Los Angeles Unified School District

Roosevelt High School
Comprehensive Modernization Project
SCH # 2017101037

Volume I
Draft Environmental Impact Report

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February 2018

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EXECUTIVE SUMMARY

INTRODUCTION

The purpose of the executive summary is to provide a clear and simple description of the project and its potential environmental impacts. Section 15123 of the *California Environmental Quality Act (CEQA) Guidelines*[1] requires the executive summary to identify each significant effect with proposed mitigation measure(s) and alternatives that would minimize or avoid that effect. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

PROJECT LOCATION AND SETTING

The Project site is located on the Roosevelt High School campus at 456 South Mathews Street, and is bounded by 4th Street on the north, South Mathews on the west, South Mott Street on the east, and East 6th Street on the south. The Project site is located within the Boyle Heights Community Plan Area of the City of Los Angeles. The approximately 22.7 acre Project site currently accommodates 23 permanent buildings (including the gazebo, arcade, and bleachers) and 23 portable buildings which are used by Roosevelt High School; Math, Science, and Technology Magnet Academy; STEM Academy of Boyle Heights; Boyle Heights Continuation School; Roosevelt Adult School; and Roosevelt Infant/Early Education Center.

The land uses within the general vicinity of the Project site are primarily residential with low-rise and mixed use commercial properties on either side of 4th Street to the north, 6th Street to the south and Soto Street a few blocks to the west. Interstate 5 (I-5) and Interstate 10 (I-10) intersect approximately two miles to the southwest. Several small parks, recreation centers, and libraries are located in the surrounding area including Hollenbeck Park 0.32 miles to the west, Boyle Heights Sports Center Facility 0.3 miles to the south, Evergreen Recreation Center approximately 0.25 miles to the northeast, and Benjamin Franklin Library 0.5 miles to the northwest. An Olympic sized swimming pool, completed as a joint-venture with the City of Los Angeles, is located at the northwest corner of the property.

Regional access to the Project site is provided by I-10 and I-5 from the west, U.S. Highway 101 from the north, and State Route 60 from the south. Local access is provided via East 4th Street along the northern boundary of the site and S. Soto Street to the northwest.

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1 California Environmental Quality Act, *State CEQA Guidelines*, Section 15123.

PROJECT OBJECTIVES

The proposed Project would be implemented as part of LAUSD's School Upgrade Program (SUP), which includes Comprehensive Modernization Projects intended to provide facilities that improve student health, safety, and educational quality.

More specifically, the Board approved SUP goals and principals are:

- Schools Should be Physically Safe and Secure
- School Building Systems Should be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

Furthermore, six core objectives have been established for Comprehensive Modernization Projects undertaken under the SUP:

- The buildings that have been identified as requiring seismic upgrades must be addressed.
- The buildings, grounds and site infrastructure determined to have significant/severe physical conditions that already do, or are highly likely (in the near future) to pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate must be addressed.
- The school's reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.
- Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.
- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved.

As these objectives, goals and principals are applied to Roosevelt High School campus and community, the following project-specific objectives have been developed:

1. Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.
2. Provide upgrades throughout the campus to improve accessibility for all students (in particular those with special needs) and for the Project to comply with the requirements of the Americans

with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).

3. Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

4. Honor and enhance features of the Roosevelt High School campus that reflect its history and cultural identity.

5. Establish 4th Street as the primary frontage of the Roosevelt High School campus and enhance its presence in the Boyle Heights neighborhood.

6. Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members and visitors.

7. Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

8. Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.

9. Improve the visual relationship between Roosevelt High School and Hollenbeck Middle School to encourage and inspire middle school students to matriculate to Roosevelt High School.

10. Eliminate reliance on portable classrooms.

11. Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

12. Replace buildings and infrastructure that have reached the end of their useful lives.

13. Reduce the amount of stormwater runoff drainage and improve the quality of stormwater runoff by increasing pervious surfaces on campus.

14. Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

15. Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).

16. To undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

PROJECT CHARACTERISTICS

The proposed Project consists of the modernization of the campus for Roosevelt High School. The concept for the proposed Project is demonstrated in **Figure ES-1, Roosevelt High School Comprehensive Modernization Project Site Organization Diagram**. As is shown in the diagram, the campus is to be divided into two "segments" with the classrooms/educational facilities located on the west portion of the campus to the central quad and the athletics zone located along the eastern half of the Project site. The campus is further organized such that the joint use/public access facilities such as the gym and performing arts zone are located along the perimeter limiting public access into the interior of the site. Further, by relocating classroom buildings to the central and eastern zones of the campus (away from the athletics zone), there is an opportunity to expand both the baseball and football fields to regulation size in the future.[2] **Figure ES-2 Proposed Project Site Pla**n shows the site plan for the Project.

Proposed Facilities

The proposed Project would include the demolition of temporary buildings that would be replaced by permanent structures and permanent buildings that have been determined to be structurally compromised beyond repair and/or aging; deteriorating; and which do not meet current educational requirements:

- Auditorium/classroom (Building #1)
- Music building (Building #4)
- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Gymnasium building (Building #19)
- Utility building (Building #20)

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2 The expansion of the athletic fields is not part of this project as funding is not currently available for those specific improvements. If funding becomes available, LAUSD will conduct additional environmental analysis to determine the potential impacts of those facilities.

- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)
- Approximately thirty-one classrooms in 17 portable buildings

The demolition plan is shown in **Figure ES-3 Proposed Project Demolition Plan**.

New Construction

The proposed Project would include the construction of the following new permanent structures to replace those that would be demolished or removed:

- Classroom/Administration Building North: This new 3-story approximately 70,000 square foot (sf) building would have general and specialty classrooms and administrative spaces and would act as the primary main entrance for campus visitors. This building would generally be located on the site of the existing tennis courts and gymnasium (Building #19).
- Auditorium and Performing Arts Building: This new 1-story approximately 35,000 sf building would have the auditorium and classroom spaces specifically designed for performing arts, including music, dance, drama, and choral arts, etc. This building would generally be located on the site of the existing athletic field on 4th Street and the gymnasium (Building #19)
- Classroom Building South: This new 3-story approximately 75,000 sf building would have general and specialty classrooms and support spaces, including flexible engineering labs, computer labs and science laboratory classrooms. This building would be generally located on the site of the existing auditorium and classroom building (Building #1).
- Gymnasium Building: The 2-story, approximately 43,000 sf Gymnasium Building would have competition and practice gymnasium floors, locker rooms (restrooms, showers, and dressing area), coaches' offices, and physical education support spaces along with support spaces for athletic storage and mechanical equipment. The gym would have approximately 800 bleacher seats. This building would generally be located on the site of the existing auditorium and classroom building (Building #1) and utility buildings (Buildings #20 and #47).
- Lunch Shelter: The new approximately 7,000 sf lunch shelter would be located at or near the location of the existing lunch shelter.
- Wellness Clinic: An approximately 6,000 sf wellness clinic would provide services to both students and the community. The clinic would be located near the Classroom/Administration Building, library building, and pool.

Site Upgrades

Site upgrades that would be implemented under the proposed Project include the following:

- Major Site-wide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Major Site-wide revamp of the campus landscaping and hardscaping, including relocation of the existing Japanese Garden (Garden of Peace). Existing trees removed by the Project would be reused to the extent feasible or replaced by an appropriate size and species selected from the LAUSD Approved Plant List.3
- Application of fresh paint to the exterior of the remaining buildings

The Project will be subject to local, state, and/or federal facilities requirements of the ADA, DSA, and CDE, as well as all District Standards and Specifications; such as those provided in LAUSD's Program EIR. Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.

Access and Circulation

Additional pedestrian access to the Project site would be provided along 4th Street. Access to staff parking would remain on Mathews Street. Approximately 8-10 parking stalls would be provided on 4th Street for visitors, staff, and accessible parking near the new administration building.

ALTERNATIVES TO THE PROJECT

CEQA requires that an environmental impact report (EIR) describe a range of reasonable alternatives to a proposed project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the project. Comparative analysis of the impacts of these alternatives is required. In response to the significant impacts associated with the proposed Project, LAUSD developed and considered several alternatives to the Project. These alternatives include:

Alternative 1 - No Project

The No Project Alternative assumes that the demolition of the existing structures and construction of the modernized campus site would not occur. Under this alternative, the site would remain in its existing condition with no improvements. Because much of the identified contaminated soil is located under existing buildings and no buildings would be demolished, the cleanup associated with the RAW would not be implemented under this alternative.

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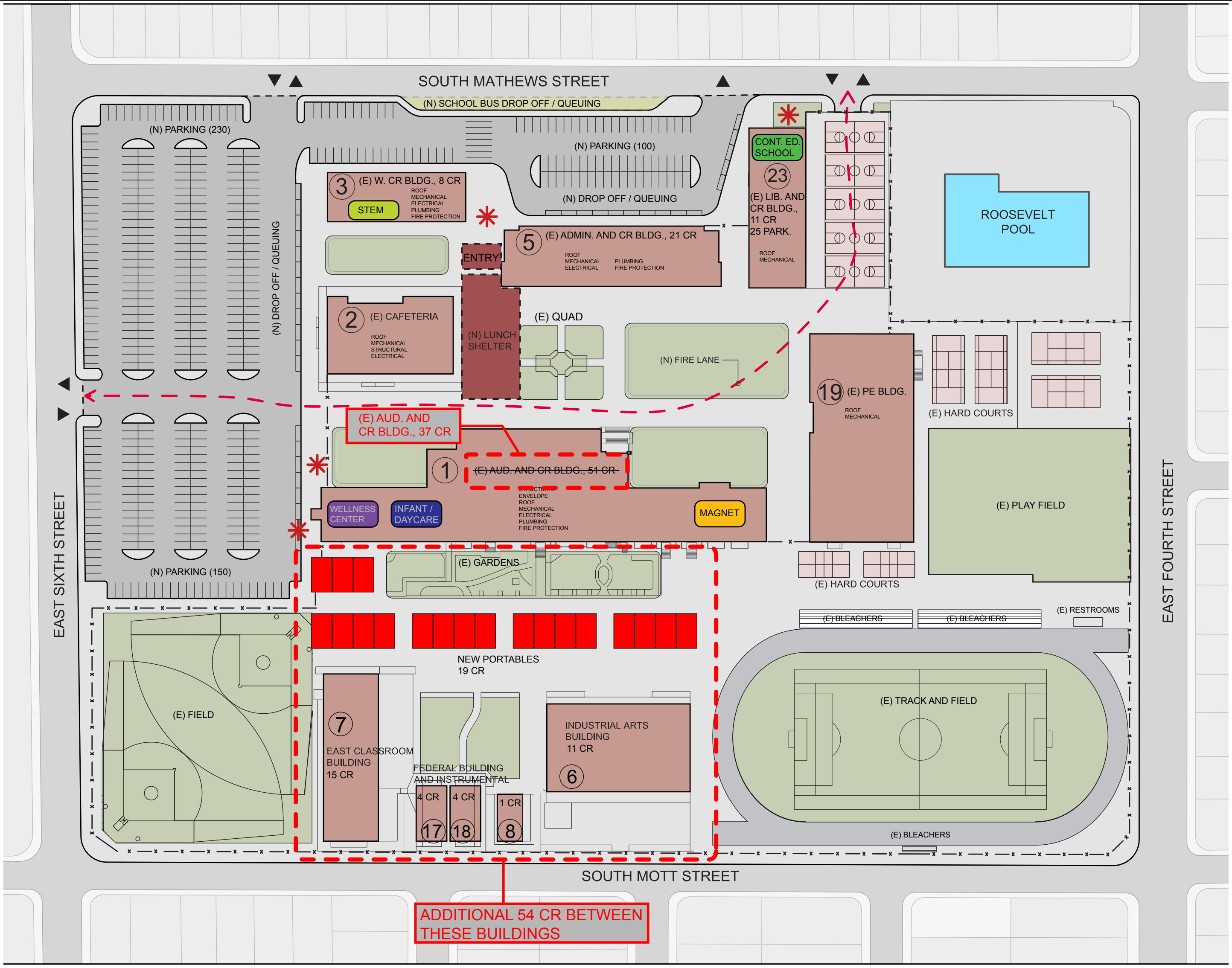
3 LAUSD, LAUSD Approved Plants List, 2012, http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf



SOURCE: LAUSD, 2017

FIGURE **ES-1**

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Roosevelt High School Comprehensive Modernization Project Site Organization Diagram

