February 2020 | Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2019119071

BELVEDERE MIDDLE SCHOOL

Comprehensive Modernization Project

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Table of Contents

Table of Contents

APPENDICES

(Provided on the compact disc attached to the back cover)

List of Figures

Table of Contents

List of Tables

Abbreviations and Acronyms

Update as needed, minimize the use of acronyms. If a term is used only once, do not use the acronym. The acronym is used only at the first use of the term.

AAQS	ambient air quality standards
AASHTO	American Association of State Highway and Transportation Officials
BMPs	best management practices
BOE	[LAUSD] Board of Education
BUG	Backlight-Uplight-Glare
C&D	construction and demolition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
CDE	California Department of Education
CEQA	California Environmental Quality Act
CH_4	methane
CHPS	Collaborative for High Performance Schools
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
DSA	Division of the State Architect (under the California Department of General Services)
EIR	environmental impact report
FETU	Facilities Environmental Technical Unit
FTA	Federal Transit Administration
GHGs	greenhouse gases
HVAC	Heating, ventilation and air conditioning
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
LST	localized significance thresholds
LZ	lighting zones (LZ)
MEP	maximum extent practicable
MEP	Maximum Extent Practicable
MLD	Most Likely Descendant
MM	Mitigation Measures
MND	mitigated negative declaration
Mph	miles per hour
MT	metric ton
$MTCO_2e$	dioxide equivalents
$MTCO_2e$	metric tons of carbon dioxide equivalents
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
ND	negative declaration
NO_2	nitrogen dioxide
O_3	ozone
Pb	lead
PCBs	Polychlorinated Biphenyls
PDFs	Project design features
PFCs	perfluorocarbons
PM_{10}	particulate matter
$PM_{2.5}$	particulate matter
ppv	peak particle velocity

Abbreviations and Acronyms

PRC	Public Resources Code
Program EIR	Program Environmental Impact Report
SC	Standard Conditions of Approval
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SF6	sulfur hexafluoride
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SP	Specific Plan
Sq.ft.	square feet
STC	sound transmission class
SUP	School Upgrade Program

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization project at Belvedere Middle School (MS), 312 North Record Avenue, Unincorporated East Los Angeles, Los Angeles County, California. Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at the Belvedere MS Campus (Project site or Campus) through building replacement, renovation, modernization, and reconfiguration. The proposed comprehensive modernization project (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 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a $7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.[1]

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.[2] Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.[3]

On December 13, 2016, the BOE approved the project definition for the proposed Belvedere Middle School Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Project site while providing renovations, modernizations, and reconfiguration as needed.[4]

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1 LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.
2 LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.
3 LAUSD. LAUSD Board of Education Report- LAUSD Regular Meeting Stamped Order of Business. Report. 15/16 ed. Vol. 159. Los Angeles, CA: LAUSD, 2015.
4 LAUSD. LAUSD Board of Education Board Informative- Important Updates Regarding the Facilities Managed Bond Program.: LAUSD, September 18, 2018.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[5] and the State CEQA Guidelines.[6] 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.[7]

When an initial study identifies the potential for 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 a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[9]

1.4 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])

[5] California Public Resources Code, §21000 et seq (1970).
[6] California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.
[7] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.
[8] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.
[9] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

The proposed 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.

1.4.1 Initial Study

This Initial Study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 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 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 finding in an ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that an MND is the appropriate level of environmental documentation for this project.

1.4.2 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. Additionally, LAUSD will respond to Draft MND public comments in the Final MND.

1.4.3 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."

[10] *Program EIR for the School Upgrade Program. Report.* 2015. http://achieve.lausd.net/ceqa.

1. Introduction

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

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location, and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the Program EIR.

The proposed 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.

1.4.4 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

[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] Ibid, at 4-8.
[14] Ibid, at 1-7.

impacts, such as the California Green Building Code (CALGreen Code)[15], LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[16]

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. SCs 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 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 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 on-site 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

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

[16] 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.

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.

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.[17] 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.

1.5 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.

[17] CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.

1.6 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 with the incorporation of mitigation. This report contains the following sections:

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

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 or contents of this CEQA Initial Study.

A. CalEEMod Output May 1, 2019
B. Tree Inventory/Evaluation
C. Historic Resources Evaluation Report
D. Phase I Cultural Assessment
E. Geologic Investigation and Engineering Geologic Review
F. Final Phase I Environmental Site Assessment
G. Noise and Vibration Impact Analysis
H. Site Circulation Report
I. Construction Traffic Analysis
J. Notice of Intent to Adopt a Mitigated Negative Declaration
K. Public Comments

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

The approximately 12.1-acre school site is located at 312 North Record Avenue (Assessor Parcel Numbers [APNs] 5233-011-900 and 5233-012-912) in the community of East Los Angeles in an unincorporated portion of Los Angeles County. Regional access to the site is from East Cesar E. Chavez Avenue. (see **Figure 1, Regional Location**).

Within the greater Los Angeles region, the Project site is located in a residential area east of Downtown Los Angeles. Regionally, the Project is bounded by four freeways, SR-60 to the south, I-5 to the west, I-10 to the north, and I-710 to the east. The nearest major road is East Cesar E. Chavez Avenue, which borders the Project site immediately to the north (see **Figure 2, Aerial Location of the Project Site**).

2.2 SURROUNDING LAND USES

The Project site is bounded by East Cesar E. Chavez Avenue to the north, North Record Avenue to the west, Michigan Avenue to the south, and athletic fields and houses to the east bounded by San Carlos Street. Residences surrounding the Project site are single family homes or duplexes. The nearest residences to Belvedere MS's buildings are the residences immediately to the west across North Record Avenue. The nearest commercial use is along East Cesar E. Chavez Avenue, which functions as a commercial corridor.

2.3 CAMPUS HISTORY

As stated in the Historic Resources Evaluation Report prepared by Rincon Consultants, Inc.,[18] the Campus was initially established in 1924 on the western portion of the Project site. The Administrative Building, the Home Economics Building, the Shop Building, and the Academic Building were built in the 1920s. Following the 1933 Long Beach earthquake, these buildings were altered with stucco and architectural detailing.

In 1952, the Physical Education Building was built and in operation, becoming the eastern-most building on Campus. The Utility and Music buildings were completed in 1953, with the Multi-Purpose Building following in 1957. Classroom Building 1 replaced several small bungalows in 1962. The Choral Music Building located at the northern edge of the Campus dates back to 1963. Classroom Building 2 was completed in 1965 north of the Physical Education Building. Five portable classroom facilities were installed on Campus between 1940 and 1966. The last major facility constructed on the Campus was the Classroom and Library Building, built in 1969.

Prior to 1948, the Campus was bisected by a road that was no longer present by 1964. In the 1960s, the residential parcels to the east of the bisecting road were acquired to make up the eastern end of Campus. In the 1970s, the homes were removed, and the resulting land used as athletic fields. Since the 1970s, there have

[18] Rincon Consultants, Inc., Belvedere Middle School, Historical Resources Evaluation Report, June 2018.

been few major additions or alterations to the Campus, with new lunch shelters constructed in 1985 and 2001, and modernization of the Home Economics Building in 1996.[19]

2.4 EXISTING CONDITIONS

The Project site is currently developed as Belvedere MS on two contiguous parcels totaling approximately 12.1 acres. The Project site is approximately 315 feet above mean sea level with a topographic gradient generally sloping down to the east-southeast. There are 20 existing buildings, an athletic field and associated paved driveways, parking areas, and landscaping. The buildings are primarily located on the western and central portions of the Campus with the athletic field comprising the eastern portion. There is an underground parking garage located at the northwestern-most building and paved parking and an athletic area on the south-central portion of the school.

The Project site currently serves Belvedere MS, Collegiate Charter High School, and Central High Tri-C CDS, a continuation school/community day school. Belvedere MS serves grades 6 through 8 and is the primary user of the Project site. Collegiate Charter High School is an independent public charter school that leases property on the Project site. Collegiate Charter High School has a different bell schedule than Belvedere MS, and therefore, does not affect pick-up/drop-off circulation. The continuing education school on the Project site started in the 2018-2019 school year.

2.5 GENERAL PLAN AND EXISTING ZONING

The existing County of Los Angeles zoning at the Project site is Specific Plan (SP). [20] Specific Plan zoning is for property that is subject to a specific plan and is recognized as subject to different details and standards within the specific plan's development standards and procedures. The Project site is within the East Los Angeles 3rd Street Specific Plan area. The plan was adopted on November 12, 2014. The Project site is within the "East Cesar E. Chavez Avenue West" area of the East Los Angeles 3rd Street Specific Plan.

On February 19, 2019 the LAUSD Board of Education, adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094 (Bd. Of Ed Rpt No. 256-18/19).[21]

2.6 NECESSARY APPROVALS

It is anticipated that approvals required for the proposed Project would include, but may not be limited to, those listed below by agency type.

Responsible Agencies

A "Responsible Agency" is defined as a public agency other than the lead agency that has discretionary approval power over a project (CEQA Guidelines §15381). The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

[19] Rincon Consultants, Inc. Belvedere Middle School, Historical Resources Evaluation Report, June 2018.
[20] Los Angeles County. Department of Regional Planning, Z-Net, Accessed on February 8, 2019.
[21] LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. Approval of General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- Los Angeles County, Public Works Department. Permit for curb, gutter, and other offsite improvements.
- Los Angeles County, Fire Department. Approval of plans for emergency access and emergency evacuation.

Trustee Agencies

"Trustee Agencies" include those agencies that do not have discretionary powers, but that may review the EIR for adequacy and accuracy. Potential Reviewing Agencies for individual projects to be implemented under the SUP may include the following:

State

- California Department of Transportation
- California Resources Agency
- California Department of Conservation
- California Department of Fish & Wildlife
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol

Regional

- Metropolitan Transportation Authority
- South Coast Air Quality Management District
- Southern California Association of Governments

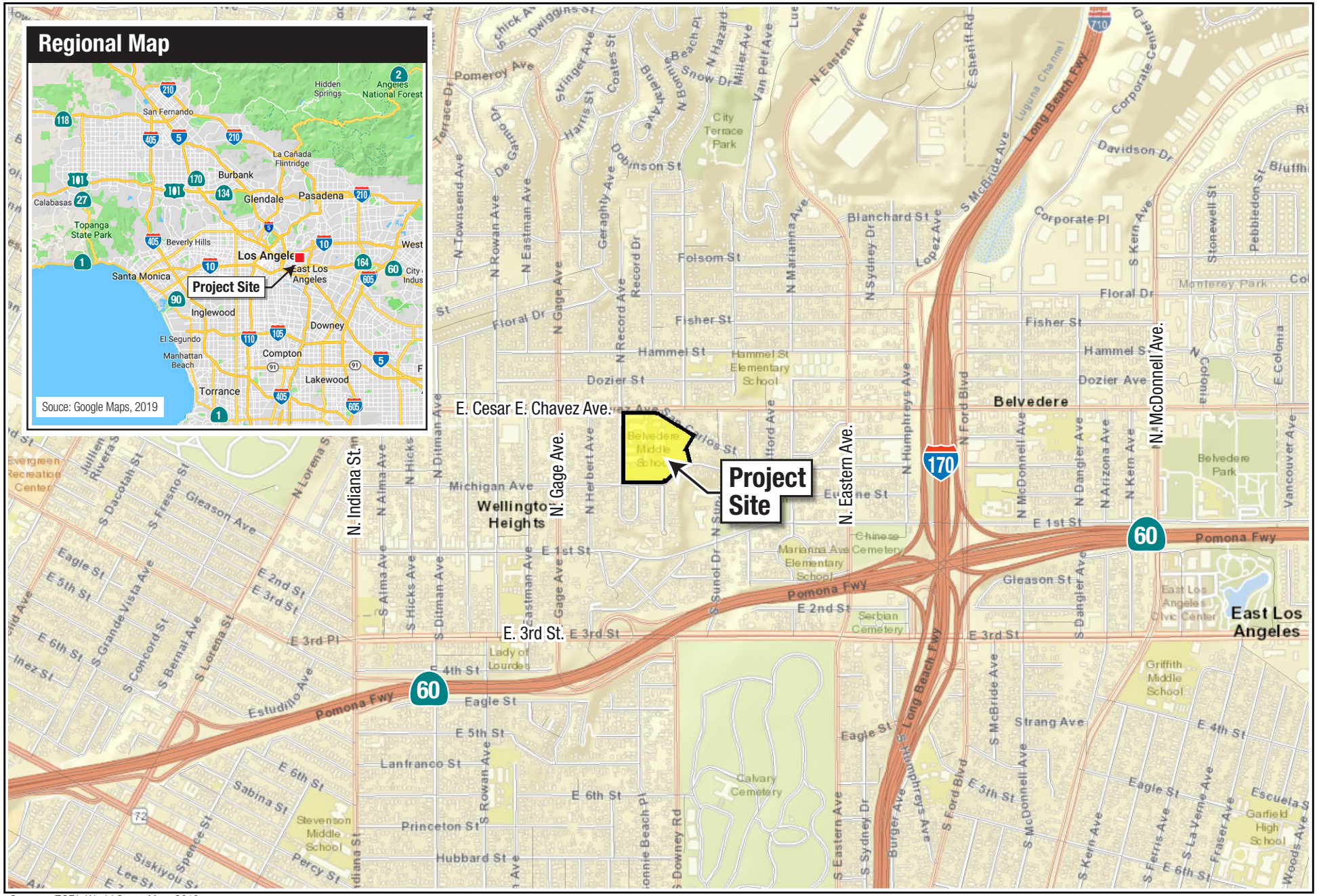
Local

- Los Angeles County, Department of Regional Planning
- Los Angeles County, Sheriff's Department
- Los Angeles County, Department of Parks and Recreation
- Los Angeles County, Department of Environmental Health

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1?

One Native American Tribe, Gabrieleño Band of Mission Indians - Kizh Nation, has requested notification and consultation through the PRC Section 21080.3.1 process. LAUSD notified the Gabrieleño Band of Mission Indians – Kizh Nation about this and other Projects on January 8, 2019. On January 9, 2019, the Gabrieleño Band of Mission Indians – Kizh Nation requested consultation on this and other Projects. The result of the consultation is to include SC-TCR-1 and SC-TCR-2 to protect any potential unanticipated discoveries associated with Tribal Cultural Resources.

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) contains provisions specific to confidentiality.



Sources: ESRI, World Street Map, 2016.

BELVEDERE MIDDLE SCHOOL - MND

envicom

Regional Location Map

0 750 1,500 Feet

FIGURE 1

2. Environmental Setting

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Sources: Google Earth Pro, Nov. 7, 2019.

BELVEDERE MIDDLE SCHOOL - MND

envicom

Aerial Location of the Project Site

0 125 250 Feet

FIGURE 2

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

Belvedere MS is located in the unincorporated Los Angeles County community of East Los Angeles. The Project site boundary spans two adjacent parcels totaling 12.1 acres. The western two-thirds of the Project site are developed with 20 buildings and structures, while the eastern third consists of athletic fields. The original Campus was established in 1924 with four buildings on the western parcel. Following the 1933 Long Beach earthquake, these buildings were redeveloped. Aside from the four original buildings, the other permanent buildings and structures were added to the campus primarily between 1951 and 2001. Given the age of the facilities, many of the school buildings are out of date and are in need of renovation and upgrade.

3.2 PROPOSED PROJECT

The proposed Project involves building replacement, renovation, modernization, and reconfiguration on the Campus of Belvedere MS as part of the School Upgrade Program. This Project would seismically retrofit buildings, and meet access requirements of the Americans with Disabilities Act (ADA). The exteriors of all existing buildings would be painted to provide a uniformed look across the Campus and enhance curb appeal. Upgrades to aging and outdated infrastructure, such as the utilities and irrigation, will also be included. Various Campus safety improvements will be made, including site lighting, fencing gates, and CCTV systems. Landscape and hardscape improvements will also be made to include a student garden, central courtyard, parking lot, and service yard.

The Project will reduce the amount of classrooms, thus reducing the overall student capacity. Upon completion of the Project, the Collegiate Charter High School lease will not be renewed and that use of the Campus would cease.

3.2.1 Campus Buildings

The proposed Project changes to the Campus Buildings are shown in **Table 3.2.1-1, Proposed Project Buildings (Demolition, Remodel, and Construction)**, and **Figure 3, Proposed Project Site Plan**.

3. Project Description

Table 3.2.1-1

Proposed Project Buildings (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition (sf)	Remodel/ Modernization (sf)	New Construction (sf)	Existing to Remain (sf)
1	Main Building (Administration Building)	38,741	15,979		
2	Classroom and Library Building (North Building)		56,429		
3	Choral Music (Building 154)				1,840
4	Existing All-Purpose Building (Building 151)				1,355
5	Existing Music Building (Building 150)				1,676
6	Storage Unit 2	371			
7	Classroom Building #2 (Math Lab)	7,441			
11	Physical Education Building	32,167			
12	Home Economics (Cafeteria)	13,610			
13	Lunch Shelter	899			
14	Utility Building (Plant)	1,738			
15	Shop Building (Industrial Arts)	16,623			
16	Storage Unit #1	376			
17	Green House	195			
19	Agriculture Classroom	752			
20	Classroom Building #1 (South Building)	25,198			
21	Academic Building	17,519			
25	Existing Building #25	1,862			
26	New Lunch Shelter	1,481			
27	Flammable Storage	51			

Table 3.2.1-1
Proposed Project Buildings (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition (sf)	Remodel/ Modernization (sf)	New Construction (sf)	Existing to Remain (sf)
New Construction					
	Instruction Space			38,108	
	Physical Education/Athletics Facilities			19,153	
	Shared Support Areas			19,953	
	Administration			6,964	
	Maintenance & Operations			3,087	
	Campus Total* (does not include outdoor space)	**159,024**	**72,408**	**87,266**	**4,871**

Note: Floor area numbers are in square feet (sq. ft.). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These changes would not significantly change the environmental analysis or findings in this IS.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Belvedere Middle School Comprehensive Modernization Project Scheme A – Space Program. September 15, 2019.

