidable in the Draft EIR. The CEQA Guidelines allow the District to approve a Project with significant and unavoidable impacts provided specific findings are made.

1. The project keeps the existing school in the neighborhood;
2. Use of District owned land maximizes use of limited funds;
3. The school is adjacent to a park, which affords options for students before and after school.

As such, pursuant to CEQA Section 21081(b) and CEQA Guidelines Section 15093, the District has balanced the benefits of the proposed Project against the following unavoidable adverse impacts relating to transportation associated with the proposed Project, despite the adoption of all feasible mitigation measures. The District has also examined alternatives to the proposed Project, none of which meets both the Project objectives and is preferable to the proposed Project.



September 20, 2018

Paula Montalbo
Business Manager
Hermosa Beach City School District
425 Valley Drive
Hermosa Beach, CA 90254

VIA email: pmontablo@hbcasd.org

RE: City of Hermosa Beach Comments on North School Reconstruction Project Draft Environmental Impact Report

Dear Ms. Montalbo,

Thank you for the opportunity to review and comment on the recirculated sections of the Draft Environmental Impact Report (DEIR) for the North School Reconstruction Project ('Project') and for allowing additional time for our traffic engineers to collaborate on this issue before submitting our letter. This letter is not intended to replace the letter submitted by the City of Hermosa Beach in January 2018, which included comments on areas other than transportation, but rather build upon that letter given the additional transportation analysis and mitigations provided as part of the Recirculated Draft EIR.

The City would like to express its appreciation for the continued dialogue with the School District, and we regard this process as a meaningful opportunity to collaborate on addressing potential impacts to City services and infrastructure. While there are still some questions, which we have articulated in this letter, based on the additional analysis and information included in the recirculated Draft EIR, and our on-going coordination with the School District, **we are optimistic that the Final EIR will be able to provide the technical basis for a final project design and suite of mitigation measures that resolve environmental impacts to the greatest degree feasible.** We remain committed to working with the School District toward that end and look forward to finding effective solutions that mitigate significant traffic impacts and implement our collective community vision to provide exceptional local schools to the Hermosa Beach community.

Role of the City of Hermosa Beach

Given the location of the North School Reconstruction Project, on a small and constrained site within a residential neighborhood, the City recognizes that mitigation of all significant traffic impacts will not likely be possible without some use of, or changes to, City property or right-of-way and/or the allocation of City staff resources to further reduce significant impacts and potential inconveniences to the neighborhood. However, **the City maintains the previously-stated suggestions that the School District prioritize implementation of mitigation measures that are on-site or within their operational control, including on-site loading and unloading, prior to relying on mitigation measures that use City property, right-of-way, or operational resources.**



While the Project itself is not subject to approval by the City of Hermosa Beach, there are components of the proposed project which involve City property, right-of-way, or utility infrastructure (i.e. sewer connections, storm drains, etc.) that are subject to approval by the City. The range of possible measures being considered by the School District further considers measures that involve City personnel and ongoing operational or maintenance resources which will also require City approval to allocate ongoing funding and staffing resources toward those efforts. The City's decision makers will need to play an active role in evaluating and approving the mitigation methods considered in the DEIR that involve physical changes and use of City resources and personnel.

To that end, we feel this information is key for the City to properly evaluate the feasibility of those mitigation measures that fall under our jurisdiction, so that the CEQA analysis can disclose with certainty all *feasible* mitigation measures that can be implemented, and provide substantial evidence to support conclusions that certain mitigation measures are infeasible or ineffective.

Analysis and Information to Inform the Recommendations of the City of Hermosa Beach

There are three key areas articulated in our previous letter related to requests for additional analysis or disclosure of information to determine both the potential significant impacts of the project and assist in evaluating the effectiveness of proposed mitigation measures.

Level of Service Analysis

We would like to thank the School District for providing the additional level of service analysis in the Recirculated Draft EIR for a thirty-minute peak period, as we believe it provides a better depiction of the actual traffic conditions that may be experienced during the focused peak periods of school pick up and drop off.

