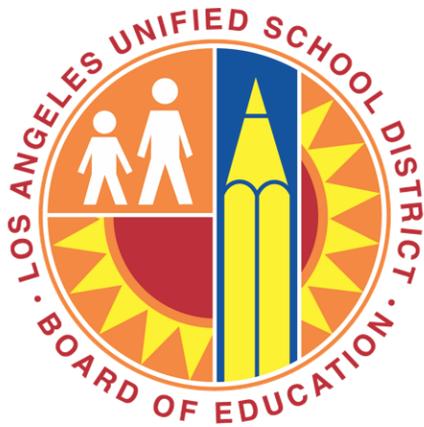


June 2019 | Mitigated Negative Declaration



RISE KOHYANG HIGH SCHOOL

Prepared for:

LEAD AGENCY: Los Angeles Unified School District

Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017

Contact: Eimon Smith, CEQA Project Manager

APPLICANT: Bright Star Schools

600 S. La Fayette Park Place
Los Angeles, California 90057

Contact: Elijah Sugay, Vice President, Finance & Facilities



Prepared by:

PlaceWorks

3 MacArthur Place, Suite 1100
Santa Ana, California 92707

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) Sections 2100 et seq.) and the State CEQA Guidelines (California Code of Regulations (CCR) Sections 15000 et seq.), the Los Angeles School District has completed this Mitigated Negative Declaration (MND) for the project described below based on the assessment presented in the attached Initial Study.

LEAD AGENCY: Los Angeles Unified School District

PROJECT TITLE: Rise Kohyang High School

PROJECT LOCATION: The proposed Project site is at in the City of Los Angeles (Koreatown Neighborhood) at 3500, 3468, 3478 3474, 3470, 3464, 3506, and 3510 West 1st Street, and 119 and 115 South Madison Avenue (APNs 5501-014-004, -021, -022, -023, -024, -025).

PROJECT DESCRIPTION: The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District for the construction and operation of a charter school (Rise Kohyang High School; proposed Project). The new charter high school would have a capacity of 600 students in grades 9-12 and 75 full and part-time teachers and staff. The Project consists of a 76,390-square-foot two-story building with staff space (reception/clerical/administration/teacher offices, meeting rooms), restrooms, support space (custodial, storage, electrical/telecommunications rooms), 24 classrooms, multipurpose room and servery, gymnasium, and semi-subterranean parking garage.

The 62-space parking garage would have a designated drop-off/pick-up area and queuing lane. The drop-off/pick-up zone would permit student unloading and loading directly from the passenger side without obstructing the circulation lane. Existing Rise Kohyang High School is currently operating in classroom space on the first and second floors of a building at 600 S La Fayette Park Place, about 1.2 miles southeast. The existing school has 16 classrooms, a multi-purpose room, and several office spaces and serves about 287 students in grades 9-11. When the new school is completed, students would transfer to the new location.

EXISTING CONDITIONS: The site is currently occupied by the Good News Central Church. There are seven buildings on the property—two chapels, a kitchen, two storage sheds, an International Youth Fellowship, and a two-story single-family residence (operating as the parsonage for the church).

Vehicular access is via one driveway on Madison Avenue, and a pedestrian access gate is near the northwest corner of the site on 1st Street. The church has about 50 on-site parking spaces. Curbside parking is available along Madison Avenue and 1st Street.

DOCUMENT AVAILABILITY: The MND and supporting Initial Study for Rise Kohyang High School are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3417)
- Rise Kohyang High School, 600 South La Fayette Park Place, 2nd Floor, Los Angeles, CA 90057
- Felipe de Neve Brach Library, 2820 West 6th Street, Los Angeles, CA 90057
- Wilshire Branch Library, 149 North Saint Andrews Place, Los Angeles, CA 90004
- LAUSD OEHS website: <http://achieve.lausd.net/ceqa>

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from the installation and operation of the modernized campus and to evaluate the significance of those effects. Based on the environmental analysis, the proposed Project would have no impacts or less-than-significant environmental impacts related to the following issues:

- | | | |
|-------------------------------|--------------------------------------|-----------------------------------|
| • Aesthetics | • Agriculture and Forestry Resources | • Air Quality |
| • Biological Resources | • Cultural Resources | • Energy |
| • 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 | • Tribal Cultural Resources | • Utilities and Service Systems |
| • Wildfire | | |

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed Project with mitigation measures incorporated for pedestrian safety and transportation impacts would not have a significant adverse effect on the environment.

June 2019 | Initial Study

RISE KOHYANG HIGH SCHOOL

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- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Geotechnical Investigation
- C. Geohazards Report
- D. Preliminary Environmental Assessment & Phase I Environmental Site Assessment
- E. Pipeline Safety Hazard Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Impact Assessment



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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ACCM	asbestos-containing construction material
ADT	average daily trips
AQMP	air quality management plan
BMP	best management practices
BOE	Board of Education (LAUSD)
BSS	Bright Star Schools
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools
CNEL	Community Noise Equivalent Level
CMP	Los Angeles County Congestion Management Program
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
dB	decibel
dBA	A-Weighted Decibel
dBA L _{eq}	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources
EIR	environmental impact report

Abbreviations and Acronyms

EPA	US Environmental Protection Agency
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System
FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LADOT	Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
L _{dn} or DNL	Day-Night Noise Level
Leq	Equivalent Continuous Noise Level
LID	low-impact development
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
MTCO _{2e}	metric ton of CO _{2e}
MW	Materials and Waste Management
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
O ₃	ozone
OITC	outdoor-indoor transmission class
PCSD	Pacific Charter School Development
PDF	project design features
PEA	Preliminary Environmental Assessment
PF	Public Facility



Abbreviations and Acronyms

PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SO ₂	sulfur dioxide
SoCAB	South Coast Air Basin
SRA	Source Receptor Area
STC	sound transmission class
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra low sulfur diesel
UST	underground storage tank
VdB	vibration decibel
VOC	volatile organic compounds

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District (LAUSD or District) for the construction and operation of a charter high school facility on a 1.15-acre site at the corner of 1st Street and Madison Avenue in the City of Los Angeles. The proposed Rise Kohyang High School (proposed Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA¹ and the State CEQA Guidelines.² CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, LAUSD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.³

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,⁴ however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.⁵

¹ California Public Resources Code, § 21000 et seq (1970).

² California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 et seq.

³ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15063.

⁴ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15064.

⁵ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15070.

1. Introduction

1.3 ENVIRONMENTAL PROCESS

A “project” means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- 1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

The proposed discretionary actions by LAUSD constitute a “project” because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All “projects” in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.3.1 Initial Study

LAUSD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine the type of CEQA document that is required for a project.⁶

The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in an MND or ND; 6) eliminate unnecessary EIRs; and 7) determine if the project is covered under a previously prepared EIR.⁷ When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR;⁸ however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND, or MND that incorporates mitigation measures into the project.⁹

⁶ 14 CCR § 15063.

⁷ 14 CCR § 15063.

⁸ 14 CCR § 15064.

⁹ 14 CCR § 15070.



1. Introduction

1.3.2 Mitigated Negative Declaration

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the MND is provided in the Initial Study Checklist (Chapter 4).

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings.

1.3.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.¹⁰ LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.¹¹ The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.¹²

The Program EIR is applicable to all projects implemented under the School Upgrade Program. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.¹³ Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:¹⁴

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus

¹⁰ Program EIR for the School Upgrade Program. Report. 2015. <http://achieve.lausd.net/ceqa>.

¹¹ Program EIR for the School Upgrade Program. Report. 2015. <http://achieve.lausd.net/ceqa>.

¹² California Code of Regulations Title 14, § 3 Article 1-15152(a).

¹³ California Code of Regulations Title 14, § 3 Article 1-15152(a) at 4-8.

¹⁴ California Code of Regulations Title 14, § 3 Article 1-15152(a) at 1-7.

1. Introduction

- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

This Project falls under the category of a Type 1 project, New Construction on New Property. The Project is not adjacent to an existing school; it consists of new building construction on new property. The evaluation of environmental impacts related to Type 1 projects, and the appropriate project design features and Standard Conditions of Approval to incorporate, are provided in the Program EIR.

The proposed charter school Project is considered a site-specific project under the Program EIR; therefore, this MND is tiered from the SUP Program EIR. The Program EIR is available for review online at <http://achieve.lausd.net/ceqa> and at LAUSD’s Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.3.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),¹⁵ LAUSD Standard Conditions of Approval (SC),¹⁶ and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁷

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational

¹⁵ California Green Building Standards Code, Title 24, Part 11.

¹⁶ LAUSD OEHS, “Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects.” Update adopted by the Board of Education on February 19, 2019. <http://achieve.lausd.net/ceqa>.

¹⁷ The Board of Education’s October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.



1. Introduction

phases of the projects. The Board of Education adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project design features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Mitigation Measures. If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

1. Introduction

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations; PDFs; and SCs.

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.¹⁸ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

Bright Star Schools is the project proponent and developer of this Project and as such has assumed all of the responsibilities that would typically be attributed to LAUSD. Where Standard Conditions of Approval or other measures identify “LAUSD” as the responsible party, it is understood that Bright Star Schools is in fact the responsible party for compliance with these and all measures related to the proposed Project. Specifically, Bright Star Schools is responsible for compliance with and implementation of all of the measures that are outlined in this MND for the proposed Project.

1.4 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.5 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study are that the proposed Project would have no significant impacts. This report has the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the MND and supporting Initial Study and the terminology used.

¹⁸ CHPS criteria are summarized. The full requirement can be found at <http://www.chps.net/dev/Drupal/California>.



1. Introduction

Chapter 2, *Environmental Setting* describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the proposed Project site and surrounding area.

Chapter 3, *Project Description* identifies the location, provides the background, and describes the scope of the proposed Project in detail.

Chapter 4, *Environmental Checklist and Analysis* presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the CHPS criteria, PDFs, Standard Conditions of Approval, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore a stand-alone bibliography section is not required.

Chapter 5, *List of Preparers* identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis in this CEQA Initial Study.

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Geotechnical Investigation
- C. Geohazards Report
- D. Preliminary Environmental Assessment & Phase I Environmental Site Assessment
- E. Pipeline Safety Hazard Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Impact Assessment

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

The 1.15-acre Project site is in the City of Los Angeles (west of downtown) in the Koreatown neighborhood, one of 114 neighborhoods in the City.¹⁹ The 10 addresses associated with the site are: 3500, 3468, 3478, 3474, 3470, 3464, 3506, and 3510 West 1st Street, and 119 and 115 South Madison Avenue. The site is identified with Assessor's Parcel Numbers (APN) 5501-014-004, -021, -022, -023, -024, -025.

The site is about 0.5 mile south of US 101 (Hollywood Freeway) and about 2.2 miles northwest of Interstate 110 (I-110 or the Harbor Freeway; see Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*). Access from US 101 is via ramps at Vermont Avenue to the north and Silver Lake Boulevard northeast of the site. The Vermont/Beverly Red Line Metro Rail Station is approximately 0.25 mile north of the site. The Red Line extends from Union Station northwest to the community of North Hollywood.²⁰ The site is about 0.7 mile north of Wilshire Boulevard, the primary commercial corridor extending west from downtown Los Angeles.

2.2 SURROUNDING LAND USE

The Project site is bounded by 1st Street, Virgil Middle School and Dr. Sammy Lee Medical and Health Sciences Magnet Elementary School to the north; Madison Avenue and commercial uses and single-family residences to the east; surface parking to the west; and surface parking lot and residential uses to the south (see Figure 3, *Aerial Photograph*).

2.3 SITE HISTORY

The site was developed in the late 1930s with several commercial buildings. By 1950 the site was occupied by a repair shop, a janitorial supply store, a restaurant, an unidentified store, and a residential dwelling. The single-family residence was built in 1938; the two-story building (currently a large chapel) was built in 1951; and the one-story building (currently a small chapel) was built in 1965. The Good News Central Church has owned the site since 1998.²¹

¹⁹ Los Angeles Times. 2018, August 9. Mapping L.A. https://s3-us-west-2.amazonaws.com/maps.latimes.com/static/img/mapping_la/mappingla.pdf.

²⁰ Metropolitan Transportation Authority of Los Angeles County (Metro). 2018, June 24. Red & Purple Lines Schedule. <https://media.metro.net/documents/b4f1f223-c6b4-4b6e-bd18-648dbca1e7e9.pdf>.

²¹ PlaceWorks, Inc. August 2018. Phase I Environmental Site Assessment.

2. Environmental Setting

2.4 EXISTING CONDITIONS

The site is currently occupied by the Good News Central Church. There are seven buildings on the property—two chapels, a kitchen, two storage sheds, an International Youth Fellowship, and a two-story single-family residence (operating as the parsonage for the church; see Figures 4a, 4b, 4c, *Site Photographs*).

The site frontage on 1st Street has a concrete block wall and chain-link fence, both covered with an ivy-type plant. The Madison Avenue side has a block wall and roses. There are five trees on the property and seven street trees.

Vehicular access is via one driveway on Madison Avenue, and a pedestrian access gate is near the northwest corner of the site on 1st Street. There are sidewalks on 1st Street and Madison Avenue along both sides of the street, and Class II (striped and signed) bicycle lanes on both sides of 1st Street. The church has about 50 on-site parking spaces. Curbside parking is available along Madison Avenue and 1st Street.

2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan designation for the Project site is General Commercial along 1st Street and Medium Residential along Madison Avenue. The site is in the Wilshire Community Plan Area.

City of Los Angeles zoning for the Project site is C2-1 (Commercial) and R3-1 (Multi-family Residential; see Figure 5, *Zoning Designation*).²²

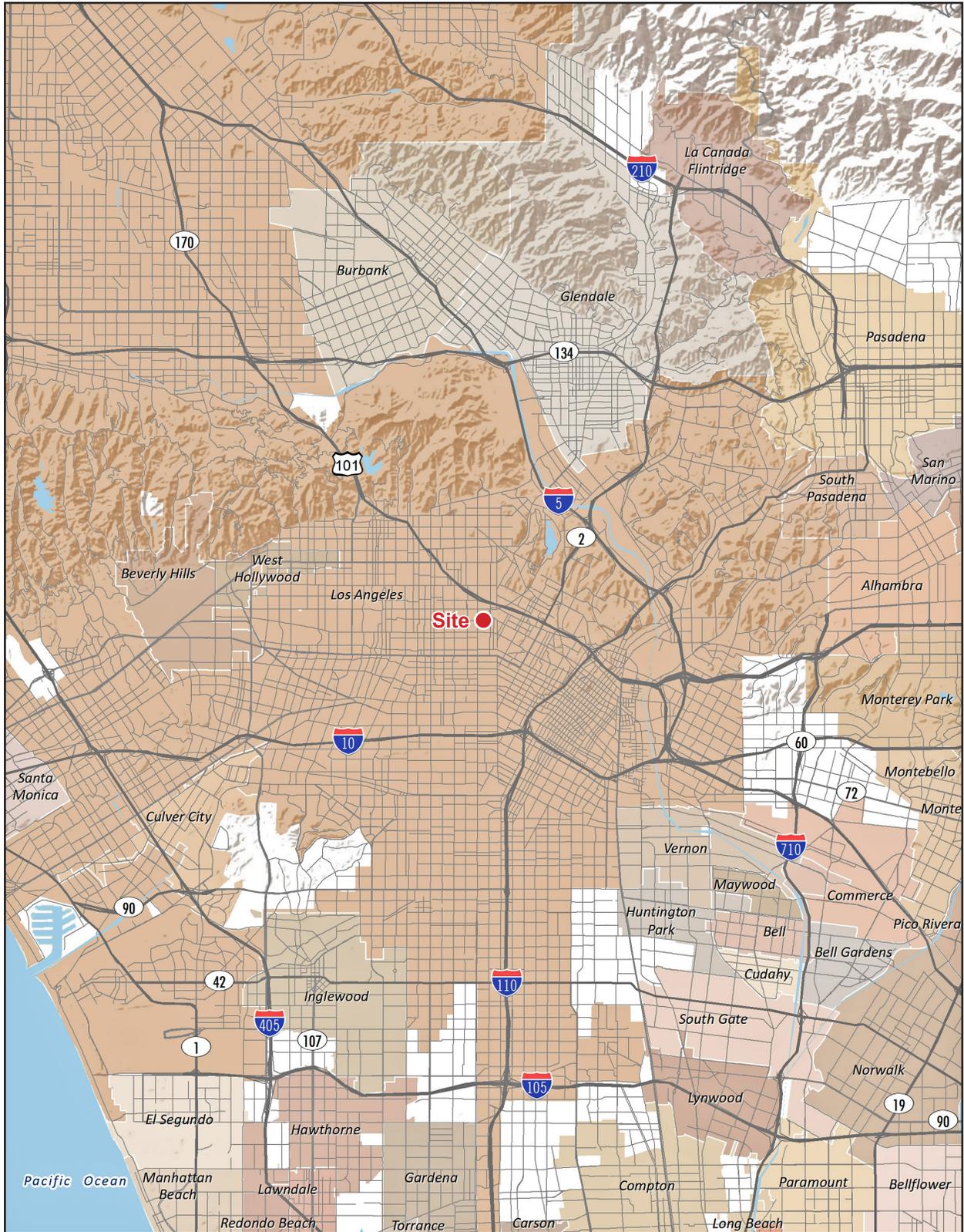
Project site is within the Vermont/Western Transit Oriented District Specific Plan in both Subarea A: Neighborhood Conversion and Subarea B: Mixed Use Boulevards.²³ Subarea A is designated to maintain the current prevailing scale and character of the subarea and to improve the pedestrian environment and permits a schools on any lot or lots, provided that the building site for those uses has no more than 2 acres (Section 7.C). Subarea B is located mostly around subway stations and allows live-work and low-impact manufacturing workshops; school is an allowed use.

²² City of Los Angeles zoning. <http://zimas.lacity.org/>

²³ City of Los Angeles, Department of City Planning. Vermont/Western Transit Oriented District Specific Plan. (Vermont/Western Station Neighborhood Area Plan Ordinance No. 173749)
<https://planning.lacity.org/complan/specplan/pdf/VermontWesternTOD.pdf>



Figure 1 - Regional Location
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



Source: ESRI, 2018

2. Environmental Setting

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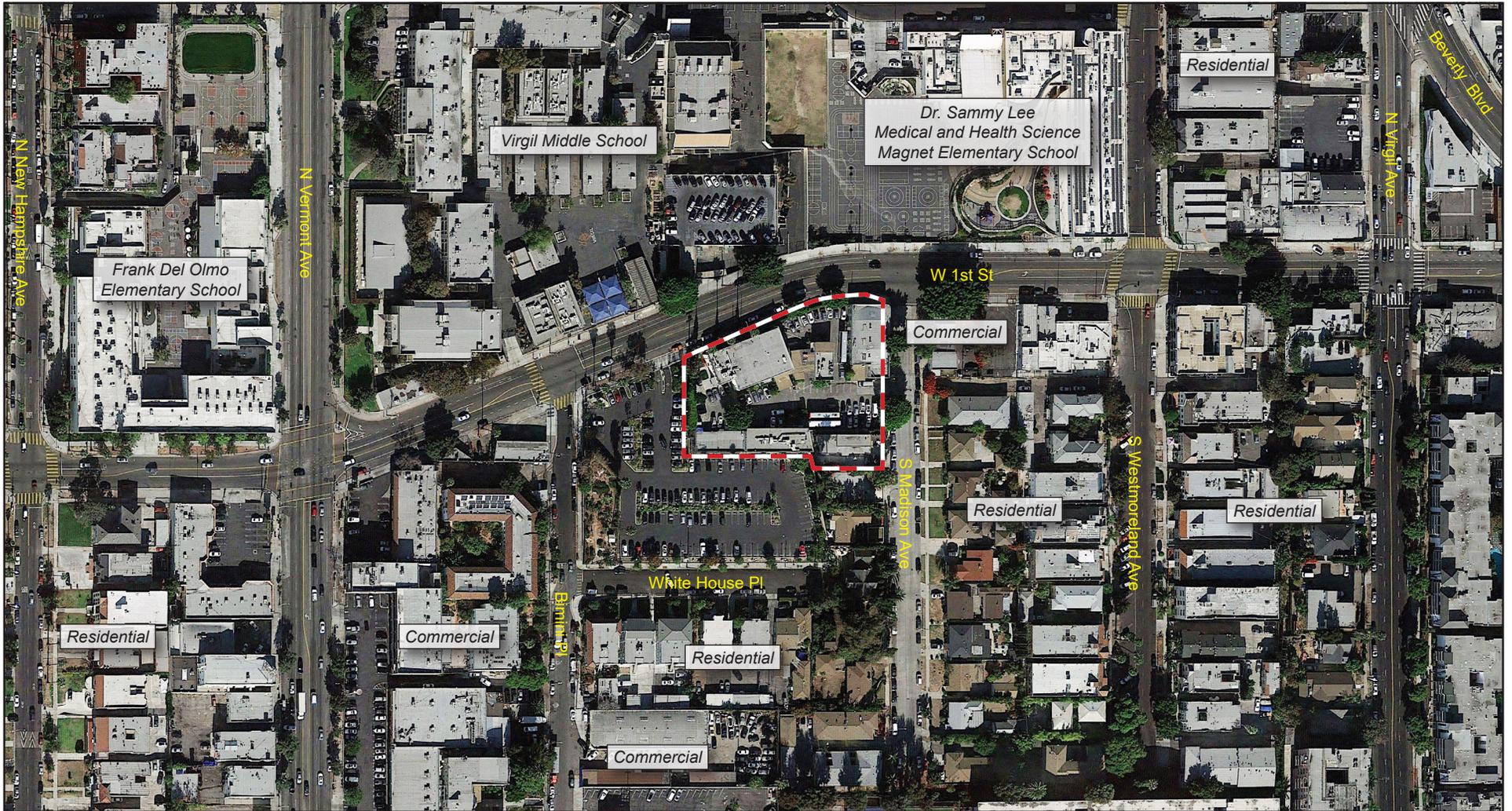


2. Environmental Setting

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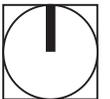


Figure 3 - Aerial Photograph
2. Environmental Setting



--- Project Boundary

0 200
Scale (Feet)



Source: Google Earth Pro, 2018

2. Environmental Setting

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Figure 4a - Site Photographs
2. Environmental Setting



Photo 1. View looking south along Madison Avenue from project site.



Photo 2. View looking west toward project site from Madison Avenue.

2. Environmental Setting

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Figure 4b - Site Photographs
2. Environmental Setting

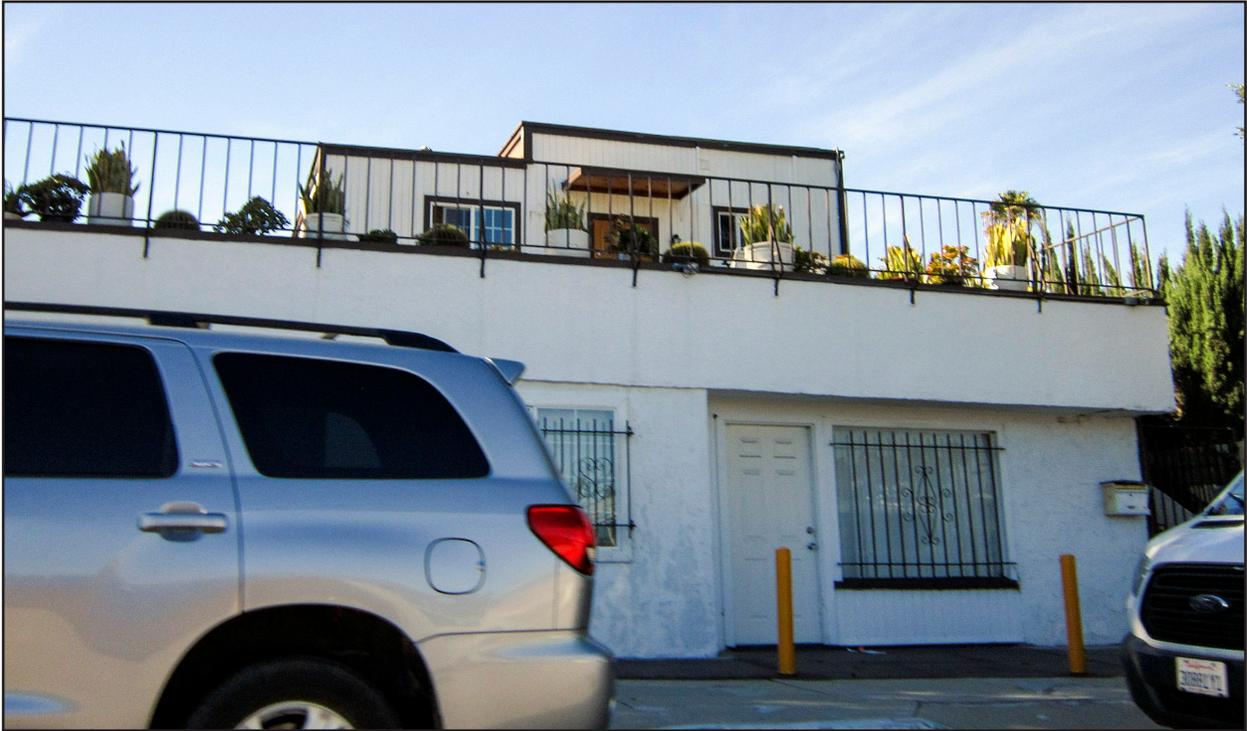


Photo 3. View looking west toward on-site residential building from Madison Avenue.



