



SOUTH HIGH SCHOOL AUDITORIUM

Torrance Unified School District

August 2015 | Response to Comments

SOUTH HIGH SCHOOL AUDITORIUM

Torrance Unified School District

Prepared for:

Torrance Unified School District

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1. Introduction

1.1 INTRODUCTION

This document includes a compilation of the public comments received on the South High School Auditorium Mitigated Negative Declaration and Initial Study (collectively, “MND”; State Clearinghouse No. 2015061109) 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 South 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. Introduction

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 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 29, 2015	2-3
B	Scott Morgan, State Clearinghouse and Planning Unit	July 30, 2015	2-9

2. Response to Comments

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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
<p>July 29, 2015</p>		
<p>Mr. Donald Stabler (dstabler@tusd.org) Deputy Superintendent Torrance Unified School District 2335 Plaza Del Amo Torrance, California 90501</p>		
<p>DTSC COMMENTS ON THE MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY FOR THE SOUTH HIGH SCHOOL AUDITORIUM PROJECT</p>		
<p>Dear Mr. Stabler:</p>		
<p>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 and operation of a new auditorium on South High School that would be developed near the southwest corner of the school. The new structure would displace four tennis courts, which would be relocated to a practice ball field adjacent to other tennis courts on the eastern perimeter of the campus. The proposed project would also require the installation of a new baseball backstop in the center of the campus. Based on review of the submitted MND and IS, DTSC would like to provide the following comments:</p>	A-1	
<p>1. 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 <i>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</i>, dated June 9, 2006."</p>		A-2
<p>2. Because the proposed project is school site related, DTSC recommends that an environmental review, such as a 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</p>	A-3	
<p>♻️ Printed on Recycled Paper</p>		

2. Response to Comments

Mr. Donald Stabler
July 29, 2015
Page 2

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 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.

A-3
cont'd

3. 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-4

4. 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.

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.

A-5

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 rana.georges@dtsc.ca.gov.

Sincerely,



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

rg

cc: See next page

2. Response to Comments

Mr. Donald Stabler
July 29, 2015
Page 3

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

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2. Response to Comments

A. **Response to Comments from Rana Georges, Department of Toxic Substances Control, dated July 29, 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 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. The project site is currently occupied with tennis courts that have been in place since at least 1963, based on historical aerial photographs (HistoricAerials.com). Additionally, based on an aerial photograph from 1953, it appears that no structures existed on the project site prior to the construction of the school and its tennis courts (HistoricAerials.com). Therefore, there are no potential environmental concerns from site buildings because no buildings appear to have ever been on the site.

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.

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 DTSC's EnviroStor and RWQCB's GeoTracker

2. Response to Comments

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 1957, and Education Code sections 17213.1 and 17213.2 are not applicable, the additional environmental review recommended by DTSC does not appear to be warranted. The District will not be conducting additional environmental review for the proposed project.

- A-4 DTSC expands on the previous comment 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.


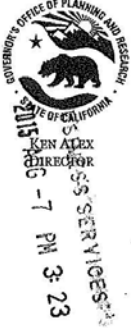

As mentioned above, there is no indication of any current or historical hazardous substance releases on the property. No additional environmental review will be prepared, and no response action is required. The circulated MND includes sufficient description of the whole project proposed and complies with CEQA (Public Resources Code §§ 21000 et seq.) and the CEQA Guidelines (CCR, Title 14, §§ 15000 et seq.).

- A-5 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 commenter also states that 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.

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. No response action and no loans will be required for the proposed project.

2. Response to Comments

LETTER B – Scott Morgan, State Clearinghouse and Planning Unit. (2 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 JUL 30 2015 6-7 PM 3-23 SERVICES
<p>July 30, 2015</p>		
<p>Donald Stabler Torrance Unified School District 2335 Del Amo Plaza Blvd. Torrance, CA 90509</p>		
<p>Subject: South High School Auditorium SCH#: 2015061109</p>		
<p>Dear Donald Stabler:</p>		
<p>The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 29, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.</p>		
<p>Please note that Section 21104(c) of the California Public Resources Code states that:</p>		
<p style="padding-left: 40px;">"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."</p>		
<p>These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.</p>		
<p>This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.</p>		
<p>Sincerely,</p> <p style="text-align: center;"></p> <p>Scott Morgan Director, State Clearinghouse</p>		
<p>Enclosures cc: Resources Agency</p>		
<p style="text-align: center;">1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p>		