Loading/Unloading and Queuing

In our comment letter of January 2, 2018, we requested that the EIR analyze potential queuing through a quantitative analysis that, in turn, would then be used to verify the length of the loading zone needed to accommodate the maximum capacity of 510 students. The City's traffic engineer suggested that the analysis use actual school traffic data collected at the other two elementary schools in the District (CHB letter, page 8), and that this method would yield a robust and useful analysis.

The Recirculated DEIR does not provide this analysis and instead applies a factor of one (1) loading space per 50 students, a number found in "Traffic Operations and Safety at Schools: Recommended Guidelines" (Cooner et al 2004). However, this factor is not presented as a recommendation or a guideline in the source text, rather it is cited as one example of what other cities have done. Moreover, the one space per 50 students factor comes from schools in the City of Henderson, Nevada, where school buses are also provided. Because the schools in the City of Henderson provide buses, it can be implied that the demand for the student loading zone is significantly less. The actual rate applied at Henderson schools is one (1) vehicle loading space per 50 students **and** two (2) school bus loading spaces per 50 students. Because the North School Reconstruction does not propose to provide school buses or a bus loading zone, to the use this rate (one (1) vehicle loading space per 50 students) without further emphasis on how the proposed metric is relevant to the conditions in Hermosa Beach, it is difficult to assess whether the proposed loading zone(s) are adequate to avoid back up of vehicles queuing in the street



outside of the loading zone(s) and constrains the ability of the City and the School District to compare the effectiveness of the different mitigation measures.

It is the City's opinion that an evaluation of the adequacy of the proposed loading zones should not be postponed until mitigation measures are implemented after the project is approved, as suggested in the Recirculated DEIR (Page 6-5, TRAF-5 (d)(v)). It should instead be evaluated and disclosed prior to certification of the Final EIR in order to determine whether the proposed site plan provides sufficient space to accommodate the projected demand. The City recognizes there may be challenges to estimating the demand for loading/unloading and potential queuing impacts. Nevertheless, we suggest that a more thorough search of available technical reports along with the expertise of traffic engineers who have addressed this specific issue would yield the basis of a sufficiently rigorous analysis to serve as an estimate of potential impacts and a working hypothesis for adaptive management purposes. The City feels this analysis is important to determining whether queuing or stacking of vehicles into travel lanes creates an adverse impact, as it not only inhibits the efficient flow of the circulation system, but might also create secondary traffic safety hazards.

Walk and Bike to School Rates

We previously expressed support for the District to rely on the data provided in the 2016 Safe Routes to School/Commute Survey administered by the School District and summarized by the City to estimate the current rates at which students walk and bike to school so that mitigation measures may be proposed that further encourage walking and biking to school. If it is helpful to this process, the City is willing to work with the District to administer a 2018 version of the survey, providing another data point that can be used to support the implementation of transportation demand management based mitigation measures.

City Input on Feasibility/Prioritization of Mitigation Measures

Both the November 2017 DEIR and the recirculated sections conclude that impacts to the local circulation system are significant and unavoidable because "mitigation measures proposed are within the jurisdiction of the City of Hermosa Beach." Several pages of the recirculated Transportation and Traffic section are devoted to the discussion of whether or not specific measures are "preferred" or "warranted" or "feasible", even though the measures discussed are within City right-of-way and would necessitate the City's approval and participation.

The City suggests that all proposed mitigation measures should be left on the table unless there is definitive data and sound rationale to support the conclusion that mitigation measures are either not effective or not feasible. Determinations of feasibility, preference and desirability of specific methods for mitigating project impacts requires careful consideration by City of Hermosa Beach decision makers and at this stage it is premature to determine that certain mitigations are infeasible without formal review and consideration from the City. Rather than attempting to make decisions of feasibility and "preference" on behalf of the City, and in lieu of applying the blanket assertion that all mitigation measures within City right-of-way are "infeasible" because they involve the jurisdiction of another agency, the process would be better served, and mitigation of impacts more assured, if a definitive suite of effective and feasible mitigation measures were identified and incorporated into the Final EIR. This is consistent with the Neighborhood Traffic Management Plan (NMTP) proposed in mitigation measure TRAF-5 and could include provisions to adjust mitigation methods during the implementation phase in response to variations in enrollment levels at the school.