Current total floor area = Existing + Remodel + Demolition (237,057 sq. ft.). After Project square footage = Existing + Remodel + New (164,546). Decrease in campus square footage = 72,511 sq. ft

As shown in Table 3.2.1-1, with Project implementation, the total Campus building floor area would decrease by 72,511 sq. ft.

3.2.2 Site Access, Circulation, and Parking

The Site Circulation Report by LIN Consulting, Inc. dated October 26, 2018 was used to delineate school access, circulation, and parking (**Appendix H**). The report is incorporated into the IS analysis below.

The Campus is generally bounded by East Cesar E. Chavez Avenue to the north, Michigan Avenue to the south, North Record Avenue to the west, and San Carlos Street to the northeast. The east side of the Campus is bounded by a single-family residential neighborhood.

Bus transit stops adjacent to Belvedere MS include Metro 68 traveling westbound on East Cesar E. Chavez Avenue at the northeast corner of North Record Avenue and Metro 68 traveling eastbound on the southeast corner of North Record Avenue. The Metro Gold Line Indiana Station is approximately 1 mile southwest of Belvedere MS.

3. Project Description

There are no public bicycle facilities located within the school zone.[22] Sidewalks exist on both sides of East Cesar E. Chavez Avenue, North Record Avenue, and Michigan Avenue within the school zone. Along the northeast side of San Carlos Street there is no sidewalk for approximately 250 feet just south of its intersection with East Cesar E. Chavez Avenue. Pedestrian access to the school and sidewalks are available along the southwest side of San Carlos Street. Approximately 75 percent of the student body walk to school and approximately 10 to 15 students and faculty regularly bike to Belvedere MS. Bicycle racks and skateboard racks are provided within the Campus.

During the morning drop-off period, observed maximum vehicle queues were approximately 100 feet for the southbound and westbound directions at the intersection of North Record Avenue and Michigan Avenue. During the afternoon pick up period, maximum vehicle queues of approximately 500 feet were observed in the westbound direction on Michigan Avenue between North Record Avenue and North Bonnie Beach Place, approximately 200 feet for the eastbound through movement for the intersection of North Bonnie Beach Place and Michigan Avenue, and approximately 100 feet for the northbound movement in front of the school on North Record Avenue. Congestion generally occurs from the number of vehicles that double park and vehicles that navigate in and out of curb parking.

There are three faculty/staff parking lot facilities. The main parking lot is located underground beneath the northwestern most building, the classroom and library building. It contains 39 marked spaces with no accessible parking spaces and is approximately 95 percent utilized during school hours. The second parking lot is a surface lot located at the northeast side of the Campus. It contains 52 marked spaces and 3 van-accessible spaces and is approximately 50 percent utilized during school hours. The third parking lot is accessed from a gate located on East Cesar E. Chavez Avenue and is located between the administration school buildings and the gymnasium. This parking area contains 35 marked spaces, includes 3 van-accessible spaces, and is approximately 50 percent utilized. As Belvedere MS is a closed campus, faculty and visitors utilize available curb parking, mainly along North Record Avenue.

Most vehicular traffic to and from the school was observed to travel from East Cesar E. Chavez east and from Michigan Avenue east or west. There is an approximately 500-foot-long designated or signed passenger loading/unloading area north of Michigan Avenue between North Record Avenue and North Bonnie Beach Place. As the loading/unloading area is not sufficient in length to meet the demand, some vehicles park on the curb along Michigan Avenue, Nevada Avenue, and North Record Avenue. Other vehicles double park in the middle of the roadway. There is an additional loading/unloading area east of North Record Avenue where buses drop off or pick up students and occasional parents park in this area and block school buses.

As Belvedere MS is a closed campus, gates are only open for the morning and afternoon bell periods, with the main school entrance on North Record Avenue being the only access point during school hours. Most students enter the Campus through a gated entrance on North Record Avenue near the southeast corner of the intersection of East Cesar E Chavez Avenue and North Record Avenue and through a gated entrance on Michigan Avenue between Nevada Avenue and North Bonnie Beach Place. The north gated entrance along

[22] School zone is defined as "a designated roadway segment approaching, adjacent to, and beyond school buildings or grounds, or along which school related activities occur" in the California Manual on Uniform Traffic Control Devices (CA MUTCD) 2014 Edition.

East Cesar E. Chavez Avenue near San Carlos Street is not typically used by students and is typically used by faculty and staff who park in the northeast parking lot.

During the afternoon bell period, when school lets out, a high volume of students cross the intersection of North Record Avenue and East Cesar E. Chavez Avenue and North Record Avenue and Michigan Avenue. Crossing assistants are located at these intersections to stop students from crossing when traffic signals are red.

Most staff and faculty create vehicular traffic to the school and they predominantly come from the San Gabriel Valley area. This traffic mainly uses East Cesar E. Chavez Avenue to access the SR-60 freeway or the I-710 freeway.

There is one school bus used for magnet school students and six buses used for special education. All school buses use the east side of North Record Avenue for loading and unloading.

No changes will be made to pedestrian and vehicular circulation.

3.2.3 Landscaping

The proposed Project would involve removal and replacement of existing landscaping in selected areas of the Campus. The landscape design would comply with LAUSD School Design Guidelines. CHPS criteria would be implemented where appropriate. Irrigation systems would be installed compliant with LAUSD School Design Guidelines and Standards, CALGreen, and CHPS requirements, with a dedicated meter, new pressure reducing backflow, master valve, flow sensor, and smart controller to increase irrigation efficiency.[23] Plant material would comply with the LAUSD approved plant list and be grouped according to hydrozones. Planting areas would be amended accordingly per agronomist soils report in order to improve the soil quality, and water holding capacity.

Clear and accessible paths of travel as required by the ADA would be provided throughout the Campus. Any P.E. stations to be removed would be replaced with a one-to-one ratio of play value or greater than existing conditions. Site lighting would be integrated into the landscape design to provide safety and visibility on campus and consist of wall mounted building lights, light posts, and pathway lighting. Additional exterior campus lighting would comply with LAUSD School Design Guidelines.

The Tree Inventory/Evaluation conducted by Arbor Essence dated December 6, 2017 (**Appendix B**) studied 73 trees on the Campus.[24] Each of the 73 trees was evaluated, with comments and recommendations from an arborist and landscape architect, for its health. Of the 73 trees evaluated (see **Figure 4, Tree Inventory**), only one tree, the California sycamore, was considered protected under the City of Los Angeles Tree Protection Ordinance. Although the California sycamore is not protected within the County of Los Angeles, the LAUSD OEHS Tree Trimming and Removal Procedure outlines protected trees on LAUSD property. The California sycamore is a protected tree under the District's procedure. The rest of the western portion of the Campus is landscaped with ornamental bushes and shrubs, while the eastern portion of the Campus is comprised of a

[23] State of California. Adopted 2009 / updated 2015. Model Water Efficient Landscape Ordinance. 2009 ordinance available at: https://water.ca.gov/LegacyFiles/wateruseefficiency/docs/MWELO09-10-09.pdf 2015; update available at: https://water.ca.gov/LegacyFiles/wateruseefficiency/landscapeordinance/docs/2015%20MWELO%20Guidance%20for%20Local%20Agencies.pdf

[24] Arbor Essence, Tree Inventory/Evaluation, Belvedere Middle School, December 6, 2017.

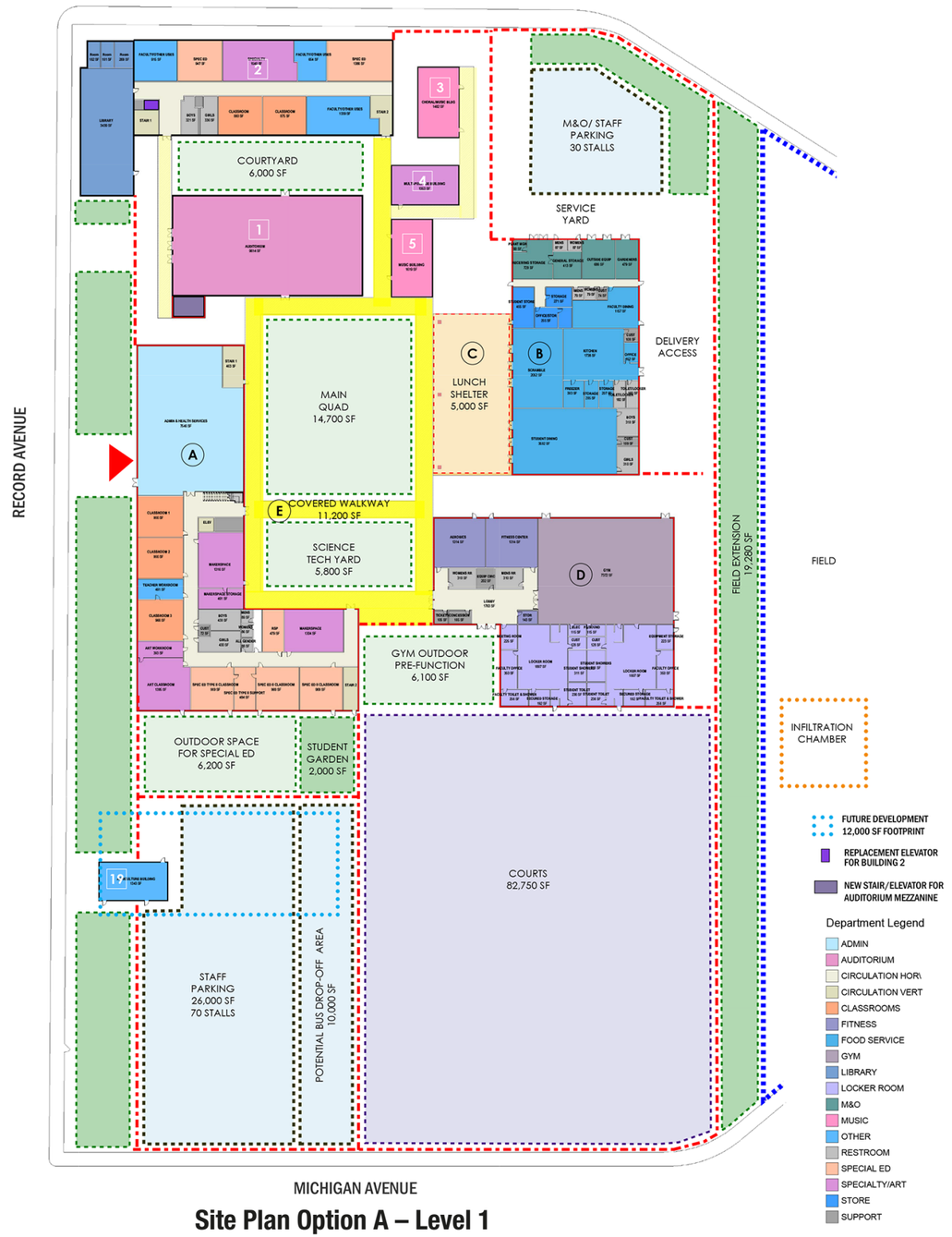
recreation lawn. Any tree removal activities would follow the procedure outlined in the LAUSD OEHS Tree Trimming and Removal Procedure. Existing trees deemed appropriate to save would be protected in place throughout construction, with attempts made to preserve as many existing trees as possible, to the extent feasible. New canopy and accent trees would be installed to increase canopy coverage and provide shade and interest throughout the Campus. Proposed trees would be climatically appropriate and located to enhance new buildings and site features.

3.2.4 Construction Phasing and Equipment

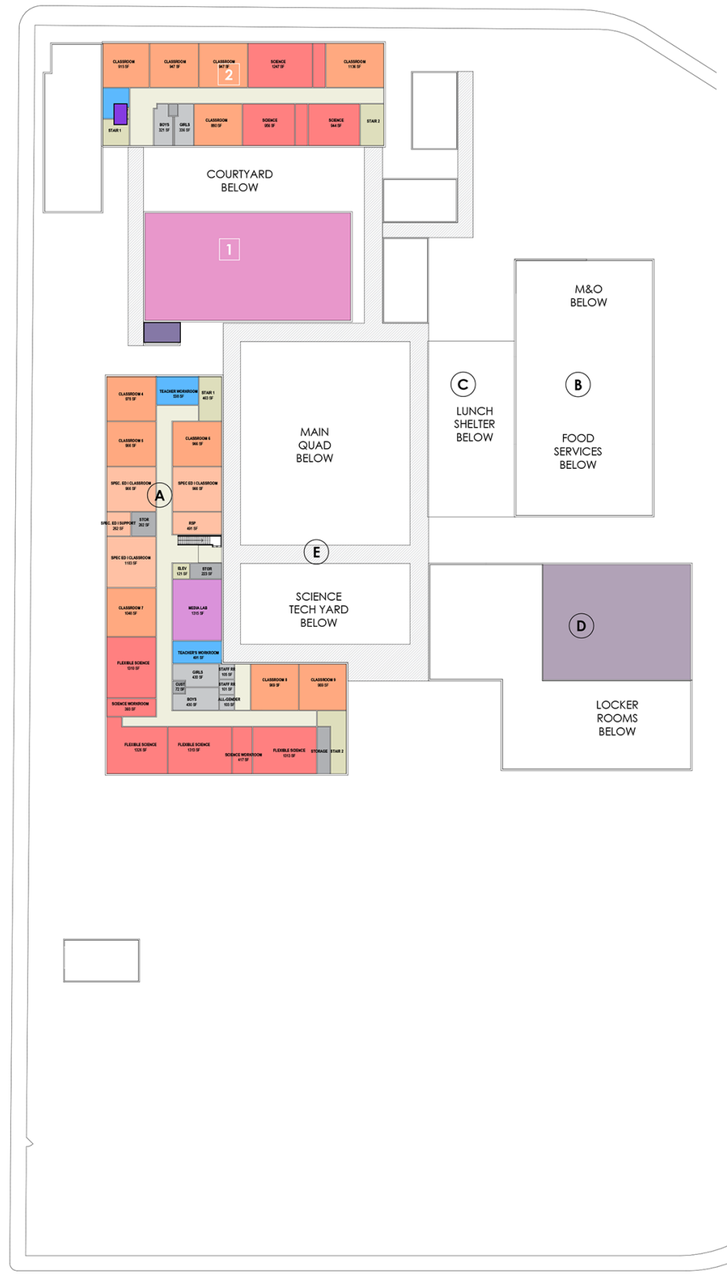
Construction is planned to start in Quarter 2 of 2021 and be completed by Quarter 1 of 2025 (bulk of work in two separate 18-month phases). **Table 3.2.4-1** summarizes the proposed construction activities and schedule for implementation of the proposed Project.

Table 3.2.4-1
Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Demolition / Interim Housing / Modernization (i.e., Building Interiors)	*2021* *Month* to *Month* *3 months*	Excavators w/breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips; average 10 CY end-dump trucks	10
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers/Air Compressor	2
Site Prep / Modernization	*Year* *Month* to *Month* *3 months*	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1
		Water Truck	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95% soil compaction)	2
		Trencher / Excavator	1
Building Construction / Modernization	*Year* *Month* to *Month* *12 months*	Concrete Trucks	5
		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Fork Lifts/Gradalls	4



Site Plan Option A – Level 1



Site Plan Option A – Level 2

MODERNIZATION

CLASSROOM AND LIBRARY BUILDING (BUILDING #2)
- Partition reconfiguration not required
- 21 Classrooms
- 3-Story + Basement
- 56,429 SF

AUDITORIUM (PART OF MAIN BUILDING #1)
- Auditorium Seating to remain, Not included in scope
- 1-Story + Basement + Mezzanine Level
- 13,563 SF

CHORAL BUILDING (BUILDING #3)
- 1,840 SF

CLASSROOM BUILDING (BUILDING #4)
- 1,335 SF

MUSIC BUILDING (BUILDING #5)
- 1,676 SF

AGRICULTURE CLASSROOM (BUILDING #19)
- 998 SF

NEW CONSTRUCTION

ADMINITRATION & CLASSROOM (BUILDING A)
- 21 Classrooms + 2 Specialty Classrooms
- 2-Story, 25,000 GSF Footprint
- 47,000 SF TOTAL

FOOD SERVICES AND M&O (BUILDING B)
- Includes Kitchen, Scramble, Indoor Dining, Student Store and M&O Spaces
- 1-Story, 16,500 GSF Footprint

LUNCH SHELTER (STRUCTURE C)
- 1-Story, 5,000 SF

GYM/LOCKER ROOM (BUILDING D)
- Includes Kitchen, Scramble, Indoor Dining, Student Store and M&O Spaces
- 1-Story, 21,000 GSF Footprint

COVERED WALKWAY (STRUCTURE E)
- 11,200 SF

SITE AREAS

LANDSCAPED AREAS
- 43,600 SF

QUAD/COURTYARD/OUTDOOR SPACE
- 38,800 SF

HARD COURTS
- 82,750 SF

STUDENT GARDEN
- 2,000 SF

EXTENSION OF FIELD
- 19,280 SF

Source: GKK works, Cannon Design, 2019.

Proposed Project Site Plan

3. Project Description

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Source: GKK works, 2019.

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.

- ☐ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☒ Cultural Resources
- ☐ Energy
- ☐ Geology & Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology & Water Quality
- ☐ Land Use & Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Pedestrian Safety
- ☐ Population & Housing
- ☐ Public Services
- ☐ None
- ☐ Recreation
- ☐ Transportation & Traffic
- ☐ Tribal Cultural Resources
- ☐ Utilities & Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance
- ☒ 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.