Photo 4. View looking west toward overgrown ficus tree adjacent to project site on Madison Avenue.

2. Environmental Setting

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Figure 4c - Site Photographs
2. Environmental Setting



Photo 5. View looking west along 1st Street from Madison Avenue intersection (project site on left side).



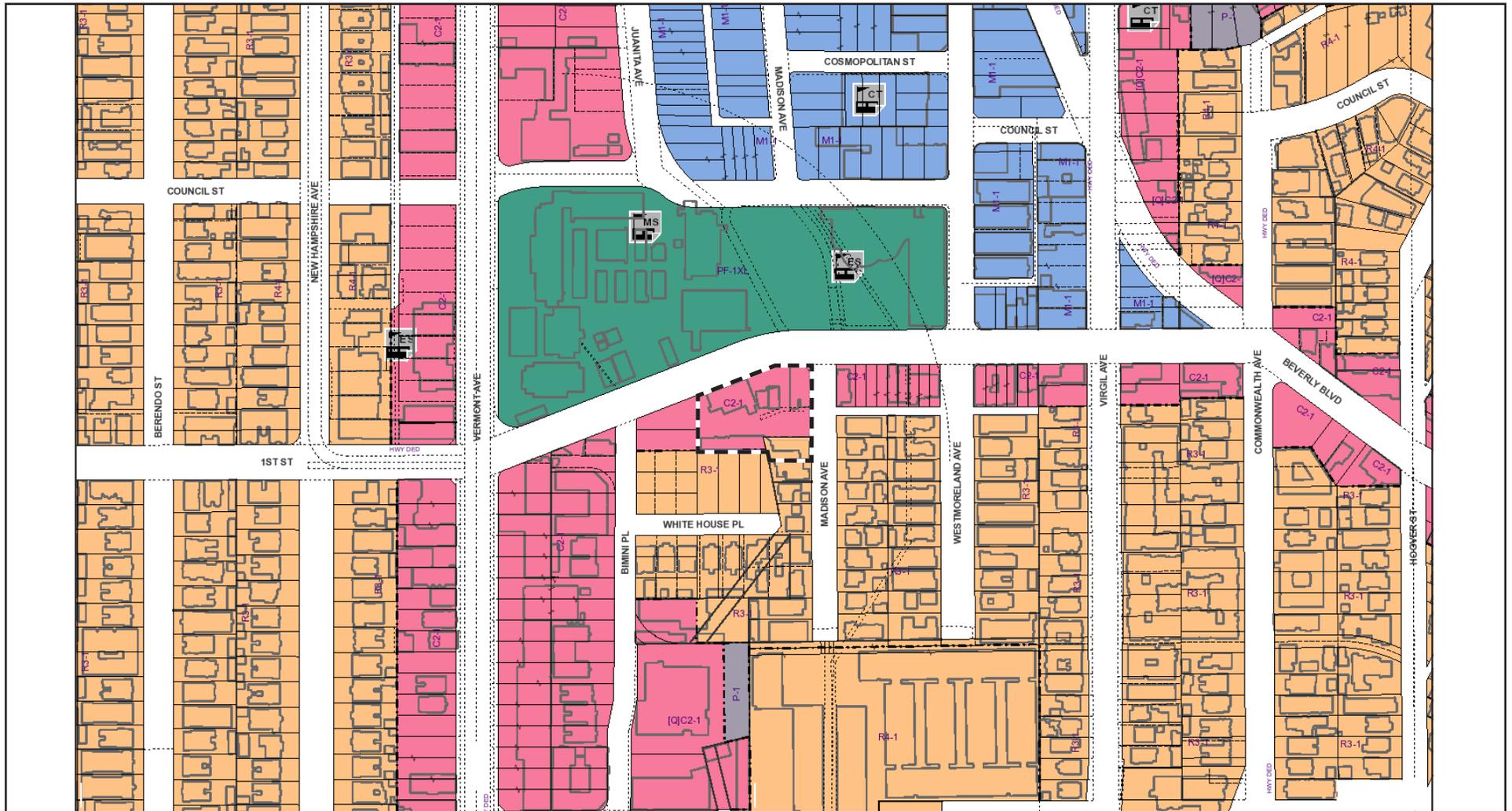
Photo 6. View looking south toward project site from 1st Street.

2. Environmental Setting

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Figure 5 - Zoning Designations
2. Environmental Setting



--- Project Boundary	Commercial	Public Facilities	Parking
Residential	Light Manufacturing	0 400 Scale (Feet)	



2. Environmental Setting

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3. Project Description

3.1 PROPOSED PROJECT

The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District for the construction and operation of a charter school (Rise Kohyang High School; proposed Project) on a 1.15-acre site at the corner of West 1st Street and South Madison Avenue in the City of Los Angeles. The 10 addresses associated with the site are: 3500, 3468, 3478 3474, 3470, 3464, 3506, and 3510 West 1st Street, and 119 and 115 South Madison Avenue.

Bright Star Schools is in the process of seeking an Augmentation Grant for this Project which, if approved by the Board of Education, would fund a portion of the proposed Project costs. Under the current Augmentation Grant Program guidelines, applicants are required, among other things, to contribute a minimum of 50 percent of the total Project cost from non-District sources. Applicants are also required to provide the District with fee-interest in the property, hold a valid charter, be in good standing, and agree to waive Proposition 39 rights to facilities. District staff reviews the applications, and if the minimum score (70 points) is achieved, the proposal is forwarded to the Bond Citizens' Oversight Committee (BOC) for consideration and the Board of Education for approval. Once the Board of Education approves a charter Augmentation Grant, funding will be provided to the charter upon proof that all other non-District funding has been received and/or committed. This practice helps ensure funds are leveraged more effectively and that projects can be successfully completed. If the proposed Project is approved, agreements between the District, Bright Star Schools, and the State would be executed to provide for the ownership of the property to be transferred to the District. The agreement would also permit Bright Star Schools to use the facility and would help to repay the Bond funding loan obligation over 30 years. If Bright Star Schools is unable to continue operating at the site, the District would take over use of the site.

3.1.1 Facilities

The new charter high school would have a capacity of 600 students in grades 9-12 and would consist of a two-story 76,390-square-foot building with semi-subterranean parking (see Figure 6a, *Conceptual Site Plan (Ground Floor)*, Figure 6b, *Conceptual Site Plan (Second Floor)*, Figure 6c, *Conceptual Site Plan (Parking Garage)*, Figures 7a and 7b, *Building Elevation Illustrations*). Project building components would include the following:

- Staff space (reception/clerical/administration/teacher offices, meeting rooms)
- Restrooms
- Support space (custodial, storage, electrical/telecommunications rooms)
- 24 classrooms
- Multipurpose room and servery (kitchen space without food preparation)
- Gymnasium

3. Project Description

3.1.2 Open Space and Landscaping

The campus would also have an approximately 11,247-square-foot area for outside student activities (athletics, lunch, outdoor learning, and informal activities) and an emergency assembly area for staff and students. The open space area would have lighting for school use during winter when the sun sets early. Additionally, the lighted open space area would be used occasionally for special events. Exterior safety and security lighting would be provided on exterior walls of buildings, building entrances, and where required to illuminate exterior areas and campus access points.

Existing palm trees along 1st Street may be retained. Due to the pedestrian hazards from uneven sidewalks caused by tree roots, the poor conditions of the trees, and very narrow sidewalks, the ficus trees along 1st Street and Madison Avenue would likely require removal; however, the removal decision would be made during final site design and if feasible the trees would be retained. Additionally, one dead tree on 1st Street and all the trees on the Project site would be removed. Landscaping would consist of drought-tolerant plants and a water-efficient irrigation system.

3.1.3 Site Access and Circulation

The parking garage would have a designated onsite drop-off/pick-up area and queuing lane. The drop-off/pick-up zone would permit student unloading and loading directly from the passenger side without obstructing the circulation lane. Students and staff would access the campus from the semi-subterranean parking garage via stairway or elevator.

School warning signs and safety devices are already present on the surrounding streets in compliance with State standards.²⁴ Signs would also be posted to prohibit parking along the Madison Avenue school frontage. School staff attendants would provide parking management and traffic guidance during drop-off and pick-up times to ensure efficiency and safety as students get in and out of cars.

All off-site road work, including the widened sidewalk along the north and east frontages, would be constructed according to City of Los Angeles (City) and LAUSD standards.

The proposed building design and placement creates a perimeter that is secure and avoids the need for extensive fencing along the street frontages. The building would be 15 feet or more from the property line to allow emergency access behind the building on the south.

Guests at the main gate along 1st Street (north side) would be required to complete a check-in procedure at the administrative office before entering the school campus. There would also be emergency access doors on the east and south sides.

²⁴ California Manual on Uniform Traffic Control Devices (CA MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of California Vehicle Code (CVC) Section 21400. Part 7 of the CA MUTCD has standards for traffic control, warning signs and markings for school areas. Part 7: Traffic Control for School Area. <http://mutcd.fhwa.dot.gov/pdfs/2009/part7.pdf>.



3. Project Description

Because this is a charter school, there are no defined attendance boundaries, and students would come from a broad area. The charter school would not provide student busing; however, buses may be used periodically for field trips.

3.1.4 Parking

The proposed Project would provide 62 parking spaces for staff in a one-level semi-subterranean lot under the building. Parking would consist of two bays with one-way, counterclockwise traffic-flow drive aisles. Ingress and egress for the parking garage would be from a gated driveway on Madison Avenue. The gate would be closed except during drop-off and pick-up hours; staff would gain access to the parking garage by using a keycard or intercom system. The garage would have a sensor-based vehicle exit system that automatically opens when triggered from the inside.

The student drop-off and pick-up zone would be on the north side of the parking garage. After drop-off, students would proceed up a stairway or elevator to the podium level. The exit would be a controlled point that passes through the administration office where students would emerge onto a large open multipurpose space. To avoid pedestrian-vehicle conflicts, student drop-off would occur after staff arrives, and pick-up would be before staff leaves. To facilitate drop-off and pick-up circulation and safety, attendants would direct vehicle and student movement.

Based on LAUSD standards for parking ratios, the new school should provide 2.25 parking spaces for every classroom, for a total of 54. The approximately 28,000-square-foot parking garage would provide 62 parking spaces, including 4 Americans with Disabilities Act (ADA) compliant spaces. Spaces for 100 bicycles would also be provided. No school time guest parking would be provided on campus; guests would park curbside.

The parking garage would be open and available for guest parking during evening events. A parking attendant would be stationed in the garage to assist guests with navigation to the school campus and to ensure circulation flow, safety, and security.

3.1.5 Operation

Student Transfers. Rise Kohyang High School is currently operating in classroom space on the first and second floors of a building at 600 S La Fayette Park Place, which is located about 1.2 miles southeast of the proposed Project site. The existing school has 16 classrooms, a multi-purpose room, and several office spaces and serves about 287 students in grades 9-11. When the new school is completed, students would transfer to the new location and vacate the space at 600 S La Fayette Park Place; this space would be used by the high school's feeder school, Rise Kohyang Middle School, which is currently operating in a facility located approximately 0.4 mile away from the proposed Project site. The proposed new school campus would have a maximum capacity of 600 students and up to 75 staff (35 full-time and 40 part-time).²⁵ Because of the transfer of students from the existing charter school, the net increase would be a maximum of 313 students.

Traditional School. The school would operate on a traditional two-semester academic calendar, with students in session from August through June. School hours would be 8:05 AM to 3:18 PM, and some teachers and

²⁵ Part-time staff work in shifts and arrive and depart at different times.

3. Project Description

students may be on campus after school hours. The new high school operation hours would avoid the start and end times at the six other schools within a 0.25-mile radius: Virgil Middle School, Dr. Sammy Lee Medical and Health Sciences Magnet Elementary School, Frank Del Olmo Elementary School, Central City Value High School, Soledad Enrichment Action Charter High School, and Commonwealth Avenue Elementary School.

School-Related Events. The school may have after-school programs for the students, such as special-interest clubs, and extracurricular activities that may end later than 3:20 PM. There may also be occasional nighttime and weekend events during the school year. If the main play yard is used during the evening, temporary portable lights may be provided for the event. Lights would not be used in areas adjacent to residential buildings. Some of these events would be campus-wide, such as school plays and open houses, while others would be grade specific, such as commencement.

Community Use. In compliance with the Civic Center Act,²⁶ the campus would be available for community use at selected times when not in use by BSS or LAUSD.

3.1.6 Construction

Construction is planned to start 3rd quarter (Q3) 2020 (actual commencement of Project construction is dependent on funding) and be completed by Q3-2022 (approximately 24 months). The start of classes is planned for August 2022. Construction activities would include building and asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping.

- **Demolition.** The 18,740-square-foot Good News Central Church (6 buildings) and the residential building would be demolished and cleared.
- **Site Grading.** Rough grading. Fine grading would follow excavation and trenching.
- **Excavation.** Excavation to a depth of approximately 15 feet for the semi-subterranean parking garage would require excavation of about 9,600 cubic yards of soil (8,700 CY exported and 900 CY recompacted on the site). Additionally about 910 CY of fill material would be imported to the site. Any soil that is exported or imported must be chemically tested in accordance with specific written procedures, as outlined in LAUSD Specifications Section 01 4524, “Environmental Import/Export Materials Testing.”²⁷ This section specifies the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. On-site concrete and asphalt crushing would occur on a portion of the site farthest from the adjacent residential development. Debris and soil would be exported to landfill facilities in either Arcadia or Irwindale.
- **Utility Trenching.** Utility trenches would be excavated, and utility pipes and cables would be laid in trenches and connected.

²⁶ CA Education Code Sections 38130–38139.

²⁷ LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing. October 1, 2011.



3. Project Description

- Construction. Building and underground parking garage construction.
- Architectural Coating. Painting the new building.
- Asphalt. Paving and off-site street work.
- Finishing and Landscaping. Finishing and new drought-tolerant landscaping.

Construction laydown/material staging would be on site as far from residences as possible. A Construction Worksite Traffic Control Plan would be prepared and implemented by the construction contractor. Off street parking for construction worker vehicles would be provided on site; workers would not park on residential streets. The plan would identify haul routes, hours of construction, protective devices, warning signs, and access. Construction noticing would be provided to the residential neighbors. Following Project construction, the site would have about the same amount of impermeable surfaces (buildings, driveway, and walkways) as the existing site.

3.2 AGENCY REVIEWS AND APPROVALS

It is anticipated that the reviewing agencies for the proposed Project would include, but may not be limited to, the following:

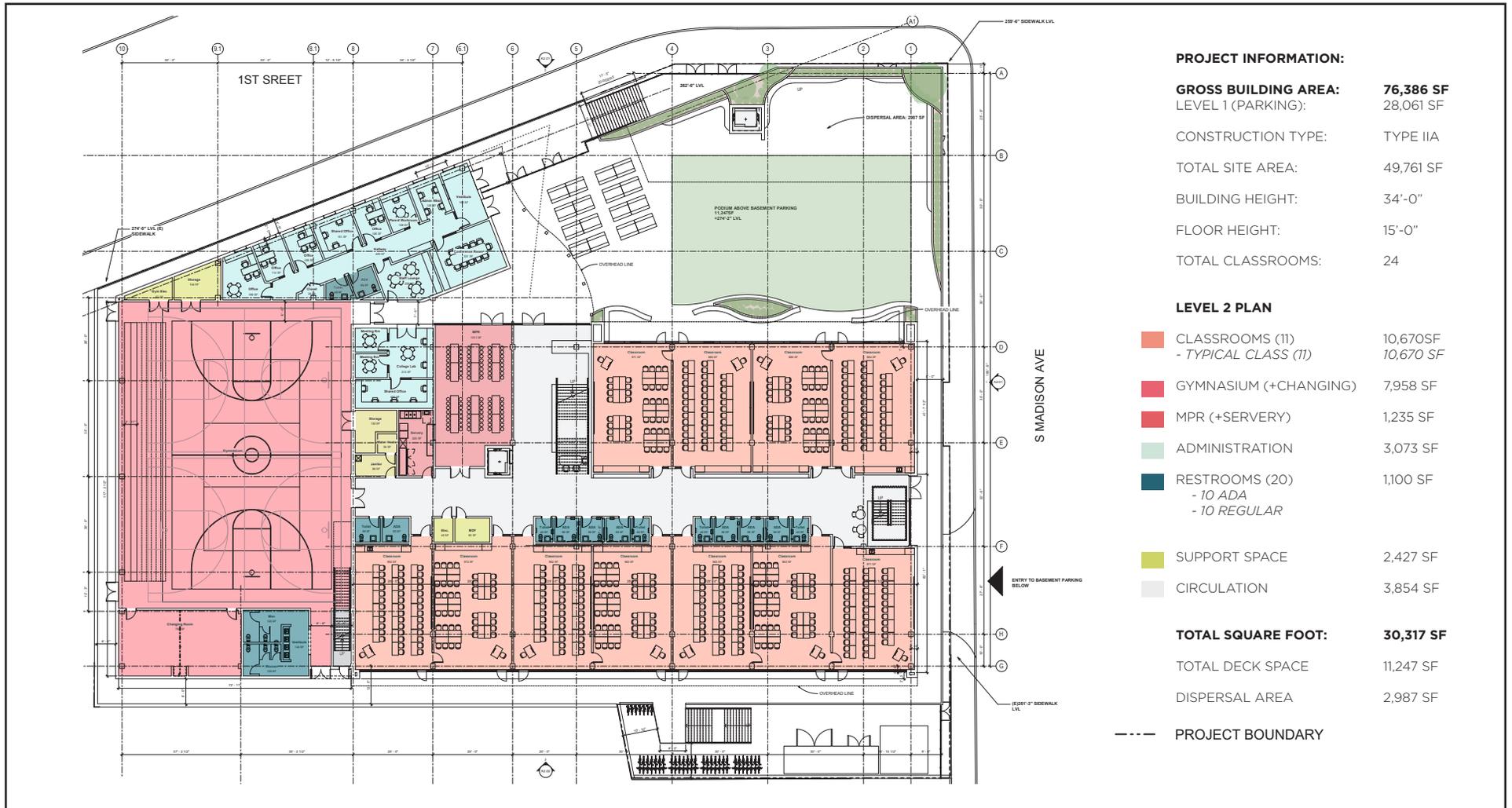
- **City of Los Angeles, Public Works Department.** Permit for curb, gutter, and other offsite improvements.
- **City of Los Angeles, Fire Department.** Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a project requires local fire authority (LFA) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
- **City of Los Angeles, Department of Transportation.** Approval of construction-related haul route.
- **California Department of General Services, Division of State Architect.** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division.** Because BSS is requesting new construction funds from the State Allocation Board, the plans must be reviewed and approved by the CDE (Education Code Section 17070.50) before BSS can submit a funding request.
- **California Department of Transportation.** Transportation permit for oversized vehicles on State highways.
- **State Water Resources Control Board.** Review of Notice of Intent to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan.

3. Project Description

- **Los Angeles Regional Water Quality Control Board.** Issue National Pollution Discharge Elimination System permit; Clean Water Act Section 401 Water Quality Certification.
- **South Coast Air Quality Management District.** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Asbestos Emissions from Demolition/Renovation Activities; Rule 201, Permit to Construct; Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific soil mitigation plan; and site monitoring.



Figure 6a - Conceptual Site Plan (Ground Floor)
3. Project Description



PROJECT INFORMATION:

GROSS BUILDING AREA:	76,386 SF
LEVEL 1 (PARKING):	28,061 SF
CONSTRUCTION TYPE:	TYPE IIA
TOTAL SITE AREA:	49,761 SF
BUILDING HEIGHT:	34'-0"
FLOOR HEIGHT:	15'-0"
TOTAL CLASSROOMS:	24

LEVEL 2 PLAN

■ CLASSROOMS (11) - TYPICAL CLASS (11)	10,670SF 10,670 SF
■ GYMNASIUM (+CHANGING)	7,958 SF
■ MPR (+SERVERY)	1,235 SF
■ ADMINISTRATION	3,073 SF
■ RESTROOMS (20) - 10 ADA - 10 REGULAR	1,100 SF
■ SUPPORT SPACE	2,427 SF
■ CIRCULATION	3,854 SF

TOTAL SQUARE FOOT:

TOTAL SQUARE FOOT:	30,317 SF
TOTAL DECK SPACE	11,247 SF
DISPERSAL AREA	2,987 SF
--- PROJECT BOUNDARY	



3. Project Description

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Figure 6b - Conceptual Site Plan (Second Floor)
3. Project Description



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Scale (Feet)

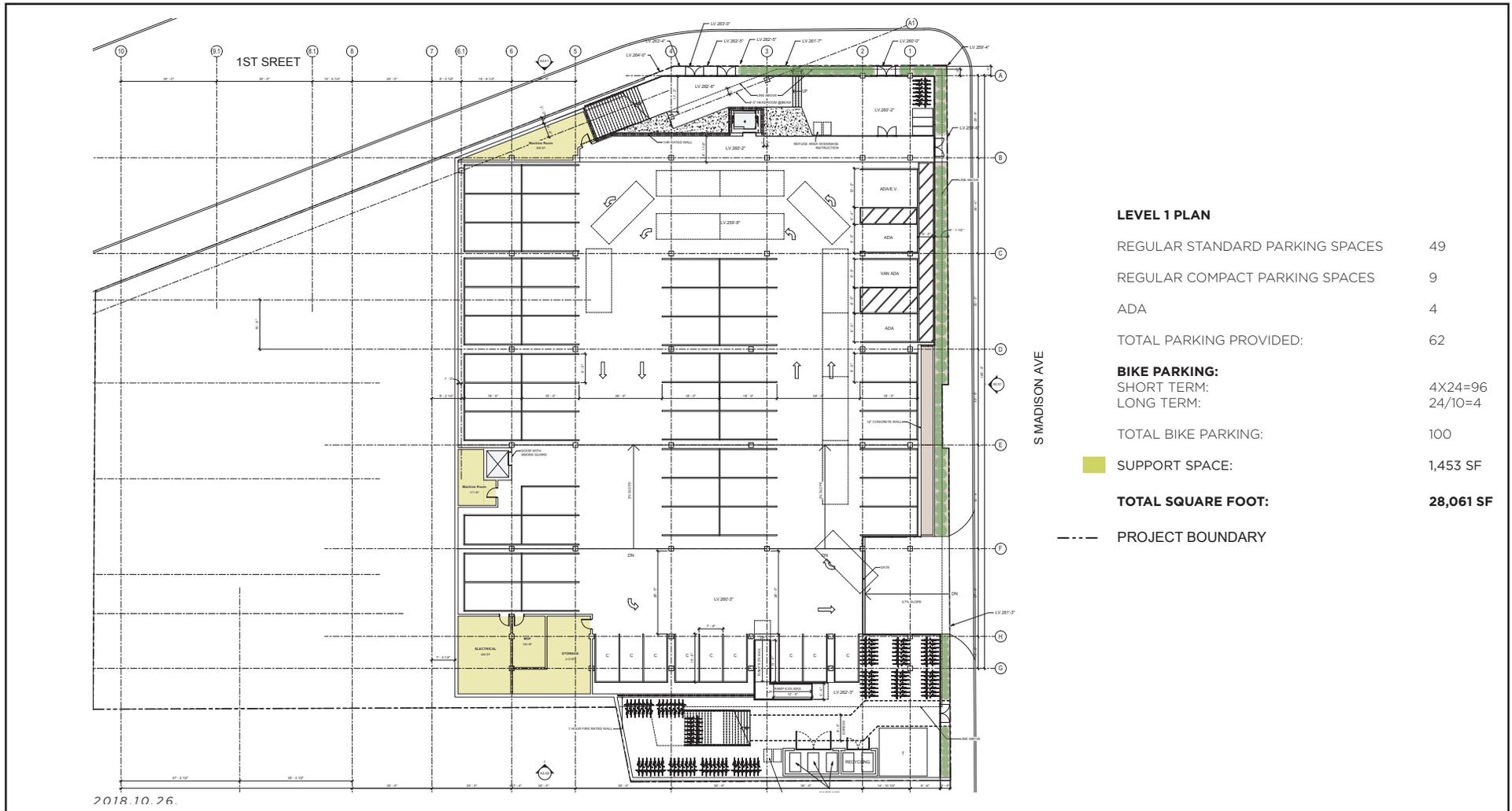


3. Project Description

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Figure 6c - Conceptual Site Plan (Parking Garage)
3. Project Description