The City maintains the previously-stated suggestions that the School District prioritize implementation of mitigation measures that are on-site or within their operational control, including on-site loading and unloading, prior to relying on mitigation measures that use City property, right-of-way, or operational resources. This includes continued evaluation or further disclosure of the potential to accommodate, at least in part, loading and unloading of students on School District property. Additionally, please expand on the basis for the conclusion that staggered school schedules beyond 15 minutes is infeasible because it may conflict with teacher contracts. This seems like it could be a very useful, non-structural tool to control traffic and congestion and should be explored further (or the basis for rejecting explained in more detail).

The suite of mitigation measures should be developed to serve as the basis for decisions by the City and District on which measures are implemented, their timing, potential funding sources and appropriate cost-sharing formulas and the parties responsible for their implementation. The fair-share formulas used to calculate the fair-share percentages presented in the Recirculated DEIR for various mitigation measures are in need of further development or refinement between the City and School District. The mitigation package should further identify an appropriate prioritization and phasing plan that is linked to the anticipated impacts at varying student enrollment levels. Details on the mitigation measures should be sufficient to determine their feasibility, estimated cost and secondary impacts, if any. For those measures that would result in secondary physical impacts the package should identify secondary mitigation or avoidance measures, if feasible, also at a conceptual level.

This information should be included in the Final EIR and provided to our City Council prior to FEIR certification so the City's decision makers can provide, at a minimum, conceptual approval of measures involving City property, right-of-way, or resources. This assurance can serve as evidence to the District and in the FEIR that the mitigation package is feasible. The conceptually approved package would become part of the Mitigation Monitoring and Reporting Program for the project. We respectfully request that the EIR not eliminate any of the potential mitigating measures without completing this process.

For the City to best assist the District in its process and play a productive role in resolving which mitigation measures are feasible or infeasible, it is extremely important that a well-vetted and prioritized mitigation package is developed that identifies realistic costs and benefits of specific mitigation methods, along with an estimation of the degree of mitigation expected to be achieved (based on substantial evidence).

City Recommendations on Process Moving Forward

We believe the comments contained within this letter will not only strengthen the School District's process, but provide additional certainty to the Final EIR related to: the level of impacts that will result from the project, the mitigation measures that can realistically be expected to be implemented, the level of mitigation those measures are expected to achieve, and the costs and means for implementing them.

The City recommends the School District formally submit the requests and necessary supporting materials to the City on those mitigation measures that involve the use of City property/right-of-way or services at the earliest opportunity possible, to allow staff to thoroughly evaluate and make recommendations. These components must comply with the City's standards and adhere to the City's processes for submittal, review, recommendation, and approval. Based on the requests submitted, staff will determine the appropriate decision-making body to review and



approve these components, which may be a staff, commission, or City Council-level decision. In the event certain requests are denied, the City will provide the District with findings to articulate the rationale for determining a proposed mitigation is infeasible. If there is substantial evidence available now to determine certain proposed mitigation is infeasible, it should be documented in the EIR. However, we believe that between our two agencies there is a combination of mitigation measures that will work together to mitigate impacts at different levels of enrollment.

In achieving these objectives, the process not only aligns the City and the District along an implementation path that is practicable and mutually acceptable to both parties, it also fortifies the project's CEQA process by fully disclosing the project's impacts and documenting (with supporting substantial evidence) that all feasible mitigation measures have been implemented per CEQA.

Conclusion

Thank you again for the opportunity to provide these comments. The City remains committed to collaborating with the School District through this process for the North School project and other initiatives to improve the trip to and from school at all of the District's campuses, and we look forward to continuing the dialogue on these matters. Our staff and traffic engineer are available to discuss these comments and data needs in more detail. We have found in-person collaboration and problem solving sessions helpful when trying to assess impacts and mitigations where multiple agencies are involved and we look forward to continuing this conversation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Suja Lowenthal'.