4. Environmental Checklist and Analysis

Signature

11/13/19

Date

Carlos A. Torres

Printed Name

CEQA Officer for LAUSD

Title

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

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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?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized 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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-AE-1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design. **School Design Guide**[26] *This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.*
SC-AE-2:	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. School Design Guide *This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.*
SC-AE-3:	*LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction*

[26] The School Design Guide establishes a consistent level of functionality, quality and maintainability for all District school facilities. The document has design guidelines and criteria for the planning, design and technical development of new schools, modernizations, and building expansion projects; it includes by reference the Facilities Space Program, the Educational Specifications, the Guide Specifications, the Standard Technical Drawings of the District, and applicable codes, regulations and industry standards.

4. Environmental Checklist and Analysis

	and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-4	LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1. Marquee Signs Bulletin BUL 5004.1 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.
SC-AE-5	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. **School Design Guide** *This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.*
SC-AE-6	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: • 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.

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.[27] 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 might include an urban skyline, valley, mountain range, the ocean, or other water bodies.[28] The Project site and surrounding area are flat and developed with urban land uses. The existing views from the area around the project site include residential and commercial uses. The area is very densely developed; thus views are mainly of existing nearby housing. The San Gabriel Mountains can be seen from certain view points on and around the Project site off in the distance. The existing development obstructs any clear views of the mountains to the north and the flat topography in the other directions does not provide any scenic views. Additionally, Project development would not obscure these views. The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection

[27] *LA CEQA Thresholds Guide, Chapter A.* Report. 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf. Note: although this Project site is within the Los Angeles County unincorporated area, the City of LA has provided CEQA guidance that is recommended by the LAUSD for this topic.

[28] *LA CEQA Thresholds Guide, Chapter A.* Report. 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf.

of unique scenic features and designated scenic vistas.[29] No impact to scenic vistas would occur. 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. The nearest designated state scenic highway to the site is State Route 2 (SR-2; Angeles Crest Highway) over 10 miles to the north.[30] Interstate 210 is an eligible state scenic highway and a portion of Interstate 110 is designated a historic parkway. Both of these highways are over 3 miles away from the site at its nearest point and separated by highly developed areas. The proposed structures associated with the Project would not be visible from any designated state scenic highway. Project development would not result in impacts to scenic resources within a designated state scenic highway. No impact to scenic resources would occur No impact would occur and no further analysis is required.

c) In non-urbanized 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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The Project site is within an urban residential neighborhood. There are residential uses on residentially zoned properties in each direction. The residential uses surrounding the area consist of a mix of single-family homes and multi-family apartments. There are commercial areas along the main thoroughfares in the Project vicinity, along with schools and parks that are intermixed in the residential areas, Belvedere MS being one of those schools intermixed in the residential areas.

The proposed Project would retain the current use of the site, within roughly the same building footprints and heights. Further, the Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide, and SC-AE-1 through SC-AE-6 into site-specific project design for the protection of character and quality of site surroundings.[31] Based on this analysis, impacts would be less than significant.

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project vicinity are limited to the residential uses adjacent to the southern, western and northern site boundaries. Impacts from shadows would be virtually the same as under current conditions, as the new Administration and Classroom building would be two stories in height, which is lower than the three story Administrative Building it would be replacing, and would be placed no closer to the Project site boundaries. Thus, the Project would not cause larger shadows that could significantly impact nearby sensitive residential uses. The other new

[29] *LA CEQA Thresholds Guide, Chapter A*. Report. 2006. http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf.
[30] California Scenic Highway Mapping System. September 7, 2011. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.
[31] *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. http://achieve.lausd.net/ceqa.

buildings that would be constructed are all 1-story buildings replacing other 1-story buildings in similar interior locations on the Campus, thus would not impact nearby sensitive residential uses. There would be no new shade impacts to uses surrounding the Campus. No significant impacts from shadows would occur as a result of the Project. No mitigation measures or further evaluation are required. Impacts 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 are glare and spill light. 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 a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

The Project site is in an urban setting and is fully developed. The current uses generate limited nighttime light from security and parking lot lights and exterior building lights. Surrounding land uses currently generate light from street lights, vehicle lights, parking lot lights, and exterior building security lights.

Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. Adherence to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses. Additionally, the exterior of the new buildings would be constructed of non-reflective building materials so vehicle headlights would not reflect glare for drivers. With respect to all SUP projects, the Program EIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and SC-AE-4, SC-AE-5, and SC-AE-6 to ensure that site lighting would have minimal off-site impacts.[32,33] The project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the project would have no impact on nighttime views. With implementation of the required measures from the LAUSD School Design Guide and SC-AE-4, SC-AE-5, and SC-AE-6, light and glare impacts would be less than significant. No mitigation measures or further evaluation are required. Impacts would be less than significant and no further analysis is required.

[32] *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. http://achieve.lausd.net/ceqa.
[33] *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. http://achieve.lausd.net/ceqa.

	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, as updated) 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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
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])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation:

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 site is within a dense developed portion of Los Angeles County with no farmland on the Campus or neighboring it. The Los Angeles County Important Farmland 2016 map published by the California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program shows that there is no designated farmland on the Campus.[34] Therefore, the Project would have no impact to converting farmland to non-agricultural use. No impact would occur and no further analysis is required.

[34] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017.

4. Environmental Checklist and Analysis

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

No Impact. The Project site is zoned for Specific Plan (SP).[35] There is no existing zoning for agricultural use on or nearby the Campus and there is no Williamson Act contract on the Campus. Therefore, the Project would have no impact to conflicting with existing zoning for agricultural use or a Williamson Act contract. 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. The Project site is zoned for Specific Plan (SP).[36] There is no existing zoning for forest land, timberland, or timberland zoned Timberland Production on or nearby the Campus. Therefore, the Project would have no impact to conflicting with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. 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. The Project site is not within a national forest, nor neighboring a national forest. The Project site is located within a highly dense urban area with no forest uses. Therefore, the Project would have no impact that would result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur and no further analysis is required.

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. The Project site is located in the unincorporated community of East Los Angeles, which is a highly urban and densely developed area. The Campus is not located on farmland or forest land, nor neighbors any farmland or forest land. Therefore, the Project would have no impact that would result in changes in the existing environment. No impact would occur and no further analysis is required.

[35] Los Angeles County, Department of Regional Planning, Z-Net, Accessed on February 8, 2019.
[36] Los Angeles County, Department of Regional Planning, Z-Net, Accessed on February 8, 2019.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Explanation:

The following analysis was completed using calculations from the California Emissions Estimator Model (CalEEMod) dated May 1, 2019, included in Appendix A.

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: • 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. • 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.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data 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. Construction bid contracts shall include protocols that 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. The

4. Environmental Checklist and Analysis

Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.

Exhaust Emissions

- 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.

Fugitive Dust

- 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.
- 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 (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal

and California Clean Air Act as either in attainment or nonattainment 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 nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.[37]

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

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

Less Than Significant Impact. The Project is within the SoCAB, which is overseen by the SCAQMD. The SCAQMD publishes an Air Quality Management Plan to which the Project is subject. Based on the Program EIR, the combined impact of all LAUSD school upgrade projects is not regionally significant and would therefore not warrant review by the Southern California Association of Governments (SCAG).[38] The Project is just one of the school upgrade projects within the whole LAUSD school upgrade program and would have less of an impact than the program as a whole. The Project is also not proposing to increase enrollment, thus during operation would not create new trips from new student attendance. Given the size of the Project, it would not be considered a substantial source of air pollution emissions (see also Section III.b). Therefore, the Project would have a less than significant impact with regard to conflicting with, or obstructing implementation of, the applicable air quality plan. 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 Project site is within the SoCAB which is in non-attainment for O_3 and $PM_{2.5}$, PM_{10}, and Pb for either the National AAQS or California AAQS.[39] Emissions analysis for these criteria pollutants, except for Pb, was performed using CalEEMod.

According to the School Upgrade Program EIR, the major sources of lead emissions to the air are from ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Today, the highest levels of lead are usually found near lead smelters. Because emissions of lead are only found in projects that are permitted by SCAQMD, Pb is not a pollutant of concern for School Upgrade Program projects, and thus is not analyzed as part of this Initial Study.[40]

Construction Emissions

The Project is proposing to demolish 158,208 sf, remodel 69,992 sf, and construct 86,512 new sf at Belvedere MS. Grading would occur on a footprint of 1.8 acres and consist of 850 cubic yards of export[41]. The Project

[37] California Air Resources Board, Area Designations Maps / State and National, Accessed October 01, 2018 at: http://www.arb.ca.gov/desig/adm/adm.htm.
[38] Placeworks, School Upgrade Program EIR, Los Angeles Unified School District, June 2014, p. 5.3-26.
[39] California Air Resources Board, Area Designations Maps / State and National, Accessed May 6, 2019 at: http://www.arb.ca.gov/desig/adm/adm.htm.
[40] Placeworks, School Upgrade Program EIR, Los Angeles Unified School District, June 2014, p. 5.3-9.
[41] Although previous estimates showed 31,850 cubic yards of export, the current estimate as of October 2019 is the export of approximately 850 cubic yards. Since the current estimate is less than the previous estimate, environmental impacts would be less than significant and no further analysis is required.

would be required to implement standard conditions of approval, as shown above. Compliance with these conditions would reduce emissions during construction.

For purposes of analyzing the construction related air quality emissions, the analysis of daily construction emissions for each pollutant was prepared using CalEEMod. The construction related air quality emissions are summarized in **Table 4.III-1, Maximum Daily Emissions – Construction**. The estimated maximum daily emissions from peak construction activities for each respective criteria pollutant are shown in Table 4.III-1 below.

Table 4.III-1
Maximum Daily Emissions – Construction

	Maximum Construction Emissions (lbs./day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions[(a)]	9.74	38.35	33.71	0.09	2.88	1.89
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod.2016.3.2 Output in Appendix A. Summer and winter outputs were considered and the higher of the two conservatively used for this analysis.
[(a)] Emissions estimates reflect required compliance with SCAQMD regulations (Rule 403) for reducing construction dust emissions.

As shown in Table 4.III-1, peak daily construction activity emissions associated with the Project would be below SCAQMD significance thresholds for criteria pollutants during the construction phases. The Project would be required to comply with SCAQMD rules, such as Rule 403, and the standard conditions of approval. Therefore, the Project would have a less than significant impact with regard to resulting in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment during the construction phase. Construction impacts would be less than significant and no further analysis is required.

Operational Emissions

Following construction, the Project would serve the same population and would not increase student enrollment. As the Project would serve the same population and student enrollment would not increase, it is not expected to increase operational emissions from existing conditions. Therefore, the Project would have no impact to resulting in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment during the operational phase. Operational impacts would be less than significant and no further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are populations that are generally more susceptible to the effects of air pollution than the population at large. Land uses considered sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities.

Construction Localized Significance Thresholds

The nearest sensitive receptors to the Project site are the existing students at Belvedere MS. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. The nearest residential sensitive receptor is located to the east across N. Record Ave., approximately 65 feet away from the Campus. However, due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Localized Significance Threshold (LST) analysis using SCAQMD methodology was conducted for the proposed project. LSTs are only applicable for certain criteria pollutants: oxides of nitrogen (NOx), CO, and particulate matter (PM_{10} and $PM_{2.5}$). The proposed Project was analyzed against the Localized Significance Thresholds (LST) for the Source Receptor Area (SRA) 11 – South San Gabriel Valley. LSTs are determined as a function of receptor distance.

For the proposed Project, to be conservative, the most stringent 25-meter source-receptor distance and 1-acre site size was used to elevate LST impacts. The maximum on-site emissions generated during any construction phase for LST-related criteria pollutants are listed in **Table 4.III-2, LST – Maximum On-site Construction Emissions**.

Table 4.III-2
LST - Maximum On-site Construction Emissions

LST 1 acre/25 meters South San Gabriel Valley	On-site Emissions (pounds/day)[a]			
	CO	NO_x	PM_{10}	$PM_{2.5}$
Max. On-Site Emissions	27.7	31.5	1.6	1.45
LST Threshold	673	83	5	4
Exceeds Threshold?	No	No	No	No

Source: CalEEMod.2016.3.2 Output in Appendix A.
[a] Emissions shown are the highest daily estimates for any construction phase. Emissions during any other phase would be less.

Table 4.III-2 shows that even at the most stringent LST thresholds, the Project would not exceed thresholds. Therefore, the Project would have a less than significant impact with regard to exposing sensitive receptors to substantial pollutant concentrations during construction. Impacts would be less than significant and no further analysis is required.

Construction Emission Health Risk

Project construction is expected to require 42 months, primarily consisting of two 18-month phases, with a break(s) or limited activity in between. As school will be active during the construction phase, the construction plan assures that less than 50 percent of the Project site would be disturbed at any one time. There would be an average of 50 workers on-site when students are present, but this number would increase during school breaks. The Project would be required to comply with applicable municipal code standards and standard conditions of approval. Therefore, the Project would have a less than significant impact with regard to exposing sensitive receptors to a construction emission health risk. Impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

Operation Localized Significance Thresholds

During operation the Project would serve the same population and have a similar number of students. The Project would not increase the number of students and would not expect to increase traffic. Schools also do not fall within the category of uses that is expected generate substantial uses of emissions.[42] Therefore, the Project would have a less than significant impact to exposing sensitive receptors to substantial pollutant concentrations during operation. Impacts would be less than significant and no further analysis is required.

Carbon Monoxide Hotspots

The Project is within the SoCAB, which is in attainment for CO. As discussed in the School Upgrade Program EIR, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour to generate a significant CO impact.[43] The student enrollment would not increase after construction; thus, the Project is not expected to increase traffic volumes by more than 44,000 vehicles. Therefore, the Project would have a less than significant impact with regard to exposing sensitive receptors to carbon monoxide hotspots. Impacts would be less than significant and no further analysis is required.

Soil Disturbance

Projects that involve earth-moving activities of more than 50 cubic yards of soil that contain identified toxic air contaminants (TACs) are subject to South Coast Air Quality Management (SCAQMD) Rule 1466. As the Project would involve earth-moving activities of more than 50 cubic yards, LAUSD would sample and test soils for the presence of TACs to determine if the Project is subject to SCAQMD Rule 1466. If TACs are found, LAUSD shall comply with all relevant and appropriate requirements of SCAQMD Rule 1466. Therefore, impacts would be less than significant. Impacts 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 involves building replacement, renovation, modernization, and reconfiguration at an existing middle school. The Project would be subject to the Los Angeles County Code and standard conditions of approval as shown above. There would not be additional significant emissions, such as those generating substantial odors, other than those discussed above, that would adversely affect a substantial number of people. Therefore, the Project would have a less than significant impact with regard to resulting in other emissions adversely affecting a substantial number of people. Impacts would be less than significant and no further analysis is required.

[42] Placeworks, School Upgrade Program EIR, Los Angeles Unified School District, June 2014, p. 5.3-30.
[43] Placeworks, School Upgrade Program EIR, Los Angeles Unified School District, June 2014, p. 5.3-30.

	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?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation:

The following analysis was completed with information from the LAUSD School Upgrade Program EIR and the site-specific Tree Inventory/Evaluation conducted by Arbor Essence dated December 6, 2017, included in Appendix B.

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-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.
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[44]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[45] Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat

[44] Substrate is the surface on which a plant or animal lives.

[45] 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.

4. Environmental Checklist and Analysis

- 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.
- 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?

Less Than Significant Impact. The Project site is highly developed with buildings and landscaped areas. Surrounding areas are also densely developed with little to no native or undisturbed habitat. Of the trees surveyed within the Tree Inventory/Evaluation, only one tree, the California sycamore, was considered protected under the LAUSD OEHS Tree Trimming and Removal Procedure.

Landscaped areas within and surrounding the Campus may provide habitat for wildlife habituated in an urban setting, but paved roads and parking areas within the urban setting provide little cover and limited foraging for the few wildlife species present in the surrounding urban environment. While there are no native species on the Campus, and the likelihood of a native species to occur on the Campus is unlikely, there is a potential for birds to nest on Campus and adjacent areas. This creates the potential to result in take of nesting birds. Implementation of SC-BIO-3 would ensure that any birds and bats that may occur on site are accounted for through surveys if construction is within the nesting season. Therefore, the Project would have a less than significant impact with regard to affecting species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Impacts would be less than significant 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, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. The Project site is highly developed with buildings and landscaped areas. Areas surrounding the Campus are similarly densely developed. There are no riparian areas on the Campus or neighboring the Campus. Therefore, the Project would have no impact with regard to riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. No 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 Project site is fully developed and has been developed for over 50 years. There are no state or federally protected wetlands on site. The western two-thirds of the Project site is landscaped and paved over, while the eastern one-third of the Project site is a landscaped recreational field of turf grass. All areas of the Project site and its surroundings are highly developed; thus, improvements would not impact protected wetlands. Therefore, the Project would have no impact with regard to state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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?

No Impact. The Project site is within a highly developed urban area within unincorporated Los Angeles County. According to the Los Angeles County General Plan, the Project site is not within or adjacent to a regional habitat linkage.[46] There are no waterbodies within or adjacent to the Project and thus would have not potential for migratory fish. All of the existing vegetation on site is ornamental and maintained landscape. Therefore, the Project would have no impact with regard to interfering 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. No impact would occur 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 is within a highly developed urban area within unincorporated Los Angeles County. A Tree Inventory and Evaluation was conducted for 73 trees on the Project site and only one was identified as being protected.[47] That tree was a California Sycamore which is only protected in the City of Los Angeles Tree Protection Ordinance but not protected within Los Angeles County. Other vegetation on the Project site consists of ornamental bushes and shrubs. All tree removal activities associated with the proposed Project would be required to comply with the LAUSD OEHS Tree Trimming and Removal Procedure. Therefore, the Project would have no impact with regard to conflicting with any local policies or ordinances protecting biological resources, such as trees. No impact 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 Project site is within a highly developed area within unincorporated Los Angeles County. There are not significant amounts of open space within the surrounding areas. The Project is not within a Regional Wildlife Linkage[48] nor is it within a habitat conservation plan. Therefore, the Project would have no impact with regard to conflicting with provisions of an adopted or approved local, regional, or state habitat conservation plan. No impact would occur and no further analysis is required.