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Scale (Feet)



3. Project Description

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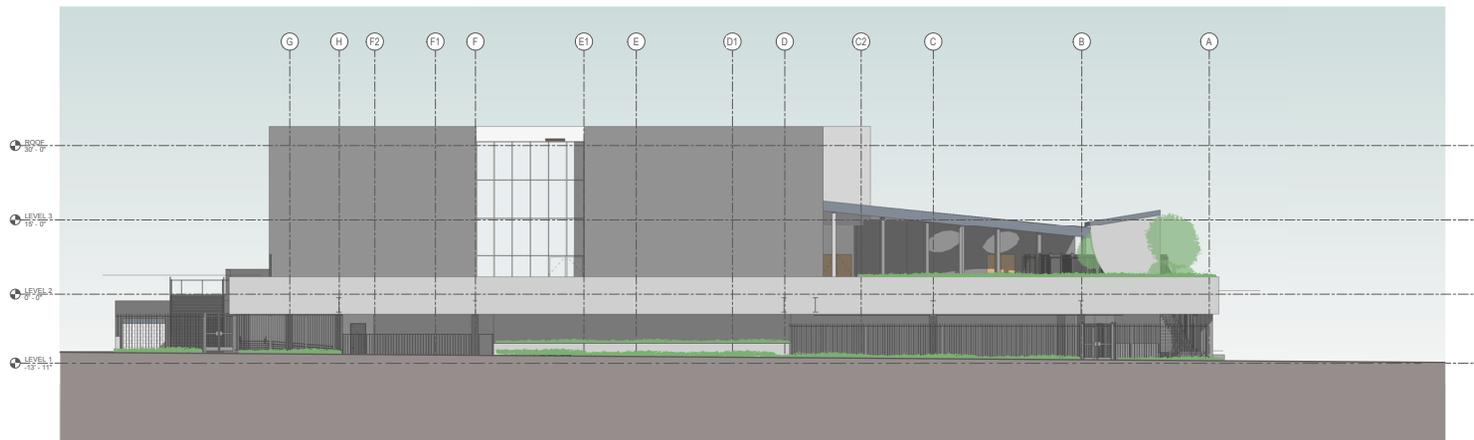


Figure 7a - Building Elevation Illustrations
3. Project Description

North Elevation



East Elevation



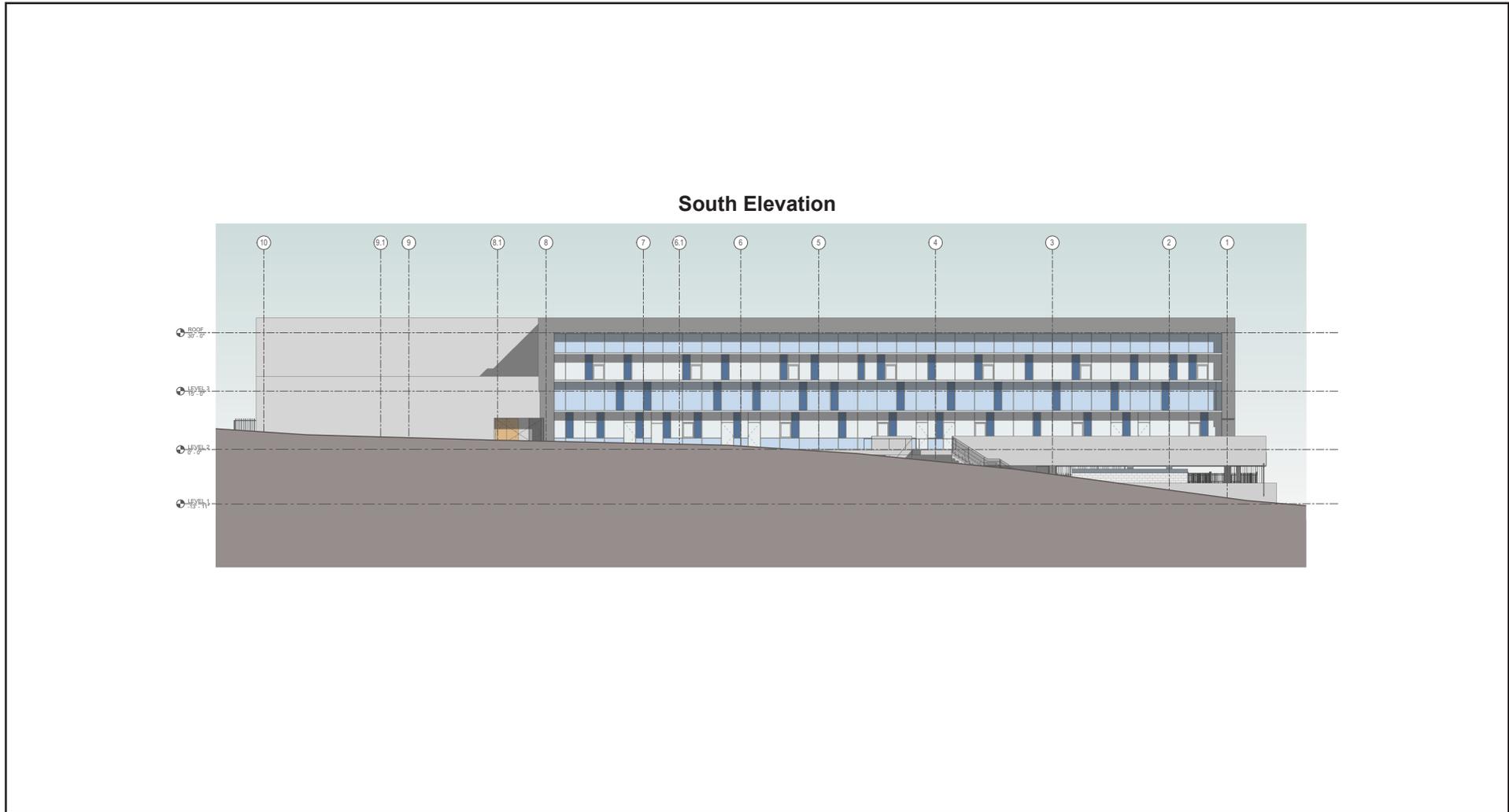
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Scale (Feet)

3. Project Description

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Figure 7b - Building Elevation Illustrations
3. Project Description



0 45
Scale (Feet)

3. Project Description

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4. Environmental Checklist and Analysis

4.1 PROJECT INFORMATION

1. **Project Title:** Rise Kohyang High School

2. **Lead Agency Name and Address:**

Los Angeles Unified School District, Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

3. **Contact Person and Phone Number:**

Eimon Smith, CEQA Project Manager
(213) 241-3417

4. **Project Location:**

The Project site is in the City of Los Angeles (west of downtown); in the Koreatown Neighborhood, at 3500, 3468, 3478 3474, 3470, 3464, 3506, and 3510 West 1st Street, and 119 and 115 South Madison Avenue (APNs 5501-014-004, -021, -022, -023, -024, -025).

5. **Project Sponsor's Name and Address:**

Bright Star Schools
600 S. La Fayette Park Place, Los Angeles, CA 90057
Contact: Elijah Sugay, Vice President, Finance & Facilities

6. **General Plan Designation:** General Commercial and Medium Residential

7. **Zoning:** C2-1(Commercial) and R3-1 (Multi-family Residential)

8. **Description of Project:**

The Project is a new charter high school with a capacity for 600 students in grades 9-12, and 75 full and part-time teachers and staff. The campus would include an approximately 76,390-square-foot, two-story building with staff space (reception/clerical/administration/teacher offices, meeting rooms), restrooms, support space (custodial, storage, electrical/telecommunications rooms), 24 classrooms, multipurpose room and servery, gymnasium, and semi-subterranean parking garage.

9. **Surrounding Land Uses and Setting:**

The Project site is bounded by 1st Street and schools to the north; Madison Avenue, commercial and single-family residences to the east; a surface parking to the west; and surface parking lot and residential to the south.

4. Environmental Checklist and Analysis

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement:

- City of Los Angeles: Public Works Department, Fire Department, Department of Transportation
- Los Angeles Unified School District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. No Native American Tribes have requested consultation with LAUSD, pursuant to Public Resources Code Section 21080.3.1. LAUSD Office of Health and Safety sent Project notification to Fernandeno Tataviam Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleno Band of Mission Indians – Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe (2 separate contacts). No Tribe has requested consultation on this Project. However, as a result of the consultations with Native American Tribal representatives on other LAUSD projects, new Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources were adopted by the LAUSD Board of Education.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) has provisions specific to confidentiality.



4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hydrology & Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities & Service Systems |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology & Soils | <input checked="" type="checkbox"/> Pedestrian Safety | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Population & Housing | |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |
| | <input type="checkbox"/> None | <input checked="" type="checkbox"/> None with Mitigation Incorporated |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Carlos A. Torres

Printed Name

Date

4/12/19

CEQA Officer for LAUSD

Title

4. Environmental Checklist and Analysis

4.2 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.



4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers) would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to light and glare. Applicable SCs related to light and glare impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval

SC-AE-4	<p>LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.</p> <p>Marquee Signs Bulletin BUL 5004.1</p> <p>This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.</p>
SC-AE-6	<p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

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a) Have a substantial adverse effect on a scenic vista?

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.²⁸

The Project site and surrounding area lack significant topography and are developed with urban land uses. The Project site is developed with one- and two-story buildings and surface parking. Although the Project would redevelop the property with a new larger building the overall height would be similar to existing buildings. There are no protected or designated scenic vistas or views in the Project vicinity, and the Project would not obscure any scenic vistas. Therefore, no impact would occur and no further analysis is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are two officially designated State scenic highways in Los Angeles County: State Route 2 (SR-2, the Angeles Crest Highway, part of the Angeles Crest Scenic Byway) from near La Canada-Flintridge north to the San Bernardino County line approximately 10 miles north, and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 17 miles east of the Project site. The Arroyo Seco Historic Parkway is about 2 miles east. The new school would not be visible from SR-2 or the Parkway. Additionally, the Project site is not visible from any Eligible State Scenic Highways, County Scenic Highways,²⁹ or City-designated Scenic Highways.³⁰ Project development would not result in impacts to scenic resources within a designated State scenic highway. Therefore, no impact would occur and no further analysis is required.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project site is in a fully developed area and surrounded by adjacent residential, commercial, recreational, and institutional uses and qualifies as an ‘urbanized area’.³¹ The site is zoned C2-1 (Commercial) and R3-1 (Multi-family Residential). The Project includes demolition of one- and two-story buildings and construction of a two-story building, along with other site improvements. The Project would not conflict with

²⁸ City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.

<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

²⁹ California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

³⁰ City of Los Angeles. 1998. General Plan Transportation Element, Scenic Highways Map.

http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif

³¹ PRC § 21071/CEQA Guidelines § 15191(m)(1) for an incorporated city “Urbanized area” means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Los Angeles has a population of about 3,999,759 [U.S. Census Bureau. QuickFacts. July 1, 2017 estimates. <https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,losangelescountycalifornia,ca/PST045218>



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C2-1 and R3-1 zoning or regulations governing scenic quality. Therefore, impacts to the scenic quality would be less than significant and no further analysis is required.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The two major causes of light pollution in this setting are spill light and glare. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. The Project site is fully developed and in an urban setting. The existing church generates nighttime light from security and parking lot lights and building lights (interior and exterior). Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and building lights.

The Project would not significantly increase nighttime lighting in the neighborhood. The new campus would have nighttime lights for the safety of people and the security of property. The building would not include any high-intensity lighting such as is used for athletic fields or nighttime sports activity. Security and path lights would be directional and would not spill light to nearby residential properties to the south and east. The parking lot would be partially underground and its lights would be concealed.

Additionally, the exterior of the new building would be constructed of nonreflective building materials. Compliance with SC-AE-4 for the design of marquee signs and SC-AE-6 that would control unwanted light is required. The Project would not introduce lights at substantially greater intensities than existing lights near the site, and the Project would have no impact on nighttime views. Light and glare impacts would be less than significant and no further analysis is required.

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

Explanation:

There are no agriculture and forestry resources LAUSD SCs.

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

No Impact. The Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the Project site; therefore, no Project-related farmland conversion would occur. The



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campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.^{32,33} No impact would occur and no further analysis is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is C2-1 (General Commercial) and R3-1 (Multiple Dwelling).³⁴ The site is not zoned for agricultural use, and Project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite.³⁵ No impact would occur and no further analysis is required.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”³⁶ Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”³⁷ The Project site is zoned for commercial and residential uses and is not zoned for forest land or timberland use.³⁸ No impact would occur and no further analysis is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Construction of the Project would not result in the loss or conversion of forest land. No vegetation onsite is cultivated for forest resources. Vegetation is limited to ornamental trees and shrubs, and no forest land would be affected by the Project. No impact would occur and no further analysis is required.

³² Division of Land Resource Protection (DLRP). California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>.

³³ Most of urbanized Los Angeles County, including the project site, is not mapped on the California Important Farmland Finder due to a lack of farmland.

³⁴ City of Los Angeles. Zoning Map. <http://zimas.lacity.org/>.

³⁵ California Department of Conservation, Division of Land Resources Protection. 2016. Los Angeles County Williamson Act FY 2015/2016. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.

³⁶ California PRC Section 12220(g).

³⁷ California PRC Section 4526.

³⁸ City of Los Angeles. Zoning Map. <http://zimas.lacity.org/>.

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

No Impact. There is no mapped important farmland or forest land on or near the Project site, and Project development would not indirectly cause conversion of such land to non-agricultural or non-forest use. No impact would occur and no further analysis is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Are significance criteria established by the applicable air district available to rely on for significance determinations? Yes No

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard ? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Air quality regulatory setting, meteorological conditions, existing ambient air quality in the project vicinity, and air quality modeling are included as Appendix A to this Initial Study.

Explanation:

LAUSD has SCs for minimizing impacts to air quality. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: <ul style="list-style-type: none"> • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping.



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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds. Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.

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LAUSD Standard Conditions of Approval

- Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- Pave all unimproved construction access roads for at least 100 feet from the main road to the project site.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
- Limit traffic speeds on unpaved roads to 15 mph or less.
- Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

- Use ultra-low VOC or zero-VOC surface coatings.
- Phase construction activities to minimize maximum daily emissions.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).
- Prepare and implement a trip reduction plan for construction employees.
- Implement a shuttle service to and from retail services and food establishments during lunch hours.
- Increase distance between emission sources to reduce near-field emission impacts.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are: ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or non-attainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated non-attainment for O₃, and PM_{2.5} under the California and National AAQS, non-attainment for PM₁₀ under the California AAQS, and non-attainment for lead (Los Angeles County only) under the National AAQS.³⁹

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The most recently adopted comprehensive plan for the SoCAB is the 2016 Air Quality Management Plan (AQMP), adopted on March 3, 2017. Regional growth projections are used by

³⁹ California Air Resources Board (CARB). 2017, December. Area Designations Maps/State and National. <http://www.arb.ca.gov/deg/adm/adm.htm>.



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SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

The Project involves demolishing the Good News Central Church to construct the Rise Kohyang High School. The high school is currently operating at 600 S La Fayette Park Place with 287 students that will transfer to the new location. The new high school would have a student capacity of 600 students. Although there will be an increase in students in the local area, the students are currently attending school at the existing Bright Star school about 1.2 miles southeast of the Project site along with other local school; all within the SoCAB. therefore, the new school would not cause an increase in regional growth or a change in the regional growth projections within Los Angeles County. Additionally, as discussed in Section III(b), the net change in operation-phase emissions would be less than the SCAQMD emissions thresholds, and is not considered a substantial source of air pollutant emissions that could affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory and would not conflict with strategies in the AQMP. Impacts would be less than significant and no further analysis is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The SoCAB is currently designated non-attainment for O₃ and PM_{2.5} under the California and National AAQS, non-attainment for PM₁₀ under the California AAQS, and non-attainment for lead under the National AAQS. Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Due to the extent of the SoCAB area and the large number of cumulative project emissions), a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds.⁴⁰

The SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, CO, NO_x, SO_x, PM₁₀, and PM_{2.5}. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes changes in regional impacts from short-term construction activities and long-term operation of the Project.

Short-Term Air Quality

Construction activities would result in the generation of air pollutants. These pollutants would primarily be from: 1) exhaust emissions from off-road diesel-powered construction equipment; 2) dust generated by demolition, earth-moving, and other construction activities; 3) exhaust emissions from on-road vehicles; and 4) off-gas emissions of volatile organic compounds (VOCs) from application of asphalt, paints, and coatings.

Construction activities would occur over 24 months; July 2020 to June 2022. Anticipated activities include building and asphalt demolition, rough and fine grading, excavation, utility trenching, building construction, paving, architectural coating, and finishing and landscaping. Construction emissions were estimated using the

⁴⁰ South Coast Air Quality Management District (SCAQMD). 1993. California Environmental Quality Act Air Quality Handbook.

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California Emissions Estimator Model (CalEEMod), Version 2016.3.2, and based on the Project’s preliminary construction schedule, phasing, and equipment list provided by BSS and CalEEMod; modeling includes the CHPS prerequisites and implementation of SC-AQ-2 through SC-AQ-4. The construction schedule and equipment mix are based on preliminary engineering and subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 1. Maximum daily construction emissions would not exceed SCAQMD’s regional construction significance thresholds. Therefore, air quality impacts from Project-related construction activities would be less than significant and no further analysis is required.

Table 1
Maximum Daily Regional Construction Emissions

Construction Activity	Criteria Air Pollutants (lbs/day) ^{a,b,c}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	1	9	8	<1	1	<1
Asphalt & Concrete Demolition	<1	5	5	<1	<1	<1
Rough Grading + Excavation	1	20	12	<1	1	1
Utility Trenching	<1	2	2	<1	<1	<1
Fine Grading	<1	4	5	<1	<1	<1
Building Construction	1	11	9	<1	1	1
Paving	<1	4	5	<1	<1	<1
Architectural Coating ^d	35	2	2	<1	<1	<1
Finishing/Landscaping	1	5	7	<1	<1	<1
Maximum Daily Emissions	35	20	12	<1	1	1
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.2

Notes: Totals may not equal 100 percent due to rounding.

^a The construction schedule is based on information provided or confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.

^b Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

^c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.

^d Includes compliance with SCAQMD Rule 1113 that requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints.

Long-Term Air Quality

Long-term air pollutant emissions are typically generated by: 1) area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), 2) mobile sources from vehicle trips (e.g., student drop-off and pick-



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up, and staff commute trips), and 3) energy use (natural gas for heating) for new buildings. The new school building would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing church and residential buildings.

The primary source of long-term criteria air pollutant emissions is from mobile sources. The school would add about 869 vehicle trips to the surrounding roadways.⁴¹ The net emissions are shown in Table 2.

Table 2
Net Maximum Daily Regional Operational Phase Emissions

Source	Maximum Daily Emissions (lbs/day) – Winter or Summer					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing Land Use						
Area	<1	<1	<1	<1	<1	<1
Energy ^a	<1	<1	<1	<1	<1	<1
Mobile Sources ^b	<1	<1	3	<1	1	<1
Total Emissions	1	<1	3	<1	1	<1
Proposed Project (Buildout Year 2022)						
Area	1	<1	<1	<1	<1	<1
Energy ^b	<1	<1	<1	<1	<1	<1
Mobile Sources ^c	2	4	34	<1	11	3
Total Emissions	3	4	34	<1	11	3
Net Emissions						
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources ^c	2	3	31	<1	11	3
Total Net Emissions	3	3	31	<1	11	3
SCAQMD Regional Threshold	55	55	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2. Highest winter or summer emissions. Totals may not add up to 100 percent due to rounding.

^a Older existing buildings were modeled using CalEEMod historical energy rates which are based on the 2005 Building Energy Efficiency Standards.

^b New buildings were modeled based on the 2016 Building Energy Efficiency Standards.

^c Transportation emissions based on trip generation rates from traffic study (see Appendix F).

As shown in the table, air pollutant emissions generated from operation-related activities would be less than their respective SCAQMD regional significance threshold values. The Project-related construction and

⁴¹ Based on the ITE Trip Generation Manual 10th Edition. Public school daily trip rates for high school at 1.85 daily trips per student x 600 students = 1,110 – transit reduction and exiting church trips = 869 average daily trips (see Section XVII. TRANSPORTATION AND CIRCULATION).

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operational activities would not result in emissions in excess of SCAQMD’s regional significance thresholds. Therefore, the Project would not result in a cumulatively considerable net increase in criteria pollutants and impacts would be less than significant. No further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The Project could expose sensitive receptors to elevated pollutant concentrations if it causes or contributes significantly to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction

Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the construction site, distance to the nearest sensitive receptor, and Source Receptor Area.⁴² The nearest offsite receptors proximate to the edge of the construction zone, which is defined as the edge of the Project site, are the single-family residential buildings to the east at about 80 feet, and south at about 5 feet. Per LST methodology, any distance within 82 feet has the same screening-level values.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows the Project’s maximum daily construction emissions (pounds per day) generated during construction activities compared with the SCAQMD’s screening-level construction LSTs. As shown, the maximum daily NO_x, CO, PM₁₀, and PM_{2.5} construction emissions generated from onsite construction-related activities would be less than SCAQMD screening-level construction LSTs. Therefore, Project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutants, and localized construction air quality impacts would be less than significant. No further analysis is required.

**Table 3
Localized Construction Emissions**

Construction Activity ^{c,d}	Pollutants (lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Utility Trenching	2	2	<1	<1
Building Construction	9	7	<1	<1
Paving	3	5	<1	<1
Architectural Coating	2	2	<1	<1
SCAQMD ≤1.00-acre LST	74	680	5	3

⁴² Source Receptor Area: Using this meteorological data set, LSTs are developed for each of the 37 source receptor areas (SRAs) within the SCAQMD’s jurisdiction. The school is in SRA 1 – Central Los Angeles County.



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Table 3
Localized Construction Emissions

Construction Activity ^{c,d}	Pollutants (lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Exceeds LST?	No	No	No	No
Demolition	7	8	1	<1
Asphalt & Concrete Demolition	4	5	<1	<1
SCAQMD 1.00-acre LST	74	680	5	3
Exceeds LST?	No	No	No	No
Rough Grading + Excavation	10	9	1	<1
Finishing/Landscaping	5	7	<1	<1
SCAQMD 1.15-acre LST	79	735	5	3
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.

South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/calceemod-guidance.pdf>.

Notes: The LST Methodology uses lookup tables based on site acreage to determine emissions for CEQA purposes. The acreage disturbed is the maximum daily disturbed acreage determined using the equipment mix for the different construction activities for this project.

- ^a The construction schedule is based on information provided or confirmed by BSS. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.
- ^b Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.
- ^c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.
- ^d In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the school in Source Receptor Area (SRA) 1.

Construction Emission Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015 the Office of Environmental Health Hazards Assessment (OEHHA) adopted an updated guidance document for the preparation of health risk assessments.⁴³ OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The Project would be constructed in stages over approximately two years, which would limit the exposure to receptors. Additionally,

⁴³ Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

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construction activities would not exceed the screening-level construction LSTs. Therefore, construction emissions would not pose a threat to receptors at or near the construction site, and Project-related construction health impacts would be less than significant. No further analysis is required.

Operation

Localized Significance Thresholds

Operation of the Project would not generate substantial quantities of emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. The Project does not fall within these uses. Although operation of the Project would result in the use of standard mechanical equipment such as new heating, ventilation, and air conditioning (HVAC) units in the buildings, air pollutant emissions generated from this equipment would be nominal, and less than the existing older units. Table 4 shows localized maximum daily operational emissions from the existing church and the new school. As shown in this table, maximum daily operational emissions would not exceed SCAQMD LSTs. Thus, operational emissions would not exceed the California AAQS, and Project operation would not expose sensitive receptors to substantial pollutant concentrations. Project impacts would be less than significant, and no further analysis is required.