Suja Lowenthal
City Manager
City of Hermosa Beach

Miyo Prassas
1753 Valley Park Avenue
Hermosa Beach, CA 90254
jwprassas@yahoo.com

September 26, 2018

Mr. Gerald J. Stock, PE, TE
Executive Vice-President
Hartzog & Crabill, Inc.
17852 E. 17th Street, Suite 101
Tustin, CA 92780

Re: Inadequate, Non-Representative North School Reconstruction EIR Traffic Data for the City
Hermosa Beach, CA

Dear Mr. Stock,

As a concerned citizen of Hermosa Beach, I am writing to you regarding several serious discrepancies to be found in the Hermosa Beach City School District's recent traffic study for the North School Reconstruction Project. The recirculated draft EIR report on traffic impacts of proposed North School campus are located at <https://www.hbcasd.org/files/user/211/file/Recirculated%20DEIR-Reduced.pdf> and https://www.hbcasd.org/files/user/211/file/Append_M1-M4.pdf - (Traffic Analysis Appendices).

The Recirculated North School Reconstruction Draft EIR, Chapter 5. Environmental Analysis
Transportation and Traffic, Environmental Impacts, Impact Analysis, Approach states:

"Traffic counts for the peak one-hour analysis were taken from 7:00 AM to 9:00 AM when District schools were in session: November 19, 2015; December 1, 2015; January 24, 2017; and January 26, 2017." Page 5.12-15

However nowhere are the dates specified on page 5.12-15 (November 19, 2015, December 1, 2015, January 24, 2017 or January 25, 2017) identified on any tally sheet contained in the appendices. In fact approximately 50% of the Level of Service Calculation tally sheets in the Traffic Analysis Appendices show the date of 12/13/15 in the "Date Performed" field in the General Information of each tally sheet. **Critically 12/13/15 was a Sunday.** HBCSD children do not attend school on Sundays and Sunday morning traffic counts at 7 to 9 a.m. in the middle of winter are almost non-existent and NOT a good representative of normal school traffic.

My questions and observations of the information contained in this traffic study for the City of Hermosa Beach Traffic Engineer consultants and Public Works Director are:

#1. If the level of service calculations were taken on the dates specified on page 5.12.-15, why didn't the analyst, R. Garland, identify one of those dates in the 'Date Performed' field in the General Information of each tally sheet? Exactly which streets and intersections were tallied on the dates described on page 5.12-15?

#2. The only analyst identified on all the Level of Service Calculations sheets is 'R. Garland'. I understand that Richard Garland has a full time job as a Traffic Engineer for the City of Carson. Was Mr. Garland actually on leave from the City of Carson on the dates specified in the report when the traffic counts were performed?

#3. Is it physically possible for one analyst, R. Garland, to perform all traffic counts? If not, who were the other employees of Garland Associates who participated in the traffic counts? Why weren't other analysts who may have participated in the study identified on the various traffic count sheets? If other analysts were employed by Garland and Associates to perform Level of Service Calculations for this study what was their training and qualifications to accurately perform traffic counts?

#4. What was the methodology used to arrive at the volume figures in the Volume Adjustments and Site Characteristics section of each tally sheet? I noticed that the volume of traffic figures indicated in traffic counts were basically multiples of five. I would think that traffic volume counts would show more of an array of digits in their actual presentation than what is reported on the traffic count tally sheets by Garland and Associates.

#5. Not all the intersections listed in Table 5.12-10 AM Peak Half Hour, Existing (2018) Conditions have tally sheets in the appendices with the updated 5/7/18 date listed in the 'Date Performed' field. Seven of the intersections listed in the table have tally sheets with the date 12/13/15 in the 'Date Performed' field but are characterized/listed as 2018 existing levels.

The basic data information used to make assumptions in this study lacks sufficient disclosure and accountability which brings in to question the accuracy of this entire traffic study.