[46] Los Angeles County, General Plan 2035, Figure 9.2: Regional Habitat Linkages, May 2014.
[47] Arbor Essence, Tree Inventory/Evaluation, Belvedere Middle School, December 6, 2017.
[48] Los Angeles County. General Plan 2035, Figure 9.2: Regional Habitat Linkages, May 2014.

	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 the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Explanation:

The following analysis was completed using information from the Belvedere Middle School Historical Resources Evaluation Report prepared by Rincon Consultants, Inc. dated June 2018 (HRER), included in **Appendix C** and the Phase I Cultural Assessment for the Belvedere Middle School Project prepared by Envicom Corporation on April 4, 2019, included in **Appendix D**.

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	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. 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.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • 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: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o 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 Section 15064.5?

Less Than Significant Impact. The Administrative Building, Home Economics Building, Shop Building, and Academic Building are the oldest buildings on campus, dating back to the mid-to-late 1920s. Each of these buildings were extensively altered after the 1933 Long Beach earthquake and in subsequent decades. Alterations and additions to these buildings resulted in the loss of integrity of design, materials, and workmanship. As a result, these buildings no longer retain architectural integrity. The HRER found that the Campus is not eligible as a historic built environmental resource. Therefore, changes to the Campus would not affect the significance of a historical resource pursuant to Section 15064.5, and impacts would be less than significant. Impacts 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 with Mitigation Incorporated. A cultural resource record search was conducted by the South Central Coastal Information Center (SCCIC) and the California Native American Heritage Commission (NAHC).[49] Both searches examined the Project site plus a 0.5-mile study area around the Project. The record search results from the SCCIC were received on January 9, 2019 and resulted in no previously identified cultural resources located within the Project property. However, 17 historic archaeological cultural

[49] Envicom Corporation, Phase I Cultural Assessment of the Belvedere Middle School Project, Los Angeles County, California, April 4, 2019.

resources were located within the 0.5-mile study area and although none of the 17 resources were adjacent or close to Belvedere Middle School and would not be directly affected, the Project location was determined to be sensitive for older historic archaeological cultural resources based on the occurrence of resources in the study area. Additionally, 18 cultural resource reports involving the surrounding 0.5-mile study area were identified within the SCCIC results, but no results directly involving the Project property.

A physical assessment of the Project property was also conducted to determine if previously unrecorded cultural resources could be identified from surface observation. Upon examination, it was determined that the athletic field was mostly modern fill and monitoring was not recommended. The landscaped area to the south of the agricultural building appeared to follow the original landscape slope and may contain subsurface artifacts and/or features that are associated with the earliest use of the school. No cultural resources were found during the physical assessment.

As the results of the SCCIC study area, the land use history, and study of historic maps and aerial photos indicated, the Project property had early historic residential development, the Project was determined to be within an area that is sensitive for older historic archaeological resources and thus have a potentially significant impact. LAUSD SC-CUL-6 through SC-CUL-10 will be employed to reduce impacts. In addition, implementation of Mitigation Measures **(MM)-CUL-1** would require monitoring and reporting during construction. With implementation of MM CUL-1 and SC-CUL-6 through SC-CUL-10, the Project would have a less than significant impact to archaeological resources. Impacts would be less than significant with incorporation of mitigation and no further analysis is required.

MM-CUL-1 An archaeological monitor that meets the Secretary of Interior qualifications will be on site during grading within the small former agricultural area in the southwest corner of the campus. The archaeological monitor will collect any prehistoric or older historic material that is uncovered through grading that is within a disturbed or sparse context, and can halt construction within 50-feet of a potentially significant cultural resource if necessary.

Artifacts collected from a disturbed or sparse context or that do not warrant additional assessment can be collected without the need to halt grading. However, if prehistoric artifact concentrations, layers, or features, or older historic foundations, artifact concentrations, or significant features are encountered, the Project "discovery" protocol should be followed.

A final Project Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the Project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the Monitoring Report. All artifacts recovered that are important, with diagnostic or location information that may be of importance, will be cleaned, analyzed, and described within the Monitoring Report. All materials will be curated at an appropriate depository. If important materials are found during monitoring, a Curation Plan will be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report.

4. Environmental Checklist and Analysis

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

Less Than Significant with Mitigation Incorporated. The Project site is within an area that is sensitive for older historic and prehistoric cultural resources.[50] Historic aerial photos show older historic development in the Project area. While there are no known human remains on site or formal cemeteries on site, the potential for inadvertent discovery of human remains is always a possibility. As the Project site is within an area sensitive for archaeological resources, the Project would have a potentially significant impact to disturb human remains. With implementation of MM-CUL-2, project impacts would be reduced to less than significant. Therefore, the Project would have a less than significant impact with regard to disturbing human remains. Impacts would be less than significant with incorporation of mitigation and no further analysis is required.

MM-CUL-2 The inadvertent discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code Section 7050.5 addresses these findings. This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. The Coroner must be notified of the find immediately, together with the City and the property owner.

If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials and an appropriate re-internment site. The Lead Agency and a qualified archaeologist shall also establish additional appropriate mitigation measures for further site development, which may include additional archaeological and Native American monitoring or subsurface testing.

[50] Envicom Corporation, Phase I Cultural Assessment of the Belvedere Middle School Project, Los Angeles County, California, April 4, 2019.

	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?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?	☐	☐	☒	☐

Explanation:

The Program EIR contains one SC for minimizing project impacts to GHG emissions and utilities and service systems that is applicable to energy. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to GHG emissions and utilities and service systems.

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-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 percent, with a goal of 20 percent 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	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: **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. **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.

The proposed Project would be designed to meet CHPS criteria for energy performance and includes an energy management system. 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.

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

Less Than Significant Impact. As detailed in the Project Description, the Project would include building replacement, renovation, modernization, and reconfiguration. During construction, the Project would be subject to the County of Los Angeles Building Code, County of Los Angeles Green Building Standards Code, California Building Code, and California Green Building Code. Compliance with these codes would also ensure efficient operational uses of energy resources. New construction would generally be more energy efficient than older construction, based on more energy-conserving code requirements over time. During operation, the Project site would be utilized for normal school functions, operating only during school hours, and would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would have a less than significant impact with regard to resulting in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The proposed Project would include building replacement and renovation, modernization, and reconfiguration of existing buildings on a middle school campus with new, more energy-efficient modernized buildings. The Project would be required to comply with the County of Los Angeles Building Code, County of Los Angeles Green Building Standards Code, California Building Code, and California Green Building Code. The codes that the Project would be required to comply with are in place to ensure compliance with state and local plans and ensure energy efficiency. Therefore, the Project would have a less than significant impact with regard to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no further analysis is required.

	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 California Geological Survey Special Publication 42.)	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Explanation:

The following analysis was completed using information from the Geotechnical Investigation and Engineering Geologic Review prepared by Southwest Inspection & Testing, Inc. dated July 5, 2017, included in **Appendix E** and the Phase I Cultural Assessment for the Belvedere Middle School Project prepared by Envicom Corporation on April 4, 2019, included in **Appendix D**.

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:

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-CUL-11	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.

	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. • 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.

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 California Geological Survey Special Publication 42.)

Less Than Significant Impact. The Project site is within Los Angeles County which is a highly seismic area within the influence of several faults that are considered to be active or potentially active. However, there are no known active or potentially active faults trending toward or through the site and it is not within any currently designated State of California Alquist-Priolo Special Studies Zones.[51] The closest fault zone to the Campus is the Elysian Park (Upper), which is over a mile away. There are several active and potentially active fault zones within a 50-mile radius but none run through the Campus. Given the distance of the Project site from nearby active and potentially active faults, potential for surface fault rupture within the Campus is considered very low.[52] Therefore, the Project would have a less than significant impact with respect to causing potential substantial adverse effects due to rupture of a known earthquake fault. Impacts would be less than significant and no further analysis is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is within the County of Los Angeles, which has numerous fault zones and is considered seismically active. As explained above, there are several faults within a 50-mile radius. For this reason, moderate to severe ground shaking can be expected. There have been several earthquakes of Richter Magnitude 6.0 or greater throughout history in the greater region, and many earthquakes of 5.9 or less within a few miles of the Campus. This historic pattern of seismic activity is expected to continue and is likely to result in moderate to severe ground shaking that will affect the Campus. Part of the Project's goals is to provide seismic upgrades for buildings and build newer buildings that would also be suited for seismic ground shaking. Compared to existing conditions, the Project would improve the school's resiliency to strong seismic ground shaking. Implementation of SC-GEO-1, which requires preparation of a Geohazard Assessment, would include geotechnical recommendations for construction to avoid impacts from seismic shaking. One of the primary objectives of the proposed Project is to ensure that buildings that have been identified as requiring seismic upgrades

[51] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.
[52] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.

are addressed. The recommendations in this report are required to be followed to avoid impacts from seismic ground shaking (see Appendix E). Additionally, all buildings would be designed and constructed in accordance with Title 24 of the California Building Standards Code. Therefore, the Project would have a less than significant impact with regard to causing potential substantial adverse effects due to strong seismic ground shaking. Impacts would be less than significant and no further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Project site is within a seismically active area, as is the case with Los Angeles County and the larger region. Liquefaction is the loss of soil strength due to a buildup of pore-water pressure during severe ground shaking. Liquefaction must simultaneously have strong ground shaking, shallow groundwater, and loss relatively clean sands to occur. The Campus is not mapped within any liquefaction hazard zone. Historic shallow groundwater level at the Campus is on order of 200 feet as documented in the state's seismic hazard zones report. Due to the deep groundwater level, potential for liquefaction does not exist for this site.[53] Therefore, the Project would have a less than significant impact with regard to seismic-related ground failure, including liquefaction. Impacts would be less than significant and no further analysis is required.

iv. **Landslides?**

Less Than Significant Impact. The Campus is within a seismically active area. The Campus is not within any landslide hazard zone. Topography within the Campus and its close surroundings is relatively flat to gently sloping. There is no steep upsloping grade within immediate vicinity of the Campus.[54] Therefore, the Project would have a less than significant impact with regard to potential substantial adverse effects due to landslides. Impacts would be less than significant and no further analysis is required.

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

Construction Phase

Less Than Significant Impact – The Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus, which would require earth moving activities that could create the potential for erosion. During construction, the Project would be subject to a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would create a plan to reduce potential for erosion into the stormwater drains and would require the use of best management practices (BMPs) to be implemented during construction. Use of BMPs as designated within the SWPPP would reduce potential impact from soil erosion or the loss of topsoil. Therefore, the Project would have a less than significant impact with regard to resulting in substantial soil erosion during the construction phase. Construction impacts would be less than significant and no further analysis is required.

[53] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.

[54] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.

4. Environmental Checklist and Analysis

Operational Phase

Less Than Significant Impact – The Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus . During operation, the Campus would be paved over and thus not have a significant amount of topsoil exposed. Thus, soil erosion would be minimal during operations. Therefore, the Project would have a less than significant impact with regard to resulting in substantial soil erosion during the operational phase. Operational 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. The Project site is not on a known active or potentially active fault zone. However, the Project site is within the highly seismic Southern California region within the influence of several faults that are considered to be active or potentially active. As stated above, the Project site is not subject to liquefaction or landslides. According to the Geotechnical Investigation and Engineering Geologic Review prepared pursuant to SC-GEO-1, the Project is also not subject to lateral spreading, subsidence, or collapse.[55] Construction would comply with all applicable state and local standards and guidelines. Therefore, the Project would have a less than significant impact with regard to being located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project. 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, as updated), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. The Campus is currently developed with existing buildings and the Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus . Subsurface soils at shallow depths across the school campus had laboratory test results indicating very low expansion potentials. Accordingly, the Geotechnical Investigation and Engineering Geologic Review prepared pursuant to SC-GEO-1 determined that the existing soils are considered non-expansive.[56] Construction would comply with all applicable state and local standards and guidelines. Therefore, the Project would have a less than significant impact with regard to being located on expansive soil and creating substantial direct or indirect risks to life or property. 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 Campus is currently connected to the existing Los Angeles County Department of Public Works sanitary sewer network and it would use the same sewer network after the Project is complete. The Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact on, and would not be impacted by soils incapable of adequately supporting the

[55] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.
[56] Southwest Inspection & Testing, Inc., Geotechnical Investigation and Engineering Geologic Review, Comprehensive Modernizations at Belvedere Middle School, 312 N. Record Avenue, Los Angeles, CA 90063, July 5, 2017.

use of septic tanks or alternative wastewater 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. According to the Phase I Cultural Assessment, the Project site contains older alluvial sediments that can contain significant fossil resources.[57] During construction, there is the potential for the discovery of fossils. SC-CUL-11, requires a paleontological monitor be retained to oversee ground-disturbing activities as determined by the scope of work and final grading plan. This standard condition would require construction activities to stop should a paleontological resource be found and allow for identification of potential resources. Therefore, with SC-CUL-11 the Project impacts to a unique paleontological resource, site, or unique geologic feature would be less than significant. Impacts would be less than significant and no further analysis is required.

[57] Envicom Corporation, Phase I Cultural Assessment for the Belvedere Middle School project, Los Angeles County, California, April 4, 2019.

4. Environmental Checklist and Analysis

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

Explanation:

The following analysis was completed using calculations from the California Emissions Estimator Model (CalEEMod) prepared by Envicom Corporation dated May 1, 2019, included in Appendix A.

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-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	Implementation of SC-USS-1.

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

Less Than Significant Impact. The California Code of Regulations defines greenhouse gases (GHGs) to include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs).[58] Because the warming potential of various identified GHGs differs, GHG emissions are commonly expressed in terms of carbon dioxide equivalents (CO_2e) that account for the volume and warming potential of each GHG generated by a particular emitter. The total GHG emissions from individual sources are then generally reported in metric tons (MT) and expressed as metric tons of carbon dioxide equivalents ($MTCO_2e$). Fossil fuel use in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for half globally. Energy use associated with industrial and commercial land uses contribute approximately one quarter of global GHG emissions. Project GHG emissions estimates were derived using CalEEMod Version 2016.3.2;[59] data, results are provided annual output tables in Appendix A.[60]

[58] California Code of Regulations, Section 15364.5.
[59] CalEEMod was developed by the SCAQMD to provide a model that calculates both construction emissions and operational emissions from a variety of land use projects, providing estimates of the daily maximum and annual average emissions for criteria pollutants and GHG emissions.
[60] Envicom Corporation CalEEMod data reports for this project are dated 3/17/2016.

Construction GHG Emissions

Construction would result in the short-term generation of GHG emissions from equipment, the use of various materials (paint, asphalt, etc.) and the disposal of construction waste. Project construction-related GHG emissions were modeled by Envicom Corporation using CalEEMod with the results provided in **Table 4.VIII-1, Project Construction Greenhouse Gas Emissions**.

Table 4.VIII-1
Project Construction Greenhouse Gas Emissions

Year	Emissions (Metric Tons CO_2e)
2021	721.2
2022	764
Total	**1,485.2**
30 Year Annual Amortized Rate	**49.5**
Significance Threshold[a]	3,000

Source: CalEEMod Version 2016.3.2, A South Coast AQMD model; annual data provided in Appendix A.
(a) On December 5, 2008, the South Coast AQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the South Coast AQMD is the lead agency of 10,000 Metric Tons (MT) CO_2 equivalent/year. In September 2010, the CEQA Significance Thresholds GHG Working Group released revisions recommending a threshold of 3,000 MT CO_2e for any land use project.

As shown in Table 4.VIII-1, total construction-related GHG emissions generated over the course of the construction period would be approximately 1,485.2 Metric Tons (MT) of CO_2e. The South Coast AQMD GHG emissions analysis policy for construction activities is to amortize emissions over a 30-year lifetime. There are no locally adopted significance thresholds for GHG emissions. The South Coast AQMD CEQA Significance Thresholds GHG Working Group recommends a threshold of 3,000 MT CO_2e for land use projects. In the absence of a locally adopted numerical threshold of significance, Project related GHG emissions in excess of this recommended threshold are presumed to trigger a requirement for enhanced GHG reduction at the Project level. Consistent with South Coast AQMD GHG emissions analysis policy for construction activities, to amortize emissions over a 30-year lifetime, the Project's 30-year annual amortized GHG emission rate would be 49.5 MT CO_2e, well below the threshold of 3,000 MT. Therefore, construction GHG emissions would be less than significant. Construction impacts would be less than significant and no further analysis is required.

Operational GHG Emissions

Operation of the proposed Project would result in GHG emissions from mobile sources such as employee and goods transportation as well as on-site use of electricity, natural gas, water, landscaping equipment, and the generation of solid waste and wastewater. The generation of operational GHG emissions was calculated using CalEEMod as recommended by the South Coast AQMD. Operational GHG emissions are provided in **Table 4.VIII-2, Project Operational Greenhouse Gas Emissions**.

4. Environmental Checklist and Analysis

Table 4.VIII-2
Project Operational Greenhouse Gas Emissions

Consumption Source	Emissions (MT CO_2e tons/year)
Area Sources [a]	0
Energy Utilization	609.9
Mobile Source	0
Solid Waste Generation	102.3
Water Consumption	79.3
Subtotal	**791.5**
Annual Amortized Construction	49.5
Total	**841**
Significance Threshold [b]	3,000

Source: Envicom Corporation CalEEMod Version 2016.3.1, annual results provided in Appendix A.

[a] CO_2e emission levels from area sources (e.g., off-site electricity generation) due to the project are very small and round to zero.

[b] On December 5, 2008, the South Coast AQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the South Coast AQMD is the lead agency of 10,000 Metric Tons (MT) CO_2 equivalent/year. In September 2010, the South Coast AQMD CEQA Significance Thresholds GHG Working Group released revisions that recommended a threshold of 3,000 MT CO_2e for any land use project.