0695.016•1/18

SOURCE: LAUSD, 2017

FIGURE **ES-2**

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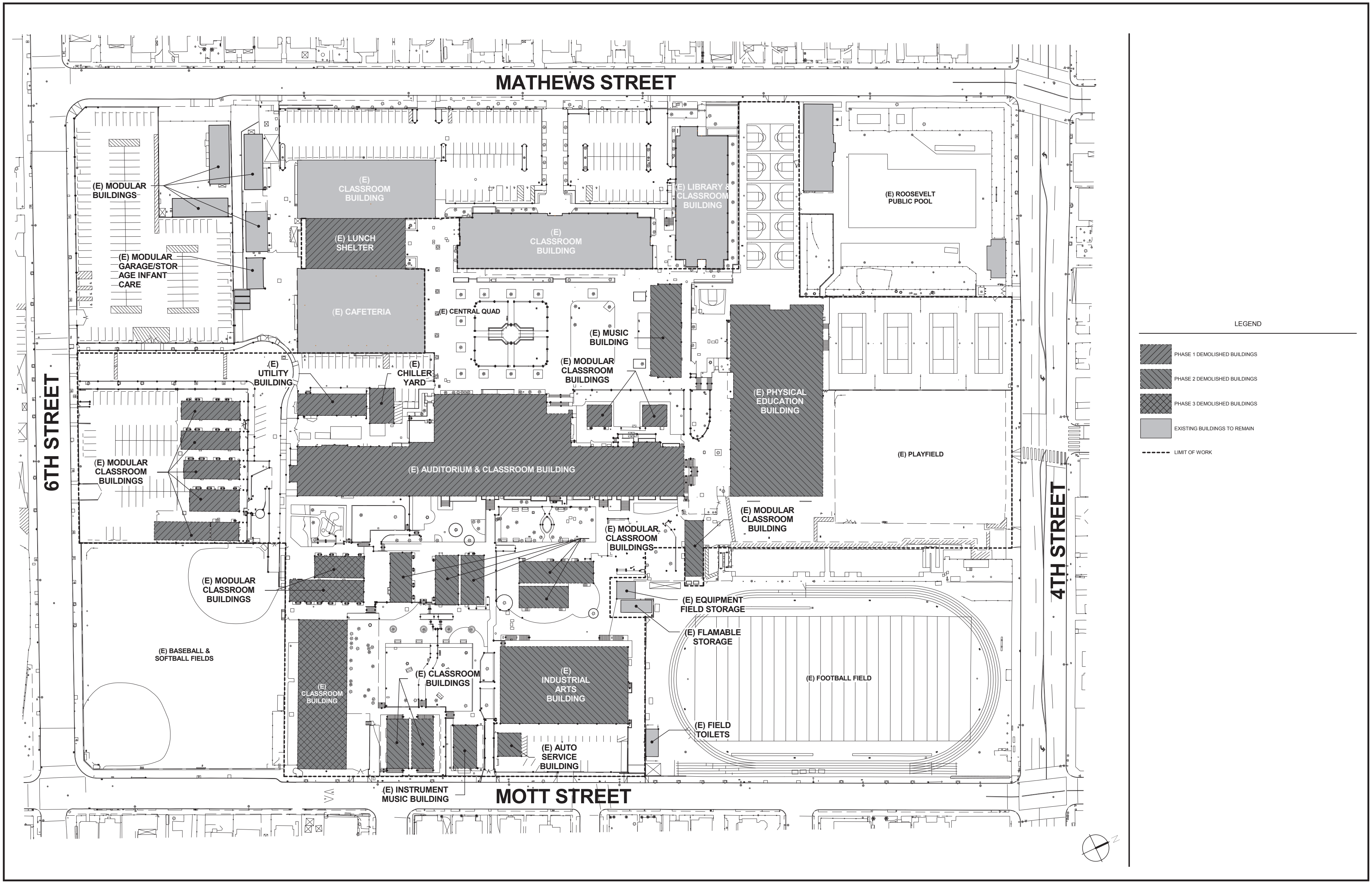
Proposed Project Site Plan

0695.016•1/18



SOURCE: Swinerton Builders and LPA, Inc, 2018

FIGURE **ES-3**

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Proposed Project Demolition Plan

0695.016•1/18

Alternative 2 - Retention and Renovation of Building 1

Under Alternative 2, Building 1 would be retained and renovated. The renovation would consist of seismic, ADA accessibility and life/fire safety upgrades to meet current DSA and LAUSD standards. The purpose of this alternative is to renovate Building 1 and maintain the historic character/character defining features of the building such that the significant unavoidable impact associated with loss of the individually eligible resource would be mitigated.

Alternative 3 - Retention of the historic district

Under this alternative, a sufficient number of primary and secondary contributors would be retained to retain the historic district. Buildings 1 (Auditorium and Classroom) and 7 (Classroom) are primary contributors to the historic district and would be retained and renovated. The following secondary contributors would also be retained and renovated: 8 (Instrumental Music), 17 (Classroom), and 18 (Classroom). All the tertiary contributors would also be retained: 10 (Flammable Storage Building), 11 (Field Sanitary Building), 12 (Equipment Field Storage), 16 (Field Light Controls), 20 (Utility Building) and the Track. Portions of the areas of historic landscaping would also be retained. Under this alternative the contributing resources identified as being retained and renovated would be renovated such that the character defining features of the buildings would be maintained. The purpose of this alternative is to maintain the historic district on the campus and avoid the significant unavoidable impact associated with the loss of the historic district.

Alternative 4 - Building 1 remains as-is

Under this alternative, Building 1 would remain in its current form. No substantial upgrades would occur and only minor improvements would be made to the building. No structural changes would occur. Similar to Alternative 2, the purpose of this alternative is to avoid the significant unavoidable impact associated with the loss of an individually eligible resource (Building 1).

AREAS OF KNOWN CONTROVERSY

Concerns raised in comments submitted to the LAUSD in response to the NOP and at the Scoping Meeting included the following:

- **Cultural Resources –** Concerns were raised regarding the eligible historic district identified at the proposed Project site. Project impacts related to historic resources are addressed in Section 3.2 (Cultural Resources).

ISSUES TO BE RESOLVED

The *State CEQA Guidelines* require an EIR to present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant impacts. The major issues to be resolved by LAUSD, as the Lead Agency for the project include the following:

- Whether the recommended mitigation measures should be adopted or modified;
- Whether additional mitigation measures need to be applied to the Project; and
- Whether the Project or an alternative should be approved.

SUMMARY OF PROJECT IMPACTS

A summary of the environmental impacts associated with implementation of the proposed project, mitigation measures included to avoid or lessen the severity of potentially significant impacts, and residual impacts, is provided in **Table ES-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts**, below.

Table ES-1
Summary of Project Impacts, Mitigation Measures, and Residual Impacts

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Air Quality		
Impact AQ-1: Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan.	No mitigation measures are required.	*Less than significant*.
Impact AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	No mitigation measures are required.	*Less than significant*.
Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	No mitigation measures are required.	*Less than significant*.
Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations.	No mitigation measures are required.	*Less than significant impact*.
Cultural Resources		
Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	**MM-CUL-1:** *Historical Resource Documentation*. A qualified historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards shall prepare HABS-like historic documentation for the historical resources slated for demolition. The HABS-like package will document in photographs as well as descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon available primary- and secondary-source research as well as available studies previously prepared for the project. The HABS documentation package will incorporate available architectural drawings on file with the Los Angeles Unified School District. New measured drawings shall not be required for the project. The specifications for the HABS-like documentation package follow: *Photographs, Descriptive and Historic Narrative, Historic Documentation Package Submittal.*	Even with implementation of the proposed interpretive plan to commemorate the events, people, and places involved in the 1968 walkouts at Roosevelt High School and the HABS documentation as outlined in Mitigation Measure CUL-1 and CUL-3, Project impacts to historical resources on the Roosevelt HS campus would remain *Significant and Unavoidable.*

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Cultural Resources (continued)		
	MM-CUL-2: Monitoring of construction-related ground disturbance and excavation is recommended in the northern portion of the Project area. This is due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through this portion of the Project area. As the depth or type of potential remains is unknown, monitoring by a qualified archaeologist is recommended during all ground disturbance and excavation in this area. **MM-CUL-3:** To communicate stories, information, and experiences pertinent to the historic events that took place on the Roosevelt High School campus to students, faculty, alumni, and the general public, an Interpretive Plan shall be developed in collaboration with the Boyle Heights community. An interpretative program shall be developed in coordination with the community.	
Hazards and Hazardous Materials		
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No mitigation measures are required.	*Less than significant*.
Impact HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	No mitigation measures are required.	*Less than significant*.
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No mitigation measures are required.	*Less than significant*.

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Hazards and Hazardous Materials (continued)		
Impact HAZ-14: Be located within 1,500 feet of a pipeline that may pose a safety hazard.	**MM-HAZ-1:** Prior to occupancy of the new school buildings, LAUSD shall conduct a Pipeline Safety Hazard Assessments in accordance with LAUSD's User Manual: Pipeline Safety Hazard Assessment. If determined to be necessary, LAUSD shall also develop and implement emergency response procedures for the school based on the assessed risk. The plan shall include the following as appropriate: • Emergency response procedures allowing students and staff to shelter in place inside the school. • Warning systems to improve evacuation time. • Safety training for staff • Communication and coordination protocols with emergency response personnel. • Requirement that a school be notified of any third party construction near an existing pipeline. • Establish emergency telephone communication with school office.	*With implementation of MM-HAZ-1 impacts would be less than significant*

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Noise		
Impact NOI-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Construction Noise – General On-Site Construction Activities: **MM-NOI-1:** The Project shall comply with the City of Los Angeles Building regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. **MM-NOI-2:** Construction and demolition activities shall be scheduled so as to avoid, to the extent feasible, simultaneously operating several pieces of equipment that cause high noise levels. **MM-NOI-3:** The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers. **MM-NOI-4**: Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.	*Construction haul truck noise would remain significant and unavoidable* Operational impacts would be *Less than Significant*.

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Noise (continued)		
	MM-NOI-5: Barriers such as plywood structures or flexible sound control curtains shall be erected between the proposed Project and adjacent sensitive receptors to minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 10 dB(A) and block the line-of-sight between the Project site and these adjacent land uses. This specification shall be included on all project plans. **MM-NOI-6:** 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. This specification shall be included on all project plans. **MM-NOI-7:** Demolition of concrete/asphalt shall not be done during school hours when children are playing in the adjacent athletic fields. **MM-NOI-8:** The construction staging area shall be as far from sensitive receptors as possible. **MM-NOI-9:** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential, school, and church uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period. **MM-NOI-10:** A sonic pile driver shall be used in place of an impact pile driver to reduce noise and vibration during pile drilling/driving activities. This specification shall be included on all project plans. Construction Noise – Off-Site Haul Truck Activities **MM-NOI-11:** All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. This specification shall be included on all project plans. **MM-NOI-12:** Any haul route for haul trucks shall avoid residential streets to the extent possible.	

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Noise (continued)		
Impact NOI-2: Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.	**MM-NOI-1** through **MM-NOI-10** are required to reduce construction related vibration impacts.	After implementation of **MM-NOI-1** through **MM-NOI-12**, vibration levels at the nearest off-site sensitive receptor would not exceed the FTA 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be less than the FTA 0.3 inch per second threshold. Therefore, with mitigation, the impacts would be *Less than Significant*. Vibration levels experienced by off-site sensitive receptors would not exceed FTA's 80 VdB threshold for human annoyance in residential uses or 83 Vdb for institutional land uses with the implementation of **MM-NOI-1** through **MM-NOI-12** and impacts would be *Less than Significant*. Operational impacts would be *Less than Significant*.
Impact NOI-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	No mitigation measures are required.	*Less than significant*.
Impact NOI-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	**MM-NOI-1** through **MM-NOI-12**, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.	Although implementation of **MM-NOI-1** through **MM-NOI-12** would reduce impacts related to construction noise, haul truck noise would remain *Significant and Unavoidable.*
Cumulative Impact: Haul truck noise from related projects occurring concurrently with haul truck activities for the Proposed Project would result in a significant	**MM-NOI-1** through **MM-NOI-12** would be required to reduce construction noise impacts.	Noise increases on local roadways when combined with haul truck noise from other related projects occurring concurrently would result in a significant and unavoidable cumulatively considerable noise impact. **MM-NOI-11** through **MM-NOI-12** are designed to reduced noise from haul truck activities, but would not reduce noise level increases to a less than significant level. Therefore, this cumulatively considerable impact would remain *Significant and Unavoidable*.
Pedestrian Safety		
Impact PED-1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	**MM-PED-1**: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD. This requirement shall be included on all construction documents.	*Less than significant*.

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impact
Pedestrian Safety (continued)		
Impact PED-2: Create unsafe routes to schools for students walking from local neighborhoods.	No mitigation measures are required.	*Less than significant*.
Transportation and Traffic		
Impact TRA-1: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersection).	No mitigation measures are required.	*Less than significant*.
Impact TRA-2: Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.	No mitigation measures are required.	*Less than significant*.

1.0 INTRODUCTION

1.0.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

This introduction is intended to provide the reader with general information regarding (1) the Project proposed by the District, (2) purpose of an environmental impact report (EIR) (3) standards for EIR adequacy, (4) format and content of this EIR, and (5) EIR procedural requirements for the proposed Project. This section is intended to educate the reader regarding the intent, format, and content of this EIR so that it can be more easily understood.

All projects within the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project in accordance with CEQA.

CEQA was enacted in 1970 by the California legislature to disclose to decision makers and the public the significant environmental effects of proposed activities and ways to avoid or reduce the environmental effects by requiring implementation of feasible alternatives or mitigation measures. CEQA applies to all California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts (such as the Los Angeles Unified School District (LAUSD)). LAUSD is the lead agency for the proposed Project and, as such, is required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

One of the primary objectives of CEQA is to enhance public participation in the planning process. Community members are encouraged to participate in the environmental review process, request to be notified of meetings and release of documents, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the lead agency. The environmental review process provides ample opportunity for the public to participate through scoping, public review of CEQA documents, and public hearings.

