

6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

INTRODUCTION

Section 15128 of the State CEQA Guidelines requires an EIR to briefly describe any possible significant effects of a project that were determined not to be significant and were, therefore, not discussed in detail in the EIR. The items listed below were scoped out of the EIR.

AESTHETICS

Threshold: **Have a substantial adverse effect on a scenic vista.**

Scenic vistas are typically views of features such as mountains, forests, the ocean, or urban skylines. The City's General Plan does not designate any scenic vistas or other scenic resources.¹ Implementation of the proposed Project would involve the reconstruction of the CHS campus, consisting in the construction of buildings ranging from 1 to 3 stories in height. The proposed buildings would be in similar height to the existing uses on the Project Site. As such, the proposed Project would not introduce uses that would substantially alter the existing views of the Project area. As such, the proposed Project would not result in a substantial adverse impact on a scenic vista.

No impacts would occur.

AGRICULTURE AND FORESTRY RESOURCES

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

The approximately 42-acre Project Site is currently developed with school, single- and multifamily residential, and commercial uses and is located in a highly urbanized area of the City. The City does not contain any agricultural land under commercial cultivation.² While the City does provide a Residential Agricultural (RA) zoning designation, these designated areas are primarily single-family uses that are permitted the private use of a limited number of farm animals, such as poultry, rabbits, sheep, goats, aviary, horses, or cows.³ The proposed Project would not involve changes that would result in the

1 City of Compton, *General Plan*, "Conservation/Open Space/Parks and Recreation Element" (December 3, 1991).

2 City of Compton, *General Plan*, "Conservation/Open Space/Parks and Recreation Element."

3 City of Compton, *General Plan*, "Conservation/Open Space/Parks and Recreation Element."

conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Important to nonagricultural uses.

No impacts would occur.

Threshold: Conflict with existing zoning for agricultural use or a Williamson Act contract.

As previously noted, the Project Site and surrounding development are fully developed and are not currently used for agricultural uses. The Project Site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. Therefore, the proposed Project would not conflict with any uses zoned for agricultural uses or subject to any Williamson Act contracts.

No impacts would occur.

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

As defined by the Public Resources Code (PRC) Section 12220(g), forestland is land that can support 10 percent native tree cover of any species under natural conditions and that allows for management of one or more forest resources. Given that minimal vegetative cover is found on the Project Site and the site is not zoned as forestland, the proposed Project would not affect any forestlands as defined by the PRC.

A Timberland Production Zone is defined by the Government Code Section 51104(g) as an area that is zoned for the sole purpose of growing and harvesting timber. Because the Project Site does not contain any timber resources, nor is it zoned as a timberland or timberland production area, the proposed Project would not conflict with timberland or Timberland Production areas.

No impacts would occur.

Threshold: Result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site is located in an urbanized area of the City and is not zoned or designated for forest or timberland, nor is it used for forestry operations. Therefore, it would not result in the loss of forestland or result in the conversion of forestland to nonforest uses.

No impacts would occur.

Threshold: **Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.**

As previously noted, the Project Site does not contain any farmland or forestland. Development of the proposed Project would occur on the same site that currently contains the existing CHS campus and adjacent urban uses, which are located in a disturbed and developed area. As such, the proposed Project would not result in the loss of Farmland or forestland or the conversion of Farmland or forestland to nonforest uses.

No impacts would occur.

AIR QUALITY

Threshold: **Create objectionable odors affecting a substantial number of people.**

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The proposed Project would not involve any elements related to these types of activities; therefore, no odors are anticipated.

During construction, activities associated with the operation of equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the area, odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the South Coast Air Quality Management District (SCAQMD) *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.⁴ With the exception of odors associated with typical fuel exhaust during construction and operational activities, the proposed Project is not likely to generate objectionable odors. The District would implement maintenance practices, such as the use of trash receptacles, to prevent nuisance odors on the surrounding land uses.

Impacts would be less than significant.

4 South Coast Air Quality Management District, *CEQA Air Quality Handbook*, accessed November 2017, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

BIOLOGICAL RESOURCES

Threshold: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The Project Site is located directly east of the Compton Creek, which is identified as wetland habitat.⁵ This portion of the Compton Creek has been modified by human activity and is currently characterized as a concrete-lined flood control channel.⁶ Moreover, the Project Site is currently separated from the Compton Creek by an approximately 20-foot-wide Class I asphalt bike path maintained by the City and a 6-foot-tall fence separating the campus from the bike path. In addition, a second fence roughly 4 feet tall further separates the bike path from the creek. The proposed Project would be designed to maintain the placement of the athletic fields and other landscaping improvements along the western portion of the Project Site, which would incorporate bioswales and other water-retention features to convey stormwater runoff on site to surrounding storm drains. In addition, the proposed Project would be designed to not result in peak stormwater runoff rates from the Project Site that exceed pre-Project condition levels. Therefore, the proposed Project would not result in any adverse impacts to the adjacent Compton Creek or any other riparian habitat or sensitive natural communities.

Impacts would be less than significant.

Threshold: Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means.

