

NORTH HIGH SCHOOL AUDITORIUM

Torrance Unified School District

August 2015 | Response to Comments

NORTH HIGH SCHOOL AUDITORIUM

Torrance Unified School District

Prepared for:

Torrance Unified School District

Donald Stabler, Deputy Superintendent
2335 Plaza Del Amo
Torrance, California 90509
310.972.6500

Prepared by:

PlaceWorks

Contact: Barbara Heyman, Associate Principal
501 W. Broadway, Suite 800
San Diego, California 92101
310.670.9221
info@placeworks.com
www.placeworks.com

Table of Contents

Section	Page
1. INTRODUCTION.....	1-1
1.1 INTRODUCTION	1-1
1.2 DOCUMENT FORMAT	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES	1-1
2. RESPONSE TO COMMENTS	2-1

APPENDICES

Appendix A Mitigation Monitoring and Reporting Program

Table of Contents

This page intentionally left blank.

1. Introduction

1.1 INTRODUCTION

This document includes a compilation of the public comments received on the North High School Auditorium Mitigated Negative Declaration and Initial Study (collectively, “MND”; State Clearinghouse No. 2015061110) and Torrance Unified School District’s (District) responses to the comments.

Under the California Environmental Quality Act (CEQA), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND that there are no potentially significant environmental effects. In the spirit of public disclosure and engagement, the District—as the lead agency of the proposed North High School Auditorium project—has responded to all written comments submitted during the 30-day MND public review period, which began June 30, 2015, and closed July 29, 2015.

1.2 DOCUMENT FORMAT

This document is organized as follows:

Section 1, *Introduction*. This section describes CEQA requirements and content of this document.

Section 2, *Response to Comments*. This section provides a list of agencies and interested persons commenting on the MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

Appendix A, *Mitigation Monitoring and Reporting Program*. The Mitigation Monitoring and Reporting Program (MMRP) lists all the mitigation measures required for implementation of the project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance. The monitoring program provides 1) a mechanism for giving the lead agency staff and decision makers feedback on the effectiveness of their actions; 2) a learning opportunity for improved mitigation measures on future projects; and 3) a means of identifying corrective actions, if necessary, before irreversible environmental damage occurs.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments on negative declarations, and reminds persons and public agencies that the focus of review and comment of MNDs should be “on the proposed findings that the project will not have a significant effect on the environment. If the commenter

1. Introduction

believes that the project may have a significant effect, it should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

Although not required by CEQA, the District will make this document available on its website prior to the date of the public hearing.

2. Response to Comments

This section provides all written comments received on the circulated MND and the District's response to each comment.




Number Reference	Commenting Person/Agency	Date of Comment	Page No.
A	Rana Georges, Department of Toxic Substances Control	July 30, 2015	2-3
B	Scott Morgan, State Clearinghouse and Planning Unit	July 30, 2015	2-11
C	Scott Morgan, State Clearinghouse and Planning Unit	July 31, 2015	2-15

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER A – Rana Georges, Department of Toxic Substances Control. (3 page[s])

 Matthew Rodriguez Secretary for Environmental Protection	 Department of Toxic Substances Control Barbara A. Lee, Director 5796 Corporate Avenue Cypress, California 90630	 Edmund G. Brown Jr. Governor
--	--	---

July 30, 2015

Mr. Donald Stabler
Deputy Superintendent
Torrance Unified School District
2335 Plaza Del Amo
Torrance, California 90501

DTSC COMMENTS ON THE MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY FOR THE NORTH HIGH SCHOOL AUDITORIUM PROJECT, TORRANCE (SCH# 2015061110)

Dear Mr. Stabler:

A-1

The Department of Toxic Substances Control (DTSC) has reviewed the Mitigated Negative Declaration (MND) and Initial Study (IS) for the subject site (Placeworks – June 2015) received by DTSC on July 3, 2015. The proposed project is for the construction of a new auditorium on the North High School campus. The proposed auditorium would be developed in the general area of the northernmost tennis courts and adjacent 47 parking stalls along Yukon Avenue. The three displaced tennis courts would be relocated to the area west of the southernmost tennis courts, replacing a portion of the existing turf ball field. Based on review of the submitted MND and IS, DTSC would like to provide the following comments:

A-2

1. If the Torrance Unified School District (District) plans to use State funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.