1.0.2 PURPOSE AND LEGAL AUTHORITY

Subsequent to the passage of CEQA in 1970, a process was established that would (1) inform governmental decision makers and the public about the potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible, and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.[1] This information is the basis of any EIR.

This EIR is an informational document for the public, and decision makers of the Los Angeles Unified School District. The EIR process will culminate with a District Board hearing to consider whether to certify a Final EIR and approve the Project.

1.0.3 EIR ADEQUACY

The principal use of an EIR is to provide input and information as one aspect of a comprehensive planning analysis. Given the important role of the EIR in the planning and decision-making process, it is imperative that the information presented in the EIR be factual, adequate, and complete. The standards for adequacy of an EIR, defined in Section 15151 of the State CEQA Guidelines, are as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

This EIR has been prepared by LAUSD in accordance with CEQA, the State CEQA Guidelines and LAUSD guidelines for the implementation of CEQA.

1.0.4 ENVIRONMENTAL REVIEW PROCESS

The environmental review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) Distributed**. Immediately after deciding that an EIR is required, the lead agency files an NOP soliciting input on the EIR scope to “responsible,” “trustee,” and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing. A scoping meeting to solicit public input on the issues to be assessed in the EIR, while not always required, may be conducted by the lead agency.

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1 State of California, State CEQA Guidelines, as amended, Section 15002(a) of the California Code of Regulations, Title 14, Chapter 3

2. **Draft Environmental Impact Report (EIR) Prepared**. The Draft EIR must contain a (1) table of contents or index, (2) summary, (3) project description, (4) environmental setting, (5) environmental impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts), (6) alternatives, (7) mitigation measures, (8) irreversible changes, and (9) organizations and persons consulted.

3. **Public Notice and Review**. The lead agency must prepare a Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092.3) and sent to anyone requesting it. Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: (1) publication in a newspaper of general circulation, (2) posting on and off the project site, and (3) direct mailing to owners and occupants of contiguous properties. LAUSD anticipates providing public notice through all three procedures. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties. The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days, unless a shorter period is approved by the State Clearinghouse (Public Resources Code 21091). Distribution of the Draft EIR may be required through the State Clearinghouse.

4. **Notice of Completion.** The lead agency must file a Notice of Completion with the State Clearinghouse as soon as it completes a Draft EIR.

5. **Final EIR.** A Final EIR must include (1) the Draft EIR or a revision thereof, (2) copies of comments received during public review, (3) list of persons and entities commenting, and (4) responses to comments.

6. **Certification of Final EIR.** Prior to approving a project, the lead agency shall certify that (1) the Final EIR has been completed in compliance with CEQA, (2) the Final EIR was presented to the decision-making body of the lead agency, and (3) the decision-making body reviewed and considered the information in the Final EIR.

7. **Lead Agency Project Decision.** The lead agency may (1) disapprove a project because of its significant environmental effects; (2) require changes to a project to reduce or avoid significant environmental effects; or (3) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted.

8. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either (1) the project has been changed to avoid or substantially reduce the magnitude of the impact; (2) changes to the project are within another agency's jurisdiction and such changes have been or

should be adopted; or (3) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

9. **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

10. **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared. A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges.

EIR Report Format and Content

Among the principal objectives of CEQA is that the environmental review process be a public one, and that the EIR be an informational document for governmental decision makers and the public about potential significant environmental effects of proposed activities.

The environmental impact analysis presented in this EIR is divided into four major sections within **Section 3.0, Environmental Impact Analysis**, which describe the existing conditions present in the area surrounding the Project site, predict the potential individual and cumulative impacts attributable to the proposed Project, present mitigation measures that are intended to minimize or avoid significant impacts caused by the proposed Project, and identify the significant impacts that would occur after implementation of mitigation measures.

Notice of Preparation

In compliance with Section 21080.4 of the California Public Resources Code, a Notice of Preparation (NOP) for the EIR was prepared by LAUSD and distributed to the State Clearinghouse, Office of Planning and Research, identified responsible and trustee agencies, as well as interested parties on October 18, 2017. The NOP and the Initial Study (IS) were circulated for a 30-day review period starting on October 18, 2017 and ending on November 16, 2017.A Scoping Meeting was held on November 1, 2017. The NOP and a flyer advertising the Scoping Meeting (both bilingual in English and Spanish) was direct mailed to parents of all current students of Roosevelt High School, all residents within a 1/4-mile radius of the Roosevelt High School campus, previous meeting attendees, and other interested parties and elected officials. The NOP was published in the Daily News and La Opinión newspapers, as well as posted around the Roosevelt High School campus.

The NOP/IS was available for review at the following locations:

- LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Los Angeles, CA 90017
- LAUSD Local District East Office, 2151 N. Soto Street, Los Angeles, 90032
- Roosevelt High School, 456 S Mathews St, Los Angeles, CA 90033
- Benjamin Franklin Branch Library, 2200 E. 1st Street, Los Angeles, CA 90033

In addition, the NOP and IS were posted on the LAUSD website at: http://achieve.lausd.net/CEQA.

The IS attached to the NOP identified those environmental topics for which the proposed Project could have adverse environmental effects and concluded that an EIR would need to be prepared to document these effects. Written comments were received from agencies and from interested parties during the review period. Refer to **Appendix 1.0-1** to this EIR for a copy of the Initial Study and NOP, and refer to **Appendix 1.0-2** to this EIR for written comments submitted to LAUSD in response to the NOP.

Environmental Issues Assessed in the EIR

This EIR addresses the issues determined to be potentially significant based on the Project's Initial Study, input from the school, community and other stakeholders, as well as from public comments received on the NOP. During the NOP scoping period several letters were received on the scope of the environmental document. The District thoroughly reviewed the comments to determine if the scope of the EIR should be further modified. **Table 1.0-1 NOP Comments**, provides a summary of the comments received and the location in the EIR document where the comment is addressed.

The EIR addresses these issues and identifies potentially significant environmental impacts of the Project and cumulative development in the City in accordance with provisions set forth in the *State CEQA Guidelines*. The EIR also recommends feasible mitigation measures, where possible, that would reduce or eliminate adverse environmental effects. The issues addressed in the EIR include:

- Air Quality
- Cultural Resources (Historical Resources)
- Hazards and Hazardous Materials
- Noise
- Pedestrian Safety

- Traffic

Environmental Review Process

This Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 calendar days. All comments or questions about the Draft EIR should be addressed to the following:

Edward S. Paek, AICP CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Email: ceqa-comments@lausd.net
Please include "Roosevelt High School" in the subject line.

The Draft EIR for the proposed Project will be distributed directly to numerous agencies, organizations, groups, and interested persons during the comment period. The Draft EIR is available for review at the following locations:

- LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Los Angeles, CA 90017
- LAUSD Local District East Office, 2151 N. Soto Street, Los Angeles, 90032
- Roosevelt High School, 456 S Mathews St, Los Angeles, CA 90033
- Benjamin Franklin Branch Library, 2200 E. 1st Street, Los Angeles, CA 90033

The Draft EIR is also available on LAUSD's website at: http://achieve.lausd.net/CEQA

After public review of the Draft EIR, a Final EIR will be prepared in response to comments received during the public review period. The Final EIR will be posted on the LAUSD website at http://achieve.lausd.net/CEQA prior to consideration of certification of the document by the District's Board of Education

Organization of the EIR

The EIR is organized into the following chapters so the reader can easily obtain information about the proposed Project and its specific issues:

Executive Summary presents a summary of the proposed Project; considered alternatives; potential impacts and mitigation measures, and describes the analysis and conclusions pertaining to potential growth inducement and cumulative effects.

Chapter 1 Introduction: describes the purpose and use of the EIR, provides a brief overview of the proposed Project, and outlines the organization of the EIR.

Chapter 2 Project Description: This section provides a detailed description of the Project including the Project location, objectives, characteristics, and anticipated public agency actions.

Chapter 3 Environmental Impact Analysis: This section is the primary focus of this EIR. Each environmental issue area contains a discussion of existing conditions for the Project area, an assessment and discussion of the significance of impacts associated with the Project, an assessment of cumulative impacts, an identification of mitigation measures (where applicable), and a discussion of level of impact significance after mitigation.

Chapter 4 Alternatives: This section includes an assessment of a reasonable range of alternatives to the proposed Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the proposed Project and to avoid or substantially lessen any of the significant effects of the proposed Project.

Chapter 5 Other CEQA Considerations: This section provides a summary of significant and unavoidable impacts of the proposed Project and a discussion of potential growth inducing effects of the proposed Project.

Chapter 6 Effects Found Not to be Significant: This section provides analysis of topics that were found not to be significant and did not need to be further analyzed in individual topic areas in the EIR.

Chapter 7 References: This section provides a list of sources used in the development of the EIR.

Chapter 8: List of Preparers: This section lists the individuals involved in preparing the EIR and organizations and persons consulted.

1.0.5 SUMMARY OF NOP COMMENTS

Below is a summary of the NOP comments received by LAUSD during the NOP period, which began on October 18, 2017 and ended on November 16, 2017. These comments are provided in **Table 1.0-1, Summary of NOP Comments and Location of Where the Comment is Addressed in the Draft EIR**.

The NOP comments are presented in the order of federal agencies, state agencies, local agencies, local groups, and individuals. The responses in **Table 1.0-1** are not intended to provide complete responses to the corresponding comment. The responses to comments are intended to be brief and to direct the reader to the appropriate section of the EIR where comments are addressed in greater detail. No formal comments related to the EIR were received at the scoping hearing.

Table 1.0-1
Summary of NOP Comments and Location of Where the Comment is Addressed in the Draft EIR

Commenter	Comment No.	Comment Summary	Addressed In Section
State Agencies			
South Coast Air Quality Management District (SCAQMD) dated 1			
	1	Quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.	Please see **Section 3.1 Air Quality** of the Draft EIR
	2	Localized air quality impacts should be calculated and compared to localized significance thresholds (LSTs). This should be completed by either using LSTs developed by SCAQMD or performing dispersion modeling as necessary.	Please see **Section 3.1 Air Quality** of the Draft EIR
	3	Identify any potential adverse air quality impacts that could occur from all phases (including construction and operation) of the Proposed Project and all air pollutant sources related to the Proposed Project.	Please see **Section 3.1 Air Quality** of the Draft EIR
	4	In the event that the proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, SCAQMD recommends that LAUSD performs a mobile source health risk assessment.	Please see **Section 3.1 Air Quality** of the Draft EIR
	5	In the event that the Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law, be utilized during Project construction and operation to minimize or eliminate significant adverse air quality impacts.	Please see **Section 3.1 Air Quality** of the Draft EIR
Native American Heritage Commission (NAHC) dated 10/23/17			
	1	NAHC provides information on consultation requirements per AB 52 and SB 18. Recommends LAUSD consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project.	The information is included in the appendix and is part of the Administrative Record.
Governor's Office of Planning and Research (OPR) dated 10/18/17			
	1	Responsible agencies must transmit their comment on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility within 30 days of receipt of the NOP from the Lead Agency.	The commenter's requests are noted.

Commenter	Comment No.	Comment Summary	Addressed In Section
California Department of Transportation (Caltrans) dated 11/16/2017			
	1	Reference to state policies and goals related to sustainable transportation were discussed. Such recommendations are reflected in Caltrans' Strategic Management Plan. Similarly, Caltrans cited LAUSD policies supporting Safe Routes to School, Vision Zero, and Walk to School Day. Caltrans encourages continued incorporation of active transportation in addition to policies related to car parking.	Please see **Section 3.5 Pedestrian Safety** and **Section 3.6 Transportation and Traffic** of the Draft EIR.
	2	If there is any transportation of heavy construction equipment and/or materials requiring use of oversized-transport vehicles on State highways, then Caltrans requires a transportation permit.	Please see **Section 3.6 Transportation and Traffic** of the Draft EIR.
Interested Parties			
Jonathan Manzanares dated 11/14/2017			
	1	Concerns expressed on demolishing the high school.	Please see **Section 3.2 Cultural Resources** of the Draft EIR.
Chris Puga dated 11/15/2017			
	1	Email communication express interest in "saving" Roosevelt High School.	Please see **Section 3.2 Cultural Resources** of the Draft EIR.
Adrian Scott Fine (on behalf of the Los Angeles Conservancy) dated 11/14/2017			
	1	Concern about the loss of Roosevelt High School's cultural and community assets related to the Blowouts in 1968. As a significant and unavoidable impact, the LA Conservancy recommends consideration of different feasible alternatives to the demolition to the original Auditorium and Classroom Building (Building 1), for example.	Please see **Section 3.2 Cultural Resources** and **Section 4.0 Alternatives** of the Draft EIR.
	2	According to the NOP, the purpose and need to demolish and replace historic campus buildings was not clear. Preserving and rehabilitating historic school facilities have been demonstrated before by LAUSD. A number of questions were asked of the Lead Agency regarding cost of construction. These comments do not specifically relate to CEQA.	Please see **Section 2.0 Project Description** and **Section 4.0 Alternatives** of the Draft EIR.
	3	Cites the lead agency's duty under CEQA to take all necessary action to preserve historical resources as well as include feasible alternatives or feasible mitigation measures to substantially lessen potentially significant effects. LA Conservancy suggests a partial preservation alternative with details on how to include new building construction and retention of Building 1.	Please see **Section 4.0 Alternatives** of the Draft EIR.