This traffic study is critically important in that it is supposed to aid district and city officials in keeping students safe traveling to and from the North School campus. The fact that there are so many obvious issues with the methodology used to create this report indicates extreme lack of concern for the safety of children and a truthful presentation of facts by the HBCSD Board of Trustees in the EIR. As a taxpayer I am also mindful of the possibility of a multi-million dollar settlement if a student were to be severely injured or killed traveling to and from the North School campus after the City had approved this extremely flawed HBCSD recirculated draft EIR traffic study. Therefore I believe it is imperative that the City of Hermosa Beach with the

assistance of their Traffic Consultants, Hartzog & Crabill, Inc., investigate my concerns before approving this traffic study.

Sincerely,



Miyo Prassas

Enclosures:

1. North School Reconstruction Draft EIR HBCSD, 5. Environmental Analysis Transportation and Traffic, 5.12.3 Environmental Impacts, Impact Analysis, Approach, page 5.12-15
2. North School Reconstruction Draft EIR HBCSD, Appendix 3, Level of Service Calculations, All-Way Stop Control Summary pages:
 - a. Morningside/27th Street, page 3M2-17
 - b. Valley Drive/Gould Ave., page 4M2-9
 - c. Park Ave./25th Street, page 3M2-25
 - d. Valley Drive/25th Street, page 4M2-17
3. North School Reconstruction Draft EIR HBCSD, 5. Environmental Analysis Transportation and Traffic, Table 5.12-10, page 5.12-25.

Cc: Mr. Nico DeAnda-Scaia, Assistant to the City Manager, City of Hermosa Beach
Ms. Suja Lowenthal, City Manager, City of Hermosa Beach
Ms. Leeanne Singelton, Environmental Analyst, City of Hermosa Beach
Mr. Glen Kau, Public Works Director, City of Hermosa Beach

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

The Initial Study, included as Appendix A, substantiates that the proposed project would not affect air traffic patterns. Therefore, Threshold T-3 will not be addressed in this EIR.

5.12.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-1a: The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for standard performance of the City of Hermosa Beach circulation system during the morning one-hour peak period. [Threshold T-1]

Impact Analysis:

Approach

The approach for traffic impact analysis of development projects is typically to study the peak one-hour morning (7:00 AM to 9:00 AM) and/or afternoon (4:00 PM and 6:00 PM) conditions. For elementary school projects, the analysis is usually conducted for only the morning peak period, which would be the worst-case condition since vehicle trips generated by the school during morning drop-off activities would coincide with morning commuter traffic. Afternoon peak hour analysis is typically not conducted because school lets out between 2:00 PM and 3:00 PM, which is before the afternoon commuter peak period.

Impact 5.12-1a is based in part on *Traffic Impact Analysis for the Proposed North Elementary School – 417 25th Street – Hermosa Beach*, prepared by Garland Associates in April 2017 (2017 TIA), and revised in May 2018 (see Appendix M-1). The scope of the 2017 TIA traffic impact analysis—e.g., AM one-hour peak period and application of trip credits of operating uses at the project site—was based on consultation with the City of Hermosa Beach on March 27, 2017, and follow-up conversations with the Hermosa Beach Public Works Department. Once completed, the District submitted the traffic impact analysis to the City for review. In an email dated August 30, 2017, the City of Hermosa Beach Acting Public Works Director/City Engineer concurred with the technical findings of the 2017 TIA.

* Traffic counts for the peak one-hour analysis were taken from 7:00 AM to 9:00 AM when District schools were in session: November 19, 2015; December 1, 2015; January 24, 2017; and January 26, 2017.

School Operations

Project-Generated Traffic

The trip generation rates and the anticipated volumes of traffic that would be generated by the project are shown in Table 5.12-3.