The Project Site is located within a highly urbanized area that has been previously developed. The portion of the Compton Creek adjacent to the Project Site is currently separated by an approximately 20-foot-wide Class I asphalt bike path maintained by the City and two fences. While Compton Creek is identified as wetland habitat, it has been modified and is currently lined with concrete. Implementation of the proposed Project would avoid excavation or disturbance of the adjacent Compton Creek because all proposed development along the western boundary would occur within the existing footprint of the CHS campus. As such, the proposed Project would not have a substantial adverse effect on federally protected

5 United States Fish and Wildlife Service, *National Wetlands Inventory*, ver. 2, accessed November 2017, <https://www.fws.gov/wetlands/data/mapper.HTML>.

6 City of Compton, *General Plan*, "Land Use Element" (December 3, 1991).

wetlands, as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.

Impacts would be less than significant.

Threshold: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

The Project Site is not located within an area covered by any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved local, regional, or State habitat conservation plans.⁷ As such, implementation of the proposed Project would not conflict with any provisions related to such plans.

No impacts would occur.

GEOLOGY AND SOILS

Threshold: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The risks associated with landslides occur when buildings or structures are placed on slopes. The Project Site and surrounding areas are relatively flat and contain minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Additionally, the City's indicates that the only portion of the City having the potential for slope failure is located along the southern banks of the Compton Creek near Artesia Boulevard, approximately 1 mile southeast of the Project Site.⁸ As such, the proposed Project would likely not be subject to seismically induced landslides.

No impacts would occur.

Threshold: Result in substantial soil erosion or the loss of topsoil.

Erosion is the movement of rock fragments and soil from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. The Project Site and surrounding areas are

7 California Department of Fish and Wildlife, "NCCP Plan Summaries," accessed April 2018, <https://www.wildlife.ca.gov/conservation/planning/nccp/plans>.

8 City of Compton, *General Plan*, "Public Safety Element."

urbanized and relatively flat, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site.

Construction activities associated with the proposed Project may result in wind- and water-driven erosion of soils due to grading activities if soil is stockpiled or exposed during construction. This impact is considered short-term in nature because the site would expose small amounts of soil only during construction activities. Any potential erosion impacts would be reduced by implementation of stringent erosion controls imposed by the City through grading permit regulations. The District would also be required to adhere to SCAQMD Rule 403—Fugitive Dust, which would further reduce the impact related to soil erosion to less than significant.

Furthermore, because the Project Site is greater than 1 acre in size, the proposed Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities.⁹ The SWPPP requires the implementation of Best Management Practices (BMPs) during construction to ensure that potential water quality impacts from water-driven erosion, as well as discharge of other construction-related pollutants, would be less than significant.

The Project Site is currently developed and is comprised of approximately 25 acres of impervious area and 17 acres of pervious area. Implementation of the proposed Project would result in the development of approximately 19 acres of impervious and 23 acres of pervious surfaces on the Project Site, which would cover the western and eastern portions of the Project Site, similar to existing conditions. Compared to existing conditions, these improvements would represent an approximate 35 percent increase in pervious surfaces on the Project Site, allowing for increased stormwater infiltration on the site.

All runoff would be captured through the bioswales and other water-retention features associated with the proposed Project to convey stormwater runoff on site to surrounding storm drains. Through the implementation of these features as part of the proposed Project, stormwater infiltration and drainage patterns on the Project Site would be improved compared to existing conditions. As a result, the proposed Project would not require any substantial changes to the existing drainage pattern of the Project Site or the area that would cause substantial erosion or loss of topsoil.

Impacts would be less than significant.

9 US Environmental Protection Agency (USEPA), *Developing Your Stormwater Pollution Prevention Plan: A Guide for Construction Sites*, https://www3.epa.gov/npdes/pubs/sw_swppp_guide.pdf.

Threshold: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Implementation of the proposed Project would continue to utilize the existing wastewater infrastructure that serves the Project Site and would not use septic tanks or alternative wastewater disposal systems.

No impacts would occur.

Threshold: Does the site contain an active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan.

The Project Site is located within the City of Compton of Los Angeles County. As provided in the Geotechnical Report (**Appendix G**), 14 known active faults near Project Site have the potential to create seismic hazards. These active faults range from a distance of 1.8 miles to 21.6 miles from the Project Site, with a maximum moment magnitude ranging from 6.7 to 7.5.¹⁰ The three nearest active faults are the Newport-Inglewood, the Puente Hills Blind Thrust–LA Basin, and the Puente Hill Blind Thrust–Santa Fe Springs Faults, which extend directly from the Project Site at approximately 1.8 miles, 4.8 miles, and 5.2 miles, respectively. The Project Site does not contain an active or potentially active earthquake fault and is not within the boundaries of any special studies zone, such as the State of California Earthquake Fault Zone (formerly known as the Alquist-Priolo Special Studies Zone). While the Project Site is not located within a special studies zone, the site is located in a seismically active area, as is the majority of Southern California. However, the proposed Project would be built in accordance with State building code, which would include the incorporation of seismic standards appropriate to the Project Site and its seismic design category.

Impacts would be less than significant.

¹⁰ Ninyo and Moore, *Preliminary Geotechnical Evaluation and Other Hazards Evaluation* (October 31, 2017).

Threshold: Would the project involve the construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.