**Table 4
Net Localized Onsite Operational Emissions**

Source	Pollutants (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Existing Land Use				
Area Sources	<1	<1	<1	<1
Proposed Project				
Area Sources	<1	<1	<1	<1
Net Emissions				
Area Sources	<1	<1	<1	<1
SCAQMD LST	79	735	2	1
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.; South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds;>

Note: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the proposed project site are included in the analysis. Operation LSTs are based on sensitive receptors within 82 feet (25 meters) in SRA 1.

Carbon Monoxide Hotspots

The SoCAB has been designated “attainment” for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or



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horizontal mixing is substantially limited—in order to generate a significant CO impact.⁴⁴ The Project would have a net increase of about 594 AM peak hour trips, which is substantially less than 24,000. Thus, the Project would not increase CO hotspots at intersections in the vicinity of the site. Therefore, localized air quality impacts related to mobile-source emissions would be less than significant and no further analysis is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The Project would not result in other emissions, such as odors. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Operation of the new school would not include these or comparable uses and therefore would not create an odor nuisance. Construction of the Project would include emissions from diesel construction equipment and VOCs from architectural coatings and paving activities, which may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial number of people. Therefore, other emissions (such as those leading to odors) would be less than significant, and no further analysis is required.

⁴⁴ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts, but SCAQMD does not.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-BIO-3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates ⁴⁵) should occur outside of nesting season to avoid take of birds, bats, or their eggs. ⁴⁶

⁴⁵ Substrate is the surface on which a plant or animal lives.

⁴⁶ Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.



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LAUSD Standard Conditions of Approval

Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat

- For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).
- If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.
- If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.
- If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.
- If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.
- A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.
- The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager.

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LAUSD Standard Conditions of Approval

- If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.
- The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.
- No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.

Bat Surveys

- Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.
- Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.
- If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.
- Mitigation measures shall be determined on a project-specific basis and may include:
 - Avoidance
 - Humane exclusion prior to demolition
 - Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality
 - Bats should be flushed from trees prior to felling or trimming.
 - Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No Impact. The Project site is fully developed, with most of the site consisting of buildings, asphalt, and concrete. Vegetation onsite is limited to a few ornamental trees and shrubs. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site. No impact would occur and no further analysis is required.

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

No Impact. No locally designated natural communities or riparian habitats exist on or adjacent to the site. The nearest Open Space is the City of Los Angeles' Elysian Park about 2.2 miles east; the nearest Significant



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Ecological Area is Los Angeles County's Griffith Park about 3 miles north.^{47,48} The site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan and is neither within nor proximate to any significant ecological area, land trust, or conservation plan.⁴⁹ No sensitive natural community impact would occur and no further analysis is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The site is fully developed and there are no protected wetlands onsite. The nearest wetland to the site is MacArthur Park Lake, an engineered pond about 1.1 mile southeast.⁵⁰ The Project would not impact any protected wetland areas. No impact would occur and no further analysis is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The Project site is surrounded by fencing and developed with buildings, asphalt, concrete surfaces, and small landscaped areas. The site does not have any native habitat and is not available for overland animal movement as a wildlife corridor. However, scattered trees on and near the site may provide nesting sites for resident or migratory birds. Several trees would be removed as part of the Project demolition phase. Project construction near trees and structures may result in disturbances to birds during nesting season. Migratory nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibits the take of all birds and their active nests, including raptors and other migratory nongame birds.

Bright Star Schools would comply with the California Fish and Game Code and would implement SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting birds. With implementation of these laws, regulations, and the standard condition, impacts to nesting birds would be less than significant and no further analysis is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project site has trees of various species, sizes, and maturity. All vegetation on site would be removed to accommodate the new development. As part of the Project, existing palm trees along 1st Street may be retained. Due to the pedestrian hazards from uneven sidewalks caused by tree roots, the poor conditions

⁴⁷ City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

⁴⁸ Department of Regional Planning (DRP), County of Los Angeles. 2013, December. Significant Ecological Areas and Coastal Resource Areas Policy Map. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf.

⁴⁹ Los Angeles County Department of Regional Planning, Significant Ecological Area Update Study 2000. Figure 1 Significant Ecological Areas Update Study 200 Existing Boundaries. <http://planning.lacounty.gov/sea/faqs>.

⁵⁰ US Fish and Wildlife Service (USFWS). 2012, April 23. National Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>.

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of the trees, and very narrow sidewalks, the ficus trees along 1st Street and Madison Avenue would likely require removal; however, the removal decision would be made during final site design and if feasible the trees would be retained. Additionally, one dead tree on 1st Street would be removed. The Project includes a landscape plan that includes planting of new trees. Trees would be planted at the appropriate size at maturity for the space, and selected from LAUSD's Approved Plant List.⁵¹ Landscaping would consist of drought-tolerant plants and a water-efficient irrigation system.

LAUSD Tree Trimming and Removal Procedure requires completion of a Tree Inventory Report by a qualified arborist that documents trees to be protected (tree species are the same as those found in both County and City of Los Angeles Protected Tree Code).⁵² The procedures also outline requirements for tree trimming or removal during avian breeding and nesting season. The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur and no further analysis is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.⁵³ No impact would occur and no further analysis is required.

⁵¹ LAUSD Approved Plant List. http://www.laschools.org/documents/file?file_id=310944045.

⁵² LAUSD Tree Trimming and Removal Procedure.

<https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD%20Tree%20Trimming%20Removal%20Procedure.pdf>. Southern California native tree species that measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: Oak, including Valley Oak and California Live Oak, or any other tree of the oak genus indigenous to California but excluding the Scrub Oak; Southern California Black Walnut; Western Sycamore; California Bay. Protected Shrubs: Mexican Elderberry and Toyon.

⁵³ California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include:

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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> ○ Extent and duration of the monitoring based on the grading plans ○ At what soil depths monitoring of earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. ● The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

a) **Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency.

Federal. The National Historic Preservation Act of 1966, as amended, defines the criteria to be considered eligible for listing in the National Register of Historic Places (National Register):



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The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history (36 Code of Federal Regulations [CFR] Section part 63).

State. Section 5024.1(c), Title 14 CCR, Section 4852 of the California Public Resources Code defines the criteria to be considered eligible for listing in the California Register of Historical Resources (California Register):

A resource may be listed as an historical resource in the California Register if it meets any of the following [National Register] criteria:

- 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2. Is associated with the lives of persons important in our past;
- 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4. Has yielded, or may be likely to yield, information important in prehistory or history.

Local. Historic-Cultural Monument - Section 22.171.7 of the City Cultural Heritage Ordinance defines a Historic-Cultural Monument (HCM):

For purposes of this article, a Historic-Cultural Monument (HCM) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

- 1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city or community;
- 2. Is associated with the lives of historic personages important to national, state, city, or local history; or

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3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The site was originally developed in the late 1930s with several commercial buildings. By 1950 the site was occupied by a repair shop, a janitorial supply store, a restaurant, an unlabeled store, and a residential dwelling. The single-family residence was built in 1938; the two-story building (now a chapel) was built in 1951; and the one-story building (now a chapel) was built in 1965. The Good News Central Church has owned the property and building since 1998.⁵⁴ The buildings are typical, simple commercial buildings with no unique or exemplary design elements and exhibit standard construction and materials.

The Project site is not listed on the National Register of Historic Places,⁵⁵ as a California Historical Landmark or a California Point of Historical Interest;⁵⁶ or as a City of Los Angeles Historic-Cultural Monument.⁵⁷ The removal of the buildings, parking lot, and landscape would not constitute an adverse environmental impact. Impacts to historic resources would be less than significant and no further analysis is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact. Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resources. The term Unique Archaeological Resources is defined in PRC Section 21083.2(g) as:

... ‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Has information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

⁵⁴ PlaceWorks, Inc. August 2018. Phase I Environmental Site Assessment.

⁵⁵ National Park Service (NPS). 2017, February 8. National Register of Historic Places. <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>.

⁵⁶ Office of Historic Preservation (OHP). 2018, August 13. California Historical Resources. <http://ohp.parks.ca.gov/listedresources/>.

⁵⁷ City of Los Angeles Department of City Planning. 2018, April 3. Historic-Cultural Monument (HCM) List. <https://preservation.lacity.org/sites/default/files/HCMDatabase%23040118.pdf>. Accessed August 13, 2018.



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Prehistoric and historic archaeological resources have been identified in the Hollywood Quadrangle—in which the Project site is located—in the archaeological records search conducted for the City of Los Angeles Citywide General Plan Framework EIR.⁵⁸

The property sits atop bedrock of the Puente Formation. Geologic units encountered during subsurface evaluation comprise undocumented fill overlying sedimentary bedrock. Fill material is associated with previous development. The thickness of fill extends from 1 to 18 feet below ground surface (bgs) and sedimentary bedrock extends from 1 to 21.5 feet bgs.⁵⁹

Soil onsite was previously heavily disturbed by construction of existing and previous development. Project construction would include excavation to a depth of approximately 15 feet for the semi-subterranean parking garage and may yield evidence of archaeological resources. As part of the Project, SC-CUL-7 through SC-CUL-10 require that if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

As part of the archaeological monitoring program required under SC-CUL-7, scheduling details for participation by a Native American monitor, if required, would be included. If archaeological or Native American resources are discovered, SC-CUL-10 would be implemented for handling and recovery. Archaeological impacts would be less than significant and no further analysis is required.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. During construction of the previous development, extensive earthwork (excavation and grading) occurred. Therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

⁵⁸ Fowler Museum of Cultural History, UCLA Institute of Archaeology. 1993, August 17. Archaeological Records Search for the City of Los Angeles. http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_AppC.pdf.

⁵⁹ Twining Consulting. 2018, September 28. Geohazard and Geotechnical Engineering Evaluation Report. Rise Kohyang Charter Project, 3500 W. 1st Street, Los Angeles, California

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Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant and no further analysis is required.



4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to greenhouse gas emissions. Applicable SCs related to energy impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. The Project would result in short-term construction and long-term operational energy consumption.

Short-Term Construction

Development of the Project would include short-term construction activities that would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction activities would be subject to applicable regulations such as anti-idling measures, limits on duration of activities, and the use of alternative fuels, thereby reducing energy consumption. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would otherwise occur elsewhere (restrictions on equipment, labor, types of activities, etc.). The Project would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities.

Long-Term Operation

Operation of the Project would not generate a significant increase in the demand for electricity, natural gas, or transportation energy compared to existing conditions. During operation energy is used for heating, cooling, and ventilation of buildings; water heating; equipment; appliances; and indoor, outdoor, perimeter, and parking lot lighting; security systems. Table 5 shows the annual natural gas and electricity usage for the proposed Project.

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The new building would use a total of 450,515 kilowatt-hours (kWh) of electricity and 502,580 kilo-British Thermal Units (kBtu) of natural gas annually. The new building would replace existing buildings on the site.

**Table 5
Building Energy Use**

	SQFT	T24 Electricity Rate (kWh/SQFT)	Non-T24 Electricity Rate (kWh/SQFT)	Lighting Electricity (kWh/SQFT)	Electricity (kWh/yr)
Electricity					
Enclosed Parking with Elevator	28,060	3.92	0.19	1.75	164,431.60
High School	48,325	1.74	1.59	2.59	286,084.00
TOTAL					450,515.60
Natural Gas					
	SQFT	T24 Natural Gas Rate (kBtu/yr/SQFT)	Non-T24 Natural Gas Rate (kBtu/yr/SQFT)	TOTAL (kBtu/yr)	Natural Gas (kBtu/yr)
Enclosed Parking with Elevator	28,060	0	0	0	0
High School	48,325	9.32	1.08	502580	502580.00
					502,580.00

Source: CalEEMod 2016.3.2.

Notes KBTU: kilo British Thermal Units; kWh: kilowatt-hour

*Rates based on 2016 Title 24 Building Energy Standards and Climate Zone 11.

Other Non-Asphalt Surfaces = 12,000 SQFT

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle to incorporate new energy efficiency technologies.⁶⁰ The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and go into effect for new construction starting January 1, 2020. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements.⁶¹ Under the 2019 standards, nonresidential buildings (which include school buildings) will be 30 percent more energy efficient compared to the 2016 standards.⁶²

⁶⁰ The California Energy Code, part 6 of the California Building Standards Code which is title 24 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings.

⁶¹ California Energy Commission (CEC). 2018. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html.

⁶² California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.



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Also, in compliance with SC-GHG-5 the new building would exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be significantly more energy efficient than the existing buildings on the site.

Because the students that would attend the new charter high school are already attending other local schools, the Project would not result in an increase in motor vehicle transportation energy during operation over what is currently used. The Project would not result in inefficient, wasteful, and unnecessary consumption of energy during construction or operation. No impacts would occur and no further analysis is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Also, in compliance with SC-GHG-5 the new buildings would exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be significantly more energy efficient than the existing buildings on campus. The Project would be reviewed by DSA for compliance with design and construction and energy regulations, and by LAUSD for compliance with standard conditions. The Project would not conflict with state or local plans for renewable energy or energy efficiency. No impacts would occur and no further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based in part on

- “Geohazard and Geotechnical Engineering Evaluation Report,” prepared by Twining Consulting, dated September 28, 2018. A complete copy of this report is included as Appendix C to this Initial Study.
- “Geologic and Environmental Hazards Assessment,” prepared by PlaceWorks, dated August 2018. A complete copy of this report is included as Appendix D to this Initial Study.

Explanation:

LAUSD has SCs for minimizing impacts to geology and soils. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided below:



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LAUSD Standard Conditions of Approval	
SC-GEO-1*	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-HWQ-1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.</p>
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits</p>
CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

*The District has already complied with this Project-related standard condition; see Appendix B and C of this Initial Study.

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other

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substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. There are several known faults in the Los Angeles region. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The site is not within or immediately adjacent to (i.e., within a few hundred feet) of an Alquist-Priolo Earthquake Fault Zone (surface fault rupture only). The nearest fault zone is the Hollywood Fault, approximately 2.5 miles northwest of the site. Fault rupture impacts would be less than significant and no further analysis is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project would not increase exposure of people or structures to earthquake impacts. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region; the nearest mapped faults are the Upper Elysian Park fault system at 1.7 miles northeast and the Santa Monica Fault at 2.3 miles west.⁶³ Moderate to strong ground shaking can be anticipated. Because of the proximity to known faults and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults. However, the site is not on or within 1,500 feet of a known active fault or geologically hazardous area.⁶⁴

The new building would be designed in compliance with the California Building Code guidelines for evaluating and mitigating seismic hazards in California and the California Geological Survey “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.” The proposed Project also requires approval from the California Department of General Services, Division of the State Architect. The DSA provides design and construction oversight for schools and develops and maintains accessibility standards and codes. The Project applicant, with oversight from DSA, would comply with these requirements in the design and construction of the school. Seismic ground shaking impacts would be less than significant and no further analysis is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three

⁶³ Twining Consulting. 2018, September 28. Geohazard and Geotechnical Engineering Evaluation Report. Rise Kohyang Charter Project, 3500 W. 1st Street, Los Angeles, California

⁶⁴ PlaceWorks. 2018, August. Geologic and Environmental Hazards Assessment.



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main factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking.

The property sits atop bedrock of the Puente Formation. Geologic units encountered during subsurface evaluation comprise undocumented fill overlying sedimentary bedrock. Fill material is associated with previous development. The thickness of fill extends from 1 to 18 feet bgs and consists of brown, damp, loose to medium dense, clayey sand and lean clay. Sedimentary bedrock (interbedded siltstone, shale and occasional sandstone) was encountered underlying the artificial fill from 1- to 21.5-foot bgs. The bedrock is generally interlayered orange brown, tan brown and gray, firm to hard, dry to slightly moist, poorly to well bedded, moderately well cemented, and slightly to moderately fractured.

The site is not in a zone of required investigation for liquefaction.⁶⁵ Due to the presence of bedrock at a shallow depth, the site is not susceptible to soil liquefaction. Therefore, the Project would not expose people or the new school buildings to adverse effects from liquefaction. Impacts would be less than significant and no further analysis is required.

iv) Landslides?

No Impact. Landsliding is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

The site and its adjoining properties are relatively flat and exhibit no substantial elevation changes or unusual geographic features. The site is not in a zone of required investigation for earthquake-induced landslides as mapped by the California Geological Survey.⁶⁶ Therefore, the Project would not expose people or the new school buildings to adverse effects from landslides. Impacts would be less than significant and no further analysis is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

Construction Phase

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the Project site; therefore, redevelopment of the site would not result in the loss of topsoil.⁶⁷

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind

⁶⁵ Twining Consulting. 2018, September 28. Geohazard and Geotechnical Engineering Evaluation Report. Rise Kohyang Charter Project, 3500 W. 1st Street, Los Angeles, California

⁶⁶ California Geological Survey. 2014, November 6. Earthquake Zones of Required Investigation Hollywood Quadrangle. http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf

⁶⁷ Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem.

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are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud in roads and tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life. Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 6. The site is 1.15 acres; thus, Project construction would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. This is also required under the LAUSD SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant and no further analysis is required.

**Table 6
Construction BMPs**

Category	Purpose	Examples
Erosion Controls	Consists of using project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season), preventing or reducing erosion potential by diverting or controlling drainage, as well as preparing and stabilizing disturbed soil areas.	Scheduling, preservation of existing vegetation, hydraulic mulch, hydroseeding, soil binders, straw mulch, geotextile and mats, wood mulching, earth dikes and drainage swales, velocity dissipation devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Silt fence, sediment basin, sediment rrap, check dam, fiber rolls, gravel bag berm, street sweeping and vacuuming, sandbag barrier, straw bale barrier, storm drain inlet protection, manufactured linear sediment controls, compost socks and berms, and biofilter bags
Wind Erosion Controls	Consists of applying water or other dust palliatives to prevent or minimize dust nuisance.	Dust control soil binders, chemical dust suppressants, covering stockpiles, permanent vegetation, mulching, watering, temporary gravel construction, synthetic covers, and minimization of disturbed area
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits, and entrance/outlet tire wash.



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**Table 6
Construction BMPs**

Category	Purpose	Examples
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	Water conservation practices, temporary stream crossings, clear water diversions, illicit connection/discharge, potable and irrigation water management, and the proper management of the following operations: paving and grinding, dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing, demolition adjacent to water, material over water, and temporary batch plants.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management, sanitary/septic waste management, liquid waste management, and management of material delivery storage and use.

Source: California Stormwater Quality Association (CASQA). 2012, July. California Construction Best Management Practices Handbook.

Operational Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate SC-HWQ-1, which would be consistent with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works in February 2014.⁶⁸ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID

⁶⁸ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW; 5th Edition. Adopted by the City of Los Angeles, Board of Public Works on May 9, 2016. http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf

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principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁶⁹ Operational phase soil erosion impacts would be less than significant and no further analysis is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. Hazards arising from liquefaction and landslides would be less than significant, as discussed above in sections a.(iii) and (iv).

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The geotechnical investigation assessed the potential for liquefaction on site. Due to the presence of bedrock at a shallow depth, the site is not susceptible to soil liquefaction.⁷⁰ Therefore, the Project would not expose people or the new school buildings to adverse effects associated with lateral spreading. Impacts would be less than significant and no further analysis is required.

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. The Project site is not over a groundwater basin, groundwater was not encountered in soil borings, and the school would not increase withdraw of groundwater. Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant. No further analysis is required.

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands, in contrast to liquefaction which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. Due to the presence of bedrock at a shallow depth, seismically induced settlement would be negligible. Therefore, the proposed Project would not expose people or the new school buildings to significant adverse effects associated with seismically induced settlement. Impacts would be less than significant and no further analysis is required.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. Based on testing performed on site soils, the fill material is loose to medium dense, clayey sand and lean clay that could be collapsible. As part of the DSA review process, BSS is required to show how the Project complies with a final engineering-level geotechnical report. This report includes but is not limited to: identification of building setbacks, site preparation, specific locations and methods for fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of any deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review.

The project design and development would incorporate all recommended measures outlined in the final engineering-level geotechnical report to ensure that safety is not compromised as required by existing

⁶⁹ US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

⁷⁰ Twining Consulting. 2018, September 28. Geohazard and Geotechnical Engineering Evaluation Report. Rise Kohyang Charter Project, 3500 W. 1st Street, Los Angeles, California



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regulations. Compliance with recommendations of the geotechnical investigation would minimize hazards from collapsible soils. Impacts would be less than significant and no further analysis is required.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. Based on field exploration, soil classification, and density results, onsite soils are considered to have “moderate” expansion potential. Special recommendations for foundation design are incorporated into the final engineering-level geotechnical report and would comply with California Geological Survey, and DSA would ensure that the buildings are designed and constructed for this condition. The Project would not expose people or the new school buildings to significant adverse effects associated with expansive soils. Impacts would be less than significant and no further analysis is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The existing church does not use septic tanks or other alternative wastewater disposal systems, and the new school would not use septic tanks or other alternative waste water disposal systems. No impact would occur and no further analysis is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation.

Los Angeles County is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles County has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological sensitivity. Much of Los Angeles has some sensitivity for paleontological resources, depending on soil structure and depth of excavation.⁷¹

There were 25 fossil localities identified in the Hollywood Quadrangle, where the Project site is located, in the paleontological records search conducted for the City of Los Angeles Citywide General Plan Framework

⁷¹ City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources.
http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf

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EIR.^{72,73} Excavation to a depth of approximately 15 feet for the semi-subterranean parking garage would be required and would disturb native soils that may yield evidence of paleontological resources; therefore, the Project site is considered sensitive for paleontological resources.

As part of the Project implementation, SC-CUL-11 require that a paleontological monitoring program be prepared and implemented for earthwork activities. A paleontological monitor will be onsite for all ground-altering activities below 8 feet. As a result, impacts to paleontological resources would be less than significant and no further analysis is required.

⁷² Los Angeles County Museum of Natural History. 1993, September 10. Paleontological Records Search for the City of Los Angeles Citywide General Plan EIR. http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_AppC.pdf.

⁷³ US Geological Survey (USGS). 2010, July 19. Divisions of Geologic Time. <https://pubs.usgs.gov/fs/2010/3059/pdf/FS10-3059.pdf>.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to greenhouse gas emissions. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>

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The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. The primary source of these GHGs is fossil fuel use. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydro fluorocarbons, perfluorocarbons, and chlorofluorocarbons. This section analyzes the Project’s contribution to global climate change impacts in California through an analysis of Project-related GHG emissions. Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the Project are not applicable and are not included in the analysis. Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state’s AB 32 inventory and treats this short-lived climate pollutant separately.^{74,75}

a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

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

A typical school project may generate an increase in GHG emissions from construction activities, energy use (directly through fuel (natural gas) consumed for new building heating and electricity usage), area sources (an increase in landscape that requires more use of maintenance equipment), mobile sources (vehicle trips), water use and wastewater generation, and solid waste disposal.

The new school would not and are already using water and generating wastewater and solid waste in the Los significantly increase water demand or wastewater and solid waste generation because students and staff are at other schools Angeles region.

Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for GHG emissions from the construction.⁷⁶ The total and net increase of GHG emissions are shown in Table 7 and show the Project would have a net increase of 1,098 metric tons of carbon dioxide–equivalent (MTCO_{2e}) emissions per year. It would not exceed SCAQMD’s bright-line screening threshold of 3,000 MTCO_{2e}. Therefore, GHG emissions impacts from construction and operation of the proposed Project would be less than significant and no further analysis is required.

⁷⁴ Particulate matter emissions, which include black carbon, are analyzed in Section 4.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years.

⁷⁵ California Air Resources Board (CARB). 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.

⁷⁶ South Coast Air Quality Management District, 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf).



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**Table 7
Project-Related GHG Emissions**

Source	GHG Emissions (MTCO _{2e} / Year)		
	Existing Land Use	Proposed Project	Net Change
Area	<1	<1	<1
Energy ^a	161	278	117
Mobile Sources ^b	207	1,235	1,029
Waste Generation	54	0	<1
Water/Wastewater	10	2	<1
Amortized Construction	NA	NA	14
Total	432	380	1,098
Proposed SCAQMD Bright-Line Threshold		3,000 MTCO _{2e} /Yr	
Exceeds Bright-Line Threshold		No	

Sources: CalEEMod Version 2016.3.2.

Note: Totals may not total to 100 percent due to rounding. NA: not applicable.