As shown in Table 4.VIII-2, once completed, Project operations would emit approximately 841 MT CO_2e annually.[61] There are no locally adopted significance thresholds for GHG emissions. The South Coast AQMD CEQA Significance Thresholds GHG Working Group recommends a threshold of 3,000 MT CO_2e for land use projects. In the absence of a locally adopted numerical threshold of significance, project related GHG emissions in excess of this recommended threshold presumably trigger a requirement for enhanced GHG reduction at the project level. As shown in Table 6, the Project's combined annual operational GHG emissions and annual amortized construction-related GHG emissions would be well below 3,000 MT CO_2e per year. Thus, operational GHG emissions would be less than significant. Operational impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus. New construction will be required to comply with the California Green Building Standards Code (CALGreen), California Code of Regulations, Title 24, Part 11, which will result in buildings that are more energy efficient than existing ones built to previous state building codes. In addition, mobile source emissions and total GHG emissions shown in Table 4.VIII-2 would be well below significance thresholds. As such, the Project would be consistent with statewide goals and policies for energy efficiency aimed at reducing the generation of GHG emissions and would therefore avoid conflicting with GHG reduction plans or policies. The Project would not interfere with implementation of local or regional plans for achieving GHG reduction targets and impacts would be less than significant. Impacts would be less than significant and no further analysis is required.

[61] Including construction emissions annualized over a 30-year period.

	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?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Explanation:

The following analysis was completed using information from the Final Phase I ESA for Belvedere Middle School prepared by Tetra Tech, Inc. dated June 12, 2017, included in **Appendix F**.

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	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • 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).

4. Environmental Checklist and Analysis

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. As a school, the Project would not involve the production or use of a significant amount of hazardous chemicals. During construction and operation, the Project would use minimal amounts of hazardous materials that are involved in the construction of a building, such as paints and solvents, and maintenance of buildings, such as chemical cleaners. Use of hazardous materials would be in insignificant amounts and would be transported, used, and disposed of in accordance with applicable federal, state, and local regulations. The proper use of these materials for their intended purpose would not pose a significant risk to the public or environment.

Projects that involve earth-moving activities of more than 50 cubic yards of soil that contain identified toxic air contaminants (TACs) are subject to South Coast Air Quality Management (SCAQMD) Rule 1466. As the Project would involve earth-moving activities of more than 50 cubic yards, LAUSD would sample and test soils for the presence of TACs to determine if the Project is subject to SCAQMD Rule 1466. If TACs are found, LAUSD shall comply with all relevant and appropriate requirements of SCAQMD Rule 1466. Therefore, the Project would have a less than significant impact with respect to creating 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 analysis is required.

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

Less Than Significant Impact. The Project will not be handling or transporting significant amounts of hazardous materials during construction or occupancy. The Project will properly store hazardous materials that are necessary to construct school buildings, such as paint, in sufficiently small quantities to not create a hazard and in accordance with federal, state, and local regulations. Therefore, the Project would have a less than significant impact with respect to creating a significant hazard involving the release of hazardous materials into the environment. Impacts 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 Project would include building replacement, renovation, modernization, and reconfiguration of buildings on an existing school campus. Construction of the Project would involve the use of hazardous materials during construction, such as paints and solvents, and during operations, such as chemical cleaners. All hazardous materials that would be used for the Project would be stored in sufficiently small quantities to not create a hazard and in accordance with federal, state, and local regulations. Therefore, the Project would have a less than significant impact with respect to emitting hazardous emissions or hazardous materials within one-quarter mile of an existing or proposed school. 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. A database search was conducted for the Campus in the Final Phase I ESA for Belvedere Middle School prepared by Tetra Tech, Inc.[62] The Campus was listed on several databases with results of either no pertinent information, the site is permitted, the site has no violations found, or the site has disposed of asbestos-containing wastes. The database search also resulted in finding no indication of environmental liens, activity and use limitations, or engineering or institutional controls against the site. The Campus is not listed on the EDR Radius Map Report with Geocheck as having any violations, therefore the database listing is not considered to be a REC in connection with the site. Therefore, the Project would have a less than significant impact to being located on a site which is included on a list of hazardous materials sites resulting in creating a significant hazard to the public or the environment. Impacts would be less than significant and no further analysis is required.

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 Project site is not located within two miles of a public airport and would not result in a safety hazard for people residing or working in the Project area. The closest airport to the Campus is the El Monte Airport, which is over 8 miles away.[63] Therefore, the Project would have no impact with respect to posing a safety hazard or excessive noise from an airport for people residing or working in the Project area. 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 Project site is not located along a disaster route, based on the Los Angeles County General Plan 2035 Disaster Routes Map, nor is it on a connecting street to a disaster route.[64] Further, as enrollment will not be increased with the Project, significant new traffic generation would not occur. Therefore, the Project would have no impact with respect to impairing implementation of or physically altering an adopted emergency response plan or emergency evacuation plan. No 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 Project site is in a densely developed urban area and is not within a fire hazard area.[65] Therefore, the Project would have no impact with respect to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur and no further analysis is required.

[62] Tetra Tech, Inc., Final Phase I ESA for Belvedere Middle School, 312 North Record Avenue, Los Angeles, California 90063, July 19, 2017.
[63] Los Angeles County, General Plan 2035, Figure 7.4: Airports / Airfields Map, July 2014.
[64] Los Angeles County, General Plan 2035, Figure 12.6: Disaster Routes Map, May 2014.
[65] Los Angeles County, General Plan 2035, Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. 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?	☐	☐	☒	☐

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	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **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.
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities. **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.
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable:

	• Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.

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

Construction Phase

Less Than Significant Impact. The Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus . Construction of the project would involve grading which would create the potential for discharge into surface or groundwater. The Project would be required to prepare a SWPPP which would implement BMPs that would be designed to reduce potential water quality or waste discharge impacts. As part of the approval process, the project would be subject to SC-HWQ-2, which requires a compliance checklist for stormwater requirements during construction, and SC-HWQ-3 which requires compliance with water quality programs and procedures to be implemented during construction and operation. Implementation of compliance with stormwater requirements would reduce impacts from construction to water quality. Therefore, impacts would be less than significant with respect to violating water quality standards or waste discharge requirements during construction. Construction impacts would be less than significant and no further analysis is required.

Operation Phase

Less Than Significant Impact. During operation, the Project would operate as a school and a majority of the Project site would be paved over. There is no surface water source on or adjacent to the Project site, and the paved nature of the campus would reduce potential for groundwater impacts. Upon approval of the Project, it would also be subject to SC-HWQ-1 which requires the project to be designed to meet or exceed the current and applicable stormwater guidelines. Implementation of SC-HWQ-1 would reduce potential operational impacts to stormwater quality. Therefore, impacts would be less than significant with respect to violating water quality standards or waste discharge requirements during operation. Operational 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 Project site is currently developed as a school campus. The Project would include building replacement, renovation, modernization, and reconfiguration of buildings on campus. As the Project site is currently paved and would be paved following the Project, the recharge to groundwater would not be significantly different than existing conditions. Therefore, the Project would have a less than significant

impact with respect to decreasing groundwater supplies or interfering with groundwater recharge. Impacts would be less than significant and no further analysis is required.

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:

i) Result in substantial on- or offsite erosion or siltation;

Less Than Significant Impact. The Project site is currently developed as a school campus . There are no streams or rivers flowing through the Project site and impervious surfaces would be similar to existing conditions. Drainage at the site would be subject to SC-HWQ-1 and would have a similar drainage pattern to existing conditions. Therefore, the Project would have a less than significant impact with respect to altering the existing drainage pattern that would result in substantial on- or offsite erosion or siltation. 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 offsite;

Less Than Significant Impact. The Project site is currently developed as a school campus This Project includes replacement, renovation, modernization, and reconfiguration of buildings on campus. As the function, size, and location would all be similar to what currently exists on the Project site, the Project's drainage pattern and surface runoff would not substantially change. LAUSD would comply with County ordinances regulating drainage improvements and grading plans as they relate to construction of on-site improvements that affect drainage.[66] Compliance with these ordinances would ensure that the proposed Project would not adversely affect the local drainage system in a manner that would result in substantial flooding on or off site. In addition, the LAUSD would incorporate CHPS standards and LAUSD BMPs to the extent feasible.[67] Therefore, the Project would have a less than significant impact with respect to the rate or amount of surface runoff in a manner that would result in flooding on- or offsite. Impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project site is currently developed as a school campus The Project includes replacement, renovation, modernization, and reconfiguration of buildings on campus. As the function, size, and location of the buildings would all be similar to what currently exists on the Project site, the Project's drainage pattern would not substantially change. Runoff water from the Project would be similar to existing conditions and the stormwater drainage systems would not be subject to substantially increased or polluted runoff. Therefore, the Project would have a less than significant impact with respect to creating or contributing runoff water which would exceed the capacity of exiting or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant and no further analysis is required.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The Project site is currently developed as a school campus The Project includes replacement, renovation, modernization, and reconfiguration of buildings on campus.

[66] Collaborative for High Performance Schools (CHPS). n.d. CHPS Criteria. Available at: https://chps.net/chps-criteria. Accessed January 8, 2019.
[67] Ibid.

As the function, size, and location of the buildings would all be similar to what currently exists at the project site, the Project's drainage pattern would not substantially change. The drainage pattern and flood flows would be similar to what currently exists. The Project is not within a flood hazard zone and would not impede flood flows.[68] Therefore, the Project would have a less than significant impact with respect to impeding or redirecting flood flows. Impacts would be less than significant 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 not within a flood hazard, tsunami, or seiche zone.[69] Therefore, the Project would have no impact with respect to the risk of releasing pollutants due to Project inundation. No impact would occur and no further analysis is required.

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

Less Than Significant Impact. The Project site is currently developed as a school campus. The Project would include replacement, renovation, modernization, and reconfiguration of buildings on campus. The overall water quality and drainage patterns would be similar to existing conditions. The Project would also be subject to SC-HWQ-1 through SC-HWQ-3 which would reduce impacts to water quality and groundwater. Therefore, the Project would have a less than significant impact and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant and no further analysis is required.

[68] Los Angeles County, General Plan 2035, Figure 12.2: Flood Hazard Zones Policy Map, April 2013.
[69] Los Angeles County, General Plan 2035, Figure 12.2: Flood Hazard Zones Policy Map, April 2013.
Los Angeles County, General Plan 2035, Figure 12.3: Tsunami Hazard Areas, May 2014.

4. Environmental Checklist and Analysis

	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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Explanation:

a) Physically divide an established community?

No Impact. The Project site is currently developed as a school campus The Project site is within an established community, contained within existing fenced boundaries. The Project would involve modernization of the existing Campus and would not expand development outside of the current Campus boundary. Therefore, the Project would have no impact and would not physically 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 Project site is located fully within an existing middle school property and is within the Specific Plan area for the East Los Angeles 3rd Street Specific Plan. The Project would not construct or make alterations outside of the Campus. The Project site abuts East Cesar E. Chavez Avenue to the north, which is highlighted within the East Los Angeles Specific Plan as a corridor area that will facilitate complimentary mixed-use buildings. The Specific Plan strategy mainly applies to the commercial and mixed-use buildings along East Cesar E. Chavez Avenue and provides a vision and strategy for buildings within the Specific Plan. The upgrades to the school would include modernization of buildings, painting the outside of buildings, and various other upgrades, all of which would be made in compliance with local, state, and/or federal facilities requirements. The Los Angeles County Code and the East Los Angeles Specific Plan allows for schools on the Project site. The Project use is therefore consistent with County planning and zoning for the site. As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.[70] Therefore, the Project would have a less than significant impact and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant and no further analysis is required.

[70] LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

	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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation:

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 within the unincorporated Los Angeles County community of East Los Angeles. There are no known mineral resources on the site that would be a value to the region and residents of the state. Therefore, the Project would have no impact on the availability of a known mineral resource that would be a value to the region and residents of 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 site is within the unincorporated Los Angeles County community of East Los Angeles. As shown within the Los Angeles County General Plan, Figure 9.6: Mineral Resources Map, the Campus is outside of any mineral resource zones or oil and gas resource zone.[71] Within the East Los Angeles 3rd Street Plan, the Specific Plan for the Campus, there is no mention of mineral resources. Therefore, the Project would have no impact on the availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impact would occur and no further analysis is required.

[71] Los Angeles County, General Plan 2035, Figure 9.6: Mineral Resources, May 2014.

4. Environmental Checklist and Analysis

	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 a 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 in other applicable local, state, or federal standards?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Explanation:

The following analysis was completed using information from the Noise and Vibration Impact Analysis for The Belvedere Middle School Comprehensive Modernization Project prepared by Giroux & Associates dated June 22, 2019, included in **Appendix G**.

LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided 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}.[72]
SC-N-2	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. • 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.
SC-N-4	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.

[72] L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour.

SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-8	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. 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: <u>Source Controls</u> • 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. <u>Path Controls</u> • 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. <u>Receptor Controls</u> • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialog to involve affected residents. • 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.
SC-N-9	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.[73] Noise control measures may include, but are not limited to: <u>Path Controls</u> • Noise Attenuation Barriers[74] – 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. <u>Source Controls</u> • 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).

[73] 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.

[74] 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).

	• 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. 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: <u>Receptor Controls</u> • 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.
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.

a) Generation of a 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 in other applicable local, state, or federal standards?

Less Than Significant with Mitigation Incorporated.

<u>On Road Construction Noise</u>

The proposed Project would produce traffic noise. Estimates of traffic noise impacts would vary, depending upon the haul route and season. As construction truck haul routes have not been finalized, the Noise and Vibration Impact Analysis analyzed two different haul route scenarios. Two different scenarios during different seasons was also taken into consideration as truck haul route schedule is expected to change during when school is not in session.[75] For this analysis the two haul route scenarios are, 1) a haul route destined for the Puente Hills landfill, where trucks would travel along East Cesar E. Chavez Avenue to the Gage Avenue on-ramp to the SR 60 eastbound, and 2) a haul route destined for Scholl Canyon landfill, where trucks would travel along East Cesar E. Chavez Avenue to the Ford Boulevard on-ramp to the I-710 northbound. For this analysis, an average of 50 construction workers would be allowed on site during school operation (fall, winter and spring) and during summer months construction activities would increase to a maximum of 150 construction workers.

Land use compatibility noise thresholds are shown in the Noise and Vibration Impact Analysis as from the County of Los Angeles General Plan EIR. Exposures up to 65 dB CNEL for sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are considered normally unacceptable except in unusual circumstances. These standards apply primarily to any outdoor uses such as recreational space.

As the number of construction workers would change based on the time of the year and whether school is in session, both scenarios were analyzed in **Table 4.XIII-1, School Year Construction Traffic Noise Impact Analysis**, and **Table 4.XIII-2, Summer Construction Traffic Noise Impact Analysis**.

[75] Giroux & Associates, Noise and Vibration Impact Analysis, The Belvedere Middle School Comprehensive Modernization Project, June 15, 2019.

Table 4.XIII-1
School Year Construction Traffic Noise Impact Analysis
(CNEL in dBA at 50 feet from Centerline)

Roadway Segment		Existing	Exist+Proj SR 60	Exist+Proj I-710	Project Only Impact SR 60	Project Only Impact I-710
Cesar Chavez/	Gage Ave and Record Ave	57.0	57.8	57.3	0.8	0.4
	East of Record Ave	57.0	57.6	58.0	0.6	1.0
	West of Eastern Ave	57.4	57.9	58.3	0.5	0.9
	Eastern Ave-Humphreys Ave	57.6	57.9	58.1	0.2	0.4
	East of Humphreys Ave	58.0	58.2	58.4	0.2	0.4
	West of Ford Blvd	58.0	58.2	58.3	0.1	0.3
Gage Ave/	North of Cesar Chavez Ave	52.9	53.0	53.0	0.1	0.1
	Gage Ave-1st St	51.9	53.9	52.8	2.0	0.9
	1st St-3rd St	52.3	54.3	53.3	2.0	1.0
1St St/	West of Gage Ave	55.7	55.8	55.8	0.1	0.1
	East of Gage Ave	55.9	55.9	55.9	0.0	0.0
3rd St/	West of Gage Ave	55.1	55.3	55.3	0.2	0.2
	Gage Ave – SR 60 WB Ramp	56.0	56.5	56.2	0.4	0.2
Eastern Ave/	North of Cesar Chavez Ave	57.6	57.7	57.9	0.1	0.3
	South of Cesar Chavez Ave	57.1	57.2	57.2	0.2	0.2
Humphreys Ave/	I 710 SB Off Ramp	49.4	49.4	50.5	0.0	1.2
	Floral Dr-Cesar Chavez Ave	48.9	48.9	48.9	0.0	0.0
	South of Cesar Chavez Ave	48.0	48.0	48.0	0.0	0.0
Record Ave/	North of Cesar Chavez Ave	47.2	47.2	47.2	0.0	0.0
	South of Cesar Chavez Ave	46.5	53.3	53.3	**6.8**	**6.8**

4. Environmental Checklist and Analysis

Table 4.XIII-2
Summer Construction Traffic Noise Impact Analysis
(CNEL in dBA at 50 feet from Centerline)

Roadway Segment		Existing	Exist+Proj SR 60	Exist+Proj I-710	Project Only Impact SR 60	Project Only Impact I-710
Cesar Chavez/	Gage Ave and Record Ave				0.3	0.3
	East of Record Ave	56.0	56.5	56.5	0.5	0.5
	West of Eastern Ave	56.4	56.8	56.8	0.4	0.4
	Eastern Ave-Humphreys Ave	56.7	56.9	56.9	0.2	0.2
	East of Humphreys Ave	57.0	57.2	57.2	0.2	0.2
	West of Ford Blvd	57.0	57.2	57.2	0.1	0.1
Gage Ave/	North of Cesar Chavez Ave	51.9	52.0	52.0	0.1	0.1
	Gage Ave-1st St	50.9	51.7	51.6	0.8	0.7
	1st St-3rd St	51.4	52.2	52.1	0.8	0.8
1St St/	West of Gage Ave	54.7	54.8	54.8	0.1	0.1
	East of Gage Ave	55.0	55.0	55.0	0.0	0.0
3rd St/	West of Gage Ave	54.2	54.3	54.3	0.1	0.1
	Gage Ave – SR 60 WB Ramp	55.0	55.2	55.2	0.1	0.1
Eastern Ave/	North of Cesar Chavez Ave	56.7	56.7	56.7	0.1	0.1
	South of Cesar Chavez Ave	56.1	56.2	56.2	0.1	0.1
Humphreys Ave/	I 710 SB Off Ramp	48.4	48.4	48.4	0.0	0.0
	Floral Dr-Cesar Chavez Ave	47.9	47.9	47.9	0.0	0.0
	South of Cesar Chavez Ave	47.0	47.0	47.0	0.0	0.0
Record Ave/	North of Cesar Chavez Ave	46.2	46.2	46.2	0.0	0.0
	South of Cesar Chavez Ave	45.5	50.3	50.3	**4.8**	**4.8**

As shown in Tables 4.XIII-1 and 4.XIII-2, traffic volumes are generally already high in the area's urban setting, and because the Project would not result in many construction trips relative to existing traffic volumes, there is little noise impact from the Project trips along most of the analyzed roadway segments. However, Record Avenue currently carries very low traffic volumes. During the school year there are approximately 1,370 daily trips and during the summer the number decreases to 1,090 daily trips. Almost all Project construction traffic will utilize Record Avenue to access the site. The addition of 56-111 daily trips to the low traffic volumes creates a traffic noise impact that exceeds the +3 dBA CNEL threshold. For the school year, it is estimated that the Project traffic would create a +6.8 dBA CNEL increase and during the summer a +4.8 dBA CNEL increase. This impact would be observed by the residences are immediately west of Record Ave.