As mentioned previously, the proposed Project is not on an active earthquake fault, nor is it located within a special studies zone. The Project would be built to the 2016 California Building Code, which would include incorporation of seismic standards appropriate to the Project Site and its seismic design category.¹¹

Impacts would be less than significant.

Threshold: Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to landslides.

As mentioned previously, the Project Site and the surrounding vicinity are relatively flat and are not located near any adjacent hillsides or steep slopes. The Project Site is not located within a landslide hazards zone.¹² In addition, the Project Site is an area with no known landslides, nor is it in the path of any potential landslides.

No impacts would occur.

HAZARDS AND HAZARDOUS MATERIALS

Threshold: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The types and amounts of hazardous materials that would be used in connection with the proposed Project would be typical of those used on high school campuses (e.g., cleaning solutions, solvents, pesticides landscaping, painting supplies, and petroleum products). Construction of the proposed Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with in compliance with applicable federal, State, and local regulations. Additionally, the Compton Fire Department (CFD) would have the authority to perform inspections and enforce federal and

11 California Buildings Standards Commission, "California Green Building Standards Code (Cal. Code Regs., Title 24, Part 1)" (January 1, 2017), <http://www.bsc.ca.gov/Home/CALGreen.aspx>.

12 California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the South Gate 7.5-Minute Quadrangle, Los Angeles County, California, 1998* (2001), map, accessed January 2018, available http://gmv.conservacion.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR_034_South_Gate.pdf.

State laws governing the storage, use, transport, and disposal of hazardous materials and wastes.¹³ The proposed Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials.

Impacts would be less than significant.

Threshold: Contain one or more pipelines, situated underground or above ground, which carry hazardous substances, acutely hazardous, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?

As previously mentioned, the nearest gas transmission pipeline to the proposed Project Site is approximately 0.8 miles north of the site. The nearest hazardous liquid pipeline is approximately 0.4 miles east of the site. The nearest high pressure natural gas pipeline is a transmission line located approximately 1.15 miles west of the site. Natural gas pipelines are present parallel to W. Laurel Street, W. Myrrh Street, S. Oleander Avenue, S. Acacia Avenue, and W. Alondra Boulevard with lateral 0.5- and 1-inch connection lines to the site. However, the maximum diameter of the pipelines in the vicinity of the site is 3 inches, meaning they are not high-pressure lines.¹⁴

Impacts would be less than significant.

Threshold: Be in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site.

As stated previously, the Project Site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. Additionally, no designated agricultural land uses or zoning exist adjacent to or near the Project Site.

No impacts would occur.

13 City of Compton, "Hazardous Materials," <http://www.comptoncity.org/depts/fire/protection/hazmat.asp>.

14 According to Converse Consultants' Phase I ESA for the existing CHS campus, transmission lines are "generally large diameter pipelines that operate at pressures above 200 pounds per square inch (psi) and transport gas from supply points to the gas distribution system." Converse Consultants, *Phase I Environmental Site Assessment Report, Compton High School 601 S. Acacia Avenue, Compton, California* (January 3, 2018).

Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?

The Project Site is located approximately 0.35 miles east of the Compton/Woodley Airport. The proposed Project would be implemented on the existing CHS campus and developed acquisition area and would not encroach into an airport runway. The California Education Code (CDE) identifies requirements for schools located near airports, which not apply to sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites.¹⁵ Because a majority of the CHS campus was constructed prior to 1966, it would be exempt from CDE requirements pertaining to school sites located within proximity of airports. In addition, the inclusion of the acquisition parcels as part of the Project Site would be considered an extension of the CHS campus, thereby also exempting the parcels from these CDE requirements.

The City of Compton General Plan Land Use Element notes that the 1991 Airport Master Plan has a designated accident potential zone extending just east of N. Wilmington Avenue and to Central Avenue on the west.¹⁶ The Project Site is located outside of this accident potential zone.

Impacts would be less than significant.

Threshold: Is the proposed school site within 2 miles, measured by air line, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site. (Ed. Code §17215(a)&(b); Does not apply to school sites acquired prior to January 1, 1966.).

The Project Site is located approximately 0.35 miles east of the Compton/Woodley Airport. The proposed Project would be implemented on the existing CHS campus and developed acquisition area and would not encroach into any potential runway. The CDE identifies requirements for schools located near airports, which do not apply to sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites.¹⁷ As a majority of the CHS campus was constructed prior to 1966, it would be exempt from CDE requirements pertaining to school sites located within proximity of airports. In addition, the inclusion of the acquisition parcels as part of the Project Site would be considered an extension of the CHS campus, thereby also exempting the parcels from these CDE requirements.

15 California Education Code, Sections 17215(a) and 17215(b).

16 City of Compton, *General Plan*, "Land Use Element."

17 California Education Code, Sections 17215(a) and 17215(b).

The City of Compton General Plan Land Use Element notes that the 1991 Airport Master Plan has a designated accident potential zone extending just east of N. Wilmington Avenue and to Central Avenue on the west.¹⁸ The Project Site is located outside of this accident potential zone.

Impacts would be less than significant.

Threshold: **For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the project area.**

The proposed Project would be implemented on the existing CHS campus and developed acquisition area and would not encroach into an airport runway or any potential runway. Given that no known private airstrips are near the Project Site, the proposed Project would not result in safety hazards for students, faculty, staff, and visitors on the Project Site.