^a Energy rates for the existing church is based on the CalEEMod historical energy rates which are based on the 2005 Building Energy Efficiency Standards. Energy rates for the new school is based on the 2016 Building Energy Efficiency Standards.

^b Construction emissions are amortized over a 30-year period.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020.⁷⁷ The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. The new buildings are required to comply with the Building Energy Efficiency Standards and California Green Building Code (CALGreen). CARB adopted Final 2017 Climate

⁷⁷ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan: A Framework for Change.

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Change Scoping Plan Update on December 24, 2017, to address the new 2030 target to achieve a 40 percent reduction below 1990 levels by 2030, established by Senate Bill (SB) 32.⁷⁸ While measures in the Scoping Plan apply to state agencies and not the proposed Project, the Project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed Project would be consistent with the CARB Scoping Plan, and no impact would occur.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

In addition to AB 32, the California legislature passed SB 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016.⁷⁹ The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed Project would provide for the educational needs of the community while meeting the existing demand for school services. Overall, the proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016 RTP/SCS. No impact would occur and no further analysis is required.

⁷⁸ California Air Resources Board. 2017, November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

⁷⁹ Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.



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

The analysis in this section is based in part on the following technical studies:

- “Preliminary Environmental Assessment Report for Proposed Rise Kohyang High School” prepared by PlaceWorks, dated January 2019. A complete copy of this report is included as Appendix D to this Initial Study.⁸⁰
- “Phase I Environmental Site Assessment for Proposed Rise Kohyang High School” prepared by PlaceWorks, dated July 2018. A complete copy of this report is included as Appendix D to this Initial Study.⁸¹
- “Pipeline Safety Hazard Assessment for Proposed Rise Kohyang High School” prepared by PlaceWorks, dated September 2018. A complete copy of this report is included as Appendix E to this Initial Study.⁸²

⁸⁰ PlaceWorks. January 2019. “Preliminary Environmental Assessment Report for Proposed Rise Kohyang High School”

⁸¹ PlaceWorks. July 2018. “Phase I Environmental Site Assessment for Proposed Rise Kohyang High School”

⁸² PlaceWorks. September 2018. “Pipeline Safety Hazard Assessment” for Proposed Rise Kohyang High School”

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Explanation:

LAUSD has SCs for minimizing impacts to hazards and hazardous materials. Applicable SCs related to hazards and hazardous materials impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HAZ-4	<p>The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):</p> <ul style="list-style-type: none"> • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight..</p>

- a) **Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?**

Less Than Significant Impact.

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” A historically recognized environmental condition (HREC) is “a past release



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of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.”

One REC in connection with the Project site was identified in the Phase I ESA—the site is in a City of Los Angeles Methane Zone. As such, the site is subject to methane testing and mitigation requirements per the city “methane code” (Ordinance No. 175790).⁸³ One HREC in connection with the Project site was identified in the Phase I ESA—A gasoline leak from a leaking underground storage tank (LUST) was discovered and stopped in 1986; the case was closed in 1996.

Asbestos-Containing Material

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁸⁴ Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.⁸⁵ Buildings on the site were constructed between 1938 and 1965 and therefore may contain asbestos.

During demolition and renovation of permanent buildings, asbestos would be removed, contained, and disposed. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACM. OSHA also regulates asbestos as a potential worker safety hazard. The buildings would be inspected for presence of potential ACMs prior to demolition, and materials that are suspect would be tested. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified personnel using specific handling procedures. In addition, construction contractors are required to comply with asbestos abatement procedures. Compliance with federal and State regulations and the District guidelines and procedures would ensure the reduced risk of release of hazardous building materials into the environment.

Lead-Containing Material

The buildings would be inspected for the presence of lead-based paint prior to demolition. Specific procedures for handling building materials that may contain lead include, but are not limited to, lead abatement performed by contractors certified by the California Department of Public Health, review of assessment reports addressing

⁸³ ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

⁸⁴ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

⁸⁵ US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos. <https://www.epa.gov/asbestos/us-federal-bans-asbestos>.

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the disturbance of lead-based materials, and transportation of lead-related waste under a Uniform Hazardous Waste Manifest.

Soil Import and Export

DTSC requires testing to assess for potential soil impacts from lead-based paint and organochlorine pesticides from possible termiticide usage. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.⁸⁶ This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites. Additionally, DTSC requires soil testing for lead-based paint and organochlorine pesticides from possible termiticide usage. Soil samples were collected on site to assess the existing structures following DTSC's Interim Guidance for Evaluating 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 2006. Based on the results of the PEA, a Supplemental Site Investigation will be implemented to delineate the areas of concern for two pesticides, VOCs, and lead.

Furthermore, a gasoline leak from a LUST was discovered and stopped in 1986; the case was closed in 1996. A soil gas survey was conducted to assess the potential LUST site. Construction contractors are required to comply with specific procedures regarding worker training, health and safety, hazardous material containment, and offsite transport and disposal of contaminated soil in accordance with LAUSD Section 13614, Abatement of Hazardous Materials.⁸⁷ Additionally, California Education Code which requires that all new school sites or existing school sites with new construction obtain a "No Further Action" (NFA) determination from the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) prior to proceeding with construction of a school.

Operation Phase

The City of Los Angeles, Bureau of Engineering, Department of Building and Safety, has published a methane zone map of the city limits. This map is predominantly based on the location of historical crude oil and natural gas extraction wells. The site is in a City of Los Angeles methane zone; therefore, methane testing and abatement or hazard reduction methods are required to be developed and installed by City-approved vendors, in accordance with the City of Los Angeles methane ordinance (No. 175790). Soil samples were tested. Methane was detected at 123.2 ppmv (parts per million by volume) at 15.0 feet bgs, and is below the screening level of 5,000 ppmv for methane.

Furthermore, the amounts of hazardous materials that are handled at any one time would be small, reducing the potential consequences of an accident during transport, storage, or handling.

Hazardous materials that would be used during construction (e.g., petroleum-based products, paints, solvents, sealers, oils, grease, and cleaning fluids) would be transported, used, stored, and disposed. The use of these materials would be short term in nature and would occur in accordance with standard construction practices.

⁸⁶ LAUSD. 2011, October 1. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

⁸⁷ LAUSD Section 13614: Abatement of Hazardous Materials (July 7, 2003).



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Once the Project is complete and operational, hazardous materials that might be handled, used, transported, or disposed of include: standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts (wood, metal, electronics), could involve the use of small quantities of chemicals, fuels, and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would require management in accordance with standard LAUSD policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas.

The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, State, and local health and safety requirements. All transport, handling, storage, use, and disposal of substances would comply with all federal, State, and local laws and regulations for the management and use of hazardous material, including but are not limited to: the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), federal Clean Air Act, California Environmental Protection Agency (CalEPA), Caltrans, California Division of Occupational Safety and Health (Cal/OSHA), California Department of Toxic Substances Control (DTSC), and the Los Angeles Fire Department.⁸⁸

Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no further study is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The use, handling, storage, and disposal of hazardous materials in the course of Project construction and operation would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at the school, including training school staff to safely contain and clean up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies onsite; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Impacts from reasonably foreseeable upset and accident conditions would be less than significant and no further analysis is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The following schools are within 0.25 mile of the Project site:

⁸⁸ The Los Angeles Fire Department is the Certified Unified Program Agency (CUPA) for the City of Los Angeles; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.

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- Virgil Middle School, 152 Vermont Avenue, opposite 1st Street north
- Dr. Sammy Lee Medical and Health Sciences Magnet Elementary School, 3600 Council Street, opposite 1st Street north
- Frank Del Olmo Elementary School, 100 North New Hampshire Avenue, about 550 feet west
- Central City Value High School, 221 North Westmoreland Avenue, about 575 feet north
- Soledad Enrichment Action Charter High School, 222 North Virgil Avenue, about 1,100 feet northeast
- Commonwealth Avenue Elementary School, 215 South Commonwealth Avenue, about 1,050 feet southeast

Operation of construction equipment and heavy trucks would generate diesel emissions, which are considered hazardous; however, the construction period would be temporary. Health risk is based upon the conservative assumption that exposure is continuous and occurs over a 70-year lifetime. A determination of risk is not appropriate for short-term construction activities. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at any of the schools within 0.25 mile of the school campus. Operation of the school would not generate hazardous emissions. Impacts would be less than significant and no further analysis is required.

- d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less Than Significant Impact. California Government Code Section 65962.5 requires that lists of hazardous materials sites be compiled and available to the public. These lists include:

- Hazardous waste facilities subject to corrective action.
- Hazardous waste discharges for which the State Water Resources Control Board has issued certain types of orders.
- Public drinking water wells containing detectable levels of organic contaminants.
- Underground storage tanks with reported unauthorized releases.
- Solid waste disposal facilities from which hazardous waste has migrated.

The Phase I ESA included a regulatory agency environmental database search. The Project site is not included on any list compiled pursuant to California Government Code Section 65962.5. Furthermore, offsite hazardous materials sites within 0.25 mile of the Project site include small quantity generators, underground storage tanks, photo processing and printing services, lead-contaminated soil from gas stations, schools, auto repair shops, and a pest control company. All offsite hazardous materials cases have been closed and do not pose a risk hazard to students or staff at the new school. Impacts would be less than significant and no further analysis is required.



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- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

No Impact. The nearest airport to the school is Bob Hope Airport in the City of Burbank, a commercial airport approximately 9 miles north.⁸⁹ The site is not within the airport influence area or the airport land use planning area of the airport.⁹⁰ Project development would not result in a new use that would interfere with air traffic patterns, or increase traffic levels or change traffic patterns. New building would be of similar height to the existing church buildings and would not create a safety hazard or excessive noise. No impact would occur and no further analysis is required.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No Impact. The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.⁹¹ The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The charter school administrators would prepare and implement an emergency school evacuation plan in compliance with District "safe school plans." Construction and operation of the new school and closure of the existing school would not interfere with any other existing emergency response plans or emergency evacuation plans.

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.⁹² Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.⁹³ Additionally, BSS is required to comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires that BSS prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures.

⁸⁹ Caltrans. 2018, August 10. Caltrans Aviation GIS Data.

<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>

⁹⁰ Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports.

<http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.

⁹¹ 2012 Los Angeles County Operational Area Emergency Response Plan.

<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

⁹² City of Los Angeles Municipal Code Appendix D Section D102.1.

⁹³ California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

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The Project construction and operation would not interfere with existing emergency response plans or emergency evacuation plans. No emergency response or access impact would occur and no further analysis is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The site is in an urban area, and there is no wildland susceptible to wildfire on or near the site. The nearest Fire Hazard Severity Zone is about 1.2 miles to the northeast.⁹⁴ Project development would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

⁹⁴ California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer.
http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in substantial on- or offsite erosion or siltation;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or substantial ground water management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to hydrology and water quality. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HWQ-1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.</p>

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LAUSD Standard Conditions of Approval	
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact would occur if the Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. A significant impact would also occur if the Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

New construction projects can result in two types of water quality impacts: (1) short-term impacts from discharge of soil through erosion, sediments, and other pollutants during construction and (2) long-term impacts from impervious surfaces (buildings, roads, parking lots, and walkways) that prevent water from being absorbed/soaking into the ground, thereby increasing the pollutants in stormwater runoff. Impervious surfaces can increase the concentration of pollutants, such as oil, fertilizers, pesticides, trash, soil, and animal waste, in stormwater runoff. Runoff from short-term construction and long-term operation can flow directly into lakes, local streams, channels, and storm drains and eventually be released untreated into the ocean.

The Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. Currently, local stormwater is collected by a Los Angeles County Flood Control District (LACFCD) 120-inch reinforced concrete box within the Madison Avenue right-of-way, part of a network of LACFCD storm drains discharging into Ballona Creek, which empties into the Pacific Ocean at Marina Del Rey.⁹⁵ The nearest inlets into the storm drain is on 1st Street immediately west of Madison Avenue and at the east end of White House Place south of site.⁹⁶

Construction Phase

Construction projects of one acre or more are regulated under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The site is 1.15 acres. Project construction would comply with the Statewide Construction General Permit and BMPs specified

⁹⁵ Los Angeles County Department of Public Works (DPW). 2018, August 20. Los Angeles County Storm Drain System.

⁹⁶ Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map).



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in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. Construction phase water quality impacts would be less than significant and no further analysis is required.

Operation Phase

After completion of the Project, ground surfaces at the proposed school would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low impact development like those provided in the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁹⁷ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID stormwater management would be incorporated into the Project design. LID principles are described further in Section VII(b), *Geology and Soils*, of this Initial Study. LAUSD would comply with existing regulations and SC-HWQ-1. Operational phase soil erosion impacts would be less than significant and no further analysis is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The site is not over a groundwater basin⁹⁸ and the Project does not include new groundwater wells. The City of Los Angeles Department of Water and Power (DWP) supplies water to the school campus and the surrounding community. DWP water supplies consist of about 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and 2 percent recycled water.⁹⁹ The school would serve students already living in the area and attending other schools and would not significantly increase groundwater withdraws. The Project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the school would not lower the groundwater table or deplete groundwater supplies. Furthermore, the 1.15-acre Project site does not provide intentional groundwater recharge. Therefore, the Project would not interfere with groundwater recharge. Impacts would be less than significant and no further analysis is required.

⁹⁷ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

⁹⁸ Department of Water Resources (DWR). 2018, August 10. Groundwater Information Center Interactive Map Application. <https://gis.water.ca.gov/app/gicima/>.

⁹⁹ Los Angeles Department of Water and Power (LADWP). 2016, June. 2015 Urban Water Management Plan. https://wuedata.water.ca.gov/public/uwmp_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%20LADWP%20Epdf. The percentages of water supply by source identified above are 5-year averages, 2011-2015.

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c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the additional of impervious surfaces, in a manner which would:**

i) **Result in a substantial erosion or siltation on- or off-site**

Less Than Significant Impact. There are no streams or rivers on the Project site. The site drains into a 120-inch reinforced concrete box within the Madison Avenue right-of-way, part of a network of LACFCD storm drains discharging into Ballona Creek, which empties into the Pacific Ocean at Marina Del Rey.¹⁰⁰ The Project would not change the drainage pattern of the site or its surroundings.

Construction Phase

Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. During construction, erosion and siltation from the disturbed areas may occur. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction, sediment may enter storm drains. Project construction would comply with the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion and pollution control measures to protect water quality in stormwater runoff. Impacts would be less than significant and no further analysis is required.

Operation Phase

Drainage from the school would be captured on campus or conveyed to Ballona Creek via the same storm drains as with existing conditions. The school campus would discharge cleaner stormwater than the existing Project site does because of compliance with County of Los Angeles LID requirements (see item VI(b) for more information about LID). Additionally, California Code of Regulations, Title 23, Division 2, Chapter 2.7, “Model Water Efficient Landscape Ordinance,” requires water conservation for landscaping. Thus, Project development would not cause substantial erosion. Impacts would be less than significant and no further analysis is required.

ii) **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site**

No Impact. The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance,¹⁰¹ the proposed on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, Project development would not result in flooding on- or off-site, and no impacts would occur. No further analysis is required.

¹⁰⁰ Los Angeles County Department of Public Works (DPW). 2018, August 20. Los Angeles County Storm Drain System. <https://dpw.lacounty.gov/fcd/stormdrain/disclaimer.cfm>.

¹⁰¹ California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.



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iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff

Less Than Significant Impact. Project development would not result in runoff exceeding the capacity of the municipal storm drain system. Development of the Project would not cause substantial water pollution. Runoff water impacts would be less than significant and no further analysis is required.

iv) Impede or redirect flood flows?

Less Than Significant Impact. Currently on FEMA maps, the site is in the dam inundation area of Silver Lake Reservoir. However, the reservoir was decommissioned in 2008. It was removed from the network of Los Angeles Department of Water and Power (LADWP) water storage facilities and replaced by Headworks Reservoir, consisting of two underground reservoirs built north of Griffith Park. Additionally, the site is outside of 100-year flood zone mapped by the Federal Emergency Management Agency.¹⁰² The Project buildings would not impede or redirect flood flows. No impact would occur and no further analysis is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project site is outside of 100-year and 500-year flood zones.¹⁰³ A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent body of water that would pose a flood hazard to the site due to a seiche. The site is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project site is approximately 270 feet above sea level and is 12 miles inland from the Pacific Ocean. The site is not within the mapped tsunami inundation areas defined by Tsunami Inundation Maps for Emergency Planning. Therefore, the campus is outside the tsunami hazard zone and would not be affected by a tsunami.

The Project would not release pollutants as the result of floods, tsunami, or seiche. No impact would occur and no further analysis is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?

No Impact. The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water

¹⁰² Federal Emergency Management Agency (FEMA). 2018, November 2. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.28472445322258,33.93018828110084,-118.20164034677735,33.96578848287957>.

¹⁰³ Federal Emergency Management Agency (FEMA). 2018, August 10. Flood Map Service Center. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html>

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Requirements at Construction Sites) that also requires control measures. After completion of the Project, ground surfaces would be either hardscape or maintained landscaping. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.¹⁰⁴ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board. The Project would comply with existing regulations and SC-HWQ-2 and SC-HWQ-2. The Project would not obstruct implementation of a water quality control plan. Additionally, the Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan. No impact would occur and no further analysis is required.

¹⁰⁴ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

There are no land use and planning LAUSD SCs.

a) Physically divide an established community?

No Impact. The Project site and surrounding area is fully developed with urban land uses, including residential, commercial, and school uses. The new school would be constructed on a developed site and would not divide an established community. No impact would occur and no further analysis is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The zoning for the school property is C2-1 (General Commercial), which permits a wide variety of retail, service, and institutional uses, and R3-1 (Multiple Residential), which permits residential, child care, senior living, and assisted living uses. Schools are permitted in the C2-1 Zoning District but not in the R3-1 Zoning District.¹⁰⁵

As part of the Project, BSS is requesting that LAUSD exempt the school site from the City of Los Angeles land use designations. The California legislature granted school districts the power to exempt school construction projects from county and city land use and zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, LAUSD can approve or deny the request. The District may exercise a zoning exemption on behalf of an individual charter school for a specifically identified property on a case by case basis upon completion of the five step process. BSS would follow the LAUSD Charter School Zoning Exemption Policy as part of their request.¹⁰⁶ If approved, LAUSD would initiate the following procedures for implementation of the City of Los Angeles land use overrides:

- Two-thirds of the LAUSD Board of Education must vote to render a City zoning ordinance inapplicable to a proposed use of property by the school district.
- Within 10 days of taking the action, the LAUSD Board of Education or their designee must provide the City with notice of the action under Government Code Section 53094.

¹⁰⁵ City of Los Angeles. zoning. <http://zimas.lacity.org/>. Permitted Uses are set forth in City of Los Angeles Municipal Code Section 12.10, "R3" Multiple Dwelling Zone; and Section 12.14 "C2" Commercial Zone.

¹⁰⁶ Charter School Zoning Exemption Policy. <https://achieve.lausd.net/Page/1831>

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If the request is denied by LAUSD, BSS would need a vesting conditional use permit under the authority of the City Planning Commission, Area Planning Commission, and Zoning Administrator. If a conditional use permit were denied by the City, the Project could not move forward.

The site is surrounded by other schools, commercial, and residential land uses, and the new school would serve the surrounding residential community. Redevelopment of the site would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects; the impact would be less than significant.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no mineral resource LAUSD SCs.

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. The Project site is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is in an area where “adequate information indicates that no significant mineral deposits are present, or where it judged that little likelihood exists for their presence.”¹⁰⁷ No active mines are in the local vicinity.¹⁰⁸ The site is in an area designated as ‘Oil and Gas Resources,’¹⁰⁹ and the site is mapped within the Los Angeles City Oilfield by the Division of Oil, Gas, and Geothermal Resources.¹¹⁰ Several old, buried, inactive oil wells are to the south; urban development has since been constructed over this area.¹¹¹ Therefore, development of the Project would not cause a loss of availability of a known mineral resource valuable to the region and the state. No impact would occur and no further analysis is required.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project would not cause a loss of locally important mineral resource. No impact would occur and no further analysis is required.

¹⁰⁷ California Geological Survey (CGS). 1994a. Generalized Mineral Land Classification Map of Los Angeles County: South Half. Open File Report 94-14, Plate 1B. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf.

¹⁰⁸ Office of Mine Reclamation (OMR). 2018, August 10. Mines Online. <http://maps.conservation.ca.gov/mol/>.

¹⁰⁹ http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-6_mineral_resources.pdf

¹¹⁰ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2018, August 10. DOGGR Well Finder. <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>.

¹¹¹ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2018, August 10. DOGGR Well Finder. <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise and vibration background and modeling data used in this analysis are included as Appendix F of this Initial Study.

Explanation:

LAUSD adopted SCs that apply uniformly to all projects proposed by the District. The applicable SCs related to noise impacts are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq} .
SC-N-2	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.</p> <ul style="list-style-type: none"> • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}. • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA L_{eq} inside classrooms should be modified.



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LAUSD Standard Conditions of Approval	
SC-N-4	<p>LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.</p>
SC-N-7	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. <p>During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.</p>
SC-N-8	<p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types.

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	<p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability. • Community Participation – open dialog to involve affected residents. <p>Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.</p>
SC-N-9	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.¹¹² Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Attenuation Barriers¹¹³ – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD’s noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:</p>

¹¹² The need for noise control measures depends on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be required if a major construction project (e.g. demolition of a building and/or construction of a new building) takes place on an active LAUSD campus.

¹¹³ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).



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	<p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Temporary Window Treatments – temporarily reinforcing the building’s noise reduction ability. • Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity
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- a) **Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable local, state, or federal standards?**

Less Than Significant Impact. Noise is unwanted or harmful sound; sound that is too loud is distracting or, worse, injurious. For school projects, the State of California and City of Los Angeles, and LAUSD (shown in table) have established noise standards to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

State Noise Regulations

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for non-residential structures.¹¹⁴ Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission,¹¹⁵ wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{eq} during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

City of Los Angeles Noise Regulations

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect noise sensitive land uses.¹¹⁶ For construction noise, Los Angeles Municipal Code LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)¹¹⁷ states that no construction or repair work, or any excavating for, any building or structure, shall be performed between the

¹¹⁴ Multi-family residential buildings greater than three stories are considered under the non-residential standards in Title 24.

¹¹⁵ California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method.
<https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5>

¹¹⁶ The City of Los Angeles General Plan identifies noise-sensitive receptors as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.

¹¹⁷ Los Angeles Municipal Code. Chapter IV Public Welfare. Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)

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hours of 9:00 PM and 7:00 AM. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited between the hours of 9:00 PM and 7:00 AM.

No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work (or operation, repair or servicing of construction equipment and the job-site delivering of construction materials) within 500 feet of land so occupied before 8:00 AM or after 6:00 PM on any Saturday or on a federal holiday, or at any time on Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above. This code does not apply to emergency repair work.

LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools)¹¹⁸ states that “Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment...”

However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

The city does not have established standards for school operational noise.

Construction Noise

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling and (2) onsite noise from use of construction equipment. Demolition and construction activities are anticipated to start in 2020 and last approximately 24 months.

¹¹⁸ Los Angeles Municipal Code. Chapter XI Noise Regulation. Article 2 Special Noise Sources Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools).
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)



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Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 8 lists maximum construction equipment noise levels at 50 feet¹¹⁹

Table 8
Construction Equipment Noise Levels

Equipment	Noise Level (dBA) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Scraper	85
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80

Source: FHWA, 2006. Construction Noise Handbook. August.

Note: KVA = kilovolt amps

¹¹⁹ Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

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Construction equipment typically moves around the site and has variable power levels. Noise from construction equipment decreases by approximately 6 dB with each doubling of distance from the source. For example, the noise levels from a bulldozer that generates 85 dBA at 50 feet would attenuate to 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet. Also, noise levels are reduced by the amount of use as well as barrier effects provided by buildings.

Sensitive Receptors

The nearest sensitive receptors from the acoustical center of the construction site are the La Sa-Rang Church and Virgil Middle School at approximately 175 feet northwest; Dr. Sammy Lee Medical and Health Science Magnet Elementary School at approximately 175 feet northeast; International Bible Church at approximately 250 feet and residences at approximately 220 feet east; a residence at approximately 130 feet south. The anticipated construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The maximum and average noise levels—grouped by construction phase—are summarized in Table 9.