ALL-WAY STOP CONTROL ANALYSIS									
General Information					Site Information				
Analyst	R Garland				Intersection	Morningside Dr/27th Street			
Agency/Co.	Hermosa Beach City School Dist				Jurisdiction	City of Hermosa Beach			
Date Performed	12/13/2015				Analysis Year	2018 Existing			
Analysis Time Period	AM Peak Half Hour								
Project ID North Elementary School									
East/West Street: 27th Street/Gould Avenue					North/South Street: Morningside Drive				
Volume Adjustments and Site Characteristics									
Approach	Eastbound					Westbound			
Movement	L	T	R	L	T	R			
Volume (veh/h)	10	125	5	5	100	20			
%Thrus Left Lane									
Approach	Northbound					Southbound			
Movement	L	T	R	L	T	R			
Volume (veh/h)	5	10	10	30	5	5			
%Thrus Left Lane									
	Eastbound		Westbound		Northbound		Southbound		
	L1	L2	L1	L2	L1	L2	L1	L2	
Configuration	LTR		LTR		LTR		LTR		
PHF	0.50		0.50		0.50		0.50		
Flow Rate (veh/h)	280		250		50		80		
% Heavy Vehicles	0		0		0		0		
No. Lanes	1		1		1		1		
Geometry Group	1		1		1		1		
Duration, T	0.25								
Saturation Headway Adjustment Worksheet									
Prop. Left-Turns	0.1		0.0		0.2		0.8		
Prop. Right-Turns	0.0		0.2		0.4		0.1		
Prop. Heavy Vehicle	0.0		0.0		0.0		0.0		
hLT-adj	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.6	-0.6	-0.6	-0.6	-0.6
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	-0.0		-0.1		-0.2		0.1		
Departure Headway and Service Time									
hd, initial value (s)	3.20		3.20		3.20		3.20		
x, initial	0.25		0.22		0.04		0.07		
hd, final value (s)	4.54		4.49		5.06		5.28		
x, final value	0.35		0.31		0.07		0.12		
Move-up time, m (s)	2.0		2.0		2.0		2.0		
Service Time, t _s (s)	2.5		2.5		3.1		3.3		
Capacity and Level of Service									
	Eastbound		Westbound		Northbound		Southbound		
	L1	L2	L1	L2	L1	L2	L1	L2	
Capacity (veh/h)	530		500		300		330		
Delay (s/veh)	9.99		9.52		8.44		8.98		
LOS	A		A		A		A		
Approach: Delay (s/veh)	9.99		9.52		8.44		8.98		
LOS	A		A		A		A		
Intersection Delay (s/veh)	9.57								
Intersection LOS	A								

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	R Garland	Intersection	Valley Drive/Gould Avenue
Agency/Co.	Hermosa Beach City School Dist	Jurisdiction	City of Hermosa Beach
Date Performed	12/13/2015	Analysis Year	2018 Existing
Analysis Time Period			

Project ID North Elementary School	
East/West Street: Gould Avenue	North/South Street: Valley Drive

Volume Adjustments and Site Characteristics						
Approach	Eastbound			Westbound		
	L	T	R	L	T	R
Movement						
Volume (veh/h)	75	115	40	115	120	45
%Thrus Left Lane						

Approach	Northbound			Southbound		
	L	T	R	L	T	R
Movement						
Volume (veh/h)	5	35	70	40	85	5
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LT	R	L	TR	LT	R	LTR	
PHF	0.50	0.50	0.50	0.50	0.50	0.50	0.50	
Flow Rate (veh/h)	260	80	230	330	80	140	260	
% Heavy Vehicles	0	0	0	0	0	0	0	
No. Lanes	2		2		2		1	
Geometry Group	5		5		5		4b	
Duration, T	0.25							

Saturation Headway Adjustment Worksheet								
Prop. Left-Turns	0.1	0.0	1.0	0.0	0.1	0.0	0.3	
Prop. Right-Turns	0.0	1.0	0.0	0.3	0.0	1.0	0.0	
Prop. Heavy Vehicle	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
hLT-adj	0.5	0.5	0.5	0.5	0.5	0.5	0.2	0.2
hRT-adj	-0.7	-0.7	-0.7	-0.7	-0.7	-0.7	-0.6	-0.6
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.1	-0.7	0.5	-0.2	0.1	-0.7	0.0	