No impacts would occur.

Threshold: **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

The Project Site is bound by W. Alondra Boulevard along the south, which is a City-designated emergency evacuation route.¹⁹ Implementation of the proposed Project would not result in a substantial change in uses on the Project Site that would impair existing emergency access operations.

Construction of the proposed Project may require temporary and/or partial street closures adjacent to the Project Site on an intermittent basis. While such closures may cause a temporary inconvenience, they would not be expected to substantially interfere with the City's emergency operations plan.²⁰ The District would be required to coordinate with the City's Public Works Department and obtain necessary permits for all construction work occurring within the public right-of-way. In addition, proposed Project would be required to comply with applicable fire code requirements to the satisfaction of the City and CFD, including the incorporation of necessary on- and off-site access and circulation for emergency vehicles and services.

Impacts would be less than significant.

18 City of Compton, *General Plan*, "Land Use Element."

19 City of Compton, *General Plan*, "Land Use Element."

20 City of Compton, "Emergency Preparedness," <http://www.comptoncity.org/depts/fire/preparedness/default.asp>.

Threshold: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The City is not located within a designated Very High Fire Hazard Severity Zone.²¹ The Project Site is located within an urbanized area of the City and is not adjacent to wildlands that could be subject to wildland fires. No significant risk of injury, loss, or death involving wildland fires are likely to occur as a result of the proposed Project.

No impacts would occur.

HYDROLOGY AND WATER QUALITY

Threshold: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

The proposed Project includes a series of improvements to the CHS campus, which would consist of the demolition of all existing uses, and the construction of new, modern buildings, facilities, and athletic fields. The proposed Project would incorporate bioswales and other water-retention features to convey stormwater runoff on site to surrounding storm drains. Furthermore, construction of the proposed Project is not anticipated to involve deep excavations that could result in the interception of existing aquifers or penetration of the existing water table. Because implementation of the proposed Project would result in an increased amount of pervious surface compared to that currently located on the Project Site, the proposed Project would allow for increased stormwater infiltration on the site. Therefore, Project development would not deplete groundwater supplies or interfere with groundwater recharge.

Impacts would be less than significant.

21 California Department of Fire and Forestry Protection, *Los Angeles County FHSZ Map*, accessed November 2017, http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf.

Threshold: **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on or off site.**

The proposed Project would not involve an alteration in the course of a stream or river. While the Project Site is located adjacent to the Compton Creek, all proposed development along the western boundary would occur within the existing footprint of the CHS campus, and no alterations to Compton Creek would occur. The proposed Project would be designed to maintain the placement of the athletic fields and other landscaping improvements along the western portion of the Project Site, including the use of bioswales and other water-retention features to convey stormwater runoff on site to surrounding storm drains.

Because implementation of the proposed Project would relocate similar school facilities within a developed area on the site, the existing drainage pattern would be slightly modified. The proposed Project would be designed to not result in peak stormwater runoff rates from the Project Site that exceed pre-Project condition levels. As such, the proposed Project would not result in an increased rate of stormwater runoff from the Project Site.

Impacts would be less than significant.

Threshold: **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on or off site.**

The Project Site is located in a developed area of the City, and no streams or river courses are located on or within the Project vicinity. Stormwater runoff on the Project Site currently flows into existing City streets and drains. Implementation of the proposed Project would result in the development of approximately 19 acres of impervious and 23 acres of pervious surfaces on the Project Site, which would cover the western and eastern portions of the Project Site, similar to existing conditions. Compared to existing conditions, these improvements would represent an approximate 35 percent increase in pervious surfaces on the Project Site, allowing for increased stormwater infiltration on the site.

Although Compton Creek is adjacent to the Project Site, it has been highly modified and has impervious surfaces for a majority of its length. The proposed Project would be designed to maintain the placement of the athletic fields and other landscaping improvements along the western portion of the Project Site adjacent to Compton Creek, which would incorporate bioswales and other water-retention features to convey stormwater runoff on site to surrounding storm drains. In addition, the proposed Project would be designed to not result in peak stormwater runoff rates from the Project Site that exceed pre-Project

condition levels. As such, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

Impacts would be less than significant.

Threshold: **Otherwise substantially degrade water quality.**

Construction of the proposed Project, such as grading and trenching activities, could potentially degrade water quality through erosion and subsequent sedimentation. However, the proposed Project would implement BMPs and comply with all federal, State, and local regulations governing stormwater discharge. In addition, the proposed Project would incorporate bioswales and other water-retention features to convey stormwater runoff on site to surrounding storm drains. As such, the proposed Project would not include potential sources of contaminants that could potentially degrade water quality.

Impacts would be less than significant.

Threshold: **Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.**

The proposed Project does not propose the development of new homes. Implementation of the proposed Project includes a series of improvements to the CHS campus, which would consist of the demolition of all existing uses and the construction of new, modern buildings, facilities, and athletic fields. The Project Site is located within a FEMA-designated shaded Zone X area, while the eastern portion of the Project Site is located within an area of moderate flood hazard, generally between the limits of the 100-year and 500-year flood hazard zone.²² No portion of the Project Site is located within a FEMA-designated 100-year flood zone.

No impacts would occur.