Table 9
Project-Related Construction Noise Levels

Construction Phase	Maximum at 50 feet (L _{max} dBA)	Residence at 130 feet south ^a	Church, Schools at 175 feet northwest and northeast ^a	Church at 250 feet east ^a	Residences at 175 feet east ^a
Building Demolition	87	74	71	68	71
Asphalt and Concrete Demolition	87	74	71	68	71
Rough Grading	86	73	70	67	70
Excavation	82	69	66	63	66
Utility Trenching	82	65	63	60	63
Fine Grading	89	70	67	64	67
Building Construction	87	75	72	69	72
Paving	90	76	73	70	73
Architectural Coating	74	65	63	60	63

Source: FHWA, August.2006. Construction Noise Handbook.

^a Noise levels are **Leq dBA**, as measured from the acoustical center of the construction site to the nearest property line.

According to LAMC Section 41.40, construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays or national holidays (not allowed on Sundays). District contractors would comply with City regulations for construction hours.

LAMC Section 112.05 specifies the maximum noise level of 75 dBA at a distance of 50 feet. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise



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reduction device or techniques during the operation of equipment. As shown in Table 9, the construction noise levels would average between 65 and 76 dBA L_{eq} at the nearest residence. At times when construction equipment is operating at the south edge of the construction site, noise levels could sporadically reach 90 dBA L_{max} only during the paving phase. However, this would not be constant or long term on a day-to-day or week-to-week basis.

Implementation of SC-N-8 requires all feasible measures to reduce construction noise below the Municipal Code standard through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8 construction noise levels could be reduced by up to 15 dBA. During paving, which is estimated to be the loudest phase, this would reduce construction noise levels to approximately 75 dBA L_{max} , which would not exceed the 75 dBA L_{max} criterion. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant and no further analysis is required.

Mobile Source Noise

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

Traffic noise levels were modeled using the Federal Highway Administration Traffic Noise Model 2.5 with peak hour traffic volume inputs from the Traffic Impact Analysis (Appendix G). Under existing conditions at the Madison Avenue residences, existing peak hour traffic noise levels are estimated to be in the range of 52.1 dBA Leq. With operation of the new school, AM peak hour traffic noise levels are projected to increase to 52.3 dBA Leq, an increase of 0.2 dBA Leq. Under Future Plus Project conditions, traffic noise levels are projected to increase to 52.7 dBA Leq at residences across S. Madison Avenue from the proposed Project, an increase of 0.6 dBA Leq. The peak hour traffic noise increases on other roadway segments in the traffic study area for Project buildout and full operation for Existing Plus Project conditions were estimated using a version of the Federal Highway Traffic Noise Prediction Model and found to be 0.2 dBA Leq or less. Under Future Plus Project Conditions, traffic noise increases were calculated to be 2.5 dBA Leq. In no case would implementation of the Project increase traffic noise levels by 3 dB or more. The Project would also not contribute to a cumulative traffic noise increase of 3 dB or more. Traffic noise levels would remain the same as current conditions, and would exceed established standards. No impacts would occur and no further analysis is required.

Stationary Source Noise

Operation of the Project could include use of rooftop heating, ventilation, and air conditioning systems (HVAC). Such equipment would typically generate noise levels ranging up to 67 dBA at a distance of 25 feet. Noise generated by mechanical systems to be installed on the new building is expected to be similar to the mechanical equipment noise generated by surrounding schools and buildings in the area. The HVAC equipment is expected to be located in the center of the second-story roof behind a parapet wall, which would break the line-of-sight to nearby receptors. The nearest sensitive receptors would be the residences, approximately 130 feet from the center of the building, to the south. At this distance, HVAC noise would attenuate to

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approximately 53 dBA. The parapet wall is estimated to provide an additional 5 dBA or greater reduction, thereby reducing the overall noise to less than 50 dBA during the daytime, which would not exceed City noise standards for residential uses.¹²⁰ Additionally, under Sections 112.02 and 112.05 of the City of Los Angeles Municipal Code, noise attributable to school-related mechanical equipment (such as HVAC systems or any pumping, filtering, or heating equipment) should not exceed the ambient noise level by more than 5 decibels. HVAC equipment would also not raise the existing ambient noise levels by 5 dBA or more, as the ambient noise level at nearby residences is estimated at about 52.1 dBA Leq or more due to traffic noise. SC-N 2 has restrictions on HVAC noise to limit potential noise impacts. Permanent stationary source noise increases and would exceed established standards. Impacts would be less than significant and no further analysis is required.

Other noise sources that are considered stationary include vehicles idling during student drop-off and pick-up times, students during outdoor activities, school buzzers or bells, and landscaping equipment.

Vehicle-related sounds during student drop-off and pick-up times (such as braking, car doors closing, honking, and idling engines) is not expected to temporarily raise the localized ambient noise along the school frontage since pick-up and drop-off activity would occur in the parking garage and not curbside and would only occur twice a day during the school year. Therefore, student drop-off and pick-up activities would not significantly raise the community noise levels. School staff parking would also be in the semi-subterranean garage with the access off of Madison Avenue; therefore, noise associated with on-site parking would be negligible because it would be shielded from the community. Noise increases and would exceed established standards. Impacts would be less than significant and no further analysis is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Operational Vibration

Typically, the types of land uses that result in vibration impacts are industrial businesses that use heavy machinery or railroads where passing trains generate perceptible levels of vibration. The proposed Project is a charter school, and there would be no significant vibration-generating sources during operation; therefore, no impacts would occur.

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures,

¹²⁰ Los Angeles Municipal Code Section 111.03.



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but can achieve levels in buildings close to a construction site that are perceptible.¹²¹ Table 10 lists vibration levels for different types of construction equipment.

Table 10
Construction Equipment Vibration Levels

Equipment	Approximate RMS ¹ Velocity at 25 feet (VdB)	Approximate PPV ² at 25 feet (in/sec)
Pile Driver, Impact (Upper Range)	112	1.518
Pile Driver, Impact (Typical)	104	0.644
Pile Driver, Sonic (Upper Range)	105	0.734
Pile Driver, Sonic (Typical)	93	0.170
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

¹ RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.

² PPV – peak particle velocity measured in inches/second.

Construction vibration effects are typically assessed in terms of either architectural damage or annoyance to nearby people. Construction equipment such as jackhammers, high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) could generate vibration in the immediate vicinity.

Typical construction equipment rarely exceeds vibration levels that are perceptible.¹²² Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.¹²³

Construction Vibration-Induced Annoyance

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is 78 VdB for residential uses.¹²⁴ Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects

¹²¹ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.

¹²² As measured at a distance of 25 feet from an individual piece of equipment perceptible vibration would be 0.1 peak particle velocity (PPV) in inches per second. Architectural damage at typical building structures may occur at 0.2 to 0.5 PPV in inches per second.

¹²³ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

¹²⁴ Federal Transit Administration, 2018. *Transit Noise and Vibration Impact Assessment Manual*. September.

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in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.

Vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the construction site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using the distance from the center of the construction zone to the nearest sensitive receptors.

Table 11 shows the vibration levels from typical construction equipment at adjacent receptors. As shown, vibration from construction activities is not anticipated to be perceptible at the nearest receptors.

Table 11
Construction Equipment Vibration Annoyance

Equipment	Vibration Annoyance Threshold				
	Residence to south (130 Feet) ^a [78 VdB] ^b	School and Church to north (175 Feet) ^a [78 VdB] ^b	Residence to west (390 Feet) ^a [78 VdB] ^b	Church to east (250 feet) [78 VdB] ^b	Residence to east (175 feet) [78 VdB]
Vibratory Roller	72	69	58	64	69
Caisson Drilling	65	62	51	57	62
Large Bulldozer ^c	65	62	51	57	62
Small Bulldozer ^c	36	33	22	28	33
Jackhammer	57	54	43	49	54
Loaded Trucks	64	61	50	56	61

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

Notes:

^a Construction activities are typically distributed throughout the Project site and would only occur for a limited duration when vibration producing equipment is operating in close proximity to receptors. Therefore, distances to the nearest receptors are measured from the center of the construction site to represent the average vibration level.

^b Residences have a daytime residential threshold of 78 VdB; industrial buildings have a “office” threshold of 84 VdB; the storage facility has a “workshop” threshold of 90 VdB (because of the lack of occupancy during any given day).

^c A large bulldozer is above an operating weight of 85,000 pounds (represented by a Caterpillar D8-class or larger); medium bulldozer has an operating weight range of 25,000 to 60,000 pounds (such as a Caterpillar D6- or D7-class); and a small bulldozer has an operating weight range of 15,000 to 20,000 pounds (such as a Caterpillar D3-, D4-, or D5-class).

As heavy construction equipment moves around the Project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment and would generally not be perceptible. The Geotechnical report recommends cast-in-drilled-hole (CIDH) piles bearing into bedrock for the building foundation; however, a shallow foundation system may be used for support of the new structures. As part of the Project, implementation of SC-N-5 requires the use of less-vibration-intensive



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equipment when working next to existing buildings. Under SC-N-4, LAUSD Facilities Division or its construction contractor shall consult and coordinate nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. If drilled piles are used, SC-N-6 requires that an acoustical engineer determines the risk to adjacent buildings.

As required by the City of Los Angeles Municipal Code Section 41.40, construction activities would not occur outside of the allowable hours of 7:00 AM to 9:00 PM Monday through Friday or 8:00 AM and 6:00 PM on Saturdays. No construction activities would occur on Sundays or federal holidays. Annoyance vibration impacts would be less than significant, and no further analysis is required.

Construction Vibration-Induced Architectural Damage

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.¹²⁵ Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

Table 12 shows the reference vibration levels for typical construction equipment. Impacts would be less than significant and no further analysis is required.

**Table 12
Construction Equipment Vibration Damage**

Equipment	Vibration Levels at 25 Feet
Vibratory Roller	0.21
Caisson Drilling	0.089
Large Bulldozer	0.089
Small Bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

The nearest off-campus structure is a residence approximately 10 feet to the south from the nearest potential construction equipment. At 10 feet, there could be a potential for architectural damage due to construction vibration from vibratory rollers. Although the building to the south is not considered historic, because it is a residence, SC-N-7 would be applied to reduce the possibility of architectural damage. SC-N-7 requires the use of less-vibration-intensive equipment when working next to existing buildings. Alternatives shall include mechanical methods using static, non-vibratory rollers. Additionally, implementation of inspection and reporting on the current foundation and structural condition of the residential building.

¹²⁵ FTA category “non-engineered timber and masonry buildings”

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At other nearby sensitive receptors, maximum vibration levels could reach up to 0.056 in/sec PPV, which would be below the threshold of 0.2 in/sec PPV. Therefore, with implementation of these standard conditions, impacts from vibration-induced architectural damage would be less than significant.

Groundborne Noise

Construction-related groundborne noise occurs mainly from the powered mechanical equipment for rock breaking/drilling works (such as hydraulic breaker, rock drill, pile rig, etc.) and tunnel boring machine.

Operation-related groundborne noise occurs when trains operate in tunnels that are located in close proximity to occupied structures. Vibrations associated with train passbys can be transmitted through the ground and structure and be radiated as noise in the occupied spaces within the structure. The transmitted noise through structures may have potential impact on the noise sensitive receivers.

The Project does not include activities or equipment that would generate substantial construction or operational groundborne noise. No impacts would occur and no further analysis is required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. There are no private airstrips within 10 miles of the Project site. There are several private heliports within 10 miles of the Project site; the closest are:¹²⁶

- Operating Engineers Pension Trust Building Heliport at 1.0 miles southeast.
- Saint Vincent Professional Office Building Heliport at 1.2 miles southeast.
- Queen of Angel-Hollywood Presbyterian Hospital Heliport at 1.6 miles north.

While operations at these private aircraft facilities may, at times, be audible at the site, the relatively limited and sporadic use of these heliports for corporate travel or medical emergencies, coupled with the distances between them and the site, would result in negligible amounts of noise at the campus. The Project would not expose people onsite to excessive noise levels from helicopters approaching or departing these heliport facilities. No impact would occur and no further analysis is required.

The nearest airport to the school is Bob Hope Airport in the City of Burbank, a commercial airport approximately 9 miles north.¹²⁷ The site is not within the airport influence area or the airport land use planning area of the airport.¹²⁸ The site is outside the 65 dBA CNEL noise exposure contours for both of these airports. Thus, Project development would not expose people working on-site to excessive airport noise levels. No impacts would occur and no further analysis is required.

¹²⁶ Caltrans. 2018, August 10. Caltrans Aviation GIS Data.

<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>

¹²⁷ Airmav.com. 2018, December 3. Airport Information. <http://www.airnav.com/airports>

¹²⁸ Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports.

<http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create unsafe routes to schools for students walking from local neighborhoods?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based in part on the Traffic Impact Analysis (TIA), prepared by PlaceWorks dated March 2019. A complete copy of this report is included as Appendix G to this Initial Study.¹²⁹

Explanation:

LAUSD has SCs for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC- PED-1	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p>Caltrans SR2S program LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.</p>
SC- PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>OEHS Traffic and Pedestrian Safety Program LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC- PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p>

¹²⁹ PlaceWorks. 2019, March. Traffic Impact Analysis: Bright Star Kohyang High School.

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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> Clearly designate passenger loading areas with the use of signage, painted curbs, etc. Install new walkway and/or sidewalk segments where none exist. Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p>School Traffic Safety Reference Guide REF- 4492.1 This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.</p>
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>School Design Guide The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. Implementation of SR2S, traffic control and pedestrian safety devices. Fair share contribution and/or other mitigation measures for potential traffic impacts. Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.



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SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.
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a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less Than Significant Impact. Incompatible uses for a school would include agricultural operations that generates air pollution from soil tilling dust and/or airborne pesticides, or diesel emissions or hazard to cars or pedestrians from logistic distribution centers that have large tractors, semi-trucks, and oversized equipment consistently traveling the local roadways. Project-related circulation designs that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous new intersections. These typically consist of new roads or driveways on busy roadways with left or right turns that force cross-traffic and create conflicts between cars and people. The Project would not create new roads or dangerous driveway turning movements.

Construction activity may be considered an incompatible use because it would require the use of haul trucks, equipment, worker vehicles, in an area with schools and residential. The construction and demolition activities would result in a temporary increase in truck activity on the roadway network, but the trucks would not exceed the size and weight limits for public roadways and would not travel during peak traffic hours. Construction would not require roadway or sidewalk closures and/or traffic detours.

To avoid construction conflicts, pedestrians construction zones and construction staging areas (i.e., storage of equipment and materials) and truck access locations would be fenced as required by SC-T-4. Additionally under SC-T-4, BSS's construction contractor would prepare a Construction Worksite Traffic Control Plan prior to start of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic. BSS's construction BMPs, identified in the Construction Worksite Traffic Control Plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties.

The Project's design has the drop-off and pick-up inside the parking garage which would avoid curbside traffic obstructions. The Project would have standard driveway widths, turning radii, and provision of adequate line of sight to avoid conflict hazards. "Sight Distance Standards" from the Caltrans Highway Design Manual relates minimum sight distance values to a range of design speeds.¹³⁰ The school driveway would be clearly visible and not obstructed by parked cars. Additionally, LAUSD has design standards to ensure Project design does not create hazards for students or staff: compliance with OEHS Traffic and Pedestrian Safety Program for student drop-off areas and vehicle access (SC-PED-2); separation of foot traffic from vehicular traffic on and adjacent to campus (SC-PED-3); compliance with School Traffic Safety Reference Guide for passenger loading zones

¹³⁰ California Department of Transportation (Caltrans). 2012, May 7. Highway Design Manual. Table 201.1: Sight Distance Standards. <http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0200.pdf>.

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and parking restrictions (SC-PED-4); compliance with School Design Guide for student drop-off and pick-up, bus loading areas and parking areas for student safety (SC-PED-5); compliance with City design guidelines for access, parking, and circulation in the vicinity of the Project (SC-T-3).¹³¹

The Project-related geometric designs and incompatible uses (e.g., construction equipment) would not substantially increase pedestrian safety hazards. Impacts would be less than significant and no further analysis is required.

b) Create unsafe routes to schools for students walking from local neighborhoods?

Less Than Significant Impact with Mitigation. The school is in an urban area characterized by residential, and commercial, manufacturing, industrial, and institutional (churches and schools). The existing land use (church and residential) has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for deliveries on the surrounding roadways. There are six schools in the local vicinity.

- Virgil Middle School, 152 Vermont Avenue, opposite 1st Street northwest
- Dr. Sammy Lee Medical and Health Sciences Magnet Elementary School, 3600 Council Street, opposite 1st Street northeast
- Frank Del Olmo Elementary School, 100 North New Hampshire Avenue, west
- Central City Value High School, 221 North Westmoreland Avenue, north
- Soledad Enrichment Action Charter High School, 222 North Virgil Avenue, northeast
- Commonwealth Avenue Elementary School, 215 South Commonwealth Avenue, southeast

Because of the schools in the area all of the signalized intersections in the study area have painted crosswalks and pedestrian push buttons to activate the signals. Additionally, all streets in the surrounding area near the school site have sidewalks on both sides of the street.

A review of the existing pedestrian crossing activity at Madison Street / 1st Street intersection shows that during the morning student drop-off hours at the surrounding schools, 38 school children and 18 adults cross from 7:00 AM to 8:00 AM, and 9 school children and 36 adults cross from 8:00 AM to 9:00 AM. During the afternoon student pick-up hours, 40 school children and 34 adults cross from 3:00 PM to 4:00 PM, and 17 school children and 35 adults cross from 5:00 PM to 6:00 PM. Currently there is no crosswalk or any pedestrian treatments to provide a safe and adequate Madison Avenue crossing. This intersection would experience increased traffic and pedestrian crossings with the Project.

The new school would generate increased motorized (cars and trucks) and non-motorized (pedestrians and bicyclists) travel. Vehicle traffic would be transferred from the existing Bright Star school, and because of the close proximity (about 1.2 miles southeast), it is anticipated that some of the pedestrian and bike traffic would be transferred from the existing campus to the new campus. The Project would increase the concentration of

¹³¹ BSS has already complied with the City scope of analysis and methodology for the traffic and pedestrian study.



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pedestrians, bicycles, and vehicles on Madison Avenue; vehicle turning movements at the school driveway and at Madison Avenue / 1st Street intersection. Because of this concentration, pedestrian hazards may be significant.

As part of the project, and in compliance with LAUSD standard conditions, BSS would implement the following:

- SC-PED-1 requires that LAUSD and BSS prepare a Caltrans Safe Routes to School (SR2S) program that provides information about pedestrian and bicycle safety and would outline the safe travel paths within a 0.25-mile radius of the new school. The Plan would be updated as necessary and distributed to staff, students, and parents annually at the start of each school year. Based on the Plan, LAUSD and BSS may request that the City install additional traffic control devices.
- SC-PED-2 requires that school traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures (see Mitigation Measure PED-1 and PED-2 for specific traffic measures).
- Because of the pedestrian hazards from uneven sidewalks caused by tree roots, the poor conditions of the trees, and very narrow sidewalks SC-PED-3 would be implemented. This condition requires infrastructure improvements prior to the opening of a school, including upgrading substandard walkway/sidewalk segments. As part of the project the sidewalks along the school frontage on 1st Street and Madison Avenue would be repaired and widened.
- SC-PED-4 requires compliance with the LAUSD School Traffic Safety Reference Guide. Crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff (see Mitigation Measure PED-1 and PED-2 for specific pedestrian safety measures).
- SC-PED-5 requires compliance with LAUSD School Design Guide for new student drop-off, pick-up, bus loading areas, and parking areas.
- SC-T-3 requires implementation of SR2S, along with traffic control and pedestrian safety devices per LADOT requirements and standards (see Mitigation Measure PED-1 and PED-2 for specific traffic and pedestrian safety measures).

The California Manual on Uniform Traffic Control Devices (CA MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of California Vehicle Code Section 21400. Part 7 of the CA MUTCD has standards for traffic control, warning signs, and markings for school areas.¹³²

¹³² California Manual of Uniform Traffic Control Devices (MUTCD), Part 7: Traffic Control for School Area.
<http://mutcd.fhwa.dot.gov/pdfs/2009/part7.pdf>.

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The following sections of the California Vehicle Code, Division 11, Chapter 2, require a city to implement traffic control devices requested by a school district if they are meant to mitigate safety risks for students traveling to and from school:

- Article 1, Section 21372, Guidelines for Traffic Control Devices near Schools¹³³
- Article 1, Section 21373, School Board Request for Traffic Control Device¹³⁴
- Article 1, Section 21368, Crosswalks near Schools
- Article 2, Section 21400, Official Traffic Control Devices

As discussed above to improve the overall intersection operation and to reduce pedestrian hazards at the Madison Avenue / 1st Street intersection and to comply with SC-PED-2, SC-PED-4, and SC-T-3, LAUSD and BSS shall implement Mitigation Measures MM-PED-1 and MM-PED-2. These measures require the installation of pedestrian safety features to improve operations at the intersection and implementation of a Traffic Control Plan to minimize traffic congestion and enhance safety for students that walk and bike to school.

Mitigation Measures

MM-PED-1: Prior to the first day of classes at the high school, the Charter School administrators shall prepare a Traffic Control Plan to minimize traffic congestion and ensure a safe path of travel for walking and biking to school. Among the measures that shall be included in the Traffic Control Plan is school staff monitors or crossing guards during drop-off and pick-up.

MM-PED-2: Prior to the first day of classes at the high school, the Charter School administrators shall ensure construction of improvements at the Madison Avenue / 1st Street intersection to generate driver awareness of pedestrian activity and increase pedestrian safety. All improvements shall comply California Manual of Uniform Traffic Control Devices for Streets and Highways (CA MUTCD) and with LADOT requirements and standards. Specific improvements and programs shall include:

- Enhanced crosswalk and pedestrian safety treatments such as yellow crosswalk, pavement markings, raised crosswalk, safety lighting, warning signage, in-pavement flashing beacons, curb extensions.
- The charter school will provide monitors or crossing guards. Monitors or crossing guards shall be posted at the intersection of Madison and 1st Street during the student drop-off and pick-up to facilitate pedestrian crossings and vehicular traffic flow and to ensure the safety of students.
- Meetings and informational packets shall be distributed to instruct parents/guardians on the student drop-off and pick-up procedure.
- The school facilities staff and school principal shall review student drop-off and pick-up procedures every month for the first year that school is in session, then quarterly after

¹³³ Amended Ch. 545, Stats. 1974. Effective January 1, 1975.

¹³⁴ Amended Ch. 1061, Stats. 1969. Effective November 10, 1969.



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that, to identify bottlenecks and areas for improvement and shall make adjustments to the Traffic Control Plan.

- Charter school administrators shall implement an incentive program to encourage parents of students to rideshare with other students.

Measures to control traffic and pedestrian movements under Mitigation Measures MM-PED-1 and MM-PED-2 would improve operations at the intersection of Madison Avenue at 1st Street and reduce pedestrian hazards. With mitigation impacts would be less than significant and no further analysis is required.

c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

Less Than Significant Impact. The site is about 0.5 mile south of US 101 (Hollywood Freeway) and about 2.2 miles northwest of Interstate 110 (I-110; Harbor Freeway). The nearest four-lane arterial roadway to the project site is 3rd Street one block south. This east-west four-lane undivided roadway is classified as an Avenue II. There are paved sidewalks on both sides, with a posted speed limit of 35 mph outside the school zone and a 25 mph speed limit within the school zone. Because of the other schools in the area, all major intersections have a traffic signal, painted crosswalks, and pedestrian push button to activate the signal; therefore, crossing would not pose a safety hazard. Impacts would be less than significant and no further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no population and housing LAUSD SCs that apply to this Project.

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

No Impact. The Project would not induce population growth. The charter school would serve students already living in the area and attending other schools. The Project area is built out, and the new school would not attract new residents to the region. The Project would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the Project. No population growth impacts would occur and no further analysis is required.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. Project development would displace one house at 119 South Madison Avenue.; however, this residence is associated with the church that would be demolished. Project development would not displace a substantial number of housing units and would not require replacement housing. No impact would occur and no further analysis is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. PUBLIC SERVICES. 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, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PS-1	<p>If necessary, LAUSD shall:</p> <p>Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval.</p> <p>1. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.</p>
SC-PS-2	<p>LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.</p>

a) Fire protection?

Less Than Significant Impact. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the Project site. The nearest LAFD fire station to the site is Station 6 at 326 North Virgil Avenue, about 0.2 mile northeast.¹³⁵ Station 6 is equipped with one engine and one paramedic rescue ambulance.¹³⁶

BSS is required to comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires that BSS prepare an Emergency Preparedness Plan for the school with emergency preparedness and response

¹³⁵ City of Los Angeles Fire Department (LAFD). Accessed August 10, 2018. Find Your Station. <https://www.lafd.org/fire-stations/station-results>.