A-3

2. Because the proposed project is school site related, DTSC recommends that an environmental review under DTSC oversight be conducted. The environmental review may include, but is not limited to, a Phase I Environmental Site Assessment and/or Preliminary Endangerment Assessment, to determine whether there has been, or may have been, a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about each property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California

♻️ Printed on Recycled Paper

2. Response to Comments

Mr. Donald Stabler
July 30, 2015
Page 2

Environmental Quality Act (CEQA) process. Such an environmental review is also recommended for compliance with the requirements of California Education Code, §17268(a) or §17213(a), as applicable. If the District elects to proceed to conduct an environmental assessment at the site under DTSC oversight, it should enter into an Environmental Oversight Agreement or a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.

A-3
cont'd

3. If the existing site buildings were constructed prior to 1978, lead based paint and organochlorine pesticides (from termiticide applications) may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers,"* dated June 9, 2006.

A-4

4. If the site was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision),"* dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

A-5

5. If a response action is required based on the results of the above investigations, and/or other information, the Draft Environmental Impact Report (EIR) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Div. 13, §21000 et seq.) and its implementing Guidelines (CCR, Title 14, §15000 et seq.), prior to approval. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to each site and the surrounding environment, should be included in the Draft EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to each site and the surrounding environment, are not available for inclusion in the Draft EIR, then an Addendum or Supplement to the Draft EIR may be required.

A-6

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

2. Response to Comments

Mr. Donald Stabler
July 30, 2015
Page 3

For additional information on DTSCs School process or CLEAN Program, please visit DTSCs web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (714) 484-5320 or at rana.georges@dtsc.ca.gov.

Sincerely,



Rana Georges
Project Manager
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

cc: State Clearinghouse (via e-mail)
Office of Planning and Research
state.clearinghouse@opr.ca.gov

Mr. Michael O'Neill (via e-mail)
Department of Education – Sacramento, CA
moneill@cde.ca.gov

John Gordon (via e-mail)
Department of Education – Sacramento, CA
JGordon@cde.ca.gov

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

A. **Response to Comments from Rana Georges, Department of Toxic Substances Control, dated July 30, 2015.**

A-1 The commenter accurately summarizes the improvements proposed on the existing South High School campus. Because the improvements would be funded entirely by local bond measures and no state bond funds would be used, the Department of Toxic Substances Control (DTSC) is commenting on the Mitigated Negative Declaration as a reviewing agency. DTSC is neither a trustee nor responsible agency for this project.

The comments from DTSC apply to new school property acquisition with state funding. This project is locally funded and not subject to Education Code sections 17213.1 and 17213.2. The issues raised in DTSC's comments—naturally occurring hazardous substances, lead based paint in soil around buildings, etc.—are typically de minimis concerns with respect to environmental due diligence for new property acquisition. Nonetheless, specific responses to each comment are provided.

A-2 DTSC states that if the District plans to use state funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.

The District is not planning to use any state funds for the project. Therefore the requirements of Education Code sections 17213.1 and 17213.2 do not apply. In addition, there is no indication of any current or historical hazardous substance releases on the property.

A-3 DTSC recommends that an environmental review, such as Phase I environmental site assessment and/or preliminary endangerment assessment, be conducted to determine whether there has been, or may have been, a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about each property and the area in its vicinity. DTSC also states that such an environmental review should be analyzed as a part of the CEQA process and that if the District desires, it may conduct the environmental review in accordance with DTSC's Environmental Oversight Agreement or a Voluntary Cleanup Agreement.

The project is on an existing school campus and there is no indication of any current or historical hazardous substance releases on the property. There is no evidence of any naturally occurring hazardous materials on the project site. The environmental research completed for the Initial Study included record searches from Environmental Data Resources (EDR) and review of the DTSC's EnviroStor and RWQCB's GeoTracker websites, which did not identify any historical releases of hazardous substances at the site. The findings were documented in the Initial Study. Based on the facts that there are no reported releases of hazardous substances at the site, the project site has been operating as a school since 1962, and Education Code sections 17213.1 and 17213.2 are

2. Response to Comments

not applicable to the project, the additional environmental review recommended by DTSC is not warranted. Therefore, the District will not be conducting additional environmental review for the proposed project and will not be entering into an agreement with DTSC to oversee the preparation of such assessment.