Threshold: **Be subject to inundation by seiche, tsunami, or mudflow.**

The Project Site is not located near an ocean or enclosed body of water, and the site would not likely be subject to inundation by seiche or tsunami. With respect to the potential impact from a mudflow, the

22 Federal Emergency Management Agency, *Flood Insurance Rate Map (FIRM): Los Angeles County California*, panel 1815 of 2350, map no. 06037C1815F (September 26, 2008).

Project Site is relatively flat, surrounded by urban development, and not located within proximity to any prominent mountains.

No impacts would occur.

LAND USE AND PLANNING

Threshold: **Physically divide an established community.**

Implementation of the proposed Project involves improvements to an existing high school campus within a developed urban area. Project development would not divide any established residential communities surrounding the Project Site. The acquisition of the 10 parcels on the southeastern portion of the Project Site, including the vacation of S. Oleander Avenue and W. Cocoa Street, would not bisect or transect the surrounding parcels. All off-site improvements associated with the street vacations and utility relocations would occur within the existing public right-of-way. Therefore, implementation of the proposed Project would be consistent with the existing physical arrangement of the properties surrounding the Project Site.

Impacts would be less than significant.

Threshold: **Conflict with any applicable habitat conservation plan or natural community conservation plan.**

The Project Site is not located within an area covered by any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved local, regional, or State habitat conservation plans. Implementation of the proposed Project would not conflict with any provisions related to such plans.²³

Impacts would be less than significant.

MINERAL RESOURCES

Threshold: **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.**

According to the City, the State Division of Mines and Geology has not designated any lands in Compton as a classified mineral resource deposit area.²⁴ As such, it is unlikely that the Project Site and surrounding areas contain any mineral resources of significance. The proposed Project would be implemented in a developed urban area of the City and would not disrupt any mining operations.

23 City of Compton, General Plan, "Conservation/Open Space/Parks and Recreation Element."

24 City of Compton, General Plan, "Conservation/Open Space/Parks and Recreation Element."

No impacts would occur.

Threshold: **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.**

As previously noted, the City does not identify the likely presence of mineral resources within the City boundaries. As such, the Project is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

No impacts would occur.

NOISE

Threshold: **For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels.**

The Project Site is located approximately 0.35 miles from the Compton/Woodley Airport. However, no private airports, airstrips, or heliport stations are near the Project Site. As such, the proposed Project would not expose students, faculty, staff, and visitors to excessive noise levels associated with public or private airport uses.

No impacts would occur.

PUBLIC SERVICES

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

Fire protection and emergency medical services in the City of Compton are provided by the Compton Fire Department (CFD). The nearest fire station to the Project Site is Fire Station 1, located at 201 S. Acacia Avenue, approximately 0.2 miles northeast of the Project Site.

Project development includes a series of improvements to the CHS campus, which would consist of the demolition of approximately 1,063,493 square feet of existing uses, including the acquisition area, followed by the construction of approximately 1,827,830 square feet of new, modern buildings, facilities,

and athletic fields. Implementation of the proposed Project would result in the decrease in the student capacity of the CHS campus by approximately 686 seats.

The proposed Project also involves the implementation of various parking and circulation improvements. Emergency fire access within the Project Site would be provided along W. Alondra Boulevard on the south, and along W. Myrrh Street on the north. This emergency fire access would enhance emergency access to the Project Site and neighboring properties in the event of an emergency.

The proposed Project would be required to comply with applicable fire code requirements to the satisfaction of the City and CFD. The District would be required to coordinate with the City and CFD and provide for the design, number, and the installation of fire hydrants, as well as the provision of adequate emergency access (during construction and operation), including ingress and egress points for emergency services.²⁵ Therefore, implementation of the proposed Project would not result in a substantial change in conditions that would increase the demand for fire protection services or inhibit the ability of the CFD to provide adequate response to the Project Site. The proposed Project would be adequately served by existing public services and would not necessitate the provision of new or physically altered fire protection facilities.

Impacts would be less than significant.

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

Police protection services in the City of Compton are provided by the Los Angeles County Sheriff's Department through the Compton Sheriff Station, located at 301 S. Willowbrook Avenue, approximately 900 feet northeast of the Project Site, adjacent to Compton City Hall.

The proposed Project involves a series of improvements to the CHS campus, which would consist of the demolition of approximately 1,063,493 square feet of existing uses, including the acquisition area, followed by the construction of approximately 1,827,830 square feet of new, modern buildings, facilities, and athletic fields. Implementation of the proposed Project would also result in the decrease in the student capacity of the CHS campus by approximately 686 seats. These proposed changes would not result

25 City of Compton, "Fire Department," <http://www.comptoncity.org/depts/fire/default.asp>.

in a substantial change in the provision of police protection, given that the Project Site is currently served by Los Angeles County Sheriff's Department and the proposed Project would not result in a substantial change in the existing use of the Project Site.