Departure Headway and Service Time								
hd, initial value (s)	3.20	3.20	3.20	3.20	3.20	3.20	3.20	
x, initial	0.23	0.07	0.20	0.29	0.07	0.12	0.23	
hd, final value (s)	7.32	6.55	7.43	6.72	7.81	7.04	7.41	
x, final value	0.53	0.15	0.47	0.62	0.17	0.27	0.54	
Move-up time, m (s)	2.3		2.3		2.3		2.3	
Service Time, t _s (s)	5.0	4.2	5.1	4.4	5.5	4.7	5.1	

Capacity and Level of Service								
	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	472	330	473	523	330	390	463	
Delay (s/veh)	17.94	10.36	16.66	19.63	12.15	12.37	18.34	
LOS	C	B	C	C	B	B	C	
Approach: Delay (s/veh)	16.16		18.41		12.29		18.34	
LOS	C		C		B		C	
Intersection Delay (s/veh)	16.86							
Intersection LOS	C							

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	R Garland	Intersection	Park Avenue/25th Street
Agency/Co.	Hermosa Beach City School Dist	Jurisdiction	City of Hermosa Beach
Date Performed	12/13/2015	Analysis Year	2018 Existing
Analysis Time Period	AM Peak Half Hour		
Project Description North Elementary School			
East/West Street: 25th Street		North/South Street: Park Avenue	
Intersection Orientation: North-South		Study Period (hrs): 0.25	

Vehicle Volumes and Adjustments						
Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)		15	5	5	15	
Peak-Hour Factor, PHF	1.00	0.50	0.50	0.50	0.50	1.00
Hourly Flow Rate, HFR (veh/h)	0	30	10	10	30	0
Percent Heavy Vehicles	0	--	--	0	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration			TR	LT		
Upstream Signal		0			0	
Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)				10		10
Peak-Hour Factor, PHF	1.00	1.00	1.00	0.50	1.00	0.50
Hourly Flow Rate, HFR (veh/h)	0	0	0	20	0	20
Percent Heavy Vehicles	0	0	0	0	0	0
Percent Grade (%)		0			0	
Flared Approach		N			N	
Storage		0			0	
RT Channelized			0			0
Lanes	0	0	0	0	0	0
Configuration					LR	

Delay, Queue Length, and Level of Service							
Approach	Northbound	Southbound	Westbound			Eastbound	
Movement	1	4	7	8	9	10	11 12
Lane Configuration		LT		LR			
v (veh/h)		10		40			
C (m) (veh/h)		1551		941			
v/c		0.01		0.04			
95% queue length		0.02		0.13			
Control Delay (s/veh)		7.3		9.0			
LOS		A		A			
Approach Delay (s/veh)	--	--		9.0			
Approach LOS	--	--		A			

TWO-WAY STOP CONTROL SUMMARY								
General Information				Site Information				
Analyst	R Garland			Intersection	Valley Drive/25th Street			
Agency/Co.	Hermosa Beach City School Dist			Jurisdiction	City of Hermosa Beach			
Date Performed	12/13/2015			Analysis Year	2018 Existing			
Analysis Time Period	AM Peak Half Hour							
Project Description North Elementary School								
East/West Street: 25th Street				North/South Street: Valley Drive				
Intersection Orientation: North-South				Study Period (hrs): 0.25				
Vehicle Volumes and Adjustments								
Major Street	Northbound			Southbound				
Movement	1	2	3	4	5	6		
	L	T	R	L	T	R		
Volume (veh/h)	5	100			230	10		
Peak-Hour Factor, PHF	0.50	0.50	1.00	1.00	0.50	0.50		
Hourly Flow Rate, HFR (veh/h)	10	200	0	0	460	20		
Percent Heavy Vehicles	0	--	--	0	--	--		
Median Type	Undivided							
RT Channelized			0			0		
Lanes	0	1	0	0	1	0		
Configuration	LT						TR	
Upstream Signal		0			0			
Minor Street	Eastbound			Westbound				
Movement	7	8	9	10	11	12		
	L	T	R	L	T	R		
Volume (veh/h)	10		5					
Peak-Hour Factor, PHF	0.50	1.00	0.50	1.00	1.00	1.00		
Hourly Flow Rate, HFR (veh/h)	20	0	10	0	0	0		
Percent Heavy Vehicles	0	0	0	0	0	0		
Percent Grade (%)	0			0				
Flared Approach	N			N				
Storage	0			0				
RT Channelized			0			0		
Lanes	0	0	0	0	0	0		
Configuration	LR							
Delay, Queue Length, and Level of Service								
Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	LT					LR		
v (veh/h)	10					30		
C (m) (veh/h)	1085					453		
v/c	0.01					0.07		
95% queue length	0.03					0.21		
Control Delay (s/veh)	8.3					13.5		
LOS	A					B		
Approach Delay (s/veh)	--					13.5		
Approach LOS	--					B		