Commenter	Comment No.	Comment Summary	Addressed In Section
	4	Concerns raised over LAUSD's project approval and environmental review processes. These concerns include, but are not limited to an inaccurate historical resources survey, action taken by the Board of Education related to design and construction of the proposed Project, and community outreach.	Please see **Section 2.0 Project Description, Section 3.2 Cultural Resources and Section 4.0 Alternatives** of the Draft EIR.
Jenesis Fonseca-Ledezma dated 11/14/17			
	1	Expressed modernizing the campus has good intentions, but it is crucial that the campus is maintained or remodeled and not demolished. Cites the campus's importance to the 1960's Chicano Civil Rights Movement as well as other cultures that make up a diverse history in Boyle Heights. Building "R", the Auditorium and Classroom building, is the most iconic on campus and has been the heart of the campus since 1923.	Please see **Section 3.2 Cultural Resources** of the Draft EIR.
Michi Dobashi dated 11/13/17			
	1	In favor of preserving and restoring Roosevelt High School's historical buildings over demolition. Describes how Roosevelt High School is a big part of the community and concerned that demolition would hurt community and school spirit events such as football games.	Please see **Section 3.2 Cultural Resources** of the draft EIR.
Jean Kawaguchi dated 11/13/17			
	1	Believes LAUSD should exhaust all possibilities of historical preservation prior to demolition and replacement. Cites family history and relationships to the campus through generations.	Please see **Section 3.2 Cultural Resources** of the draft EIR.
Anita Mendez dated 11/15/17			
	1	The importance of the buildings, such as Building "R", should be considered when improvements to this old building are made. Safety is imperative, but reconstruction should be done without damaging the history the buildings hold for the campus and the community.	Please see **Section 3.2 Cultural Resources** of the Draft EIR.
Henry Perez (on behalf of Innercity Struggle) dated 11/16/17			
	1	Writing in support of the proposed Project because the students and families of Boyle Heights deserve a safe learning environment. Cites the 1968 walkouts demanded new schools and better facilities and the comprehensive modernization project is in line with those goals.	Please see Section **3.2 Cultural Resources** of the Draft EIR.
Cynthia Sanchez (on behalf of Proyecto Pastoral at Dolores Mission) dated 11/17/17			
	1	Writing in support of the proposed Project because the students deserve a safe learning environment and commends the Board of Education for investing in upgrade to school facilities.	Please see Section **2.0 Project Description** of the Draft EIR.

Commenter	Comment No.	Comment Summary	Addressed In Section
Paula Samuel dated 11/18/17			
	1	Questions raised about designs and community outreach. Concerns LAUSD and other public agencies will demolish and sell the property and add to gentrification.	Please see **Section 2.0 Project Description** of the Draft EIR.
Promesa Boyle Heights dated 11/2017			
	1	Supports the proposed Project; commends the Board of Education's investment to modernize classrooms; and is eager to work with LAUSD prior to, during, and following the construction to ensure students thrive.	Please see Section **2.0 Project Description** of the Draft EIR.
Coalition to Preserve LA dated 11/16/17			
	1	Urges the preservation of Building 1 for its National Register-eligible historic district significance and the consideration of a meaningful preservation alternative. Key points were made with acknowledgement of the 1968 Blowouts and the multiculturalism of various ethnic groups (such as Jewish, Mexican, Japanese, Armenian, Italian, Anglo, African American, and Russian Molokans) within Boyle Heights and Roosevelt High School. The Coalition has deep concerns about LAUSD's outreach in the community regarding Building 1's proposed demolition versus preservation, understands the effort needed for seismic work, and the greenhouse gas emission impacts on the environment from proposed demolition activities.	Please see Section **3.2 Cultural Resources**, **4.0 Alternatives**, and Appendix **1.0-2 Initial Study** for analysis on greenhouse gas emissions of Draft EIR.
Non-LAUSD Comment Cards dated 11/20/17			
	1	There were 53 comment cards collected written and signed by various community members including alumni and parents of current students. All comments addressed their disapproval of the destruction of historically significant buildings on the Roosevelt High School campus.	Please see **Section 3.2 Cultural Resources** of the Draft EIR.

2.0 PROJECT DESCRIPTION

2.0.1 INTRODUCTION

The purpose of the project description is to describe the project in a way that will be meaningful to the public, reviewing agencies, and decision makers. This project description provides information pertaining to the Roosevelt High School Comprehensive Modernization Project (proposed Project or Project). As described in Section 15124 of the *California Environmental Quality Act (CEQA) Guidelines*, the project description in an EIR is required to contain the following information: (1) the location of the proposed Project; (2) a statement of Project objectives; (3) a general description of the Project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR. The *State CEQA Guidelines* state that a project description need not be exhaustive, but should provide the level of detail needed for the evaluation and review of potential environmental impacts.

The project description is the starting point for all environmental analysis required by the *State CEQA Guidelines*. Section 15146 of the *State CEQA Guidelines* states that the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity, which is described in the EIR. In this case, the proposed project consists of the demolition, construction, and modernization of the campus for Theodore Roosevelt Senior High School (Roosevelt High School). The following project description serves as the basis for the environmental analysis contained in this Draft EIR.

2.0.2 PROJECT LOCATION

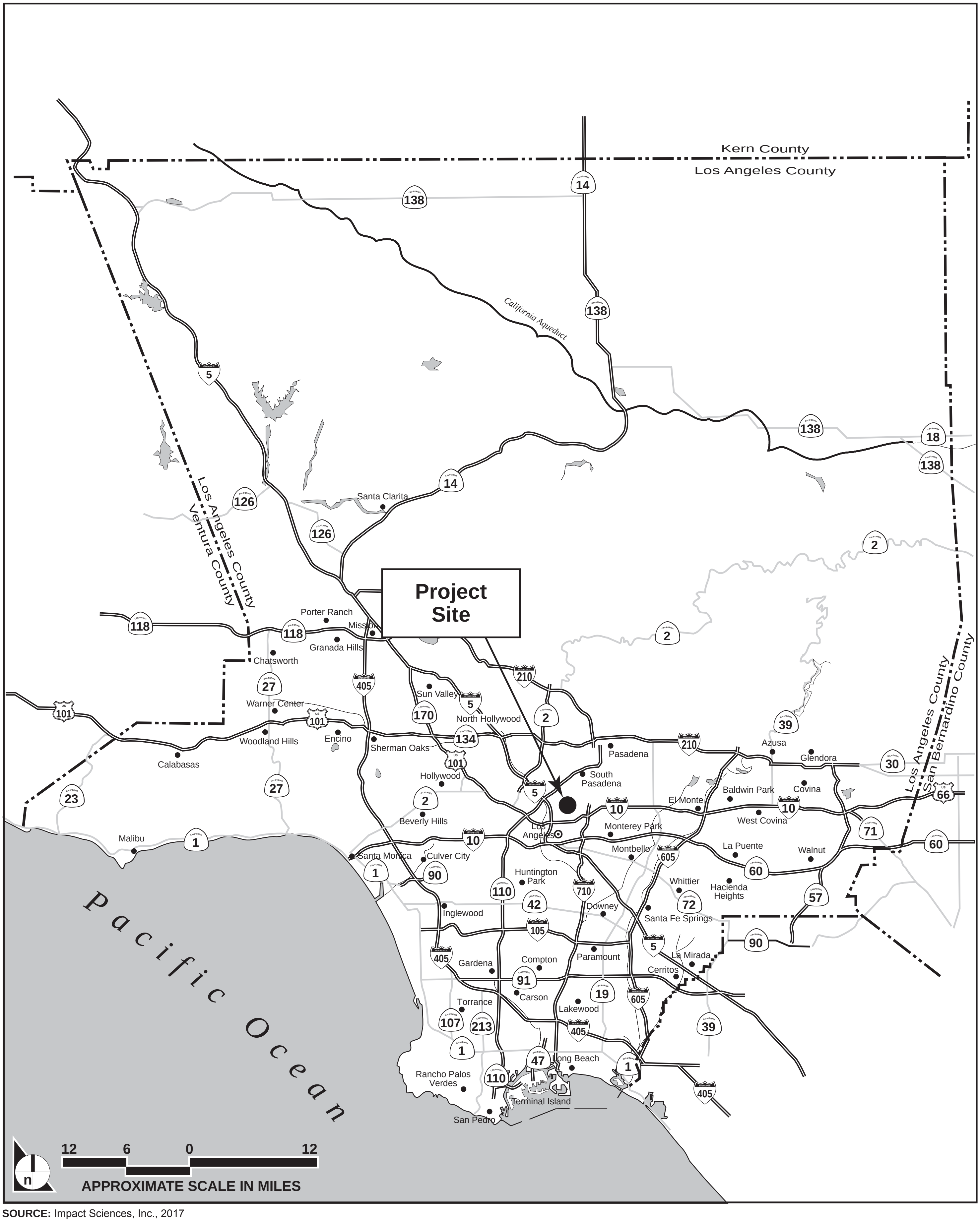
The Project site is located at 456 South Mathews Street in the Boyle Heights Community Plan Area (CPA) of the City of Los Angeles. The approximately 22.7-acre Project site currently accommodates 23 permanent buildings (including the gazebo, arcade, and bleachers) and 23 portable buildings, some of which serve a part of the Boyle Heights Continuation School, the Roosevelt Adult School, and the Roosevelt Infant/Early Education Center. The Project site is bounded East 4th Street to the north, East 6th Street to the south, South Matthews Street to the west, and South Mott Street to the east. (**Figure 2.0-1, Regional Location**). Regional access to the Project site is provided by the adjacent roads from the junction, as well as from I-10 and I-5 from the west, U.S. Highway 101 from the north, and State Route 60 from the south. Local access is provided via East 4th Street along the northern boundary of the site and S. Soto Street to the northwest.

The land uses surrounding the Project site are primarily single and multi-family residential, with some institutional (e.g., school, hospital and church), commercial, and recreational uses. (**Figure 2.0-2, Project Vicinity**) Immediately south of the site, across East 6th St. is Hollenbeck Middle School. Approximately

0.1 miles west of the Project site is Promise Hospital of East L.A. and 0.4 miles to the east is the Our Lady of Talpa School and the affiliated church. Approximately 0.3 miles northeast of the Project site is the Evergreen Recreation Center and athletic fields and a Food 4 Less grocery outlet. Hollenbeck Park is approximately 0.32 miles to the west. Other commercial facilities in the vicinity include a bank, a beauty supply store, and a Carl's Jr. At the north end of the site, 0.1 miles across S. Mathews Street, is a small market, La Princesa Tortilleria. An aerial view of the site is provided in **Figure 2.0-3 Aerial Photograph**.

Land Use and Zoning

The City of Los Angeles General Plan land use designation for the Project site is "Public Facilities" (**Figure 2.0-4 City of Los Angeles General Plan Land Use Designation**). The City of Los Angeles Municipal Code – Zoning Plan has designated the proposed Project site as PF: Public Facilities, a zone for the use and development of publicly owned land, including fire and police stations, public libraries not located inside public parks, post office and related facilities, public health facilities such as clinics and hospitals, public elementary and secondary schools, public parking facilities under freeway rights-of-way, and farming and nurseries under power transmission rights-of-way (**Figure 2.0-5, Zoning Designation Map**). The City of Los Angeles has designated the properties surrounding the Project site as RD1.5 (restricted density multiple dwelling zone) to the west, C2 (commercial zone) to the north, R2 (two-family zone) to the east, and PF (public facilities) to the east of the Project site in the City's Zoning Plan and General Plan. The proposed Project site is located on Assessor's Parcel Number (APN) 5185-004-929. The project site is located in the Boyle Heights Community Plan Area (CPA) which is one of the 35 CPAs that comprise the land use element for the City of Los Angeles General Plan (**Figure 2.0-6, Boyle Heights Community Plan Area**).