- A-4 DTSC is concerned that existing site buildings may have been constructed prior to 1978, in which case lead based paint and organochlorine pesticides (from termiticide applications) are potential environmental concerns at the site. The commenter recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the DTSC's "Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers," dated June 9, 2006.

There are no buildings on the project site. Based on historical aerial photographs, the project site was first graded as part of the school construction in 1954. The existing parking area was developed since at least 1963, and the tennis courts since at least 1972 (HistoricAerials.com). Additionally, based on an aerial photograph from 1952, it appears that no structures existed on the project site prior to the construction of the school (HistoricAerials.com). Therefore, there are no potential environmental concerns from existing or historical buildings because no buildings were ever on the site.

- A-5 DTSC is concerned that if the site was previously used for agricultural purposes, there could be persistent pesticides or other residual chemicals present in the soil and to investigate the project site in accordance with the DTSC's "Interim Guidance for Sampling Agricultural Soils" (3rd revision).

Based on an aerial photograph from 1952, the site appears to have been vacant, undeveloped land, which indicates that no agricultural use existed on the project site prior to the construction of the school. Therefore, there are no potential environmental concerns from historical agriculture on the project site.

- A-6 DTSC expands on the previous comments by saying that if a response action is required based on the results of the above investigations, and/or other information, then a draft environmental impact report (EIR) (or an addendum or supplement to the draft EIR if one has already been published) would require analysis of the potential public health and environmental impacts associated with any proposed response action.

The commenter also states that the DTSC is administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program, which provides low-interest loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community.

2. Response to Comments

As mentioned above, there is no indication of any current or historical hazardous substance releases on the property. No additional environmental review will be prepared, and no response action will be required. The circulated Initial Study and Mitigated Negative Declaration include sufficient descriptions of the whole project proposed; they comply with CEQA (Public Resources Code §§ 21000 et seq.) and the CEQA Guidelines (CCR, Title 14, §§ 15000 et seq.).