While a majority of the Project Site is currently secured, the proposed Project would maintain necessary fencing around the Project Site to minimize trespassing, loitering, and vandalism. With regard to safety and reduction of theft during operation of the proposed Project, other security features—such as fencing and secured access gates, surveillance cameras, and security lighting—would be incorporated within the proposed improvements to reduce additional demand on the Los Angeles County Sheriff's Department. As previously discussed above, the proposed Project also involves various parking and circulation improvements, which would include emergency fire access provided along W. Alondra Boulevard and W. Myrrh Street to better facilitate emergency access throughout the Project Site. Therefore, implementation of the proposed Project would not result in a substantial change in conditions that would increase the demand for police protection services or inhibit the ability of the Los Angeles County Sheriff's Department to provide adequate response to the Project Site. The proposed Project would be adequately served by existing public services and would not necessitate the provision of new or physically altered police protection facilities.

Impacts would be less than significant.

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

Implementation of the proposed Project includes a series of improvements to the CHS campus, which would consist of the demolition of all existing uses, followed by the construction of new, modern buildings, facilities, and athletic fields. The proposed Project does not involve construction of any dwelling units or an increase in population that would require the construction of new school facilities outside the CHS campus. Although the construction of the proposed Project would necessitate the relocation of students to nearby schools for the 2018–19 through 2022–23 school years, this would only be temporary in nature and these students would be accommodated by other existing District schools with available capacities. Because the proposed Project would not result in an increased demand for school services, the need for new school facilities would not be required.

Impacts would be less than significant.

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

Demand for parks and recreational facilities in an area is usually determined by the area's population. The proposed Project would not construct any dwelling units, nor would it generate additional population. The proposed Project includes modern improvements to an existing high school campus for use by students, including improvements to existing athletic and outdoor educational facilities. Students who would be relocated to facilitate construction of the proposed Project would be placed in schools with available capacities and served with recreational facilities. Upon completion of the proposed Project, demand for recreational services would remain relatively the same. Therefore, the proposed Project would not necessitate the provision of new or expanded parks or recreational facilities.

No impacts would occur.

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

Library services within the Project area are provided by the County of Los Angeles Public Library, which has a branch located 240 W. Compton Boulevard, approximately 0.2 miles north of the Project Site. A significant impact may occur if the proposed Project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries) that would exceed the capacity available to serve the Project Site. The proposed Project does not involve the construction of residential uses and would therefore not result in any increase in population. Additionally, the proposed Project would not include a substantial change in faculty and staffing at the CHS campus, nor would there be an increase in operational or staffing capacity associated with the relocated District uses. Therefore, given that the proposed Project would not generate population or employment growth, the proposed Project would not necessitate the provision of new or expanded library facilities within Los Angeles County. Demand for library services would remain relatively the same.

No impacts would occur.

Threshold: Does the site promote joint use of parks, libraries, museums, and other public services.

Implementation of the proposed Project includes a series of improvements to the CHS campus, which would consist of the demolition of all existing uses followed by the construction of new, modern buildings, facilities, and athletic fields. The District currently has a joint-use agreement with the City to allow the joint use of CHS campus recreational facilities for private organizations, including a community football league. Subject to District approval, these community groups would be able to utilize the athletic fields after school hours. While use of the CHS campus would not be available during construction of the proposed Project, the District and community groups would temporarily suspend their agreement and then resume once the Project is operational.

Impacts would be less than significant.

RECREATION

Threshold: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The demand for parks and recreational facilities in an area are usually determined by the area's population. Implementation of the proposed Project includes improvements to an existing high school campus. Because there would be no increase in population associated with the construction of residential uses, the demand for recreational services would remain the same, and the deterioration to recreational facilities would not occur.

No impacts would occur.

Threshold: Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Implementation of the proposed Project involves various landscaping and other associated improvements to existing athletic and outdoor educational facilities. These proposed improvements would occur within the Project Site. Thus, no off-site recreational facilities are proposed, and none would be required.

No impacts would occur.

TRAFFIC AND TRANSPORTATION

Threshold: **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.**

The Project Site is located approximately 0.35 miles east of the Compton/Woodley Airport. The proposed Project would be on the existing high school campus and developed acquisition area and would not encroach into an airport runway or any potential runway. Airplane takeoffs and landing are at a sufficient distance from the Project Site and, as such, would not pose a safety risk. Therefore, airline traffic would remain similar, and no airline safety risks would occur.

No impacts would occur.

Threshold: **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

The proposed Project would include various parking and circulation improvements that would facilitate access within the Project Site and surrounding neighborhood, including the construction of internal circulation roads and three surface parking lots. If not properly designed and constructed, these improvements could potentially conflict with adjacent uses or interfere with vehicular and pedestrian circulation within the Project area. However, the proposed Project would not include unusual or hazardous design features. The proposed parking and circulation improvements would be consistent with the uses proposed for the Project Site; these improvements are intended to reduce conflicts and incompatibility with surrounding land uses.

Impacts would be less than significant.

Threshold: **Result in inadequate emergency access.**

As previously discussed above, the Project Site is bound by W. Alondra Boulevard along the south, which is a City-designated emergency evacuation route.²⁶ Implementation of the proposed Project would not result in a substantial change in uses on the Project Site that would impair existing emergency access operations. The proposed Project may require temporary and/or partial street closures adjacent to the Project Site on an intermittent basis. While such closures may cause a temporary inconvenience, they would not be expected to substantially interfere with the City's emergency operations plan.²⁷ The District would be required to coordinate with the City's Public Works Department and obtain necessary permits

²⁶ City of Compton, *General Plan*, "Public Safety Element."