2. Response to Comments

Document Details Report State Clearinghouse Data Base			
SCH#	2015061109		
Project Title	South High School Auditorium		
Lead Agency	Torrance Unified School District		
Type	MND Mitigated Negative Declaration		
Description	<p>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 four existing tennis courts, which would be relocated to a practice ball field that is proximate to other tennis courts on the eastern perimeter of the campus. The proposed project would also require the installation of a new baseball backstop in the center of the campus. 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.</p>		
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° 48' 42" N / 118° 21' 58" W		
Cross Streets	Pacific Coast Highway (Hwy 1) and Harlee Lane		
Parcel No.	7529-001-900		
Township	4S	Range	14W Section 20 Base SBB&M
Proximity to:			
Highways	SR-1; 107		
Airports	Torrance		
Railways	BNSF		
Waterways	Pacific Ocean		
Schools	South High School etc.		
Land Use	Z: Public Use; GP: Public/Quasi-Public/Open Space		
Project Issues	<p>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</p>		
Reviewing Agencies	<p>Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; 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; State Lands Commission</p>		
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 South High School Auditorium Mitigated Negative Declaration to state agencies and that as of the close of the 30-day review period, only the Department of Substances Control submitted comments (see Letter A). The District has responded to the comment letter (see page 2-7). No other state agencies submitted comments. The commenter also confirms that the Torrance Unified School 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

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Appendix

Appendix A Mitigation Monitoring and Reporting Program

Appendix

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August 2015 | Mitigation Monitoring and Reporting Program

South High School Auditorium

Torrance Unified School District

Prepared for:

Torrance Unified School District

Donald Stabler, Deputy Superintendent
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1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The Torrance Unified School District (District) is the lead agency for the proposed South High School Auditorium project and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring mitigation measures from in the South High School Auditorium Mitigated Negative Declaration (MND), State Clearinghouse No. 2015061109. 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 site comprises three general areas on the South High School campus at 4801 Pacific Coast Highway (PCH) in the City of Torrance: tennis courts near the southwest corner, a ball field on the east-central boundary, and a grass field in the center of the campus.

1.2.2 Proposed Improvements

The proposed project is the construction and operation of a new auditorium at South High School that would be developed near the southwest corner of the school at PCH and a driveway into the school's main parking lot. The new structure would displace four tennis courts, which would be relocated to a practice ball field near other tennis courts on the eastern perimeter of the campus. The project would also install a new baseball backstop in the center of the campus. 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. That 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.

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).

1. Introduction

OR

- (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 SHS when school is in session.

OR

- (3) Relocate students to campus facilities that are at least 50 feet from the edge of the construction zone.

- B Prior to construction, the District will meet with the construction contractor to discuss alternative methods to reduce vibration impacts of demolition and construction less than 25 feet from instructional buildings. 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 constructor 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.
- E During all phases of the construction of the South High School Auditorium, District will:
 - (1) Limit the operation of construction equipment at the construction zone to outside school instructional hours (i.e., after school is released in the afternoon, Saturday, or during extended school breaks).

OR

- (2) Relocate students to campus facilities that are at least 150 feet from the edge of the construction zone or do not face the construction site.

OR

- (3) Erect a temporary noise barrier/curtain between the construction zone and all classrooms. The temporary sound barrier will have a minimum height of 12 feet and be free of gaps and holes and must achieve a Sound Transmission Class (STC) of 35 or greater. The barrier can be (a) a $\frac{3}{4}$ -inch-thick plywood wall OR (b) a hanging blanket/curtain with a surface density of at least 2 pounds per square foot. For either configuration, the construction side of the barrier will have an exterior lining of sound absorption material with a Noise Reduction Coefficient (NRC) rating of at least 0.7.

1. Introduction

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

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

Cultural Resources was the only environmental topic identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures. 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 will be 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, archaeology, paleontology). 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 will assess compliance with required mitigation measures, and recognized experts from responsible agencies will consult with the construction manager regarding disputes.

2. Mitigation Monitoring Process

2.4 ARBITRATION RESOLUTION

If a mitigation monitor is of the opinion that a mitigation measure 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. Mitigation Monitoring Requirements

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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 archaeologist and paleontologist	Before and during ground-disturbing construction activities	Construction Manager and Torrance Unified School District	

3. Mitigation Monitoring Requirements

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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

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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

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6. Report Preparation

6.1 LIST OF PREPARERS

PlaceWorks

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Report Preparation

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