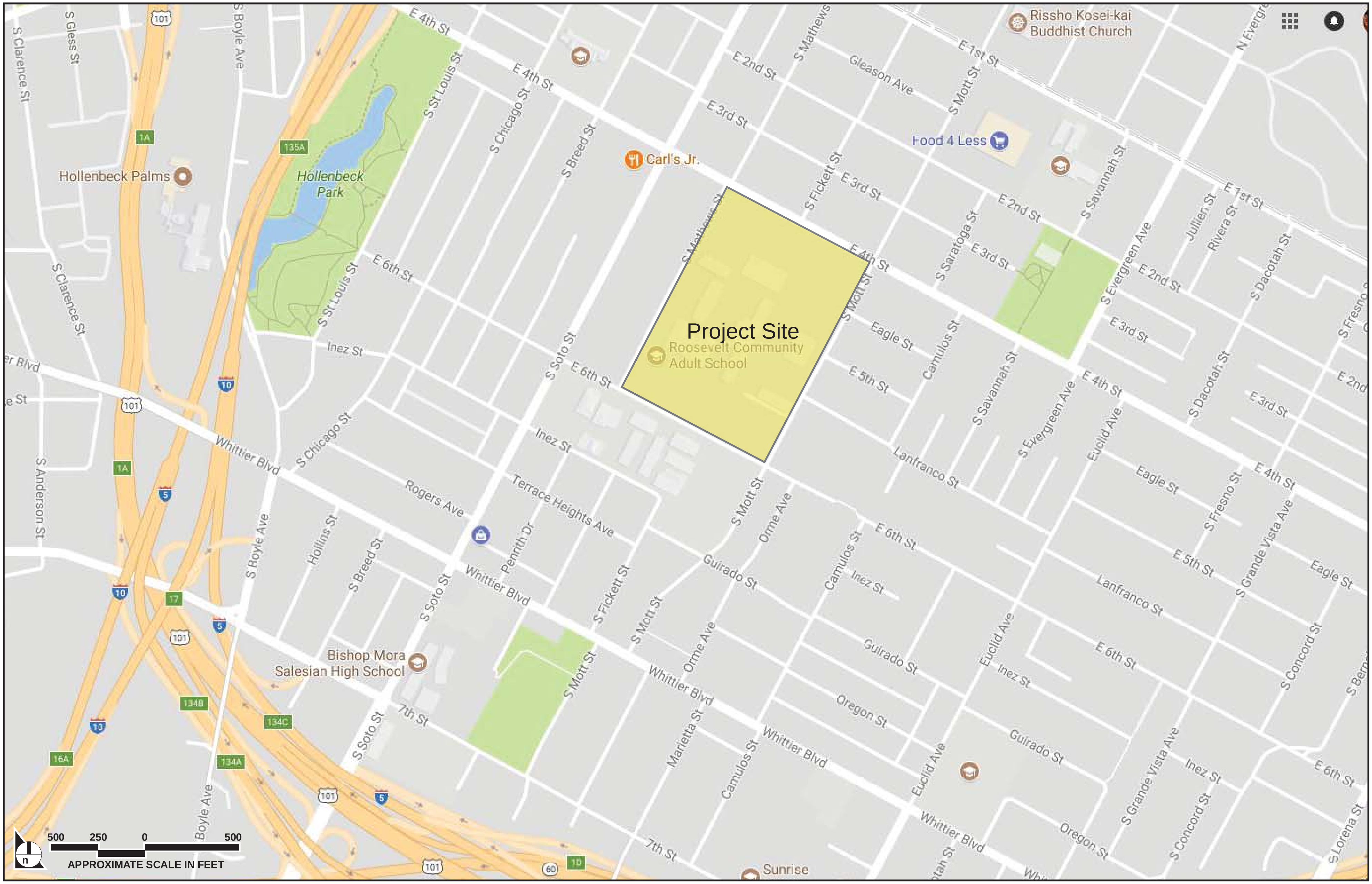
SOURCE: Impact Sciences, Inc., 2017

FIGURE **2.0-1**

IMPACT SCIENCES

Regional Location

0695.016•12/17

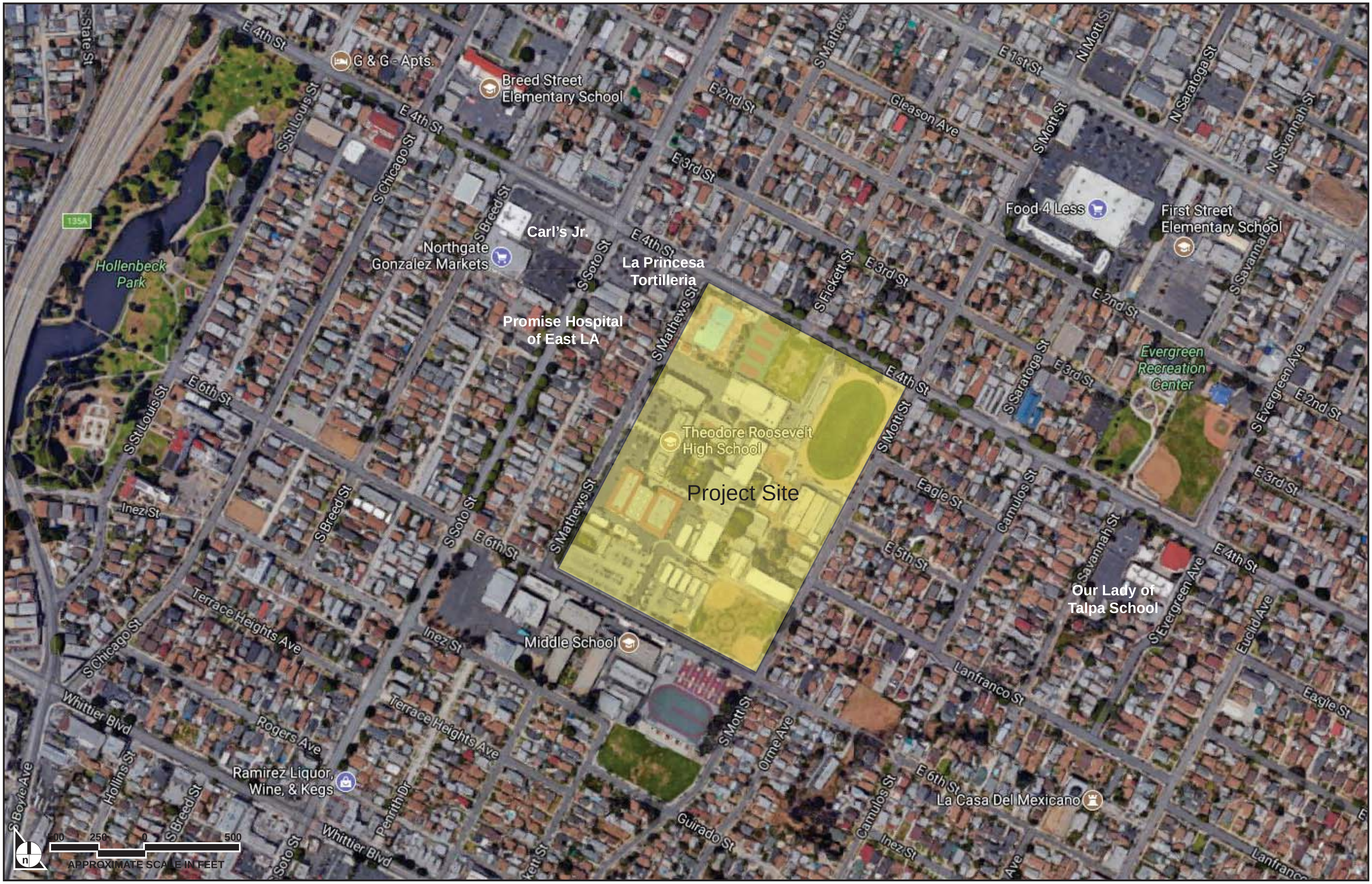


SOURCE: Google Maps, 2017

FIGURE **2.0-2**

Project Vicinity

0695.016•12/17



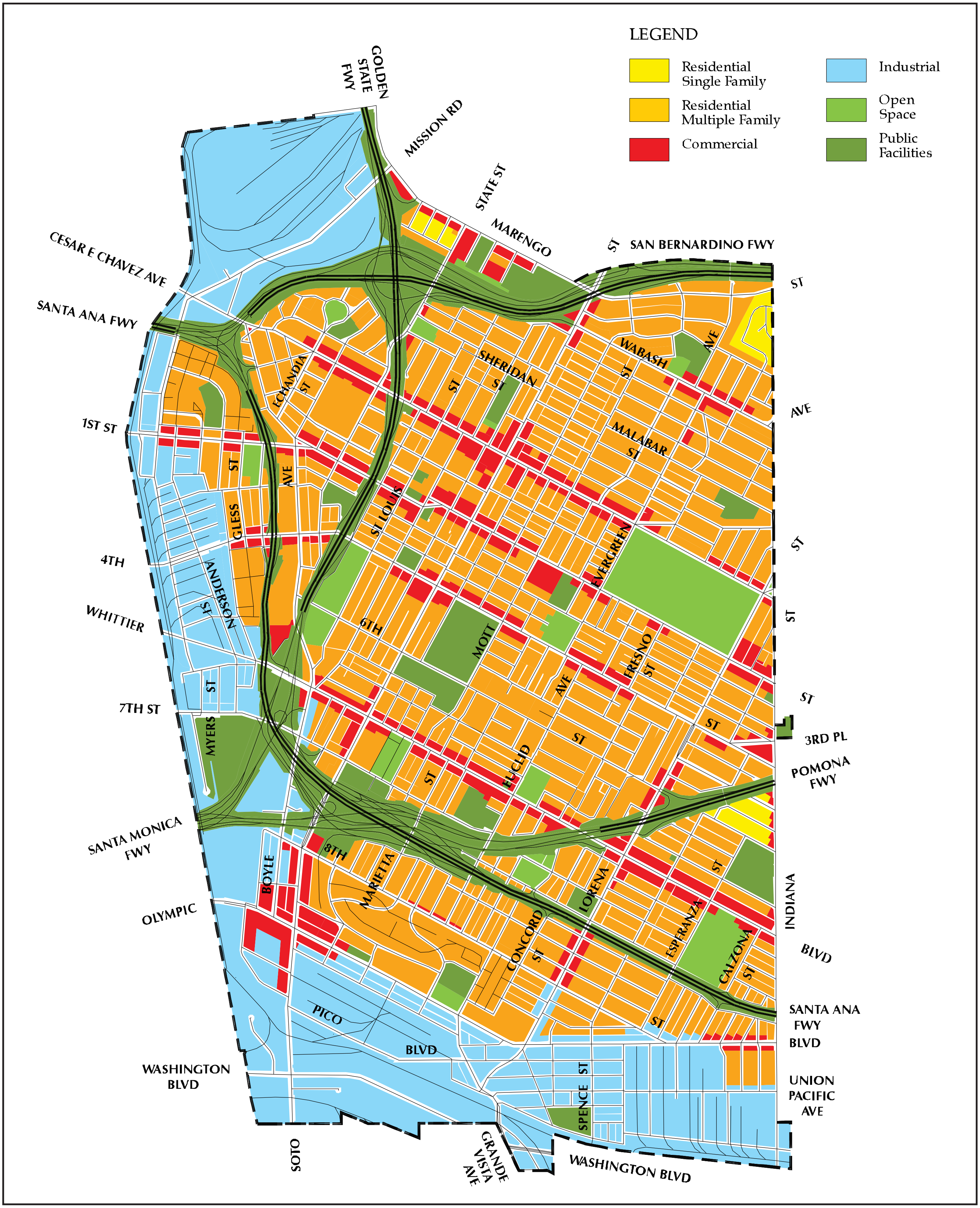
SOURCE: Google Maps, 2017

FIGURE **2.0-3**

IMPACT SCIENCES

Aerial Photograph

0695.016•12/17



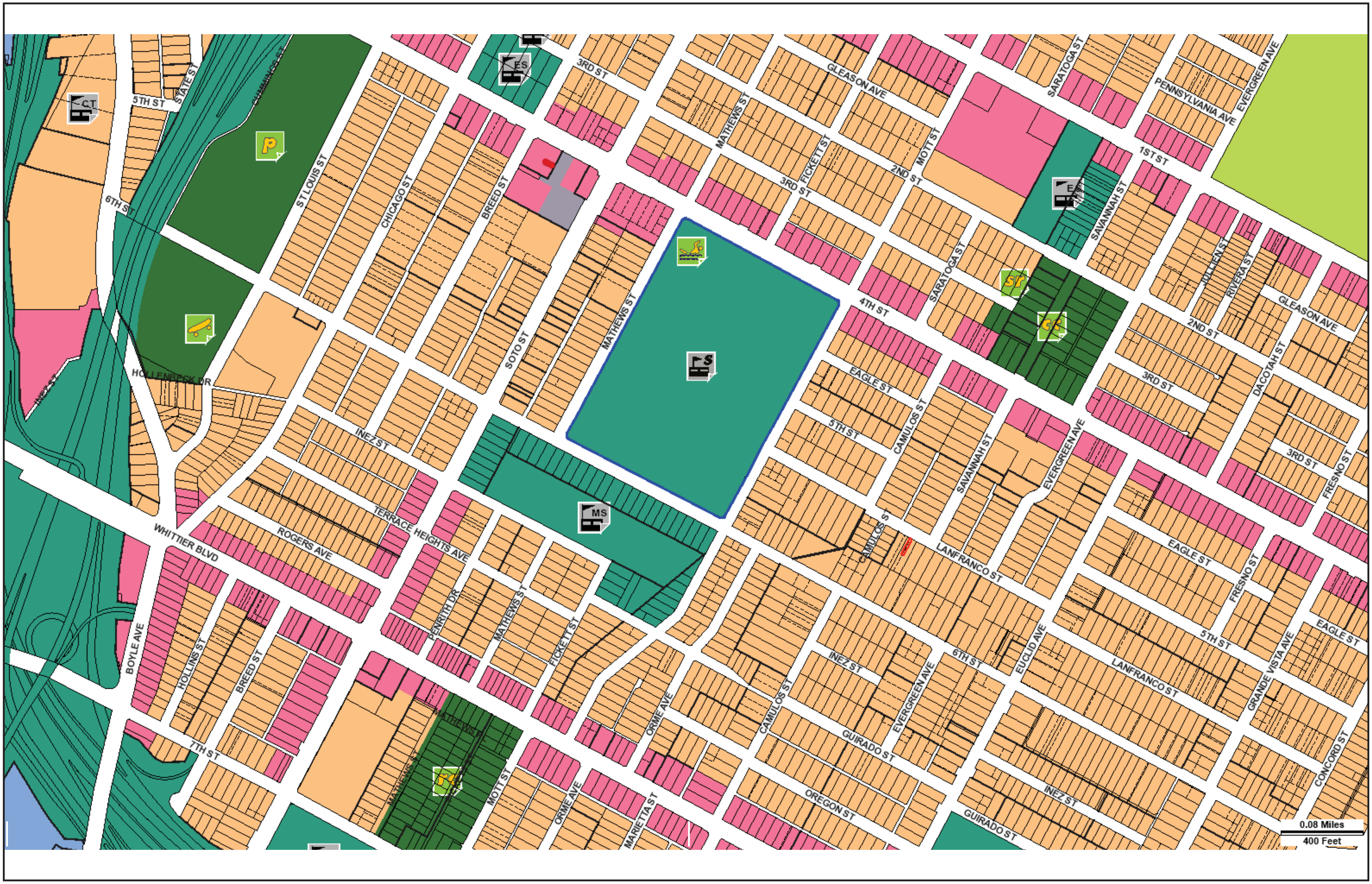
SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE **2.0-4**