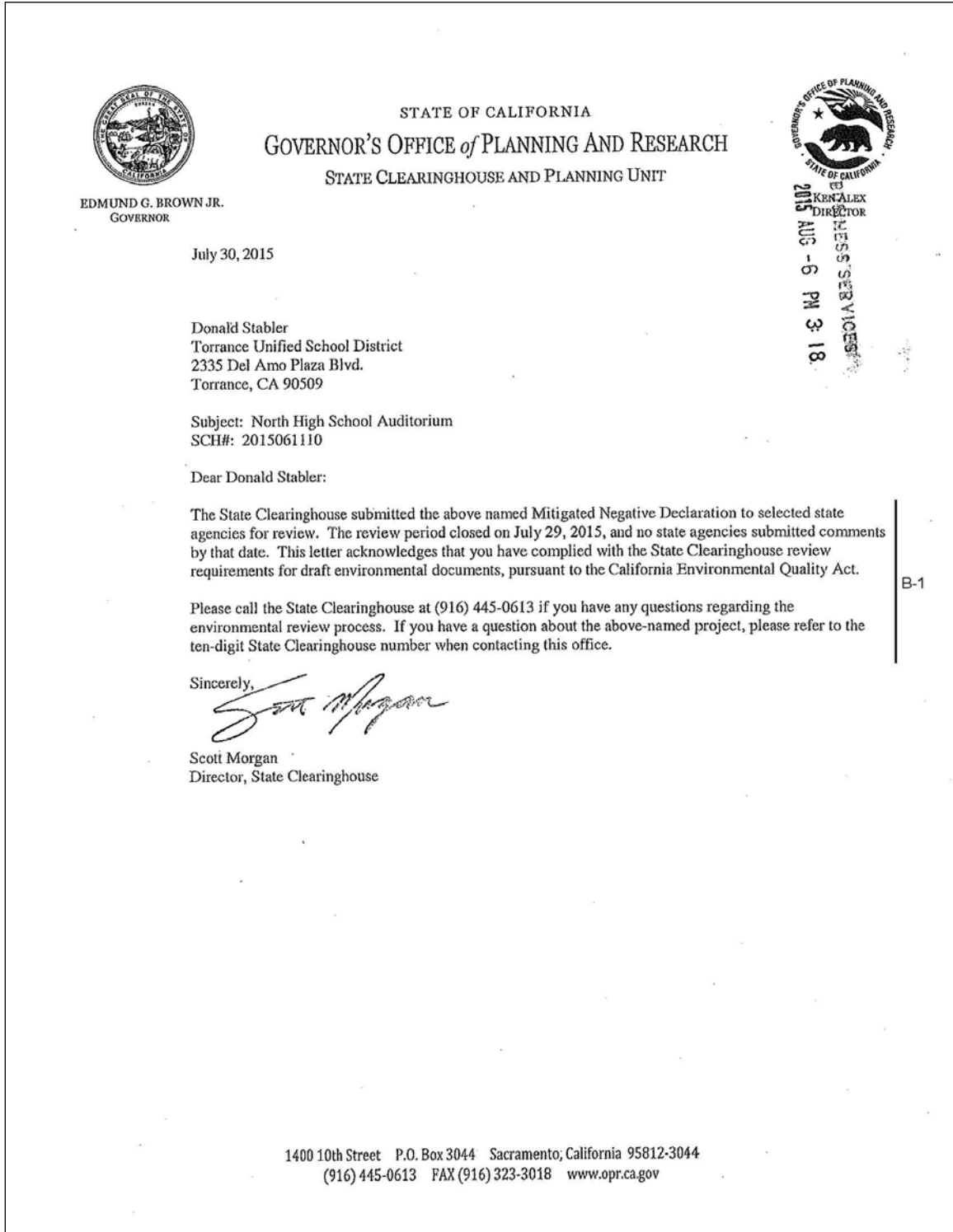
No loans will be required for the proposed project.

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER B – Scott Morgan, State Clearinghouse and Planning Unit. (2 page[s])



2. Response to Comments

Document Details Report State Clearinghouse Data Base			
SCH#	2015061110		
Project Title	North High School Auditorium		
Lead Agency	Torrance Unified School District		
Type	MND Mitigated Negative Declaration		
Description	The proposed project is the construction of a new auditorium on the North High School campus. The proposed auditorium would be 13,900 sf, with seating for up to 550 spectators, including 494 fixed seats. The facility would displace three existing tennis courts and 47 parking stalls. The displaced tennis courts would be relocated to the area west of the southernmost tennis courts, replacing a portion of an existing turf ball field. The auditorium would primarily accommodate programs and performances currently held at the school. Although no joint-use programs are proposed for the auditorium, the facility would be available for community use through the Civic Center Act.		
Lead Agency Contact			
Name	Donald Stabler		
Agency	Torrance Unified School District		
Phone	310 972 6500	Fax	
email			
Address	2335 Del Amo Plaza Blvd.		
City	Torrance	State	CA Zip 90509
Project Location			
County	Los Angeles		
City	Torrance		
Region			
Lat / Long	33° 51' 48" N / 118° 20' 9" W		
Cross Streets	West 182nd Street and Yukon Avenue		
Parcel No.	4089-012-902		
Township	3S	Range	14W Section 34 Base SBB&M
Proximity to:			
Highways	I-405; SR-107, 213		
Airports	No		
Railways	BNSF		
Waterways	No		
Schools	North HS		
Land Use	Z: Public Use GP: Public/Quasi-Public / Open Space		
Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues		
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission		
Date Received	06/30/2015	Start of Review	06/30/2015 End of Review 07/29/2015

2. Response to Comments

B. Response to Comments from Scott Morgan, State Clearinghouse and Planning Unit, dated July 30, 2015.

B-1 The commenter states that the State Clearinghouse submitted the North High School Auditorium Mitigated Negative Declaration to state agencies and that as of the close of the 30-day review period, no state agencies submitted comments. The commenter also confirms that the Torrance Unified School District (District) complied with the State Clearinghouse review requirements, pursuant to the California Environmental Quality Act.