²⁷ City of Compton, *General Plan*, "Public Safety Element."

for all construction work occurring within the public right-of-way. In addition, the proposed Project would be required to comply with applicable fire and building code requirements to the satisfaction of the City and CFD, including the incorporation of necessary on- and off-site access and circulation for emergency vehicles and services.

Impacts would be less than significant.

TRIBAL CULTURAL RESOURCES

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

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

Based on information provided in the Historical and Cultural Reports (see **Appendices E** and **F**, respectively), no Tribal Cultural Resources (TCRs), as defined in PRC Section 21704, are known to exist on or immediately adjacent to the Project Site. Preparation of the Cultural Report included property research and review of records at the South Central Coastal Information Center located on the campus of California State University, Fullerton (part of the California Historical Resources Information System). No evidence of historical resources was found.

This Historical Report specifically determined that the Project Site does not appear to be eligible for listing in the National or California Registers. Therefore, the buildings on the Project Site do not meet the CEQA historic resources threshold. The Project Site is not listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k). Thus, no buildings or facilities that meet the CEQA historic resources threshold would be demolished on the Project Site.

Impacts would be less than significant.

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

- **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe**

Assembly Bill (AB) 52 establishes a formal consultation process for California Native American tribes to identify potential significant impacts to TCRs, as defined in PRC Section 21074 as part of CEQA. The procedures under AB 52 offer the tribes an opportunity to take an active role in the CEQA process to protect TCRs. PRC Section 21080.3.1 and 21080.3.2 requires public agencies to consult with tribes identified by the Native American Heritage Commission for the purpose of mitigating a project's potential impacts to TCRs. Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to PRC Section 21080.3.1(d).

In compliance with the requirements of AB 52, the District provided formal notification (see **Appendix P**) of the proposed Project on November 6, 2017, to the following five tribes: (1) Gabrieleño/Tongva Nation, (2) Gabrieleño Band of Mission Indians–Kizh Nation, (3) Gabrieleño/Tongva San Gabriel Band of Mission Indians, (4) Gabrieleño/Tongva Indians of California Tribe Council, and (5) Gabrieleño/Tongva Tribe. The 30-day response period for consultation requests concluded on December 5, 2017.

No communication or request for consultation was received by the District from any of the five named tribes within the 30-day period identified in Public Resources Code Section 21080.3.1.

The records search and literature review conducted did not identify any known Native American resources within the Project Site or the surrounding area. The Sacred Lands File search request for the Project Site also did not identify any recorded TCRs on the Project Site.

Impacts would be less than significant.

UTILITIES AND SERVICE SYSTEMS

Threshold: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

The proposed Project would not generate industrial wastewater or new point sources of wastewater that would require an individual permit from the Los Angeles Regional Water Quality Control Board for additional treatment beyond the capabilities of the existing wastewater treatment facilities serving the Project Site. The proposed Project would make use of the existing wastewater infrastructure serving the Project area, which is conveyed by the Sanitation Districts of Los Angeles County (LACSD) sewage system.

Wastewater generated by the proposed Project would be similar to what is generated by the existing CHS campus and would not be a significant increase to what is currently generated. Because the proposed Project would result in the construction of modern facilities with water efficient features and would result in the decrease in student capacity by approximately 686 seats, wastewater generated by the proposed Project is not anticipated to increase compared to what is currently generated. While the proposed Project is not anticipated to result in an increase in wastewater generation, the existing wastewater infrastructure would require improvements and modifications to support the new campus facilities. However, these improvements would be incremental and would be completed in accordance with City standards and in coordination with LACSD.

Impacts would be less than significant.

Threshold: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

No new sources of water supply, such as groundwater, are required to meet the proposed Project's water demand. Potable water would be supplied by the City of Compton Municipal Water District, which draws its water supplies from a blend of local groundwater well and imported from MWD.²⁸ According to the

28 City of Compton, "Sources of Water," http://www.comptoncity.org/depts/mu/waterutil/water_quality/sources_of_water.asp.

City's 2010 Urban Water Management Plan, in 2010 the City provided a total of 8,929 acre-feet per year (afy) for a service population of approximately 82,000 people. The City projects a water demand of 8,061 afy with a water supply of 10,121 afy in 2025.²⁹ Wastewater treatment would be provided by the LACSD-operated Joint Water Pollution Control Plant, which has a treatment capacity of 400 million gallons of water per day and a service population of approximately 3.5 million people.³⁰

Implementation of the proposed Project involves improvements to an existing school campus, totaling a net decrease of approximately 764,337 square feet of new, modern buildings, facilities, and athletic fields. The CHS campus would result in a decrease in student capacity by approximately 686 seats. Water and wastewater treatment would be provided by existing extraction and treatment facilities currently serving the Project Site. To reduce demand on local water and wastewater treatment facilities, the new campus facilities would contain more water-efficient features, such as the installation of ultra-low flush toilets and low-flow faucets. In addition, the landscaping improvements proposed by the Project would consist of drought-tolerant plants and the use of efficient irrigation systems, which would also reduce water demand on the Project Site. As such, the proposed Project would be constructed in compliance with the City's building and development codes, which include by reference Title 24 requirements, to maximize water efficiency and reduce demand for potable water and wastewater treatment.