However, even the "with Project" construction traffic the noise levels along Record Avenue would be approximately 53 dBA CNEL when school is in session and only 50 dBA CNEL during the summer months. These noise levels are much less than the 65 dBA CNEL recommended compatibility threshold for both schools and residential uses. In addition, measured noise levels in the area were 65 dBA. This is likely because

the traffic noise calculations only include vehicles on Record Avenue and do not factor in the residual noise from Cesar Chavez Avenue and extraneous noise sources associated with an urban environment. Therefore, because the "with Project" construction noise levels are less than the recommended noise compatibility threshold and less than the observed noise levels, the Project roadway impacts are considered to be less than significant.

Off-Road Construction Noise

Construction of the Project is planned to occur from Q2 2021 to the Q1 2025. This analysis uses equipment information provided for the air quality analysis.

Specific noise standards for construction activities pursuant to the Los Angeles County Code, chapter 12.08.440, are as shown below.

Noise Restrictions at Affected Structures. The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in the following schedule:

1. At Residential Structures.

   a. Mobile Equipment. Maximum noise levels from mobile equipment:

	Single-family Residential (dBA)	**Multi-family Residential (dBA)**	**Semi-residential/ Commercial (dBA)**
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75	80	85
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays.	60	65	70

   b. Stationary Equipment. Maximum noise level for repetitively use of stationary equipment:

	Single-family Residential (dBA)	**Multi-family Residential (dBA)**	**Semi-residential/ Commercial (dBA)**
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60	65	70
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays.	50	55	60

The Program EIR outlines the following LAUSD noise level thresholds for school sites according to Education Code Section 17215. LAUSD has established maximum allowable noise levels to protect students and staff from noise impacts. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA or pre-project ambient noise levels. Therefore, the Project would result in a significant long-term noise impact if:

- Exterior noise levels exceed 67 dBA Leq;
- Interior classroom noise levels exceed 45 dBA Leq; or
- Permanent increase noise levels at nearby noise-sensitive land uses exceed 3 dBA CNEL.

4. Environmental Checklist and Analysis

Table 4.XIII-3, Off-road Mobile Construction Equipment Noise Levels, identifies the highest (Lmax) noise levels associated with each type of the probable equipment fleet and the extent of use. Accounting for equipment usage, hourly levels are represented as Leq.

Table 4.XIII-3
Off-road Mobile Construction Equipment Noise Levels

Phase Name	Equipment	Measured Noise @ 50 feet (dBA)	Cumulative Noise Level @ 50 feet (dBA)[1]
Demolition	Excavators w/breaker	81	77
	Loader	79	75
	Bobcat/Skip Loader	80	76
	Water Truck	80	76
	Jack Hammer	89	82
	Crushing Equipment	89	89
Site Prep	Excavator	81	77
	Compactor	83	76
	Loader	79	75
	Skip Loader	80	76
	Water Truck	80	76
	Vibratory Rollers	80	76
	Trencher / Excavator	80	77
Building Construction	Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	84	77
	Concrete Pump	80	73
	Crane	81	73
	Fork Lift/Gradall	83	75
	Backhoe	78	74
	Air Compressor	78	74
Paving	Skip Loader	80	76
	Roller	80	73
	Paver	77	74
	Asphalt Trucks	81	74
	Water Truck	80	76

Source: Source: FHWA's Roadway Construction Noise Model, 2006.

[1] Estimates take into account the fraction of time each piece of equipment is operating at full power during a construction operation.

Since most construction equipment is mobile, the corresponding threshold of significance used in the noise analysis is not to exceed Leq noise level of 75 dBA at a noise-sensitive use. Ambient noise levels in the Project site vicinity range from 68-74 dBA Leq. **Table 4.XIII-4, Loudest Construction Equipment Noise at Closest Off-Site Sensitive Uses,** shows the distance attenuation and ambient noise level associated with each receptor location.

Table 4.XIII-4
Loudest Construction Equipment Noise at Closest Off-Site Sensitive Uses

Sensitive Receptor	To Closest Campus Structure (feet)	Attenuation due to distance (dBA Leq)	Ambient Noise Level (dBA Leq)
Residents to the east across Record Ave	120	-8	65
Residents to the north across Cesar Chavez	270	-15	65
Residents to the south across Michigan Ave	230	-13	69
Residents to the east across San Carlos St	150	-10	65
On-Site Classrooms	20	+8	65-69

Using the information found in Table 4.XIII-3 and Table 4.XIII-4, **Table 4.XIII-5, Unmitigated Construction Noise Exceeding Threshold,** calculates the noise level at each receptor adjusting for distance attenuation. As shown, construction noise for mobile equipment is not expected to exceed the 75 dBA Los Angeles construction threshold for mobile equipment at the closest off-site homes. However, the school itself will incur noise which could interrupt the educational environment. As shown, in the absence of mitigation, construction noise could be as much as 23 dBA higher than the LAUSD threshold of 67 dBA Leq at on-site classrooms and offices.

4. Environmental Checklist and Analysis

Table 4.XIII-5
Unmitigated Construction Noise Exceeding Threshold

Phase Name	Equipment	Record Ave Homes (dBA Leq)	Exceeds 75 dBA Leq Threshold?	Cesar Chavez Homes (dBA Leq)	Exceeds 75 dBA Leq Threshold?	Michigan Av Homes (dBA Leq)	Exceeds 75 dBA Leq Threshold?	San Carlos St Homes (dBA Leq)	Exceeds 75 dBA Leq Threshold?	On-Site Class-rooms	Exceeds 67 dBA Leq Threshold?
Demolition	Excavators w/breaker	69	no	62	no	64	no	67	no	85	yes
	Loader	67	no	60	no	62	no	65	no	83	yes
	Bobcat/Skip	68	no	61	no	63	no	66	no	84	yes
	Water Truck	68	no	61	no	63	no	66	no	84	yes
	Jack Hammer	74	no	67	no	69	no	72	no	90	yes
Site Prep	Excavator	69	no	62	no	64	no	67	no	85	yes
	Compactor	68	no	61	no	63	no	66	no	84	yes
	Loader	67	no	60	no	62	no	65	no	83	yes
	Skip Loader	68	no	61	no	63	no	66	no	84	yes
	Water Truck	68	no	61	no	63	no	66	no	84	yes
	Vibratory Rollers	68	no	61	no	63	no	66	no	84	yes
	Trencher / Excavator	69	no	62	no	64	no	67	no	85	yes
Building Construct	Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	69	no	62	no	64	no	67	no	85	yes
	Concrete Pump	65	no	58	no	60	no	63	no	81	yes
	Crane	65	no	58	no	60	no	63	no	81	yes
	Forklift/Gradall	67	no	60	no	62	no	65	no	83	yes
	Backhoe	66	no	59	no	61	no	64	no	82	yes
	Air Compressor	66	no	59	no	61	no	64	no	82	yes
Paving	Skip Loader	68	no	61	no	63	no	66	no	84	yes
	Roller	65	no	58	no	60	no	63	no	81	yes
	Paver	66	no	59	no	61	no	64	no	82	yes
	Asphalt Truck	66	no	59	no	61	no	64	no	82	yes
	Water Truck	68	no	61	no	63	no	66	no	84	yes

Because construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dBA Leq), as well as exceed the County's threshold of more than a 5 dBA increase at off-site receptors, mitigation is required. Without mitigation the proposed Project would result in a potentially significant construction noise impact related to on-site construction equipment noise.

The LAUSD includes Standard Conditions to mitigate noise impacts. Standard conditions SC-N-1 and SC-N-2 require designing of the Project to ensure acceptable exterior and interior noise levels. Standard conditions SC-N-4 through SC-N-9, require site-specific noise control measures to be implemented during construction. The SC's are further expanded on in the Noise and Vibration Study through mitigation measures, **MM-NOI-1 and MM-NOI-2**, to reduce all increases in noise levels at on-site receptors to the maximum feasible degree. These measures include installation of exhaust mufflers, proper maintenance of construction equipment, and the use of noise barriers. Absorptive noise mufflers are commercially available and can feasibly reduce noise emitted by heavy-duty construction equipment. The City of Los Angeles recognizes that the use of mufflers can achieve noise reductions of up to 3 dBA (City of LA, 2006).[76] In addition, installation of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient of 0.75 (e.g., 1" plywood with acoustical blankets or aluminum sheets with a thickness of at least 0.125 inches) can reduce noise levels by up to 20 dBA. Therefore, implementation of MM-NOI-1 and MM-NOI-2, would reduce Project-related construction noise by a total of 23 dBA. Impacts would be less than significant with mitigation and no further analysis is required.

MM-NOI-1: The Project contractor shall use power construction equipment with state-of-the art noise shielding and muffling devices capable of attenuating sound by 3 dB(A) or more.

MM-NOI-2: Barriers such as flexible sound control curtains shall be erected between the proposed Project and adjacent sensitive receptors located in nearby residences and active classrooms to minimize the amount of noise during construction. These temporary sound barriers shall be 15 feet high with a minimum STC rating of 25 and capable of achieving a sound attenuation of at least 20 dBA. If not feasible, construction activities requiring such equipment will be scheduled during breaks, after school, or when school is not in session.

As shown in **Table 4.XIII-6, Mitigated Construction Noise Exceeding Threshold**, with the implementation of MM-NOI-1 and MM-NOI-2, construction noise levels would be reduced to acceptable levels. Therefore, impacts would be less than significant with respect to temporary increases in ambient noise levels.

[76] United Muffler Corp., Accessed on September 26, 2019 at: https://www.unitedmuffler.com/.

4. Environmental Checklist and Analysis

Table 4.XIII-6
Mitigated Construction Noise Exceeding Threshold (MM NOI-1 and MM NOI-2)

Phase Name	Equipment	Record Ave Homes (dBA Leq)	Exceeds 70 dBA Leq Threshold?	Cesar Chavez Homes (dBA Leq)	Exceeds 70 dBA Leq Threshold?	Michigan Ave Homes (dBA Leq)	Exceeds 74 dBA Leq Threshold?	San Carlos St Homes (dBA Leq)	Exceeds 70 dBA Leq Threshold?	On-Site Classrooms	Exceeds 67 dBA Leq Threshold?
Demolition	Excavators w/breaker	50	no	43	no	45	no	48	no	62	no
	Loader	48	no	41	no	43	no	46	no	60	no
	Bobcat/Skip	49	no	42	no	44	no	47	no	61	no
	Water Truck	49	no	42	no	44	no	47	no	61	no
	Jack Hammer	58	no	51	no	53	no	56	no	67	no
Site Prep	Excavator	50	no	43	no	45	no	48	no	62	no
	Compactor	52	no	45	no	47	no	50	no	61	no
	Loader	48	no	41	no	43	no	46	no	60	no
	Skip Loader	49	no	42	no	44	no	47	no	61	no
	Water Truck	49	no	42	no	44	no	47	no	61	no
	Vibratory Rollers	49	no	42	no	44	no	47	no	61	no
	Trencher / Excavator	49	no	42	no	44	no	47	no	62	no
Building Construct	Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	53	no	46	no	48	no	51	no	62	no
	Concrete Pump	49	no	42	no	44	no	47	no	58	no
	Crane	50	no	43	no	45	no	48	no	58	no
	Forklift/Gradall	52	no	45	no	47	no	50	no	60	no
	Backhoe	47	no	40	no	42	no	45	no	59	no
	Air Compressor	47	no	40	no	42	no	45	no	59	no
Paving	Skip Loader	49	no	42	no	44	no	47	no	61	no
	Roller	49	no	42	no	44	no	47	no	58	no
	Paver	46	no	39	no	41	no	44	no	59	no
	Asphalt Truck	50	no	43	no	45	no	48	no	59	no
	Water Truck	49	no	42	no	44	no	47	no	61	no

Stationary Source Operational Noise

The school enrollment and use are not expected to increase as a result of Project implementation. The school buzzers and bells, outdoor activities and student pick-up and drop-off times would remain the same as current conditions. Outdoor recreational activities would also remain the same. No mobile source impact would occur.

Heating, ventilation and air conditioning (HVAC) systems could be different as a result of updated equipment and addition of new structures, but these would be comparable or quieter than other, similar sources at the existing campus and would not result in notable changes on campus. Additionally, HVAC noise would be considerably lower than ambient noise levels, which are dominated by traffic in the Project urban environs. The Project would also be required to comply with SC-N-1 and SC-N-2, which would require design elements to ensure noise is at acceptable levels. Stationary source noise increases would be less than significant.

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

Less Than Significant with Mitigation Incorporated

On-Road Construction Vibration

Delivery and haul trucks would travel to and from the Project site throughout the construction period and may create travel-related vibration. A typical heavy construction truck may generate vibration of approximately 0.0027 in/sec at a location that is 50 feet from the truck. However, according to the Federal Transit Administration (FTA), typical road traffic-induced vibration levels are unlikely to be perceptible by people, and it is also unusual for vibration, even from sources such as buses and trucks, to be perceptible, even in locations close to major roads[77]. Because this Project is located in a busy industrialized urban area, localized traffic will mask any potential Project impacts.

Buildings along the construction haul route are typically at least 25 feet from the center of the nearest travel lane, taking into consideration sidewalks, setbacks, and/or on-street parking. These structures and uses may experience groundborne vibration levels of approximately 0.076 in/sec which is below the fragile building damage threshold criterion of 0.2 in/sec for fragile buildings. This level of vibration would also be below the human annoyance threshold of 0.240 in/sec. Therefore, Project construction traffic would negligibly impact vibration levels in the Project vicinity, and vibration impacts due to on-road travel would be less than significant for building damage and human annoyance.

Off-Road Construction Vibration

A vibration descriptor commonly used to determine structural damage is the peak particle velocity (ppv) which is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in in/sec. The range of such vibration is shown below in **Table 4.XIII-7, Human Response to Transient Vibration**.

[77] FTA "Transit Noise and Vibration Assessment," page 7-1, May 2006.

4. Environmental Checklist and Analysis

Table 4.XIII-7
Human Response To Transient Vibration

Average Human Response	ppv (in/sec)
Severe	2.00
Strongly perceptible	0.90
Distinctly perceptible	0.24
Barely perceptible	0.03
Source: Caltrans Transportation and Construction Vibration Guidance Manual, 2013.	

Over the years, numerous vibration criteria and standards have been suggested by researchers, organizations, and governmental agencies. According to Caltrans, the threshold for structural vibration damage for modern structures is 0.5 in/sec for intermittent sources, which include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. The American Association of State Highway and Transportation Officials (AASHTO) (1990) identifies maximum vibration levels for preventing damage to structures from intermittent construction or maintenance activities for residential buildings in good repair with gypsum board walls to be 0.4–0.5 in/sec. The damage threshold criterion of 0.2 in/sec is appropriate for older fragile buildings (typically historic). Below this level there is virtually no risk of building damage. Although the structures adjacent to the proposed Project are not considered fragile, to be conservative, the lower damage threshold of 0.2 in/sec was used for this analysis. The predicted vibration levels generated by construction equipment anticipated for use are shown below in **Table 4.XIII-8, Estimated Vibration Levels During Project Construction.**

Table 4.XIII-8
Estimated Vibration Levels During Project Construction

Equipment	PPV at 10 ft (in/sec)	PPV at 15 ft (in/sec)	PPV at 25 ft (in/sec)	PPV at 50 ft (in/sec)	PPV at 75 ft (in/sec)	PPV at 100 ft (in/sec)	PPV at 200 ft (in/sec)
Large Bulldozer	0.352	0.191	0.089	0.032	0.017	0.011	0.004
Loaded trucks	0.300	0.163	0.076	0.027	0.015	0.010	0.003
Jackhammer	0.138	0.075	0.035	0.012	0.007	0.004	0.002
Small Bulldozer	0.012	0.006	0.003	0.001	0.001	0.000	0.000
Auger/drill rigs	0.352	0.191	0.089	0.032	0.017	0.011	0.004
Pile Drive Impact	2.544	1.385	0.644	0.228	0.124	0.081	0.028
Pile Drive Sonic	0.672	0.366	0.170	0.060	0.033	0.021	0.007
Hoe ram	0.352	0.191	0.089	0.032	0.017	0.011	0.004
Auger/drill rigs	0.352	0.191	0.089	0.032	0.017	0.011	0.004
Source: FHWA Transit Noise and Vibration Impact Assessment.							