IMPACT SCIENCES

City of LA General Plan Land Use Designation

0695.016•12/17



SOURCE: City of Los Angeles, 2017

FIGURE **2.0-5**

Zoning Designation Map

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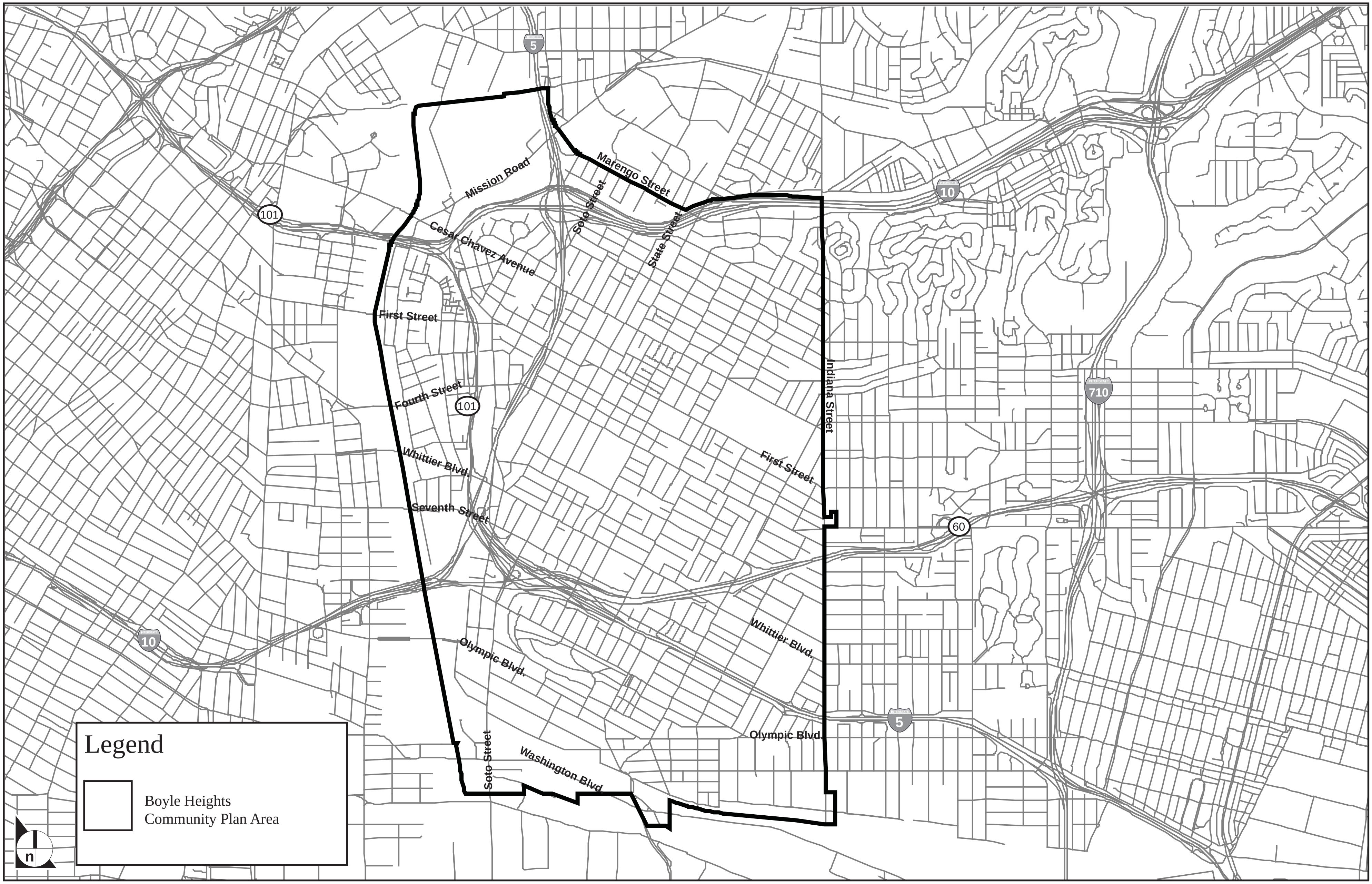
0695.016•12/17



SOURCE: City of Los Angeles, TAHA, Impact Sciences, 2016

FIGURE **2.0-6**

Boyle Heights Community Plan Area Map Area

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1264.003•09/16

2.0.3 SITE HISTORY

Roosevelt High School was constructed in 1922 and opened in 1923. The school was developed to address an over-crowding problem within public schools in Los Angeles. In 1922, the main entrance to Roosevelt High School faced Fickett Street, a small residential lane, in the form of stairs leading up from the sidewalk to the lobby of the Auditorium and Classroom Building (1). By 1926, the growth of Roosevelt High School necessitated the demolition of all remaining residential structures on the property, which were replaced with a playground, an athletic field, and a new building. The campus was retrofitted after the Long Beach Earthquake in 1933. In the 1960's the site expanded to incorporate an entire city block. Most of Fickett Street between East Fourth and East Sixth Streets was abandoned in the late 1960s to make way for the Physical Education Building (19) in 1968.

In March 1968, Roosevelt High School along with four other LAUSD high schools (Lincoln, Garfield, Belmont, and Wilson), were subjected to mass student walkouts, also known as "Blowouts" associated with community activism under the growing Chicano Civil Rights Movement, also known as 'El Movimiento'.

In 1970, Roosevelt High School was subject to arson and small bombing events by the Chicano Liberation Front on three separate occasions. Although no one was injured, two main buildings necessitated repairs. With the construction of the Administrative/Classroom Building (5) in 1972 and the Cafeteria- Classroom Cluster and the Music Building (4) in 1977, the central commons or "Quad" was finally defined. In the following years, new buildings were constructed for childhood education aide, music, new classrooms, and a cafeteria. The school would continue to be developed with the addition of contemporary buildings, athletic fields and an outdoor swimming pool until 1990.

2.0.4 EXISTING CONDITIONS

Roosevelt High School serves 9th through 12th grades on a single track calendar. The education program is organized around a 9th Grade Academy (which is comprised of three Houses), and Academic Pathways for 10th through 12th grades. A health clinic is housed in the Auditorium and Classroom Building (1). Roosevelt High School is operated by the Partnership for Los Angeles Schools (PLAS). Four other schools operate on the property as well:

- The Math, Science, and Technology Magnet Academy at Roosevelt High School currently occupies the Library and Classroom Building (23) near the northwest corner of the property. The administrative functions for this magnet school are housed in three relocatable structures (Buildings 26, 40 and 42) located to the east of the Auditorium and Classroom Building (1).

- A new STEM Academy of Boyle Heights began operation in Fall 2015 within the Classroom Building (7) near the southeast corner of the property and currently occupy other buildings as well.
- Boyle Heights Continuing Education High School occupies two relocatable structures (Buildings 44 and 45) near the southwest corner of the property.
- An Infant and Early Education Center occupies two relocatable structures (Buildings 41 and 46) near the southwest corner of the property, just north of the continuation school.

The campus also currently provides administrative space and shared classrooms for the Boyle Heights Adult Education School. The adult school only functions during evenings or otherwise outside of regular school hours.

In the beginning of 1993, the school was required to operate on a multi-track calendar until it received overcrowding relief in 2009. Over the course of the last 18 years, approximately $34 million in bond funding has been invested in improving the school's facilities, including the implementation of Academic Pathways, general repairs and upgrades to campus infrastructure.

The proposed Project has been developed under the LAUSD's School Upgrade Program (SUP) to improve student health, safety and education through the modernization of school facilities. Roosevelt High School was identified as one of 11 schools in the District most in need of an upgrade due to the physical condition of the facilities. Based on an assessment of the following conditions, the 11 proposed school sites were identified as having a multitude of critical physical conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate:[1]

- The physical condition of a school's buildings and grounds/outdoor areas identified by the 10-year Facilities Condition Index (FCI), a comparative indicator of the relative condition of a school's facilities in relation to the current replacement value. Where applicable, the FCI score is adjusted to reflect projects underway and the improved conditions that will be provided.
- The seismic risk factor identified using the Federal Emergency Management Agency's (FEMA) Hazus-MH model for determining the probability of failure based on the predicted earthquake magnitude generated by specific faults, year of construction, type of construction, number of stories, and code and construction quality at the time of construction.
- Size of food service facility, multi-purpose room/auditorium, and library determined by an assessment of the difference between the size of the core facility and the design standard for a new facility.

1 Los Angeles Unified School District (LAUSD). 2015a. *Board of Education Report 373-14/15* . March.

- Size of play space determined by an assessment of the difference between the size of a school's play area and the size recommended under the Rodriguez Consent Decree.
- Percentage of classrooms in portable buildings calculated based on the number of classrooms in portable buildings versus the number of classrooms in permanent buildings.
- Adequacy of controlled public access point based on an assessment of whether a campus has a secured single point of entry, an intercom/camera system that controls visitor access to the school site, or neither.
- Site density determined by an analysis of the amount of square footage per student at a school site.

Existing Campus Facilities

Table 2.0-1, Summary of Existing Facilities summarizes existing campus facilities.

Table 2.0-1
Summary of Existing Facilities

Building ID[a]	Building Number	Building Name	Classrooms	Building Square Footage	Building Type	Year Built
21585	1	Auditorium & Classroom Bldg.	48	108,270	permanent	1922
15158	2	Cafeteria Bldg.	--	12,586	permanent	1977
24018	3	Classroom Bldg.	8	8,896	permanent	1977
21641	4	Music Bldg.	2	3,630	permanent	1977
23689	5	Administration & Classroom Bldg.	19	57,709	permanent	1972
24215	6	Industrial Arts Bldg.	7	25,546	permanent	1968
17199	7	Classroom Bldg.	17	26,097	permanent	1937
21890	8	Instrumental Music Bldg.	1	1,800	permanent	1959
17742	9	Garage Bldg.	--	889	permanent	1972
22718	10	Flammable Storage Bldg.	--	60	permanent	1953
25799	11	Field Sanitary Bldg.	--	562	permanent	1958
25770	12	Equipment Field Storage	--	528	permanent	1941
18415	13	Gazebo	--	466	permanent	1977
NIA	14	Home Bleachers – West (new)	--	5,600	permanent	2008
NIA	15	Visitor Bleachers – East (new)	--	NIA	permanent	2008
20549	16	Field Light Controls	--	72	permanent	1949
23829	17	Classroom Bldg.	4	3,940	permanent	1964
21628	18	Class room Bldg.	4	3,940	permanent	1964
20906	19	Physical Education Bldg.	--	38,799	permanent	1968
23892	20	Utility Bldg.	--	2,537	permanent	1968
15815	21	Auto Service Bldg.	--	900	permanent	1975
36022	22	Arcade	--	36	permanent	1977
20796	23	Library & Classroom Bldg.	11	35,120	permanent	1990
20955	24	Two/Three Unit Relocatable	2	1,920	portable	1971
20958	25	Two/Three Unit Relocatable	2	1,920	portable	1971
22262	26	Two/Three Unit Relocatable	2	1,792	portable	1959
21332	27	Two/Three Unit Relocatable	2	1,824	portable	1950
21330	28	Two/Three Unit Relocatable	2	1,824	portable	1954

Building ID[a]	Building Number	Building Name	Classrooms	Building Square Footage	Building Type	Year Built
21319	29	Two/Three Unit Relocatable	2	1,792	portable	1960
21691	30	Two/Three Unit Relocatable	2	1,792	portable	1966
21098	31	Two/Three Unit Relocatable	3	2,688	portable	1961
20171	32	Two/Three Unit Relocatable	1	864	portable	1950
21634	33	Sanitary Relocatable Bldg.	--	320	portable	1975
21914	34	Two/Three Unit Relocatable	2	1,728	portable	1950
21629	35	Single Unit Relocatable	2	896	portable	1966
20329	36	Single Unit Relocatable	1	1,728	portable	1950
21251	37	Single Unit Relocatable	2	896	portable	1966
21373	38	Single Unit Relocatable	1	896	portable	1966
22228	39	Single Unit Relocatable	1	896	portable	1966
21682	40	Single Unit Relocatable	1	896	portable	1967
18330	41	Single Unit Relocatable	--	1,456	portable	1972
23828	42	Two/Three Unit Relocatable	1	1,792	portable	1967
34750	43	2 Classroom Relo-DOH/Parent Center	2	1,440	portable	NIA
			Approximate campus building space	**367,343**		

a As listed in section 5.4 Building Condition Analysis (FCI Report) of the Roosevelt High School Comprehensive Modernization Project document, dated January 19, 2016.
b As listed in section 2.0 Existing Site Survey and Investigation of the Roosevelt High School Comprehensive Modernization Project document, dated January 19, 2016.
NIA – no information available

Figure 2.0-7 Building Room Use 1st Floor and **Figure 2.0-8 show the Building Room Use 2nd Floor**, show how buildings on the campus are currently being used. As can be seen in the Figures, many buildings have undersized classrooms that do not meet LAUSD's standard classroom size.[2] In particular, Building 1 (Administration), although the largest building on the campus, currently houses only 22 usable classrooms.