Therefore, given the available capacities of the water and wastewater treatment facilities serving the City, including the Project Site, the proposed Project would not require the construction of new facilities or expansion of existing facilities.

Impacts would be less than significant.

Threshold: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Construction of the proposed Project involves various grading, trenching, and site-preparation activities that would potentially alter the existing pattern and concentration of runoff. Full implementation of the proposed Project would slightly reconfigure the drainage plan that currently exists on the Project Site. While the proposed Project would construct new, modern school facilities on the Project Site, no substantial changes to the grading of the site would occur, and the conveyance of stormwater runoff would be improved compared to existing conditions. The proposed Project would incorporate bioswales

29 City of Compton, *2010 Urban Water Management Plan*, Tables 3.2.6 and 4.1.1.

30 Sanitation Districts of Los Angeles County, "Joint Water Pollution Control Plant," <http://www.lacsd.org/wastewater/wwfacilities/jwpcp/>.

and other water-retention features to convey stormwater runoff on site to surrounding storm drains. The proposed Project would not exceed the capacity of existing stormwater infrastructure for the area; furthermore, the proposed Project would comply with all federal, State, and local regulations governing stormwater discharge.

Impacts would be less than significant.

Threshold: Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed.

The City of Compton Municipal Water District (CMWD) provides water to the Project Site. The CMWD would coordinate with the City to ensure that water supply requirements are met to support the demands of the proposed Project. The proposed Project would include the demolition of existing high school facilities, as well as six multifamily residential units, a church, and a carwash that make up the southwestern portion of the Project Site. The proposed Project would include the construction of a new, upgraded high school campus that would meet current State standards. Water demand is not anticipated to increase compared to existing conditions because the new CHS campus facilities would contain more water-efficient features to reduce the Project Site's overall demand on available City water resources.

Impacts would be less than significant.

Threshold: Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

As previously mentioned, wastewater generated on the Project Site would be conveyed into the LACSD sewage system. However, the proposed Project is not anticipated to result in an increase in generated wastewater compared to existing conditions on the Project Site. The existing wastewater infrastructure would require improvements and modifications to support the new upgraded campus facilities. However, this change would be incremental and would be completed both in accordance with City standards and in coordination with LACSD.

Impacts would be less than significant.

Threshold: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Solid waste generated within the City is disposed of at various landfills operated by the Solid Waste Management Department of the Sanitation Districts of Los Angeles County, such as the Chiquita Canyon

and Sunshine Canyon landfills. The Chiquita Canyon and Sunshine Canyon landfills have remaining capacities of approximately 8.62 million cubic yards and 96.8 million cubic yards, respectively.³¹

The proposed Project would include the demolition of existing high school and residential and commercial uses, for a total of approximately 350,800 square feet of nonresidential uses and 16,500 square feet of residential uses. Based on the amount of existing use proposed for demolition, the proposed Project would generate approximately 21,713 tons of nonresidential demolition debris and 1,048 tons of residential debris.³² Furthermore, based on the approximately 1,827,830 square feet of new school uses that would be constructed, the proposed Project would generate approximately 3,967 tons of construction debris.³³ The disposal of demolition and construction debris would occur in phases throughout 24-month construction period of the proposed Project. BMPs would be implemented to recycle and reuse construction materials to reduce solid waste generation in accordance with local and State waste-reduction goals.

Operation of the proposed Project would generate solid waste typical of a school development, which is not anticipated to result in an increase in solid waste compared to existing conditions. Based on the total student capacity of 2,500 seats, the proposed Project is estimated to generate 1,250 pounds, or 0.63 tons, of solid waste per day.³⁴ As with construction debris, this estimate is conservative because it does not factor in any recycling or waste diversion programs that would be implemented on the Project Site. The amount of solid waste generated by the proposed Project during construction and operations would be within the available capacities at area landfills.

Impacts would be less than significant.

31 CalRecycle, *Solid Waste Information System (SWIS) Database*, "Facility/Site Summary Details," accessed December 2017, <http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx>.

32 USEPA, Office of Resource Conservation and Recovery, *Estimating 2003 Building-Related Construction and Demolition Materials Amount*, Report No. EPA530-R-09-002 (March 2009). Standard demolition waste generation rates for nonresidential and residential debris is 158 pounds per square foot and 127 pounds per square foot, respectively.

33 USEPA, Office of Resource Conservation and Recovery, *Estimating 2003 Building-Related Construction*. Standard construction waste generation rates for nonresidential construction is 4.34 pounds per square foot.

34 CalRecycle, "Estimated Solid Waste Generation Rates," <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, accessed December 2017. The estimated generation rate for educational facilities is 0.5 pounds per student per day.

Threshold: Comply with federal, State, and local statutes and regulations related to solid waste.

The proposed Project would be required to comply with all applicable laws and regulations governing solid waste. The proposed Project would not affect the City's ability to continue to meet the required Assembly Bill 939 waste diversion requirements.³⁵

Impacts would be less than significant.

35 CalRecycle, "History of California Solid Waste Law, 1985–1989" (last updated January 1, 1997), <http://www.calrecycle.ca.gov/Laws/Legislation/calhist/1985to1989.htm>.