The vibration level of a large bulldozer at 25 feet would be 0.089 in/sec. In order to exceed 0.2 in/sec threshold, a large bulldozer needs to be as close as 15 feet from the offsite structures. The necessary setback distance to avoid structural damage for planned construction equipment is shown in **Table 4, XIII-9, Minimum Setback Distance for Construction Equipment**.

Table 4.XIII-9
Minimum Setback Distance for Construction Equipment

Equipment	Minimum Distance to Clear Vibration Damage Threshold (0.2 in/sec PPV)
Large Bulldozer	15
Loaded trucks	15
Jackhammer	10
Small Bulldozer	10
Auger/drill rigs	10
Pile Drive Impact	75
Pile Drive Sonic	25
Hoe ram	15
Auger/drill rigs	15

Construction activities associated with the proposed Project would have the potential to impact the existing school buildings and surrounding offsite structures. Although the exact location of equipment is not known, if it were to be very close to existing structures it could result in a significant impact. Although the proposed Project would require compliance with SC-N-6 and SC-N-7, impacts may not be reduced to less than significant, particularly if impact pile driving is necessary. SC-N-6 requires that further evaluation occur and mitigation measures be identified, but these solutions are not known at this time. Therefore, impacts are assumed to be potentially significant, and the mitigation provided below would be required in order to reduce impacts to below the significance threshold.

The nearest off-campus sensitive receptors would be well beyond the damage threshold; thus no significant impact would occur to offsite buildings. Only on-campus structures may be impacted by construction vibration. Operation of large heavy construction equipment (pile drivers, large bulldozers or loaded trucks) close to adjacent buildings may exceed the FTA's 0.2 in/sec criteria threshold and may result in vibration-induced damage to some Campus building façades, which may require patching and repairs to be conducted by LAUSD.

In addition to compliance with LAUSD Standard Conditions of Approval SC-N-8 (vibration structural damage), the following mitigation, **MM-NOI-3** and **MM-NOI-4**, is required to ensure there is no structural damage to existing campus structures. Impacts would be less than significant with mitigation and no further analysis is required.

MM-NOI-3: To avoid structural damage, when the construction equipment is within 15 feet of existing school buildings, large construction equipment (greater than 300 horsepower), such as large bulldozer and loaded trucks, should be replaced with smaller equipment (less than 300 horsepower) when feasible.

MM-NOI-4: A sonic pile driver shall be used in place of an impact pile driver to reduce noise and vibration during pile drilling/driving activities.

Operational Vibration

The proposed Project is a comprehensive modernization of an existing school campus, and there would be no significant vibration-generating sources during ongoing operations.

4. Environmental Checklist and Analysis

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. The closest airport to the Project site is the El Monte Airport, which is located over 8.5 miles away.[78] The Project site is not located within the vicinity of a private airstrip or an airport land use plan. Therefore, the Project would have no impact and would not expose people residing or working the Project area to excessive noise levels from an airstrip or airport. No impact would occur and no further analysis is required.

[78] Los Angeles County, General Plan 2035, Figure 7.4: Airports/Airfields Map, July 2014.

	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?	☐	☐	☒	☐
b. Create unsafe routes to schools for students walking from local neighborhoods?	☐	☐	☒	☐
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☒	☐

Explanation:

The following analysis was completed using information from the Site Circulation Report for Belvedere Middle School prepared by LIN Consulting, Inc. dated October 26, 2018, included in Appendix H.

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-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.

a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less Than Significant Impact. The Project would make improvements to existing buildings but would not make changes to the adjacent roadways. The Project site is generally bounded by East Cesar E. Chavez Avenue to the north, Michigan Avenue to the south, North Record Avenue to the west, and San Carlos Street to the northeast. According to the Site Circulation Report, the existing circulation system causes backups during the drop-off and pick-up times along Michigan Avenue and North Record Avenue.[79] Sidewalks along the Campus exist on both sides of East Cesar E. Chavez Avenue, North Record Avenue, and Michigan Avenue within the school zone. There is no sidewalk for approximately 250 feet on the northeast side of San Carlos Street from the intersection of East Cesar E. Chavez Avenue and San Carlos Street. Pedestrian only access to the school is available along San Carlos Street. Impacts would be less than significant and no further analysis is required.

There would be no changes made to the existing sidewalks or to driveway locations around the Campus. Although during construction, there may be temporary blockage of sidewalks or streets, Standard Condition of Approval SC-T-4 would require a worksite traffic control plan to ensure that there is safe movement around

[79] LIN Consulting, Inc., Site Circulation Report, LAUSD School Modernization Project – Belvedere Middle School, October 26, 2018.

the Project site. Therefore, the Project would have a less than significant impact with respect to vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.

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

Less Than Significant Impact. The Campus currently has sidewalks on both sides of the abutting roadways within the school zone: East Cesar E. Chavez Avenue, North Record Avenue, and Michigan Avenue. San Carlos Street has no sidewalk on the northeast side for approximately 250 feet just south of East Cesar E. Chavez Avenue. According to the Site Circulation Report, approximately 75 percent of students walk to and from campus. During construction, implementation of the Standard Conditions of Approval, particularly SC-T-4, which would require a worksite traffic control plan to ensure safety measures are in place for pedestrians, which would ensure safe student access to and from the Campus. Upon completion, the Project would not change, create, or delete any routes for students walking from local neighborhoods. Therefore, the Project would have a less than significant impact with respect to creating unsafe routes to school for students walking from local neighborhoods. 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 Project site is adjacent to East Cesar E. Chavez Avenue, which is classified as a Secondary Highway with two lanes in each direction and is the largest of the streets surrounding the Project site, the other streets only have one lane in each direction. During the afternoon bell period, a high volume of students cross the intersection of North Record Avenue and East Cesar E. Chavez Avenue and North Record Avenue and Michigan Avenue. Each intersection has a crossing assistant before and after school to assist students in safely crossing, and this program would continue during construction and operation of the proposed Project. As the Project involves the modernization of Belvedere MS through remodeling, demolition, and construction of several buildings on an existing Campus, no new safety issues with roadways or freeways would occur. Therefore, the Project would have a less than significant impact and would not pose a safety hazard due to its location adjacent to a major arterial roadway. Impacts would be less than significant and no further analysis is required.

	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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Explanation:

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)?

Less Than Significant Impact. The Project involves the modernization of Belvedere MS through building replacement, renovation, modernization, and reconfiguration of buildings on campus. Belvedere MS currently serves the existing surrounding neighborhood. The proposed Project would not increase the student population but is intended to provide appropriate facilities for the current student capacity. As the Project would be encompassed within the Campus and not make alterations outside of the Campus, nor create new homes, businesses, or infrastructure, and enrollment would not increase, no population increase would occur as a result of the Project. Therefore, the Project would result in a less than significant impact and would not induce substantial unplanned population growth. Impacts would be less than significant and no further analysis is required.

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

No Impact. The Project involves the modernization of Belvedere MS through building replacement, renovation, modernization, and reconfiguration of buildings on campus. All construction for the Project would be limited to the Campus and no people or housing would be displaced. Therefore, the Project would not displace substantial numbers of existing people or housing, and no impact would occur. Impacts 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
XVI. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

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	If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 2. 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.
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

a) Fire protection?

Less Than Significant Impact. The Project site is within the Los Angeles County Fire Department (Fire Department) District 3.[80] The nearest Fire Department station is Station 1, which is located at 1108 North Eastern Avenue, Los Angeles, CA 90063, approximately 1 mile away.[81] Station 3 is the next closest station approximately 1.2 miles away. If approved, the Project would be required to comply with the Fire Code and Fire Department standards in effect at the time of the Project development, including building specifications and other plan check and design review requirements. New building and remodeled components of the Project would be constructed to the latest Fire Codes applicable. Further, SC-PS-1 and SC-PS-2 would further improve fire safety. The Project is currently served by the Fire Department and is not proposing or expecting to increase student enrollment, thus it would require similar service to what currently exists. Therefore, the Project would have a less than significant impact with regard to fire protection services. Impacts would be less than significant and no further analysis is required.

[80] Los Angeles County, General Plan 2035, Figure 12.7: Fire Department Battalions and Stations, May 2014.
[81] County of Los Angeles Fire Department, Search Results, Accessed on February 13, 2019 at: https://locator.lacounty.gov/fire/Search?find=&near=312+North+Record+Avenue%2C+Los+Angeles%2C+CA%2C+90063&cat=&tag=&loc=&lat=34.039654850839874&lon=-118.1820508752492.

b) Police protection?

Less Than Significant Impact. The Project site is within the Los Angeles County Sheriff Department (Sheriff Department) service area.[82] The Sheriff Department station that serves the Project site is approximately 2.4 miles from the Project site at 5019 East Third Street, Los Angeles, CA 90022.[83] As the Project is currently served by the Sheriff Department and is not proposing or expecting to increase student enrollment, it would require similar service to what currently exists. Further, SC-PS-1 and SC-PS-2 would further improve security. Therefore, the Project would have a less than significant impact on police protection services. Impacts would be less than significant and no further analysis is required.

c) Schools?

No Impact. The Project is the modernization of an existing school where student capacity will not increase. Thus, the Project would not require or result in the demand for new school facilities. The Project would have no impact on school services. No impact would occur and no further analysis is required.

d) Parks?

No Impact. The nearest park to the Project site is Eugene A. Obregon Park, which is less than 1,000 feet to the southwest. The Project site itself has a large athletic field, which would be expanded as part of the Project, east of the school buildings. As the Project would increase the size of the athletic field, build a new gymnasium, and is not proposing to increase student enrollment or create population growth, the demand for parks would not change as a result of the project. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is anticipated to have a beneficial effect on the community. Therefore, the Project would have no impact on park service ratios. No impact would occur and no further analysis is required.

e) Other public facilities?

No Impact. The Project is not proposing to increase student enrollment, and would thus not increase demand for public facilities. Therefore, the Project would have no impact on other public facilities. No impact would occur and no further analysis is required.

[82] Los Angeles County, General Plan 2035, Figure 12.8: Sheriff's Department Service Areas, May 2014.
[83] Los Angeles County Sheriff's Department, East Los Angeles Station, Accessed on February 13, 2019 at: http://shq.lasdnews.net/pages/patrolstation.aspx?id=ELA.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION. Would the project:				
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?	☐	☐	☐	☒
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Explanation:

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?

No Impact. The Project site is located within the 2-mile radius of a Community Park and the 0.5-mile radius of a neighborhood park.[84] As for the Project itself, it would be building a new gymnasium and expanding the existing athletic fields. The Project is not proposing to increase student enrollment. With additional recreational facilities being built as part of the Project, no increase in student enrollment and no effect on population growth, the Project would not increase demand for parks or other recreational facilities. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is anticipated to have a beneficial effect on the community. Therefore, the Project would have no impact or create substantial physical deterioration of existing parks or recreational facilities. No impact would occur and no further analysis is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project includes replacement of a gymnasium and expansion of the athletic fields, the impacts of which is discussed throughout this document. The construction and expansion of these recreational facilities would reduce impacts to other recreational facilities outside of the Campus and thus would not require the construction or expansion of recreational facilities outside of the Campus. Therefore, the Project would have a less than significant impact and would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Impacts would be less than significant and no further analysis is required.

[84] Los Angeles County, General Plan 2035, Figure 10.3: Community, Neighborhood and Pocket Park Service Radius Map, May 2014.

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

Explanation:

The following analysis was completed using information from the Site Circulation Report for Belvedere Middle School prepared by LIN Consulting, Inc. dated October 26, 2018 and the Construction Traffic Analysis for the Belvedere Middle School Comprehensive Modernization Project prepared by Gibson Transportation Consulting, Inc. dated June 3, 2019, included in **Appendix I** .

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-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
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.

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

Less Than Significant Impact. The Project site is generally bounded by East Cesar E. Chavez Avenue to the north, Michigan Avenue to the south, North Record Avenue to the west, and San Carlos Street to the northeast. There are no bicycle facilities within the school zone. There are sidewalks on both sides of each surrounding

street except for East San Carlos where there is no sidewalk for approximately 250 feet on the northeast side, just south of East Cesar E. Chavez Avenue.

During construction, the Project site would add construction workers and equipment at different amounts depending on the construction phase and time of the year. During the school year, there would be no more than 50 percent of the Campus disturbed at any one time and an average of 50 workers on-site. In the summer months, there would be a maximum of 150 workers on-site. A detailed intersection capacity analysis was conducted for the weekday morning and afternoon peak hours during both construction scenarios in the Construction Traffic Analysis. Construction activities are expected to primarily be contained within the Campus boundaries and would generally not affect the adjacent street access, transit, or parking in the area. A Construction Management Plan (SC-T-4) would be required, which would include measures to ensure pedestrian and vehicle safety and reduce effects on the surrounding community. The nearest bus stops are along East Cesar E. Chavez Avenue, none of which are anticipated to be closed or relocated during Project construction. The Construction Traffic Analysis determined that the Project would not result in any temporary construction-related impacts at off-site intersections.

The Project would not impact the circulation system as all improvements would be made on Campus. During operations, the Project is also not proposing to increase student enrollment, thus not creating more demand on the circulation system from additional students. Therefore, the Project would have a less than significant impact and would not conflict with a program, plan, ordinance or policy addressing the circulation system. Impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project is not proposing to increase enrollment, nor affect the circulation system in the Project area. All improvements are proposed to be made within the Project site and thus would not change or impact the amount of vehicle miles travelled. Construction VMT would be local, as it is assumed that the construction vehicles would be provided from within the Los Angeles region. Due to the Project site's location within an urbanized environment readily accessible from freeways and a major road (Cesar E. Chavez Avenue), VMT impacts would be less than significant after implementation of SC-T-2 and SC-T-4. Therefore, the Project would have a less than significant impact and would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant and no further analysis is required.

c) Substantially increase 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. The Project is proposing to make improvements to the Campus including replacement, renovation, modernization, and reconfiguration of buildings on campus. All improvements on Campus would be made within the Campus and thus not change the circulation design of the streets surrounding the Campus. None of the improvements would create geometric design features or incompatible uses that would substantially increase hazards. During construction, temporary safe circulation concerns would be addressed through a construction worksite traffic control plan, as required by SC-T-4. Therefore, the Project would have a less than significant impact with respect to increasing hazards due to a geometric design feature or incompatible use. Impacts would be less than significant and no further analysis is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. The Project is proposing to make improvements to the Campus buildings. Ingress and egress to the Campus will remain the same. All buildings on Campus would be subject to comply with the Fire Code and Fire Department standards in effect at the time of the Project, including proximity to fire truck access and hydrants. With regard to blocking potential emergency routes, the Project is not within or adjacent to a disaster route and would not make any changes to adjacent streets that could be used for emergency access.[85] Also, SC-PS-2 requires that LAUSD implement emergency preparedness and response procedures in all schools, which will further address student safety. Therefore, the Project would have a less than significant impact on emergency access. Impacts would be less than significant and no further analysis is required.

[85] Los Angeles County, General Plan 2035, Figure 12.6: Disaster Routes Map, May 2014.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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 section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. 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)?	☐	☐	☒	☐
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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

Explanation:

The following analysis was completed using information from the Belvedere Middle School Historical Resources Evaluation Report prepared by Rincon Consultants, Inc. dated June 2018 included as **Appendix C** and the Phase I Cultural Assessment for the Belvedere Middle School Project prepared by Envicom Corporation on April 4, 2019, included in **Appendix D.**

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	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: • 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. 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 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)?

Less Than Significant Impact. The Project site, all of which is developed or disturbed land, is within a highly developed urban area of the County of Los Angeles. The Project site and its surroundings are relatively flat with residential and commercial uses predominating. Belvedere MS was first established at its current Campus in 1924. Belvedere MS has operated as a school since its establishment and has constructed new buildings and renovations since then. In the 1940's the Campus footprint was expanded to include the Physical Education Building and the eastern third of the campus, including the recreational field.

The Belvedere Middle School Historical Resources Evaluation Report (HRER) evaluated each building on campus for eligibility as a historic resource or contributor to a potential historic district. The Historical Resources Evaluation Report concluded that Belvedere MS and the buildings it contains are ineligible for federal, state, or local designation under any applicable criteria. The oldest buildings on Campus date back to the mid-to-late 1920s, but all were extensively altered after the 1933 Long Beach earthquake and in subsequent decades. There were also a number of buildings on Campus that were developed in the decades after World War II, but they were constructed intermittently over a period of twenty years and are not representative of LAUSD design principles of the postwar era. The Campus does not appear eligible for federal, state, or local designation under any applicable criteria and is not considered a historical resource. Thus, the Project would have a less than significant impact with regard to historical resources as defined in Public Resources Code section 5020.1(k). Impacts would be less than significant 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. A cultural resource record search was conducted by the South Central Coastal Information Center (SCCIC) and the California Native American Heritage Commission (NAHC).[86] Both searches examined the Project site plus a 0.5-mile study area around the Project. The record search results from the SCCIC resulted in no previously identified cultural resources located within the Project property. The NAHC record search results were received on January 29, 2019 with negative findings.

Pursuant to Assembly Bill (AB) 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project areas of the District's proposed Projects. These Projects included the eleven (11) Comprehensive Modernization Projects, including this Project, and one (1) Classroom

[86] Envicom Corporation, Phase I Cultural Assessment of the Belvedere Middle School Project, Los Angeles County, California, April 4, 2019.