The condition of the buildings is based on the site assessment report titled *Comprehensive Modernization Project*, prepared in 2016 by DLR Group for the Los Angeles Unified School District.[3]

Building Descriptions

Building 1

Auditorium and Classroom Building #1, or "R Building" is the oldest building on the Roosevelt High School campus. The original 1922 design featured extensive exterior ornamentation, including decorative glazed tiles and dramatic gamble pediments; however, the 1924 addition of a south wing was more subdued, and subsequent seismic strengthening projects in 1936 and 1954 removed almost all of the

2 LAUSD standard classroom size is generally 800 square feet.
3 DLR Group. *Comprehensive Modernization Project*. 19 January 2016.

original design features. A fire resulted in the removal of the original fourth floor, leaving a three-story building that mitigates some of the campus site slope through a first floor that is essentially a basement at its north end. In addition to classrooms and related support spaces, the building also includes a performance auditorium with balcony seating and a large double-height lobby. The exterior entrance to the lobby and some of the interior of the auditorium are the only remaining traces of the original design ornament, and the interior is actually a product of the 1936 seismic remodel.

Of the 48 classrooms in the building, thirty-three (33) or more than two-thirds of the building's classrooms, are less than 800 square feet, which is the smallest classroom size allowed by LAUSD.[4]

Building 1 also includes a performance auditorium with raked floor and balcony seating. The auditorium stage features a fly loft, operable rigging and small wings for storage and staging; there is also a large door directly to the exterior. The auditorium lobby is a double-height space dominated by stairs leading to the second floor to the east; the ticket booth is located on the south side of the lobby between pairs of auditorium doors; the main building entrance is located on the west side of the lobby; a large display case is featured on the north side of the lobby; and doors to the wellness center are located in the northeast corner.

Almost every exterior door, including at official building entrances, requires the use of stairs. The existing stairs do not meet current accessibility requirements, particularly for handrails. An elevator was retrofitted at the south end of the building.

Buildings 2, 3, 22

This cluster of buildings consists of Cafeteria Building #2, Classroom Building #3 (or "E Building"), and Lunch Shelter/Arcade Building #22. They were all constructed under the same DSA project in 1977 at the south edge of the "Quad" together with Music Building #4 at the north edge and Gazebo Building #13 in the middle of the Quad. These single-story wood-frame buildings feature deep perimeter overhangs enclosed by arcades. Most rooms open directly to one of these covered exterior spaces. The only enclosed part of the Lunch Shelter/Arcade is a small kiosk on the north side; the rest of Building #22 is open to the elements, including several large roof openings.

Building #3 contains eight general-use classrooms, four of which open to the west arcade and four of which open to the east arcade and lunch shelter (Building #22). The Cafeteria in Building #2 provides overflow and after-school educational space for various clubs and extracurricular activities.

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4 LAUSD's recommended classroom size is 960 s.f.

Building 4

Music Building #4, or "M Building" was constructed on the north edge of the "Quad" in 1977 together with the Cafeteria-Classroom Cluster at the south edge and the Gazebo Building #13 in the middle of the Quad. This single-story wood-frame building features a deep perimeter overhang on the south (Quad) side that is enclosed by an arcade. Most rooms open directly to this covered exterior space. The interior of the building is dominated by two large music classrooms that feature high ceilings and acoustical wall treatments.

Building #4 has two large, high-bay music classrooms with adjacent storage rooms. All rooms, including the classrooms, open directly onto the arcade on the south side of the building.

Building 5

Administrative/Classroom Building #5, or "A Building" was built in 1972 on what was originally residential property on the opposite side of the former Fickett Street. The building is three stories above grade with a partial basement at the south end and a partial fourth floor or "mezzanine" also at the south end. The first floor is exclusively administrative and includes both a parent center and office spaces for the Roosevelt Community Adult School. The second and third floors are primarily classrooms, though there are storage and support spaces as well.

Building #5 contains 19 classrooms, including 8 science labs on the third floor (including two with fume hoods) and 3 classrooms on the second floor that could be used for science (though only one currently is). Seven other classrooms on the second floor include three large computer labs and one small space that was originally intended to be a teacher workroom.

Building 6 (Industrial Arts) and Building 21

This cluster of buildings consists of Industrial Arts Building #6 (or "T Building" and Auto Service Building #21. Building #21 is apparently only used by campus staff for storage purposes.

The first floor includes one large art/shop classroom space at the northwest; one large classroom space at the northeast that has been carved from one auto shop bay; at least one other auto shop bay; and what was once a large art/shop classroom and a series of offices and storage rooms at the southwest that was subsequently carved into one regular classroom and four smaller classroom spaces. Building #21 does not contain educational facilities.

Classroom Building 7

Classroom Building #7, or “C Building” is the second oldest building still present on the Roosevelt High School campus. The original 1937 design was somewhat utilitarian and lacked almost any kind of exterior ornamentation.

Building #7 contains six classrooms on the first floor and nine classrooms on the second floor; however, two additional spaces on the first floor that are currently used as administrative offices were originally classrooms and could be re-converted, bringing the building total to 17 classrooms.

The west building entrance is at grade but features a non-compliant threshold height, while the east building entrance requires the use of stairs. Existing stairs at interior and exterior locations do not meet current accessibility requirements, particularly for handrails. There is no elevator. All restrooms require the use of stairs for access.

Building 8

Built in the late 1950s, Instrumental Music Building #8 consists of a single high volume mass with a low covered walkway along the north side. The building is used for instrumental music and includes 11 upright pianos and 2 baby grand pianos, plus unknown numbers and types of other instruments in a secure interior storage unit along the west end of the main space. Building #8 contains one music classroom with four small practice rooms along the east end of the main space.

Garage Building 9

This one-story stucco building features two large lift-up garage doors and a single pedestrian exit door. It is likely used for storage and vehicle maintenance. There are no educational facilities in this building.

Buildings 17 & 18

Built in 1964, Buildings #17 and #18 (or Building A and Building B), respectively, are mirror-images of each other separated by approximately four to five feet. The second floor walkway that projects from the north side of Building #18 and the south side of Building #17 forms a covered circulation zone for the buildings’ respective first floors. Access to these walkways is by steel stairs located at the east and west ends of each building.

Building #17 contains two classrooms on its first floor and two (2) classrooms on its second floor. Building #18 contains two classrooms on its first floor and two (2) classrooms on its second floor.

Building 19

Physical Education Building #19 was constructed in the late 1960s at the north end of campus straddling what was once Fickett Street. With its completion, a new central commons began to take shape with Building #19 forming the north edge and Building #1, the oldest campus structure, forming the east edge.[5] Building #19 takes advantage of its sloped portion of the campus property with a partial basement level at the west end actually being open to grade; the primary entrance level is therefore actually the upper floor of the building. This level is at the same general grade as the practice field to the north and the Stadium Cluster to the east.

The Physical Education Building contains the primary gymnasium and an auxiliary gym, or practice room. It also houses locker rooms, showers and restrooms for boys and girls, as well as a variety of athletic offices.

Buildings 20 & 27

This cluster is located at the southwest corner of Building #1 and consists of Utility Building #20 (built in 1966) and Chiller Yard Building #47 (of unknown construction). Building #20 contains the Plant Manager and related functions. Building #47 contains chillers and other mechanical equipment related to the campus central plant.

Building 23

The Library and Classroom Building #23, or "L Building", was built in 1990. Excluding the stadium bleachers that were constructed in 2008, it is the youngest building on the Roosevelt High School campus. The first floor of the building is a semi-enclosed parking garage; the second floor contains classrooms, including some that appear to have been retrofitted for science use; and the third floor contains a mix of classrooms, computer labs, and the campus library.

Building #23 contains nine classrooms on the second floor. Three of the classrooms have been retrofitted with pedestal sink/gas/air casework for use as science classrooms.

Central Portables

Located to the east of Building #1 and to the west of Buildings #6 and #7, the Central Portables consist of eight relocatable buildings ("Portables"): AA-2684 Building #24, originally built in 1971; AA-2685

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5 Building #5 would soon be built to form the west edge, and the later additions of the Cafeteria-Classroom Cluster to the south and Music Building #4 immediate south of Building #19 would finalize the "Quad" as it is known today.

Building #25, originally built in 1971; AA-1917 Building #26, originally built in 1959; AA-2038 Building #29, originally built in 1960; AA-2543 Building #30, originally built in 1966; AA-2249 Building #31, originally built in 1961; A-690 Building #40, originally built in 1967; and AA-2573 Building #42, originally built in 1967. Most of the portables contain two classrooms; however, Building #31 contains three classrooms, and the single-room Building #40 has been remodeled and connected to the layout of Building #42, which serves many of the administrative functions for the Magnet school. Many of the portables in this cluster are served by and connected to a covered walkway that also serves and connects to Building #1.

Building #31 contains three (3) classrooms. Buildings #24, #25, #26, #29 and #30 contain two classrooms each. Building #40 contains one (1) classroom. Building #42 is primarily administrative office space.

South Portables

Located beyond the south end of Building #1, the South Portables consists of seven relocatable buildings: AA-923 Building #27, originally built in 1950; AA-1322 Building #28, originally built in 1953; AA-831 Building #32, originally built in 1950; A-683 Building #35, originally built in 1966; A-828 Building #36, originally built in 1950; A-651 Building #37, originally built in 1966; and "College Track" Building #43, for which there is no further information available. Buildings #32, #35 and #37 are single-room structures, while the rest contain two classrooms each.

Buildings #27, #28, #35 and #37 contain two (2) classrooms each. Buildings #32 and #36 each contain a single classroom. Access to Building #43 is assumed to contain two (2) classrooms.

Quad Portables

This cluster is located at the northwest corner of Building #1, the Quad Portables consist of two relocatable buildings ("portables"): A-652 Building #38 and A-653 Building #39, both originally built in 1955. These two single-room portables help form the northeast edge of the central commons or "quad." Part of Building #39 has been built out to provide storage or similar function, but the remaining space is no longer large enough to be considered a classroom. Building #38 contains one (1) classroom. As noted above, the remaining space in Building #39 is currently used as a classroom but does not meet the 800-square-foot minimum size.

Buildings 41 & 46

Located at the southwest corner of the campus, the Infant and Early Education Center occupies two relocatable buildings: A-748 Building #41, originally built in 1972; and AA-1287 Building #46, originally built in 1953. These two multi-room portables are arranged in a single east-west row between Garage Building #9 and the west property line and just south of the Cafeteria-Classroom Cluster. A semi-enclosed covered exterior play space is located just north of Building #46.

Buildings 44 & 45

Located at the southwest corner of the campus just south of the Infant Care Cluster, the Boyle Heights Continuation High School occupies two relocatable buildings: AA-586 Building #44, originally built in 1949; and AA-1493 Building #45, originally built in 1955. These two multi-room portables are arranged in an "L" configuration along the north and east edges of the Continuation school zone, framing an outdoor space for student gathering and recreation.

General Site Conditions

Topography and Access

A grade change of nearly 30 feet from one corner of the site to the diagonally opposite corner creates the need for building elements such as "half" or "split" levels. Some areas of the site, such as the Quad, are relatively flat, whereas others, such as the portables, have multiple grade changes by way of ramps and stairs. Handrails provided for stairs and ramps are generally not in compliance with accessibility standards.

Most building entrances are not accessible due to stairs, non-compliant ramps, or thresholds exceeding one-half inch in height. While most multi-story buildings have elevators, they are old and no longer compliant with current accessibility standards.