¹³⁶ City of Los Angeles Fire Department (LAFD). 2013, September. Fire Station Directory. http://www.lafdacs.org/pdf_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf.

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procedures. The new school would not result in the need for construction of new or expanded fire stations. Impacts would be less than significant and no further analysis is required.

b) Police protection?

Less Than Significant Impact. The Los Angeles Police Department (LAPD) provides police service to the City of Los Angeles including the Project site. The site is in LAPD's Olympic Area; the Olympic Area Station is at 1130 South Vermont Avenue about 1.6 miles to the south.¹³⁷ Project development would not increase the total number of students attending schools in the region. General campus activities would be under the direct supervision of the school administrators and staff. Thus, Project development would not substantially increase demands for police services in the Olympic Area or in the City of Los Angeles. The new charter school would not require construction of new or expanded police stations. Impacts would be less than significant and no further analysis is required.

c) Schools?

No Impact. Development of the school would have a favorable effect on school facilities in the Koreatown Neighborhood by providing additional options for school choice. The Project would not increase demands for schools and would not require construction of other new or expanded school facilities. The Project would not have an adverse physical impact on existing schools. No impacts would occur and no further analysis is required.

d) Parks?

No Impact. The Project would not have an adverse physical impact on any parks or necessitate the construction of new parks. The school would include a gymnasium and an outdoor play area, and would not require that students use off-campus parks. The Project would not result in the need for new or expanded park facilities. No impact would occur and no further analysis is required.

e) Other public facilities?

No Impact. The Project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The Project would not result in population growth. Therefore, no impacts would occur and no further analysis is required.

¹³⁷ Los Angeles Police Department (LAPD). 2018, August 10. Olympic Community Police Station.
http://www.lapdonline.org/olympic_community_police_station.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION.				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no recreation LAUSD adopted Standard Conditions of Approval.

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?**

No Impact. The Project would include recreational facilities onsite and would not increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, it would not cause physical deterioration of neighborhood and regional parks or other recreational facilities. No impact would occur and no further analysis is required.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The recreational facilities would be constructed in areas that are currently developed with buildings and parking lots. The environmental effects of the construction and operation of these recreational facilities are considered throughout the environmental analysis in this Initial Study. The Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. No impact would occur and no further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRANSPORTATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based in part on the Traffic Impact Analysis (TIA), prepared by PlaceWorks dated March 2019. A complete copy of this report is included as Appendix G to this Initial Study.¹³⁸

Explanation:

LAUSD has SCs for minimizing impacts to transportation and circulation. Applicable SCs related to transportation and circulation impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-T-1	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>Traffic and Pedestrian Safety Requirements for New Schools Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide has the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements

¹³⁸ PlaceWorks. 2019, March. Traffic Impact Analysis: Bright Star Kohyang High School.



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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer’s (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>
SC-PED-1	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p>Caltrans SR2S program</p> <p>LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>OEHS Traffic and Pedestrian Safety Program</p> <p>LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>

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LAUSD Standard Conditions of Approval	
SC- PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p> <ul style="list-style-type: none"> • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. <p>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</p>
SC- PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p>School Traffic Safety Reference Guide REF- 4492.1 This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.</p>
SC- PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>School Design Guide The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

Less Than Significant Impact.

Existing Conditions

Roadways

Study area roadways are described below and shown on Figure 8, *Roadway Network and Study Area Intersections*. Roadway classifications are identified in the City of Los Angeles General Plan Circulation Element.

- **Beverly Boulevard.** This east-west four-to-six lane undivided roadway is classified as an Avenue II. It has paved sidewalks on both sides. Traffic signals control the study intersections at Normandie Avenue, Vermont Avenue, Commonwealth Avenue, and Rampart Boulevard.



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- **Commonwealth Avenue.** This is a north-south two-lane local street. It has paved sidewalks on both sides. Traffic signals control the study intersection at 1st Street/Beverly Boulevard.
- **Madison Avenue.** This north-south two-lane roadway is classified as a local street. There is on-street parking and paved sidewalks on both sides. This roadway is adjacent to the existing site driveway. No traffic signals control the study intersection at 1st Street or the site driveway.
- **Normandie Avenue.** This north-south four-lane undivided roadway is classified as an Avenue III. It has curbside parking and paved sidewalks on both sides, and a posted speed limit of 30 mph. Traffic signals control the study intersections at Beverly Boulevard, 3rd Street, 6th Street, and Wilshire Boulevard.
- **Rampart Boulevard.** This north-south four-lane undivided roadway is classified as a Avenue I south of 2nd Street and Avenue II north of 2nd Street. It has curbside parking and paved sidewalks on both sides, and a posted speed limit of 25 mph. Traffic signals control the study intersections at Beverly Boulevard and 3rd Street.
- **Vermont Avenue.** This north-south six-lane undivided roadway is classified as an Avenue I. It has curbside parking, paved sidewalks and Class II (striped and signed) bicycle lanes on both sides, and a posted speed limit of 30 mph. Traffic signals control the study intersections at Beverly Boulevard, 1st Street, 2nd Street, 3rd Street, 6th Street, and Wilshire Boulevard.
- **Virgil Avenue.** This north-south four-lane undivided roadway is classified as an Avenue II. It has curbside parking and paved sidewalks on both sides, and a posted speed limit of 35 mph (25 mph in the school zone). Traffic signals control the study intersections at 1st Street, 3rd Street, and 6th Street.
- **Westmoreland Avenue.** This north-south two-lane is classified as an local street. It has curbside parking and paved sidewalks on both sides. Traffic signals control the study intersection at 1st Street.
- **Wilshire Boulevard.** This east-west four-lane undivided roadway is classified as an Avenue I. It has curbside meter parking, sidewalks and Class II (striped and signed) bicycle lanes on both sides, and a posted speed limit of 35 mph (25 mph in the school zone). Traffic signals control the study intersections at Normandie Avenue and Vermont Avenue.
- **1st Street.** This east-west two-lane roadway is classified as a local street. It has curbside parking, and sidewalks and Class II (striped and signed) bicycle lanes on both sides. The posted speed limit of 25 mph (20 mph when children are present in the school zone). Traffic signals control the study intersections at Vermont Avenue, Bimini Place, Westmoreland Avenue, Virgil Avenue, and Commonwealth Avenue.
- **2nd Street.** This east-west two-lane roadway is classified as a local street. It has curbside parking and paved sidewalks on both sides. Traffic signals control the study intersection at Vermont Avenue.
- **3rd Street.** This east-west four lane undivided roadway is classified as an Avenue II. It has paved sidewalks on both sides, and a posted speed limit of 35 mph (25 mph speed limit in the school zone). Traffic signals control the study intersection at Normandie Avenue, Vermont Avenue, Virgil Avenue, and Rampart Boulevard.

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- **6th Street.** This east-west four-lane undivided roadway is classified as an Avenue II. It has curbside parking on the north end of the road, and paved sidewalks on both sides. The posted speed limit of 35 mph (25 mph in the school zone). Traffic signals control the study intersection at Normandie Avenue, Vermont Avenue, and Virgil Avenue.

Intersections

The following intersections were analyzed based on Project trip distribution. All existing study area intersections are signalized except for Madison Avenue at 1st Street, which is controlled by a cross-street stop on Madison Avenue. Madison Avenue at the Project Driveway is a future intersection.

1. Normandie Avenue at Beverly Boulevard
2. Normandie Avenue at 3rd Street
3. Normandie Avenue at 6th Street
4. Normandie Ave at Wilshire Boulevard
5. Vermont Avenue at Beverly Boulevard
6. Vermont Avenue at 1st Street
7. Vermont Avenue at 2nd Street
8. Vermont Avenue at 3rd Street
9. Vermont Avenue at 6th Street
10. Vermont Avenue at Wilshire Boulevard
11. 1st Street at Bimini Place
12. Madison Avenue at 1st Street
13. Madison Avenue at Project Driveway (future intersection)
14. 1st Street at Westmoreland Avenue
15. Virgil Avenue at 1st Street
16. Virgil Avenue at 3rd Street
17. Virgil Avenue at 6th Street
18. Commonwealth Avenue at 1st Street/Beverly Boulevard
19. Rampart Boulevard at Beverly Boulevard
20. Rampart Boulevard at 3rd Street

Existing Traffic Volumes

Weekday AM and PM peak-hour turn movement volumes were collected on Thursday, October 25 2018 for all intersections, except for Vermont Avenue at 3rd Street which was taken on Wednesday May 10, 2017 and provided by Los Angeles Department of Transportation (LADOT). A volume increase adjustment of 1.014 percent was included for traffic volumes at Vermont at 3rd Street to adjust baseline traffic volumes to 2018 conditions.



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Transit Service and Nonmotorized Transportation

Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT both operate public transit bus routes and subway stations in the vicinity of Project site. These routes include:

- **Line 14.** This east-west line operates on Beverly Boulevard; the closest stop is at Vermont Avenue / Beverly Boulevard about 0.4 mile from the Project site.
- **Lines 16 and 17.** These east-west lines operates on 3rd Street; the closest stop is at Vermont Avenue / 3rd Street about 0.3 mile from the Project site.
- **Line 316.** This east-west limited-stop line operates on 3rd Street; the closest stop is at Vermont Avenue / 3rd Street about 0.3 mile from the Project site.
- **Line 201.** This north-south line departs from Wilshire / Vermont Station and ends at Arcade Place at Glenoaks Boulevard in Glendale. The closest stop is Vermont Avenue / 1st Street about 0.2 mile a from the Project site.
- **Line 204.** This north-south line departs from Vermont / Barnsdall Station and ends at Vermont Avenue / 92nd Street. The closest stop is Vermont Avenue / 1st Street about 0.2 miles from the Project site.
- **Line 754.** This north-south line is part of Metro Rapid, a local express bus service. It departs from Vermont / Hollywood - North Station and ends at Vermont Avenue / 92nd Street. The closest Rapidbus stop is Vermont Avenue / 3rd Street about 0.5 mile from the Project site.
- **DASH Wilshire Center/Koreatown.** This clockwise-counterclockwise route line departs from Vermont Avenue / Wilshire Boulevard and ends at James M Wood Boulevard / 9th Street & Western Avenue. The closest stop is Vermont Avenue / 1st Street about 0.2 mile from the Project site.
- **Metro Red Line.** This rail subway line runs between Downtown Los Angeles and North Hollywood. The closest station is the Vermont/Beverly Station about 0.5 mile from the Project site.

On the closest streets to the Project site—1st Street, Madison Avenue, White House Place, and Bimini Place—there are sidewalks on each side of the street and a Class II (striped and signed) bicycle lanes on each side of 1st Street.

Methodology

The TIA is based on a Memorandum of Understanding (MOU) with Los Angeles Department of Transportation (LADOT) and in accordance with LADOT required methodology.

Levels of Service

Roadway capacity is generally limited by the ability to move vehicles through intersections. LADOT describes the performance of the City's transportation system using Level of Service (LOS), a six-point scale of the level of congestion or delay experienced by motorists. Service levels range from A through F representing traffic conditions from best (uncongested, free-flowing conditions) to worst (total breakdown with stop-and-go operation).

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Existing AM and PM peak hour operating conditions for study area signalized intersections were evaluated using volume to capacity (V/C) ratio and the LOS associated with each V/C ratio at a signalized intersection. Table 13 shows the V/C ratios and LOS letter grades for signalized intersections. The methodology used to assess the operation of signalized intersections is based on the Critical Movement Analysis (CMA) Planning Method. Because intersection 18 is a 5-leg intersection that cannot be analyzed with the LADOT methodology, Vistro software was used to calculate the V/C ratio and corresponding LOS.

Table 13
CMA Level of Service Definitions

Level Of Service	Volume/ Capacity Ratio	Delay Per Vehicle (Seconds)	Definition
A	0.000 - 0.600	≤ 10	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	> 10 - 20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	> 20 - 35	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	> 35 – 55	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	> 55 – 80	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	> 80	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: LADOT Transportation Impact Guidelines, December 2016.

The methodology used to assess the operation of an unsignalized intersection is based on the Highway Capacity Manual (HCM). The peak hours selected for analysis are the highest volumes in four consecutive 15-minute periods from 7:00 AM to 10:00 AM and from 3:00 PM to 6:00 PM on weekdays. Per the HCM methodology, overall average intersection delay at all-way-stop intersections was calculated, and the worst-case approach delay was calculated at cross-street-stop intersections. The 2010 Highway Capacity Manual (HCM 2010) was used to determine intersection levels of service in terms of control delay (in seconds per vehicle) for the two unsignalized intersections (see Table 14 for LOS definitions).



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Table 14
HCM Methodology Level of Service Definitions

Level Of Service	Description	Average Delay Per Vehicle (Seconds)
A	Level of Service A occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.	0 to 10.00
B	Level of Service B generally occurs with good progression and/or short cycle lengths. More vehicles stop than for Level of Service A, causing higher levels of average total delay.	10.01 to 15.00
C	Level of Service C generally results when there is fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear in this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.	15.01 to 25.00
D	Level of Service D generally results in noticeable congestion. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume to capacity ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.	25.01 to 35.00
E	Level of Service E is considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high volume to capacity ratios. Individual cycle failures are frequent occurrences.	35.01 to 50.00
F	Level of Service F is considered to be unacceptable to most drivers. This condition often occurs with oversaturation, i.e., when arrival flow rates exceed the capacity of the intersection. It may also occur at high volume to capacity ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels.	50.01 and up

Source: Highway Capacity Manual, Transportation Research Board, 2010.

Notes: If volume-to-capacity (V/C) ratio is greater than 1.0 for the operation of a signalized or unsignalized intersection, the LOS is F regardless of the delay value.

Acceptable LOS and Levels of Significance

LOS D is typically considered to be the minimum acceptable level of service in urban areas. A transportation impact at a signalized intersection shall be deemed “significant” according to Table 15.

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Table 15
Impact Thresholds for Development Projects

Level Of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
E	> 0.901-1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

Source: LADOT Transportation Impact Study Guidelines, December 2016.

<https://ladot.lacity.org/sites/g/files/wph266/f/COLA-TISGuidelines-010517.pdf>

Notes: These thresholds apply to signalized intersections only. For unsignalized intersections impacts are determined according to needed improvements such as installation of a traffic signal or other traffic control devices to accommodate project trips.

Los Angeles County Congestion Management Plan

The Los Angeles County Congestion Management Program (CMP) was issued by Metro in December 2010.¹³⁹ All freeways and specific arterial roadways are designated elements of the CMP Highway System. The CMP requires that individual development projects of potentially regional significance undergo a traffic impact analysis. Per the CMP Transportation Impact Analysis guidelines, a traffic impact analysis is required under these conditions:

- At CMP arterial monitoring intersections where the proposed Project would add 50 or more vehicle trips during either morning or evening weekday peak hours.
- At CMP main-line freeway monitoring locations where the proposed Project would add 150 or more vehicle trips, in either direction, during either morning or evening weekday peak hours.

The nearest CMP facilities are U.S. Route 101 (US 101), approximately a 0.9 mile northeast and Wilshire Boulevard about 1.0 mile south of the Project site. There are no CMP intersections in the Project study area.

Existing Intersection Operation

The intersection operations analysis results are summarized in Table 16. All study area intersections currently operate at a LOS D or better during the peak hours.

¹³⁹ Metropolitan Transportation Authority of Los Angeles County (Metro). 2010, December. 2010 Congestion Management Program. http://media.metro.net/docs/cmp_final_2010.pdf.



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Table 16
Existing Levels of Service

Intersections	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
1. Normandie Avenue at Beverly Boulevard	0.655	B	0.619	B
2. Normandie Avenue at 3rd Street	0.585	A	0.552	A
3. Normandie Avenue at 6th Street	0.433	A	0.517	A
4. Normandie Ave and Wilshire Boulevard	0.614	B	0.670	B
5. Vermont Avenue at Beverly Boulevard	0.804	D	0.784	C
6. Vermont Avenue at 1st Street	0.547	A	0.572	A
7. Vermont Avenue at 2nd Street	0.303	A	0.252	A
8. Vermont Avenue at 3rd Street	0.765	C	0.770	C
9. Vermont Avenue at 6th Street	0.602	B	0.581	A
10. Vermont Avenue and Wilshire Boulevard	0.827	D	0.814	D
11. 1st Street and Bimini Place	0.382	A	0.313	A
12. Madison Avenue at 1st Street*	17.76	C	19.6	C
13. Madison Avenue at Project Driveway (Future)*	-	-	-	-
14. 1st Street and Westmoreland Avenue	0.417	A	0.352	A
15. Virgil Avenue at 1st Street	0.536	A	0.521	A
16. Virgil Avenue at 3rd Street	0.720	C	0.776	C
17. Virgil Avenue at 6th Street	0.529	A	0.559	A
18. Commonwealth Avenue at 1st Street/Beverly Boulevard	0.665	B	0.671	B
19. Rampart Boulevard at Beverly Boulevard	0.676	B	0.752	C
20. Rampart Boulevard at 3rd Street	0.642	B	0.737	C

Notes: LOS calculation worksheets included in the TIA (Appendix G to this Initial Study).

* Unsignalized intersection = Average Delay (seconds per vehicle)

Intersection 18 Commonwealth Avenue at 1st Street/Beverly Boulevard is calculated based on HCM methodology and LOS criteria is based on V/C.

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Project Trip Generation

Table 17 shows the trip generation rates and Project trip generation for the AM Peak Hour and PM Peak Hour.

Table 17
Trip Generation Rates

Land Use	ITE Code	Unit	Trip Generation						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Charter Elementary School	537	Students	1.85	0.59	0.52	1.11	0.05	0.09	0.14
Church	560	TSF	6.95	0.198	0.132	0.33	0.22	0.27	0.49

Source: Institute of Transportation Engineers. 2017, September. Trip Generation Manual. 10th edition.
TSF = Thousand Square Feet

Per LADOT Transportation Impact Study Guidelines¹⁴⁰ a 10-percent trip generation reduction was applied because the Project site is just outside the 0.25 mile walking distance from the Vermont/Beverly Red Line Metro Rail Station and Line 754 RapidBus. Trip generation by the existing church—which would be demolished as part of site clearance—was deducted from estimated Project trip generation.

A 600-student charter school is estimated to generate 869 daily trips on a typical weekday, with 594 trips during the AM peak hour and 66 trips during the PM peak hour.¹⁴¹ As part of the Project operation staggered start times would be implemented to spread out student arrival and reduce school traffic during AM peak hour. A maximum of 390 students (65 percent of the student population) would arrive at the same time. The remaining 210 students would either arrive 30 minutes or more before or after the maximum 390 (depending on grade sizes this could be less than 390).

By staggering student arrival the Project-related traffic volumes would be spread over a longer period and a maximum of 383 trips (383 or less) would occur over a 30-minute period in the AM peak hour (see Table 18). Additionally, with staggered start times, the dismissal times would also be staggered (not more than 39 trips would be generated in a 30-minute period during the PM peak hour).

¹⁴⁰ LADOT Transportation Impact Study Guidelines. <https://ladot.lacity.org/sites/g/files/wph266/f/COLA-TISGuidelines-010517.pdf>

¹⁴¹ School traffic is much lower during the PM peak hour in comparison to the AM peak hour. The AM and PM peak hour refer to commuter peak hour traffic from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM. While student drop-off overlaps with the commuter AM peak hour traffic, student dismissal and therefore most school-related traffic occurs in the afternoon prior to the commuter PM peak hour.



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**Table 18
Project Trip Generation**

Land Use	Unit	Trip Generation ^a						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Charter Elementary School	390 Students	772	229	203	432	19	35	54
Transit Reduction (10%)		-77	-23	-20	-43	-2	-4	-6
Church (Reduction)	19 TSF ^b	-4	-4	-2	-6	-4	-5	-9
Total		520	202	181	383	13	26	39

^a Trip generation rates for peak hour of adjacent streets, per the ITE Trip Generation Manual 10th Edition.
^b TSF= Thousand Square Feet

Project Trip Distribution

Project-related traffic was geographically distributed on the street network by evaluating the layout of the study area roadway network, utilizing the student map, and reviewing residential land uses in the area. The trip distribution was also prepared with feedback from LADOT (see Figure 9, *Project Trip Distribution*).

Project Trip Assignment

The trip distribution percentages were applied to determine the traffic volumes at each intersection. The assignment included a 10 percent of trips via public transit.

Future Year Without Project

As shown in Table 19, all study area intersections would operate at LOS D or better during the peak hours for Future Year Without Project traffic conditions, except for:

- Normandie Avenue at Wilshire Boulevard (PM peak hour)
- Vermont Avenue at Beverly Boulevard (AM and PM peak hour)
- Vermont Avenue at 3rd Street (PM peak hour)
- Vermont Avenue at Wilshire Boulevard (AM and PM peak hour)

Future Year With Project Traffic Conditions

Opening year with Project traffic conditions were estimated by adding Project-related traffic to Future Year Without Project traffic conditions. As shown in Table 19, all study area intersections would operate at a LOS D or better during the peak hours for Future Year With Project traffic conditions, except for:

- Normandie Avenue at Wilshire Boulevard (PM peak hour)
- Vermont Avenue at Beverly Boulevard (AM and PM peak hour)
- Vermont Avenue at 3rd Street (AM and PM peak hour)

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- Vermont Avenue at Wilshire Boulevard (AM and PM peak hour)

At signalized intersections potential traffic impacts would occur if, during the weekday peak hours:

- At intersections currently operating at LOS C and a final V/C ratio between 0.701 to 0.800, the addition of Project trips would increase the V/C equal to or greater than 0.040.
- At intersections currently operating at LOS D and a final V/C ratio between 0.801 to 0.900, the addition of Project trips would increase the V/C equal to or greater than 0.020.
- At intersections currently operating at LOS E and a final V/C ratio between 0.901 to 1.00, the addition of Project trips would increase the V/C equal to or greater than 0.010.
- At intersections currently operating at LOS F and a final V/C ratio greater than 1.00, the addition of Project trips would increase the V/C equal to or greater than 0.010.

Project Impacts

Table 19 summarizes traffic conditions for Future Without Project and Future With Project conditions. As shown, Project-related impacts would be less than significant at all intersections.

Table 19
Signalized Intersection Impact Summary

Intersection	Without Project		With Project		Delay or V/C Increase	Impact?
	V/C/ Delay (seconds)	LOS	V/C/ Delay (seconds)	LOS		
	AM PM	AM PM	AM PM	AM PM		
1. Normandie Avenue at Beverly Boulevard	0.703	C	0.707	C	0.004	No
	0.680	B	0.681	B	0.001	No
2. Normandie Avenue at 3rd Street	0.638	B	0.642	B	0.004	No
	0.623	B	0.623	B	0.000	No
3. Normandie Avenue at 6th Street	0.486	A	0.496	A	0.010	No
	0.579	A	0.579	A	0.000	No
4. Normandie Ave at Wilshire Boulevard	0.802	D	0.805	D	0.003	No
	0.924	E	0.924	E	0.000	No
5. Vermont Avenue at Beverly Boulevard	0.915	E	0.917	E	0.002	No
	0.912	E	0.912	E	0.000	No
6. Vermont Avenue at 1st Street	0.613	B	0.675	B	0.062	No
	0.661	B	0.670	B	0.009	No
7. Vermont Avenue at 2nd Street	0.360	A	0.377	A	0.017	No
	0.331	A	0.331	A	0.000	No
8. Vermont Avenue at 3rd Street	0.881	D	0.899	D	0.018	No
	0.912	E	0.912	E	0.000	No
9. Vermont Avenue at 6th Street	0.697	B	0.703	C	0.006	No
	0.684	B	0.686	B	0.002	No



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Table 19
Signalized Intersection Impact Summary

Intersection	Without Project		With Project		Delay or V/C Increase	Impact?
	V/C/ Delay (seconds)	LOS	V/C/ Delay (seconds)	LOS		
	AM PM	AM PM	AM PM	AM PM		
10. Vermont Avenue at Wilshire Boulevard	1.080	F	1.089	F	0.009	No
	1.117	F	1.117	F	0.000	No
11. 1st Street at Bimini Place	0.401	A	0.466	A	0.065	No
	0.329	A	0.339	A	0.010	No
14. 1st Street at Westmoreland Avenue	0.437	A	0.497	A	0.060	No
	0.369	A	0.378	A	0.009	No
15. Virgil Avenue at 1st Street	0.573	A	0.638	B	0.065	No
	0.586	A	0.592	A	0.006	No
16. Virgil Avenue at 3rd Street	0.774	C	0.790	C	0.016	No
	0.861	D	0.863	D	0.002	No
17. Virgil Avenue at 6th Street	0.581	A	0.598	A	0.017	No
	0.627	B	0.627	B	0.000	No
18. Commonwealth Avenue at 1st Street/Beverly Boulevard	0.732	C	0.776	C	0.034	No
	0.767	D	0.772	D	0.005	No
19. Rampart Boulevard at Beverly Boulevard	0.719	C	0.723	C	0.004	No
	0.799	C	0.800	C	0.001	No
20. Rampart Boulevard at 3rd Street	0.683	B	0.687	B	0.004	No
	0.779	C	0.779	C	0.000	No

Bold= LOS E and F

* Unsignalized intersection = Average Delay (seconds per vehicle)

Intersection 18 Commonwealth Avenue at 1st Street/Beverly Boulevard is calculated based on HCM methodology and LOS criteria is based on V/C.