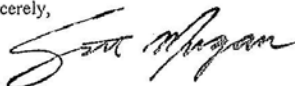
The comments are noted. No additional response is required.

2. Response to Comments

This page intentionally left blank.


2. Response to Comments


LETTER C – Scott Morgan, State Clearinghouse and Planning Unit. (4 page[s])


 Edmund G. Brown Jr. Governor	<p>STATE OF CALIFORNIA</p> <p>Governor's Office of Planning and Research</p> <p>State Clearinghouse and Planning Unit</p>	 Ken Alex Director
July 31, 2015		BUSINESS SERVICES 2015 AUG - 6 PM 3:18
<p>Donald Stabler Torrance Unified School District 2335 Del Amo Plaza Blvd. Torrance, CA 90509</p> <p>Subject: North High School Auditorium SCH#: 2015061110</p> <p>Dear Donald Stabler:</p> <p>The enclosed comment (s) on your Mitigated Negative Declaration was (were) received by the State Clearinghouse after the end of the state review period, which closed on July 29, 2015. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.</p> <p>The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.</p> <p>Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2015061110) when contacting this office.</p> <p>Sincerely,  Scott Morgan Director, State Clearinghouse</p> <p>Enclosures cc: Resources Agency</p>		
<p>1400 TENTH STREET P.O. BOX 8044 SACRAMENTO, CALIFORNIA 95812-3044 TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p>		

2. Response to Comments

LATE
7-29-15
E


Matthew Rodriguez
Secretary for
Environmental Protection


Department of Toxic Substances Control


Edmund G. Brown Jr.
Governor

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

RECEIVED
JUL 30 2015
STATE CLEARING HOUSE

July 30, 2015

Mr. Donald Stabler
Deputy Superintendent
Torrance Unified School District
2335 Plaza Del Amo
Torrance, California 90501

DTSC COMMENTS ON THE MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY FOR THE NORTH HIGH SCHOOL AUDITORIUM PROJECT, TORRANCE (SCH# 2015061110)

Dear Mr. Stabler:

The Department of Toxic Substances Control (DTSC) has reviewed the Mitigated Negative Declaration (MND) and Initial Study (IS) for the subject site (Placeworks – June 2015) received by DTSC on July 3, 2015. The proposed project is for the construction of a new auditorium on the North High School campus. The proposed auditorium would be developed in the general area of the northernmost tennis courts and adjacent 47 parking stalls along Yukon Avenue. The three displaced tennis courts would be relocated to the area west of the southernmost tennis courts, replacing a portion of the existing turf ball field. Based on review of the submitted MND and IS, DTSC would like to provide the following comments:

1. If the Torrance Unified School District (District) plans to use State funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.
2. Because the proposed project is school site related, DTSC recommends that an environmental review under DTSC oversight be conducted. The environmental review may include, but is not limited to, a Phase I Environmental Site Assessment and/or Preliminary Endangerment Assessment, to determine whether there has been, or may have been, a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about each property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California

♻️ Printed on Recycled Paper

2. Response to Comments

Mr. Donald Stabler
July 30, 2015
Page 2

Environmental Quality Act (CEQA) process. Such an environmental review is also recommended for compliance with the requirements of California Education Code, §17268(a) or §17213(a), as applicable. If the District elects to proceed to conduct an environmental assessment at the site under DTSC oversight, it should enter into an Environmental Oversight Agreement or a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.

3. If the existing site buildings were constructed prior to 1978, lead based paint and organochlorine pesticides (from termite applications) may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers,"* dated June 9, 2006.
4. If the site was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision),"* dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.
5. If a response action is required based on the results of the above investigations, and/or other information, the Draft Environmental Impact Report (EIR) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Div. 13, §21000 et seq.) and its implementing Guidelines (CCR, Title 14, §15000 et seq.), prior to approval. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to each site and the surrounding environment, should be included in the Draft EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to each site and the surrounding environment, are not available for inclusion in the Draft EIR, then an Addendum or Supplement to the Draft EIR may be required.