4. Environmental Checklist and Analysis

Expansion Project as referenced in the District's notification letter dated January 8, 2019. Request for consultation on all twelve (12) District Projects was received from the Gabrieleno Band of Mission Indians – Kizh Nation on January 9, 2019. Two consultation dates were set for March 21, 2019 and May 21, 2019. As a result of the consultation, the Gabrieleno Band of Mission Indians – Kizh Nation provided the District with suggested mitigation measures for the Projects.

Following the meeting, the District sent a conclusion letter on June 19, 2019 determining that the Gabrieleno Band of Mission Indians – Kizh Nation have not provided sufficient evidence demonstrating that the Project site has Tribal Cultural Resources (TCRs) as defined by Public Resources Code (PRC) 21074. Chairman Salas responded to this letter with a request for an additional meeting. At the requested meeting, held via conference call on August 15, 2019, Chairman Salas provided additional oral history and stated that because of the proximity to known TCRs, the Project may encounter resources. Following the meeting and the District's request for supporting evidence, Chairman Salas provided further tribal history and requested to have a Native American monitor present during all ground disturbances. Included with this request was a document describing the same mitigation measures that was previously provided for TCRs. In addition, the following documents (titles are publicly available) were included in response to the District's request for supporting documentation:

1. The old Spanish and Mexican ranchos of Los Angeles County (Gerald 1937);
2. Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937 (Kirkman 1938);
3. Official map of the County of Los Angeles, California (Wright 1898);
4. Excerpt describing the location of a village;
5. Excerpt describing habitations (Southwest Museum Leaflet); and,
6. Excerpt describing the number of huts in a rancheria.

A review of these documents did not find substantial evidence of an existing TCR within the Project site. No supporting documents indicated why the Project site should be considered to have a high potential for containing TCRs; therefore, Native American monitoring for TCRs during all ground disturbances is not required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to TCRs are avoided.

The Project would comply with SC-TCR-1, which requires all construction activities to stop should tribal cultural resources be uncovered during ground disturbing activities. SC-TCR-2 also requires monitoring should tribal cultural resources be identified during grading. With implementation of SC-TCR-1 and SC-TCR-2, Project impacts to unknown potential tribal cultural resources would be less than significant. Impacts would be less than significant and no further analysis is required.

	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 or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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	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: **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. **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.
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.

SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG-1	Implementation of SC-GHG-1.
SC-GHG-2	Implementation of SC-GHG-2.
SC-GHG-3	Implementation of SC-GHG-3.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The Project would include replacement, renovation, modernization, and reconfiguration of buildings on campus. The Project at Belvedere MS would not increase capacity and the overall square footage of the buildings would decrease. All except for one of the buildings that are currently on the Campus were built in 1985 or earlier, and modernization of Campus buildings would naturally reduce demand for water, wastewater, electric power and natural gas due to efficiency requirements of newer facilities and fixtures. Between the smaller square footage of the buildings and more efficient buildings and appliances, the construction of the Project would not significantly increase demand or require the relocation or construction of new or expanded facilities. The Project is in an area already served by telecommunication services, and such facilities would not be unaffected. Therefore, the Project would have a less than significant impact on water, wastewater treatment, electric power, natural gas, or telecommunication facilities. Impacts would be less than significant and 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?

Less Than Significant Impact. The Project site is served by the California Water Service for its water supplies. California Water Service uses a combination of local groundwater and water from the Metropolitan Water District of Southern California.[87] As the Project would not increase student enrollment, the square footage of building would decrease, and new utility facilities and fixtures would be compliant with current building codes, the Project is not likely to result in a significant, if any increase in water demand. As the Project area currently gets its water from the California Water Service, which receives its water from groundwater and imported water, supply is projected to meet demand through the year 2040.[88] Therefore, the Project would have a less than significant impact on water supplies. Impacts would be less than significant and no further analysis is required.

c) Result in a determination by the wastewater treatment provider that 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?

Less Than Significant Impact. The Project site is served by Los Angeles County Public Works, Consolidated Sewer Maintenance District.[89] At full buildout of the Project, school enrollment would not increase and building

[87] California Water Service, District Information, Accessed on February 20, 2019 at: https://www.calwater.com/about/district-information/ela/.
[88] California Water Service, 2015 Urban Water Management Plan, East Los Angeles District, June 2016.
[89] Los Angeles County Public Works, Sewer Maintenance, Accessed on February 20, 2019 at: https://dpw.lacounty.gov/smd/smd/index.cfm.

square footage would decrease. Thus, the Project would not significantly increase wastewater generation. Therefore, the Project would have a less than significant impact wastewater treatment capacity of the provider. Impacts would be less than significant and no further analysis is required.

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?

Less Than Significant Impact. The Project is not proposing to increase enrollment and would decrease total building square footage of the Campus buildings. Belvedere MS is served by Republic Services for its solid waste.[90] As stated above as SC-USS-1, during construction the Project would be required to divert waste as part of a Waste Management Plan. SC-USS-3 would require dedicated collection of recyclable materials during operation. With implementation of SC-USS-1, and no proposed increase in students or building sizes, the Project would not generate a significant amount of solid waste in excess of local infrastructure or impair solid waste reduction goals during construction. During operation with implementation of SC-USS-3, and that there would be no increase in students or building size, there would be no increase in solid waste generation. Therefore, the Project would have a less than significant impact with respect to generating solid waste. 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?

Less Than Significant Impact. The Project is not proposing to increase student enrollment and would not increase overall building square footage on Campus. Republic Services provides Belvedere MS's solid waste services. Through SC-USS-1 and SC-USS-3, as shown above, the Project would be required to comply with solid waste reduction statutes and regulations. With no increase in student enrollment or building sizes, solid waste generated during operation of the school is not expected to be significantly more, if any more at all, than existing conditions. Therefore, the Project would have a less than significant impact and comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant and no further analysis is required.

[90] Los Angeles County Public Works, Service Locator, Accessed on February 20, 2019 at: https://dpw.lacounty.gov/general/servicelocator/.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation:

According to the Los Angeles County General Plan 2035, the Project site is not within a fire hazard area, therefore analysis of this section is not applicable.[91] No impact would occur and no further analysis is required.

[91] Los Angeles County, General Plan 2035, Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?	☐	☒	☐	☐
b. Does the project have impacts which 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).	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Explanation:

a) Does the project have the potential to 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, 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 with Mitigation Incorporated. The Project site is within a highly developed urban area surrounded by residential and commercial uses. There are no open space areas or water bodies on or adjacent to the Project site, thus the potential to impact a fish or wildlife population is limited and would not cause populations to drop below self-sustaining levels. The Project site does not contain a threatened plant or animal community, nor would the Project reduce or restrict the range of a rare or endangered plant or animal. See subsection IV. Biological Resources above for further response.

The Project site is an existing campus with buildings that are not eligible for federal, state, or local designation under any applicable criteria, as referenced in the HRER. The Project site is within an area that has cultural resources within a 0.5 mile radius, thus sensitive for older historic archaeological resources. Implementation of MM-CUL-1 and SC-CUL-6 through SC-CUL-10 would reduce potential impacts of older historic or prehistoric resources to less than significant.

Therefore, the Project would have a less than significant impact with mitigation to potentially 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the

major period of California history or prehistory. Impacts would be less than significant with mitigation and no further analysis is required.

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. All Project impacts were either "no impact," "less than significant," or "less than significant impact with mitigation incorporated." There would be no significant impacts after mitigation. Given the Project site's highly developed urban location, and the Project's plans to modernize an existing school, its impacts would not be cumulatively considerable. As all changes would be within the existing Campus, the Project's impacts would be limited in scope. Therefore, the Project would have a less than significant impact. Impacts would be less than significant and no further analysis is required.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. Environmental effects which could cause substantial adverse effects on human beings were evaluated in subsections III. Air Quality, VII. Geology and Soils, VIII. Greenhouse Gas Emissions, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality, XIII. Noise, XIV. Pedestrian Safety, XVIII. Transportation and Circulation, XX. Utilities and Service Systems. Project impacts were either "less than significant," or "less than significant with mitigation incorporated." Further, it could be argued that all environmental impacts addressed in the CEQA Checklist affect humans directly or indirectly. However, as evaluated in this Initial Study, no significant impacts would remain after mitigation. Therefore, the Project would have a less than significant impact with mitigation incorporated to have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation and no further analysis is required.

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5. Public Comments

Section 15074(a) of the CEQA Guidelines requires the Lead Agency (LAUSD) to consider the mitigated negative declaration (MND) before making its recommendation to approve or deny a project. Additionally, prior to approving a project, the LAUSD must consider the MND together with any comments received during the public review process. The MND can be adopted only if they find on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis.[92] This section provides all written responses received on the Initial Study/MND (IS/MND).

5.1 CEQA REQUIREMENTS FOR COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment be "on the proposed finding that the project will not have a significant effect on the environment." If persons and public agencies believe that the project may have a significant effect, they should:

(1) Identify the specific effect,
(2) Explain why they believe the effect would occur, and
(3) Explain why they believe the effect would be significant.

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

5.2 NOTICE OF INTENT

Per CEQA Guidelines Section 15072 and 15073, LAUSD determined that an MND would be required for this proposed Project and issued a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) on November 20, 2019, included as **Appendix J.** The public review period for this CEQA document was from November 20, 2019 to December 27, 2019. Public outreach for the proposed Project was initiated in November

[92] 14 CCR Section 15074(b).

2019. The public meeting was held on December 4, 2019 at 6:00 p.m. in the Belvedere MS Library and approximately twenty individuals attended. The meeting provided the public with an opportunity to provide comments on the proposed Project. The comments included the concern of exposure of residents and students to dust, lead, and asbestos during construction. Residents requested that the project include adequate parking on campus for the faculty and staff to alleviate the current condition of street parking. Residents commented on the perceived impact of the new facilities on the aging sewer, water, and power infrastructure in the surrounding neighborhood. Residents also voiced concerns over the proposed removal of mature trees that currently shade the campus. LAUSD Facilities and OEHS staff addressed these public comments and concerns during the meeting and reiterated that the public would have additional opportunities for input as the project moves forward. No written comments were received at the December 4, 2019 public meeting.

Additionally, the NOI was published in two newspapers: *Los Angeles Daily News* and *La Opinión* on November 20, 2019; mailed to approximately 3,200 addresses including property owners and occupants located within a ¼ mile radius of the school, parents and guardians of Belvedere MS students, agencies, tribes, and elected officials; hand delivered the meeting flyer to property owners and occupants within a ½ mile radius of the school; handed out fliers at the school; and posted at the school. Hardcopies of the IS/MND were made available to the public for review at three different locations including:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Ave., 21st Floor, Los Angeles, CA 90017. (213) 241-3394 (by appointment).
- Belvedere Middle School Main Office, 312 North Record Avenue, Los Angeles, California 90063.
- Anthony Quinn Library, 3965 East Cesar E Chavez Avenue, Los Angeles, CA 90063.

The IS/MND was also made available electronically on the LAUSD Office of Environmental Health and Safety Website: http://achieve.lausd.net/ceqa.

5.3 INITIAL STUDY COMMENTS AND RESPONSES

Although it is not required to respond to comments received on a proposed MND, the Lead Agency must consider the comments received during its consultation and review period pursuant to CEQA Guidelines Section 15073. Comment letters received during the review period include a letter from the Department of Transportation (dated December 13, 2019), a letter from the County of Los Angeles Fire Department (dated December 17, 2019), and a letter from the Sanitation Districts of Los Angeles County (dated December 23, 2019). Comment letters and specific comments are given letters and numbers for reference purposes. The following is a list of persons and agencies that submitted comments on the IS/MND during the public review period.

Number Reference	Commenting Person/ Agency	Date of Comment
1	Miya Edmonson, California Department of Transportation	12/13/19
2	Michael Y. Takeshita, County of Los Angeles Fire Department	12/17/19
3	Adriana Raza, Sanitation Districts of Los Angeles County	12/23/19

5. Public Comments

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DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

1

December 13, 2019

Christy Wong
Los Angeles Unified School District
333 South Beaudry Ave, 21st Floor
Los Angeles, CA 90017

RE: Belvedere Middle School Comprehensive Modernization Project – Mitigated Negative Declaration (MND)
SCH# 2019119071
GTS # 07-LA-2019-02933
Vic. LA-60/PM: R 2.713

Dear Christy Wong:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's Mitigated Negative Declaration (MND). The Project encompasses most of the Belvedere MS campus and consists of the comprehensive modernization of the campus, including demolition, construction, and renovation activities as a part of the School Upgrade Program. The Project includes demolition and removal of several existing buildings and structures.

After reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Further information included for your consideration:

Caltrans suggests consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. These methods include the construction of physically separated facilities such as wide sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing. These suggestions can reduce pedestrian and bicyclist exposure to vehicles ensuring safety by lessening the time that the user is in the likely path of a motor vehicle. 1-1

Signal timing can be adjusted to include Leading Pedestrian Intervals, giving pedestrians a seven second head start. Pedestrian and bicyclist warning signage, flashing beacons, high-visibility continental crosswalks, scramble crossings, flashing yellow turn signals, high-visibility green bike lanes, other signage and buffer striping should be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists.

Caltrans suggests keeping livability in mind by providing shade trees, native landscaping, bioswales, street furniture, bicycle parking, bus shelters and trash cans. Bus bulb-outs can reduce conflict between bicycles and buses on busy roads. Bus only lanes are encouraged to reduce travel times and make public transit more appealing to discretionary users. Any gated communities should provide pedestrian paths and doors to ensure access to transit, shopping centers, schools and main roads. Whenever possible, a grid pattern with short blocks is recommended to promote walking. Permeable paving materials should be incorporated whenever possible.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. 1-1

If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2019-02933

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

5. Public Comments

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5. Public Comments

RESPONSE TO COMMENT LETTER 1
Response to Comments from California Department of Transportation, dated December 13, 2019

Comment 1-1
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is required.

5. Public Comments

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COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

December 17, 2019

Christy Wong, Assistant Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue
Los Angeles, CA 90017

Dear Ms. Wong:

NOTICE OF INTENT TO ADOPT A MITGATED NEGATIVE DECLARATION, "BELVEDERE MIDDLE SCHOOL COMPREHENSIVE MODERNIZATION PROJECT," CONSISTS OF THE COMPREHENSIVE MODERNIZATION OF THE CAMPUS, INCLUDING DEMOLITION, CONSTRUCTION, AND RENOVATION ACTIVITIES AS A PARK OF THE SCHOOL UPGRADE PROGRAM, LOCATED AT 312 NORTH RECORD AVENUE, LOS ANGELES, FFER 2019006875

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

2-1

The following are their comments:

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions.

This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

The County of Los Angeles Fire Department's Fire Prevention, Land Development Unit appreciates the opportunity to comment on this project.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

2-2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.
The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

2-3

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no jurisdiction for oversight of environmental assessment and cleanup at public school sites. The Cal-EPA Department of Toxic Substances Control is the lead environmental oversight agency for the project site.

2-4

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

2-4

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,

Michael Y. Takeshita

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

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5. Public Comments

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5. Public Comments

RESPONSE TO COMMENT LETTER 2
Response to Comments from County of Los Angeles Fire Department, dated December 17, 2019

Comment 2-1
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is required.

Comment 2-2
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. However, the comment states, "This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions." This information is incorrect.

The Project is located at 312 North Record Avenue, Unincorporated East Los Angeles, Los Angeles County, California. According to the City of Los Angeles Fire Department (LAFD), the Project site is located outside the LAFD service area.[93] According to the County of Los Angeles General Plan, the Project site is within the Los Angeles County Fire Department Division 3.[94] The nearest Fire Department station is Station 1, which is located at 1108 North Eastern Avenue, Los Angeles, CA 90063, approximately 1 mile away.[95] Therefore, the Project is located within the jurisdiction of Los Angeles County Fire Department.

Comment 2-3
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is required.

Comment 2-4
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is required.

[93] Los Angeles Fire Department, Find Your Station, Accessed on January 24, 2020 at: https://www.lafd.org/fire-stations/station-results.
[94] Los Angeles County, General Plan 2035, Figure 12.7: Fire Department Battalions and Stations, May 2014.
[95] County of Los Angeles Fire Department, Search Results, Accessed on February 13, 2019 at: https://locator.lacounty.gov/fire/Search?find=&near=312+North+Record+Avenue%2C+Los+Angeles%2C+CA%2C+90063&cat=&tag=&loc=&lat=34.039654850839874&lon=-118.1820508752492.

5. Public Comments

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SANITATION DISTRICTS OF LOS ANGELES COUNTY

Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

3

December 23, 2019

Ref. DOC 5427634

Ms. Christy Wong
Assistant CEQA Project Manager
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Dear Ms. Wong:

NOI Response for
Belvedere Middle School Comprehensive Modernization Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on November 20, 2019. The subject property is currently provided sewerage service within the jurisdictional boundaries of District No. 2. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the subject property discharges to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Belvedere Trunk Sewer, located in Michigan Avenue at Gifford Avenue. The Districts' 15–inch diameter trunk sewer has a capacity of 2.3 million gallons per day (mgd) and conveyed a peak flow of 1.1 mgd when last measured in 2016.

2. The wastewater generated by the subject property is treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 261.1 mgd.

3-1

3. The expected increase in average wastewater flow from the project site, described in the document as a total of 72,408 square feet of Remodel/Modernization structure and a total 87,266 square feet of new construction, is 130 gallons per day, after the scheduled demolition on the project site occurs. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. In determining the impact to the Sewerage System and if connection fees are applicable, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more

specific information regarding the connection fee application procedure and if fees are applicable to your specific project, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If a connection fee is applicable, payment will be required before a permit to connect to the sewer is issued. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

3-1

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

5. Public Comments

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RESPONSE TO COMMENT LETTER 3
Response to Comments from the Sanitation Districts of Los Angeles County, dated December 23, 2019

Comment 3-1
This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is required.

6. List of Preparers

6.10 LEAD AGENCY

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