Table 20 summarizes traffic conditions for Future Without Project and Future With Project conditions. As shown, Project-related impacts would be less than significant at all intersections.

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Table 20
Unsignalized Intersection Impact Summary

Intersection	Without Project		With Project		Average Delay (seconds per vehicle) <u>Increase</u> AM PM
	Average Delay (seconds per vehicle) AM PM	<u>LOS</u> AM PM	Average Delay (seconds per vehicle) AM PM	<u>LOS</u> AM PM	
12. Madison Avenue at 1st Street	18.57 20.2	C C	>100 26.27	F D	>100 N/A
13. Madison Avenue at Project Driveway	Future intersection	- -	13.5 8.97	B A	13.5 N/A

Madison Avenue at 1st Street

According to LADOT guidelines, unsignalized intersections are evaluated solely to determine the need for the installation of a traffic signal or other traffic control devices as determined by signal warrant methodology in the 2014 California Manual on Uniform Traffic Control Devices. If one or more of the criteria for signal warrants is met, an engineering study is required to evaluate other factors to determine if an intersection requires a signal. Due to the high Project-related northbound turn volumes leaving the student drop-off zone, 1st Street at Madison Avenue (Intersection 12) would meet the requirement for a traffic signal under Future With Project Conditions in the AM peak hour.

The requirement for a signal is based on continuous demand during typical commuter traffic during the morning and evening commute periods. However, the traffic volumes that would meet the signal warrants would only occur for a short period of time—less than 30 minutes during student drop-off. During the rest of the peak hour and throughout the rest of the day this intersection would not experience heavy delays and would not meet the requirements for a traffic signal. Therefore, because of the short duration of traffic congestion, and because a signal at this location would adversely affect free-flow east-west traffic on 1st Street, a signal would not be required. Impacts would be less than significant and no further analysis is required.

Other Transportation Modes

The school would be in an urban builtout environment and would serve the local community. Transit stops, bike lanes, and sidewalks are in the vicinity. The new school would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities. Impacts would be less than significant and no further analysis is required.

Congestion Management Plan Conformance

Los Angeles County Metropolitan Transportation Authority (Metro) serves as the county's congestion management agency. The Los Angeles County Congestion Management Program was issued by Metro in December 2010 (Metro 2010). All freeways and selected arterial roadways are designated elements of the CMP Highway System. The LOS standard in Los Angeles County is LOS E, except where base year LOS is worse



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than E. In such cases, the base year LOS is the standard. A 1992 base year has been established for Los Angeles County. CMP statute states that deficiency plans are required when LOS standards are not met on portions of the CMP highway system. A deficiency is defined as an intersection or segment of a highway or roadway that has a reduction in LOS that exceeds the minimum standard of LOS E.

The CMP requires that individual development projects of potentially regional significance undergo a traffic impact analysis. Per the CMP Transportation Impact Analysis guidelines, a significant impact may result and a traffic impact analysis is required:

- At CMP arterial monitoring intersections where the proposed Project would add 50 or more vehicle trips during either morning or evening weekday peak hours.
- At CMP main-line freeway monitoring locations where the proposed Project would add 150 or more vehicle trips, in either direction, during either morning or evening weekday peak hours.

The nearest CMP facilities are US 101, approximately 0.9 mile northeast of the Project site, and Wilshire Boulevard, approximately 1 mile south of the Project site. No CMP intersections are in the study area, but there is a CMP roadway in the study area, Wilshire Boulevard.

In addition, LADOT's Caltrans Freeway Analysis Screening Filter evaluation was performed to identify if the Project would result in a substantial increase in traffic to the freeway system. The Freeway Analysis Screening Filter evaluation concluded that the Project trips to the freeway system would be minimal and would be below thresholds. No impacts to the freeway system would occur and no further analysis is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

No Impact. CEQA Guidelines section 15064.3 “describes specific considerations for evaluating a project’s transportation impacts. Generally, “vehicle miles traveled” refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) ... (regarding roadway capacity), a project’s effect on automobile delay shall not constitute a significant environmental impact.” This section eliminates auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts.

Daily VMT is an average of the total number of miles traveled by all vehicles each day on principal arterials in the City of Los Angeles. This is then divided by the city’s total population for Daily VMT per Capita. Data for the figures are reported annually in the Caltrans publication, California Public Road Data. The most recent figures are from calendar year 2014 (released in October 2015). Population estimates for each year are taken from the Demographic Research Unit of the California Department of Finance. In 2014, the per capita daily VMT in the City of Los Angeles declined slightly to 10.73.

The City of Los Angeles, along with other agencies, has an opt-in period until July 1, 2020, to adopt the guidelines and new VMT-based criteria. Currently the city continues to use its established LOS criteria. However, in collaboration with the Department of City Planning, LADOT is updating its methodology for transportation analysis to achieve the goals of adopted City of Los Angeles plans and policies. This effort

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includes updating the City of Los Angeles CEQA Guidelines to comply with and implement State law (Senate Bill 743). On February 28, 2019 the Los Angeles planning commission recommended that the city council adopted a resolution to update the City's transportation thresholds using VMT criteria. It is anticipated that city council will vote on this resolution by summer 2019.

The LAUSD uses the criteria established by the city; therefore this analysis relies on currently adopted LOS methodologies and criteria to evaluate transportation impacts. The Project would not conflict or be inconsistent with the city of Los Angeles traffic analysis methodology. No impacts would occur and no further analysis is required.

c) Substantially increase [vehicle] hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact with Mitigation. See Section XIII. *Pedestrian Safety* for full analysis of pedestrian hazards. The Project-related geometric designs and incompatible uses (e.g., construction equipment) would not substantially increase pedestrian safety hazards. Impacts would be less than significant and no further analysis is required.

The main vehicular access to the school, parking lot and drop-off/pick-up area would be located off Madison Avenue south of 1st Street. The parking garage would have about 62 spaces and a designated drop-off/pick-up area and internal driveways that would allow for vehicular queuing within the internal circulation driveways. The drop-off/pick-up zone would permit student unloading and loading directly from the passenger side. Students and staff would access the campus from the subterranean parking garage via stairway or elevator. Signs would be posted to prohibit parking along the Madison Avenue school frontage on both sides of the driveway to ensure line of sight.

Madison Avenue is relatively flat and with minimum curvature—there are no obstructions blocking the line of sight between thru traffic and the access driveways with sufficient stopping sight distance. The Project site is be easily accessible from the surrounding streets. The Project would have standard driveway widths, turning radii, and provision of adequate line of sight to avoid conflict hazards. “Sight Distance Standards” from the Caltrans Highway Design Manual relates minimum sight distance values to a range of design speeds.¹⁴²

The Madison Avenue / 1st Street intersection is currently stop-controlled. The HCM calculations show that queues would extend from the intersection to the Project driveway. The row of cars may delay the flow in the drop-off and pick-up area. Long queues would occur during the student drop-off and pick-up periods and would dissipate after these periods, with no delays throughout the rest of the day. The Project driveway would allow full access (no turn restrictions) to Madison Avenue. The 95th percentile queue length—i.e., the length of the queue that is not exceeded 95 percent of the time—would be 3 vehicles. Assuming 25 feet per vehicle, the queue lengths to exit the garage would be 75 feet.¹⁴³

¹⁴² California Department of Transportation (Caltrans). 2012, May 7. Highway Design Manual. Table 201.1: Sight Distance Standards. <http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0200.pdf>.

¹⁴³ The Highway Capacity Manual (HCM) worksheet calculations for the project access driveway intersection at Madison Avenue are included in the Traffic Impact Analysis.



4. Environmental Checklist and Analysis

The Project would increase the concentration of pedestrians, bicycles, and vehicles on Madison Avenue; vehicle turning movements at the school driveway and at Madison Avenue / 1st Street intersection. Because of this concentration, pedestrian hazards may be significant.

LAUSD has design standards to ensure Project design does not create hazards for students or staff: compliance with OEHS Traffic and Pedestrian Safety Program for student drop-off areas and vehicle access (SC-PED-2); separation of foot traffic from vehicular traffic on and adjacent to campus (SC-PED-3); compliance with School Traffic Safety Reference Guide for passenger loading zones and parking restrictions (SC-PED-4); compliance with School Design Guide for student drop-off and pick-up, bus loading areas and parking areas for student safety (SC-PED-5); compliance with City design guidelines for access, parking, and circulation in the vicinity of the Project (SC-T-3).¹⁴⁴ As discussed above to improve the overall Madison Avenue / 1st Street intersection operation and to reduce pedestrian hazards and comply with SC-PED-2, SC-PED-4, and SC-T-3, LAUSD and BSS shall implement Mitigation Measures MM-PED-1 and MM-PED-2. These measures require the installation of pedestrian safety features to improve operations at the intersection and implementation of a Traffic Control Plan to minimize traffic congestion and enhance safety for students that walk and bike to school. With mitigation, impacts would be less than significant.

Mitigation Measures

Implementation of MM-PED-1 and MM-PED-2.

d) Result in inadequate emergency access?

Less Than Significant Impact. The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.¹⁴⁵ The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The charter school administrators would prepare and implement an emergency school evacuation plan in compliance with District "safe school plans." Construction and operation of the new school and closure of the existing school would not interfere with any other existing emergency response plans or emergency evacuation plans.

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.¹⁴⁶ Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls

¹⁴⁴ BSS has already complied with the City scope of analysis and methodology for the traffic and pedestrian study.

¹⁴⁵ 2012 Los Angeles County Operational Area Emergency Response Plan.
<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

¹⁴⁶ City of Los Angeles Municipal Code Appendix D Section D102.1.

4. Environmental Checklist and Analysis

of the first story of the building.¹⁴⁷ Additionally, BSS is required to comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires that BSS prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures.

The Project construction and operation would not interfere with existing emergency response plans or emergency evacuation plans. Emergency response and access impacts would be less than significant and no further analysis is required.

¹⁴⁷ California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

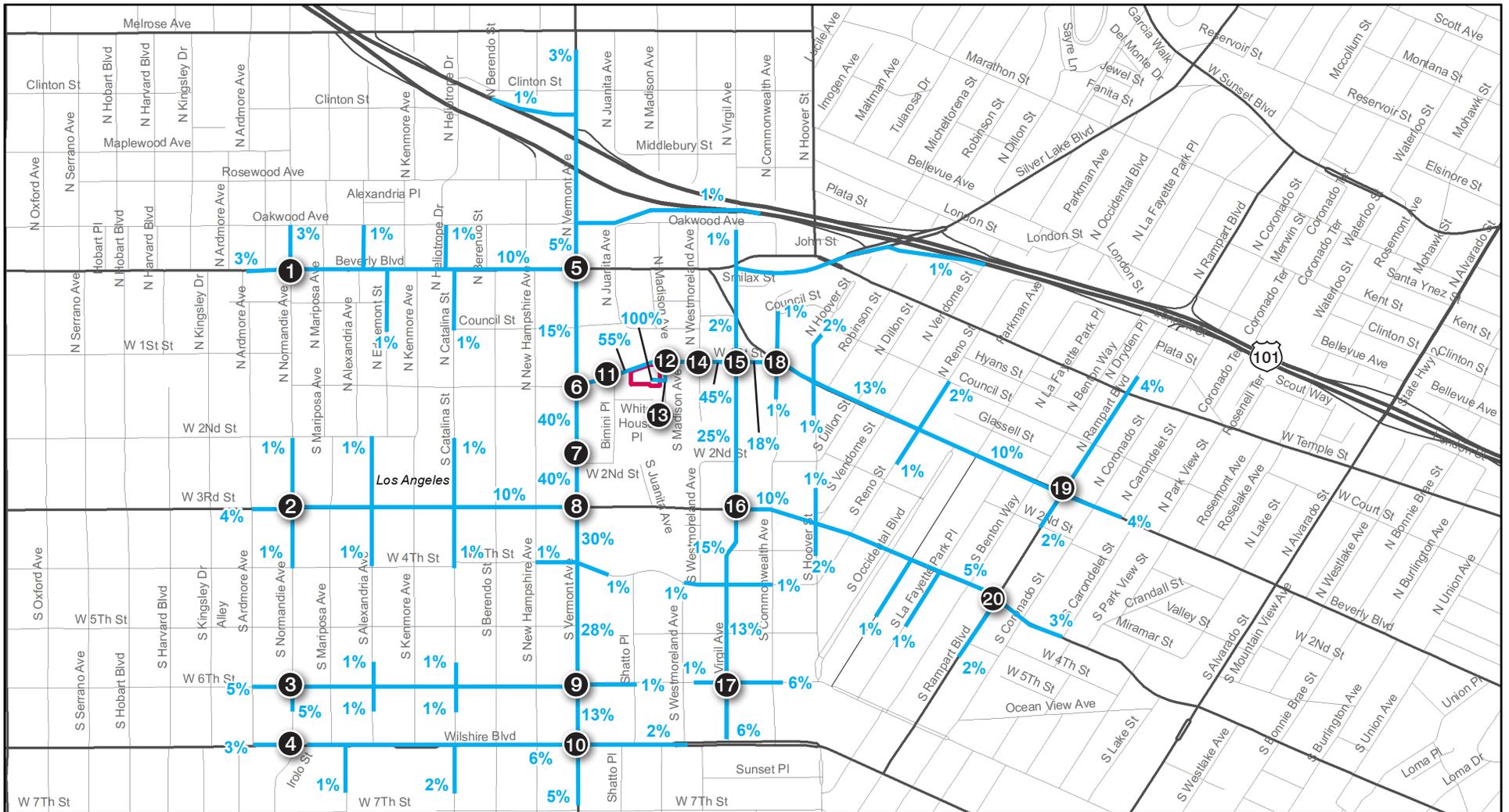


4. Environmental Checklist and Analysis

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Figure 9 - Project Trip Distribution
4. Environmental Checklist and Analysis



Source: ESRI, 2018

4. Environmental Checklist and Analysis

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4. Environmental Checklist and Analysis

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. TRIBAL CULTURAL RESOURCES.

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?

Yes No

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

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation:

LAUSD has SCs for minimizing impacts to tribal cultural resources. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	<p>In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications:</p> <ul style="list-style-type: none"> • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. <p>Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need</p>

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).

Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.

The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

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

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.¹⁴⁸

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. There are no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources on the school campus. No impacts would occur and no further analysis is required.

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

Less Than Significant Impact. No Native American tribes have requested consultation with Bright Star Schools or Pacific Charter School Development, pursuant to Public Resources Code Section 21080.3.1.

¹⁴⁸ California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.



4. Environmental Checklist and Analysis

Two Native American Tribes, the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, have requested notification through the PRC Section 21080.3.1 process with the LAUSD.

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. LAUSD Office of Health and Safety sent project notification to Fernandeño Tataviam Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleno Band of Mission Indians – Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe (2 separate contacts). No Tribe has requested consultation on this Project. However, as the result of the consultations on other projects, LAUSD has adopted Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the Project pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1 would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has SCs for minimizing impacts to utilities and service systems. Applicable SCs related to utilities and service systems impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-USS-1	<p>School Design Guide. (Book Two General Criteria, Section 2.4. C.2.f.1)</p> <p>Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.</p> <p>This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>
SC-USS-2	<p>LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.</p>



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

- a) **Require or result in the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

No Impact. The project site is in the City of Los Angeles (west of downtown) in the Koreatown neighborhood. The site is developed with a church and residential unit, is currently using utilities, and is surrounded by development. The new school would serve students currently living in the region and would not generate an increase in the regional student population or utility use. The Project would not require the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and no impact would occur. No further analysis is required.

- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

No Impact. LADWP water sources are summarized in section b, above. LADWP forecasts that it will have sufficient water supplies to meet demands in average-year and dry-year conditions over the 2020-2040 period.¹⁴⁹ The school would serve students living in the region and would not increase overall long-term water demands in the water district. Operation of the Project would not require new or expanded water supplies. Installation of landscape and irrigation improvements would comply with SC-USS-2 and SC-GHG-1, -2, and-3 for water conservation. No impact would occur and no further analysis is required.

- c) **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact. Wastewater from the property is currently treated at the Hyperion Treatment Plant in the Community of Playa Del Rey in the City of Los Angeles.¹⁵⁰ The new school would serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treated at the plant. The Project would not affect wastewater treatment capacity. No impact would occur and no further analysis is required.

¹⁴⁹ City of Los Angeles Department of Water and Power (LADWP). 2016, June 7. Urban Water Management Plan 2015. https://wuedata.water.ca.gov/public/uwmp_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%2D LADWP%2Epdf.

¹⁵⁰ Los Angeles Bureau of Sanitation (LABS). 2015, February 2. Hyperion Treatment Plant Tour: Sewers. http://www.lasewers.org/treatment_plants/hyperion/tour/sewers.htm.

4. Environmental Checklist and Analysis

d) Generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon Landfill in the Community of Castaic in unincorporated Los Angeles County; and the Sunshine Canyon Landfill in the Community of Sylmar in the City of Los Angeles.

Construction

Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) hazardous, or RCRA hazardous waste. The Project may require haul and disposal of contaminated soil and material (see IX, *Hazards and Hazardous Materials*). Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Under SC-USS-1, LAUSD established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the Project would adhere to these established standards. Therefore, the Project improvements would not adversely impact such landfills. Impacts would be less than significant and no further analysis is required.

Operation

The new school would serve students that are already generating trash at existing schools. The Project would not increase solid waste generation in the region. Impacts would be less than significant and no further analysis is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact.

Construction

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This is also required by CHPS criteria. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse requirement of 75 percent. Construction of the Project would adhere to these established standards.



4. Environmental Checklist and Analysis

Operation

Assembly Bill 939 (AB 939; Integrated Solid Waste Management Act of 1989; PRC §§ 40050 et seq.) established an integrated waste-management system for source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50 percent of its waste from landfills by the year 2000. AB 939 also required California counties to show 15 years disposal capacity for all jurisdictions within the county or show a plan to transform or divert its waste.

Assembly Bill 341 (2011) increased the statewide waste diversion goal to 75 percent by 2020 and mandated recycling for commercial and multi-family residential land uses.

Assembly Bill 1826 (PRC §§ 42649.8 et seq.), signed into law in September 2014, requires recycling of organic matter by businesses and multifamily residences of five or more units that generate such wastes in amounts over certain thresholds. The proposed school would include storage areas for recyclable materials and would take part in a recycling program. The Project would not conflict with laws governing solid waste disposal, and no impact would occur.

4. Environmental Checklist and Analysis

XXI. WILDFIRE.

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?

Yes No

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation:

There are no wildfire LAUSD adopted Standard Conditions of Approval.

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.¹⁵¹ CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the City.

¹⁵¹ California Department of Forestry and Fire Prevention (CAL FIRE). Frequently Asked Questions. http://www.fire.ca.gov/firepreventionfee/sra_faqs



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Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in a LRA. The nearest FHSZ in the SRA is a Very High about 12 miles north in La Crescenta along the foothills of the San Gabriel Mountains. The nearest FHSZ in the LRA is a about 1.2 miles northeast in the Silver Lake area; with the western edge along Sunset Boulevard.¹⁵² Land between the edge of the FHSZ and the Project site is dense urban development, along with the SR-101 (Hollywood Freeway).

The Project site is not located in or near state responsibility areas or lands classified as high fire hazard severity.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Under the Federal Disaster Mitigation Act of 2000 local governments, including counties, cities, and tribes in the United States, are required to prepare a Local Hazards Mitigation Plan as a condition of receiving Federal disaster mitigation funds. This Plan identifies the hazards that have occurred or may occur in the study area, and provides mitigation strategies, or action items, designed to save lives and reduce the destruction of property. The emergency response plans and emergency evacuation plans in effect are through the County, the District, and the City.

Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012¹⁵³ identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan, which was last updated in 2011. A comprehensive 2017 update to the plan is currently in draft form and has been submitted to the State of California Governor's Office of Emergency Services for review.¹⁵⁴

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "safe school plans."

The Project construction would not interfere with any other existing emergency response plans or emergency evacuation plans. When complete, the Project would improve emergency access on campus by providing vehicle access lanes throughout the campus. No emergency response impact would occur and no further analysis is required.

¹⁵² California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer.

http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps

¹⁵³ 2012 Los Angeles County Operational Area Emergency Response Plan.

<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

¹⁵⁴ City of Los Angeles. 2017, August. About the Hazard Mitigation Plan. <http://emergency.lacity.org/about-hmp>

4. Environmental Checklist and Analysis

- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

No Impact. The school campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site. Furthermore, the California Department of Forestry and Fire Prevention (CAL FIRE) does not classify any adjacent areas as a Very High Fire Hazard Severity Zone. Project development would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

- c) **Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

No Impact. The campus is in an urban area surrounded by development. The campus improvements would not require the installation of new infrastructure that may exacerbate fire risk. No impact would occur and no further analysis is required.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact. The campus is surrounded by development with flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. Project would not result in result of runoff, post-fire slope instability, or drainage changes. No impact would occur and no further analysis is required.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As discussed in Section IV, *Biological Resources*, the Project would neither degrade the quality of the environment nor substantially impact any endangered fauna or flora. The Project would demolish existing buildings and construct new ones. Because the property is already developed and the surrounding area is highly urbanized, the redevelopment of the property for a school would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Mandatory compliance with Fish and Game Code and SC-BIO-3 would be incorporated into the Project. Impacts would be less than significant and no further analysis is required.

As discussed under Section V, *Cultural Resources*, the Project would not significantly impact historic, archaeological, paleontological resources, and human remains. Because the property is not historic and is already developed and the surrounding area is highly urbanized, the redevelopment of the property for a school would not impact examples of California history or prehistory. As part of the Project, SC-CUL-7 through SC-CUL-10 would be incorporated. The Project does not have the potential to substantially degrade the quality of the environment. Impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

Less Than Significant Impact. A cumulative impact could occur if the Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the Project is a school, the cumulative analysis is generally confined to the immediate vicinity or within a one-mile radius. The District has several past, present, and planned charter school projects within the District’s boundaries, but none of these would occur within one mile of the campus. The City of Los Angeles has several projects that has and would add traffic to the surrounding roadways. In consideration of the preceding analysis, the Project’s contribution to cumulative traffic impacts would be less than significant, and therefore, Project impacts would not be cumulatively considerable.

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact. As discussed in the above analyses, the Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. No further analysis is required.

5. List of Preparers

5.1 LEAD AGENCY

Los Angeles Unified School District, Office of Environmental Health & Safety

Eimon Smith, CEQA Project Manager - Contract Professional

Christy Wong, Assistant CEQA Project Manager - Contract Professional

Gwenn Godek, CEQA Adviser - Contract Professional

5.2 PROJECT APPLICANT

Bright Star Schools

Elijah Sugay, Vice President, Finance & Facilities

APPLICANT REPRESENTATIVE - Pacific Charter School Development

Darryl Evans, Project Manager

Hope Fang, , AICP, LEED AP, Project Manager

5.3 CEQA CONSULTANT

PlaceWorks

Alice Houseworth, AICP, LEED AP, Senior Associate

Fernando Sotelo, PE, PTP, Senior Associate

John Vang, JD, Senior Associate

Alyssa Way, Project Planner

Joshua Carman, Senior Associate

Isabel Garcia, Project Planner

Cary Nakama, Graphic Artist

Gina Froelich, Senior Editor

Laura Muñoz, Document Specialist

Maria Heber, Clerical

5. List of Preparers

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Appendices

Appendices

The appendices are provided on the attached compact disc.

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Geotechnical Investigation
- C. Geohazards Report
- D. Preliminary Environmental Assessment & Phase I Environmental Site Assessment
- E. Pipeline Safety Hazard Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Impact Assessment

Appendices

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