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

2. Response to Comments

Mr. Donald Stabler
July 30, 2015.
Page 3

For additional information on DTSCs School process or CLEAN Program, please visit DTSCs web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (714) 484-5320 or at rana.georges@dtsc.ca.gov.

Sincerely,



Rana Georges
Project Manager
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

cc: State Clearinghouse (via e-mail)
Office of Planning and Research
state.clearinghouse@opr.ca.gov

Mr. Michael O'Neill (via e-mail)
Department of Education – Sacramento, CA
moneill@cde.ca.gov

John Gordon (via e-mail)
Department of Education – Sacramento, CA
JGordon@cde.ca.gov

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

2. Response to Comments

C. Response to Comments from Scott Morgan, State Clearinghouse and Planning Unit, dated July 31, 2015.

- C-1 The State Clearinghouse forwarded late comments submitted by the Department of Toxic Substances Control (DTSC). Torrance Unified School District has responded to the DTSC letter (see page 2-7 of this document). No additional response is required.

2. Response to Comments

This page intentionally left blank.

Appendix

Appendix A Mitigation Monitoring and Reporting Program

Appendix

This page intentionally left blank.

August 2015 | Mitigation Monitoring and Reporting Program

North High School Auditorium

Torrance Unified School District

Prepared for:

Torrance Unified School District

Donald Stabler, Deputy Superintendent
2335 Plaza Del Amo
Torrance, California 90509
310.972.6500

Prepared by:

PlaceWorks

Barbara Heyman, Associate Principal
501 W. Broadway, Suite 800
San Diego, California 92101
610.400.4965
info@placeworks.com
www.placeworks.com



Table of Contents

Section	Page
1. INTRODUCTION.....	1
1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM.....	1
1.2 PROJECT CHARACTERISTICS.....	2
1.3 ENVIRONMENTAL IMPACTS.....	3
2. MITIGATION MONITORING PROCESS	5
2.1 MITIGATION MONITORING PROGRAM ORGANIZATION	5
2.2 TORRANCE UNIFIED SCHOOL DISTRICT	5
2.3 MITIGATION MONITORING TEAM.....	5
2.4 ARBITRATION RESOLUTION	6
2.5 ENFORCEMENT.....	6
3. MITIGATION MONITORING REQUIREMENTS.....	7
3.1 PREMONITORING MEETING.....	7
3.2 CATEGORIZED MITIGATION MEASURES/TABLE.....	7
3.3 FIELD MONITORING	7
3.4 COORDINATION WITH CONTRACTORS.....	7
3.5 LONG-TERM MONITORING	7
4. MITIGATION MONITORING REPORTS	11
4.1 FIELD CHECK REPORT	11
4.2 IMPLEMENTATION COMPLIANCE REPORT	11
4.3 ARBITRATION/ENFORCEMENT REPORT.....	11
5. COMMUNITY INVOLVEMENT	13
6. REPORT PREPARATION	15
6.1 LIST OF PREPARERS.....	15

Table of Contents

List of Tables

Table	Page
Table 3-1 Mitigation Monitoring Requirements	9

1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The Torrance Unified School District (District) is the lead agency for the proposed North High School Auditorium project and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring mitigation measures outlined in the North High School Auditorium Mitigated Negative Declaration (MND), State Clearinghouse No. 2015061110. As the lead agency, the District is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the Public Resources Code:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the Mitigated Negative Declaration and drafted to meet the requirements of Public Resources Code Section 21081.6.

1. Introduction

1.2 PROJECT CHARACTERISTICS

1.2.1 Project Location

The project site comprises two general areas in the southeast quadrant of North High School at 3620 West 182nd Street in the City of Torrance.

1.2.2 Proposed Improvements

The proposed project is the construction and operation of a new auditorium at North High School that would be developed in the general area of the northernmost tennis courts and adjacent 47 parking stalls along Yukon Avenue. The three displaced tennis courts would be relocated, replacing a portion of an existing turf ball field. The auditorium would be 13,900 square feet, with seating for up to 550 spectators, including 494 fixed seats.