5. Environmental Analysis
TRANSPORTATION AND TRAFFIC

Table 5.12-10 Project Impact on Intersection Levels of Service: AM Peak Half Hour, Existing (2018) Conditions

Intersection	Delay Value and Level of Service		Increase in Delay Value (seconds)	Significant Impact
	Existing (2018) Conditions	Existing (2018) Plus Project		
Manhattan Avenue 27th Street 5/7/18	15.9 - C	20.0 - C	4.1	No
Manhattan Avenue 26th Street 12/13/15	11.2 - B	15.9 - C	4.7	No
Manhattan Avenue 25th Street 5/7/18	8.7 - A	11.3 - B	2.6	No
Manhattan Avenue 24th Street 5/7/18	11.9 - B	18.1 - C	6.2	No
Myrtle Avenue 26th Street 5/7/18	8.8 - A	11.1 - B	2.3	No
Myrtle Avenue 25th Street 5/7/18	7.5 - A	12.8 - B	5.3	No
Myrtle Avenue 24th Street 12/13/15	9.0 - A	13.5 - B	4.5	No
Morningside Drive 27th St/Gould Ave 12/13/15	9.6 - A	12.4 - B	2.8	No
Park Avenue 25th Street 12/13/15	9.0 - A	12.0 - B	3.0	No
Park Avenue 24th Place 12/13/15	9.0 - A	10.2 - B	1.2	No
Park Avenue 24th Street 5/7/18	7.2 - A	8.9 - A	1.7	No
Park Avenue Monterey Boulevard 5/7/18	10.5 - B	12.6 - B	2.1	No
Valley Drive Gould Avenue 12/13/15	16.9 - C	34.4 - D	17.5	Yes
Valley Drive 25th Street 12/13/15	13.5 - B	16.6 - C	3.1	No
Valley Drive 24th Place 5/7/18	11.1 - B	12.0 - B	0.9	No
Valley Drive 24th Street 12/13/15	13.8 - B	18.0 - C	4.2	No
Ardmore Avenue Gould Avenue Traffic Volume through Intersection 5/7/18	50.1 - F 845 vphh*	106.9 - F 985 vphh*	56.8 16.6 %**	Yes

* vphh = vehicles per half hour
** Percent increase in traffic volume through intersection

PM Half-Hour Peak

Table 5.12-11 shows the existing traffic conditions for the peak PM half-hour, the traffic conditions with the addition of the proposed school's traffic, and the increase in delay values after project implementation. As shown in the table, 15 of the 17 study intersections would continue to operate at acceptable levels of service (LOS A through C) during the peak PM half-hour for the scenario with the proposed school, and traffic impacts at these 15 intersections would not be significantly impacted. The levels of service at the intersections of Valley Drive|Gould Avenue and Ardmore Avenue|Gould Avenue would change from an acceptable LOS C to an unacceptable LOS D as a result of the additional school traffic, which is a significant impact according to the City's criteria.