1.2.3 Project Operation

Development of the proposed auditorium would not significantly change existing operations of the school, which already offers a performing arts program and holds day- and nighttime performances and events in another school facility. The existing facility accommodates approximately 500 folding chairs for performances and productions. The proposed auditorium, with 550 spectator seats, could increase event attendance by up to 50 spectators. However, the project does not include new classrooms, and consequently does not change the school's enrollment capacity or operations. Although no joint-use programs are proposed for the auditorium, the facility would be available for community use through the Civic Center Act.

1.2.4 Construction Schedule

Construction would be completed in one general phase, with the demolition of existing infrastructure commencing in late summer 2016. Construction would last approximately 17 months for the auditorium and 4 months for the relocation of tennis courts.

1.2.5 Project Design Features

The following project design features (PDFs) have been incorporated into the proposed project to minimize construction-related noise impacts on the South High School program when school is in session:

- A During the phases of construction that typically use the most vibration-intensive equipment (i.e., grading and trenching phases), if heavy equipment such as vibratory rollers, jack hammers, hoe rams, large bulldozers, or loaded trucks are used, one of the following measures will be taken:

- (1) Limit the operation of heavy equipment at the construction zone to outside school instructional hours (after school is released in the afternoon, Saturday, or during extended school breaks).

OR

1. Introduction

- (2) Vibratory rollers, jack hammers, hoe rams, large bulldozers, and loaded trucks will not be operated at the construction zone within 50 feet of the classrooms at NHS when school is in session.

OR

- (3) Relocate students to campus facilities that are at least 50 feet from the edge of the construction area.
- B Prior to construction, the District will meet with the construction contractor to discuss alternative methods to reduce vibration impacts of demolition and construction activities at instructional buildings within 75 feet of the construction zone(s). During the preconstruction meeting, the construction contractor will identify demolition methods not involving vibration-intensive construction equipment or activities.
- C Prior to construction activities, the construction contractor will inspect and report on the current foundation and structural condition of the existing instructional buildings that are less than 25 feet from the construction site.
- D The construction contractor will implement alternative, less vibration-intensive methods identified in the preconstruction meeting during demolition, excavation, and construction for work conducted less than 25 feet to instructional buildings.

1.3 ENVIRONMENTAL IMPACTS

1.3.1 Impacts Considered Less Than Significant

The MND and supporting Initial Study identified various thresholds from the CEQA Guidelines in a number of environmental categories that would not be significantly impacted by the proposed project and therefore would not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- | | |
|--------------------------------------|---------------------------------|
| ■ Aesthetics | ■ Land Use and Planning |
| ■ Agriculture and Forestry Resources | ■ Mineral Resources |
| ■ Air Quality | ■ Noise |
| ■ Biological Resources | ■ Population and Housing |
| ■ Geology and Soils | ■ Public Services |
| ■ Greenhouse Gas Emissions | ■ Recreation |
| ■ Hazards and Hazardous Materials | ■ Utilities and Service Systems |
| ■ Hydrology and Water Quality | |

1. Introduction

1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

The project could result in potentially significant impacts to Cultural Resources and Transportation/Traffic. Mitigation measures have been identified to reduce, avoid, or substantially lessen the impacts to acceptable standards. No significant and unavoidable impacts were identified.

2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of the District. The District's technical consultants (CEQA consultant, archaeologist, paleontologist, etc.) may perform related monitoring tasks under the direction of the environmental monitor (if they are contracted by the District).

2.2 TORRANCE UNIFIED SCHOOL DISTRICT

The District is the designated lead agency for the MMRP and has the overall responsibility for the review of all monitoring reports, enforcement actions, and document disposition. The District will rely on information provided by individual monitors (e.g., CEQA consultant, archaeologist, paleontologist), presuming it to be accurate and up to date, and will field check mitigation measure status, as required.

2.3 MITIGATION MONITORING TEAM

The mitigation monitoring team, including the construction manager and technical advisors (CEQA consultant, archaeologist, paleontologist), is responsible for monitoring implementation/compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work is field monitoring and compliance report preparation. Implementation disputes are brought to the District Superintendent and/or his designee.

2.3.1 Monitoring Team

The following summarizes key positions in the MMRP and their functions:

- **Construction Manager:** Responsible for coordination of mitigation monitoring team, technical consultants; report preparation; and implementing the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
- **Technical Advisors:** Responsible for monitoring in their areas of expertise (CEQA, archaeologist, paleontologist). Report directly to the monitoring program manager.

2.3.2 Recognized Experts

Recognized experts are required on the monitoring team to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts assess compliance with required mitigation measures, and recognized experts from responsible agencies consult with the construction manager regarding disputes.

2. Mitigation Monitoring Process

2.4 ARBITRATION RESOLUTION

If the mitigation monitor determines that a mitigation measure, in the opinion of the monitor, has not been implemented or has not been implemented correctly, the problem will be brought before the construction manager for resolution. The decision of the construction manager is final unless appealed to the District superintendent and/or his designee. The construction manager will have the authority to issue stop work orders until the dispute is resolved.

2.5 ENFORCEMENT

Agencies may enforce conditions of approval through their existing police power using stop work orders; fines; infraction citations; or in some cases, notice of violation for tax purposes.

3. Mitigation Monitoring Requirements

3.1 PREMONITORING MEETING

A premonitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and monitoring team responsibilities. Team rules will be established, the entire mitigation monitoring program presented, and any misunderstandings resolved.

3.2 CATEGORIZED MITIGATION MEASURES/TABLE

Project-specific mitigation measures have been categorized in Table 3-1, *Mitigation Monitoring Requirements*. The table identifies the environmental impact, specific mitigation measures, schedule, and responsible monitor. The mitigation table will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

3.3 FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g., hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring team.

3.4 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3.5 LONG-TERM MONITORING

Long-term monitoring related to TRANS-1 and TRANS-2 will be required, including limiting the scheduling of major events at the school stadium and auditorium.

3. Mitigation Monitoring Requirements

This page intentionally left blank.

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
CULTURAL RESOURCES					
CUL-1	Prior to the beginning of ground disturbances, Torrance Unified School District shall retain a qualified archaeologist/paleontologist to monitor ground-disturbing activities that occur five feet below ground surface. The archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39). Before ground-disturbing activities begin, the archaeologist/ paleontologist shall prepare an archaeological monitoring plan consistent with CEQA Guidelines section 15064.5, specifying the frequency, duration, and methods of monitoring. The archaeologist/paleontologist shall train construction workers regarding types of archaeological and paleontological resources that could be identified in site soils. The archaeologist/paleontologist shall have the authority to stop grading or construction work within 25 feet of the site of any discovery of potential historical, archaeological, or paleontological resources until a find can be recovered and the significance of the find identified per CEQA. All resources recovered shall be curated at the facilities of the Natural History Museum of Los Angeles County.	Qualified and licensed archaeologist and paleontologist	Before and during ground-disturbing construction activities	Construction Manager and Torrance Unified School District	
TRANSPORTATION AND TRAFFIC					
TRANS-1	To avoid potential parking conflicts, the District and NHS shall not schedule an event at the auditorium when there is a major event scheduled at the stadium. A major stadium event is one that would exceed 1,000 participants, including spectators.	Construction Manager, Torrance Unified School District, and North High School	During construction	Torrance Unified School District	
TRANS-2	During major events at the stadium, the District shall make the parking lots at Edison Elementary School available for overflow parking. As needed, the District shall post conspicuous signs to direct drivers to Edison Elementary School.	Construction Manager, Torrance Unified School District, and North High School	During construction and operation	Torrance Unified School District	

3. Mitigation Monitoring Requirements

This page intentionally left blank.

4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to dispute arbitration enforcement resolution. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Arbitration/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report is prepared to document the implementation of mitigation measures, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 ARBITRATION/ENFORCEMENT REPORT

The Arbitration/Enforcement Report is prepared to document the outcome of arbitration review and becomes a portion of the ICR.

4. Mitigation Monitoring Reports

This page intentionally left blank.

5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the District Superintendent and/or his designee by the general public.

5. Community Involvement

This page intentionally left blank.

6. Report Preparation

6.1 LIST OF PREPARERS

PlaceWorks

Barbara Heyman, Associate Principal

Michael Paul, Assistant Planner

Torrance Unified School District

Donald Stabler, Ed.D, Assistant Superintendent, Business Services

Report Preparation

This page intentionally left blank