Athletics

Physical education, athletics and recreation spaces are mostly located along East 4th and Mott Streets, primary and secondary arterials respectively.

Physical Education Building 19 - Has a Gymnasium with designated spaces for Boy's and Girl's Exercise Rooms as well lockers and showers.

Hard Courts - Located in between the Library and Classroom Building 23 accommodates 10 grouped courts plus 1 stand-alone court.

Tennis Courts - Located between the Roosevelt Pool and the Playing Field accommodates four tennis courts.

Playground Field - Located along East Fourth Street, is between hard courts on the west and the Track and Field on the east.

Track and Field - Located on the corner of East Fourth Street and Mott Street, bleachers are located on the west and east of the field. The soccer field end zones extend into the track. The track is impeded by the visiting team's bleachers which sit on top of it.

Baseball and Softball Field - Located on the corner of East Sixth Street and Mott Street, portable classrooms cluster on the west and Classroom Building 7 on the north.

Roosevelt Public Pool - Located on the corner of East Fourth Street and Matthews Street, this Olympic-sized pool is a joint-use facility operated by the City of Los Angeles open year-round, though the schedule changes during the school year. The pool on High School grounds features long-course swimming with 50 meter length lanes and is uncovered and heated year-round.

Parking

The front of Roosevelt High School's campus faces west onto Mathews Street where daily student pick-up and drop-off takes place. Magnet and special education buses drop-off and pick-up on East Sixth Street.

The campus parking is located in two areas off perimeter streets, one along Mathews Street on the west, and the second one along East Sixth Street on the south. The 125-parking space lot off from Mathews Street serves as faculty and staff access into the main parking. The 57-parking space lot off from East Sixth Street, is located next to the portables.

The first level of Building 23 has a 25-parking space lot designated for the Magnet School; which shares its access off of Mathews Street with Roosevelt's High School student and staff parking surface lot. A parking lot containing eight spaces is designated east of Building 19 and provides access from East 4th Street. Industrial Arts Building 6 has a 19-parking space lot on the Auto Service Building 13, with access from Mott Street.

Roosevelt High School shares East Sixth Street with Hollenbeck Middle School parking lot entrance, which is located on the southwest corner of campus. Hollenbeck Middle School 140-space parking lot's location is separated from the Boyle Heights Continuation High School and the Roosevelt Infant/Early Education Center.

Additional parking locations occur in the campus, although these are in non-designated parking areas. The location of Physical Education, athletics and recreational spaces along East 4th Street, which is a primary arterial street, prevent using those frontages for vehicular access to the campus. **Figure 2.0-9 Pedestrian and Vehicular Traffi**c, shows the primary access to the site.

Roosevelt High School students who walk to the campus mainly enter through the north gate adjacent to the Stadium complex at the corner of East Fourth Street and Mott Street.

FIRST FLOOR

10' 25' 50' 100' 250'

BUILDING INDEX

1. AUDITORIUM AND CLASSROOM
2. CAFETERIA
3. WEST CLASSROOM
4. MUSIC
5. ADMINISTRATION AND CLASSROOM
6. INDUSTRIAL ARTS
7. EAST CLASSROOM
8. INSTRUMENTAL MUSIC
9. GARAGE / STORAGE - INFANT CARE
10. FLAMMABLE STORAGE
11. FIELD SANITARY
12. EQUIPMENT FIELD STORAGE
13. GAZEBO
14. HOME BLEACHERS
15. VISITORS BLEACHERS
16. FIELD LIGHT CONTROLS
17. CLASSROOM
18. CLASSROOM
19. PHYSICAL EDUCATION
20. UTILITY
21. AUTO SERVICE
22. ARCADE / LUNCH SHELTER
23. LIBRARY AND CLASSROOM
24. TWO / THREE UNIT RELOCATABLE
25. TWO / THREE UNIT RELOCATABLE
26. TWO / THREE UNIT RELOCATABLE
27. TWO / THREE UNIT RELOCATABLE
28. TWO / THREE UNIT RELOCATABLE
29. TWO / THREE UNIT RELOCATABLE
30. TWO / THREE UNIT RELOCATABLE
31. TWO / THREE UNIT RELOCATABLE
32. TWO / THREE UNIT RELOCATABLE
33. SANITARY RELOCATABLE
34. TWO / THREE UNIT RELOCATABLE
35. SINGLE UNIT RELOCATABLE
36. TWO / THREE UNIT RELOCATABLE
37. SINGLE UNIT RELOCATABLE
38. SINGLE UNIT RELOCATABLE
39. SINGLE UNIT RELOCATABLE
40. SINGLE UNIT RELOCATABLE
41. SINGLE UNIT RELOCATABLE - INFANT CARE
42. TWO / THREE UNIT RELOCATABLE
43. CLASSROOM RELO-DOH / PARENT CENTER
44. TWO / THREE UNIT RELOCATABLE (BOYLE HEIGHTS CONT.)
45. TWO / THREE UNIT RELOCATABLE (BOYLE HEIGHTS CONT.)
46. TWO / THREE UNIT RELOCATABLE - INFANTCARE
47. CHILLER YARD

LEGEND

- BASIC CLASSROOM
- SPECIALITY CLASSROOM
- SCIENCE CLASSROOM
- CHEMISTRY CLASSROOM
- STUDENT SUPPORT
- WELLNESS CENTER

GENERAL

- CIRCULATION
- UNDERSIZED ROOM (<760 SF)
- UNDERSIZED ROOM (>760 SF, <800 SF)

CORE FACILITIES

- FOOD SERVICES
- AUDITORIUM / MULTI - PURPOSE
- PHYSICAL EDUCATION
- OPERATIONAL SUPPORT
- LIBRARY / MEDIA
- ADMINISTRATION
- PARKING

SOURCE: LAUSD, 2017

FIGURE **2.0-7**

IMPACT SCIENCES

Building Room Use 1st Floor

SECOND FLOOR

10' 25' 50' 100' 250'

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31. TWO / THREE UNIT RELOCATABLE
32. TWO / THREE UNIT RELOCATABLE
33. SANITARY RELOCATABLE
34. TWO / THREE UNIT RELOCATABLE
35. SINGLE UNIT RELOCATABLE
36. TWO / THREE UNIT RELOCATABLE
37. SINGLE UNIT RELOCATABLE
38. SINGLE UNIT RELOCATABLE
39. SINGLE UNIT RELOCATABLE
40. SINGLE UNIT RELOCATABLE
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45. TWO / THREE UNIT RELOCATABLE (BOYLE HEIGHTS CONT.)
46. TWO / THREE UNIT RELOCATABLE - INFANTCARE
47. CHILLER YARD

LEGEND

- BASIC CLASSROOM
- SPECIALITY CLASSROOM
- SCIENCE CLASSROOM
- CHEMISTRY CLASSROOM
- STUDENT SUPPORT

CORE FACILITIES

- FOOD SERVICES
- AUDITORIUM / MULTI - PURPOSE
- PHYSICAL EDUCATION
- OPERATIONAL SUPPORT
- LIBRARY / MEDIA
- ADMINISTRATION
- PARKING

GENERAL

- CIRCULATION
- UNDERSIZED ROOM (<760 SF)
- UNDERSIZED ROOM (>760 SF, <800 SF)

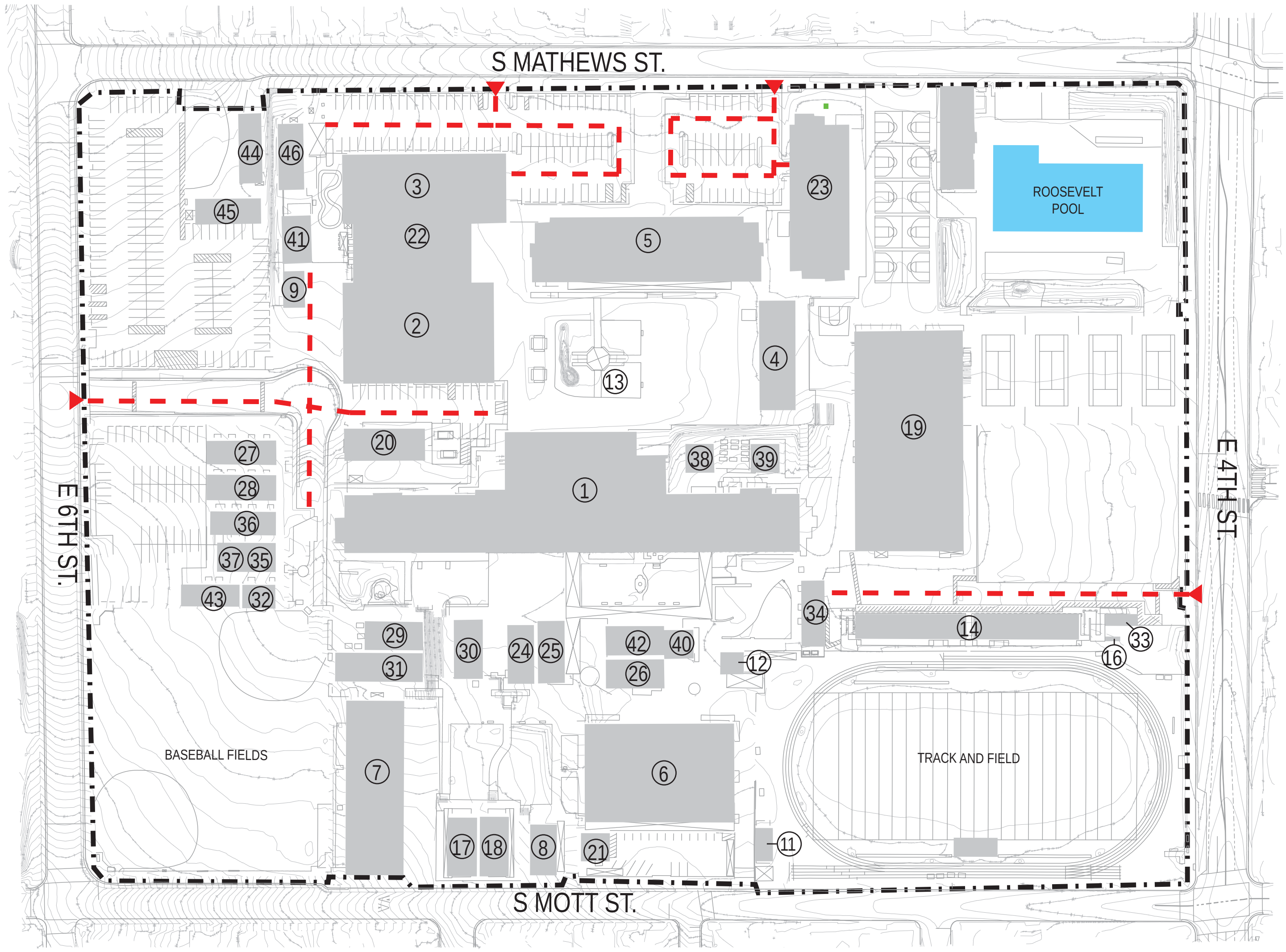
SOURCE: LAUSD, 2017

FIGURE **2.0-8**

Building Room Use 2nd Floor

IMPACT SCIENCES

0695.016•12/17



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30. TWO / THREE UNIT RELOCATABLE
31. TWO / THREE UNIT RELOCATABLE
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33. SANITARY RELOCATABLE
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36. TWO / THREE UNIT RELOCATABLE
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46. TWO / THREE UNIT RELOCATABLE - INFANTCARE
47. CHILLER YARD

VEHICULAR FLOW LEGEND

PROPERTY LINE OR LIMIT OF WORK

OTHER BUILDING ENTRANCE

OTHER PEDES-TRIAN P.O.T

SOURCE: LAUSD, 2017

FIGURE **2.0-9**

Pedestrian and Vehicular Traffic

IMPACT SCIENCES

0695.016•12/17

2.0.6 PURPOSE AND NEED FOR THE PROJECT

In December 2010, Johnson Favaro performed a site evaluation of Roosevelt High School to serve as a pre-planning survey for future development. The study found much of the campus to be in some sort of disrepair, from exposed piping in the Auditorium and Classroom building to the football field's failure to meet District standards. Findings included bungalows that are not Division of State Architect (DSA)-approved and noncompliance with American with Disabilities (ADA) legislation. Many of the classrooms on the campus do not meet current California Department of Education (CDE) standards (educational specifications for classroom size, layout, amenities, etc.) and the auditorium does not meet current District standards. School administrators identified inadequate classroom facilities and safety and supervision issues campus-wide.[6]

Further, four of the buildings: Industrial Arts, shed, gymnasium, and auditorium/classroom were found to meet the criteria for listing on the AB 300 (Corbett) Seismic Safety Inventory of California Public Schools, Department of General Services Building List. The AB 300 list identifies those school buildings that are of concrete tilt-up construction and those with non-wood frame walls that do not meet the minimum requirements of the 1976 Uniform Building Code (UBC). The condition of the existing buildings and seismic, access, and fire/life safety issues are further addressed below.

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to define the proposed Project.[7] On December 8, 2015, the BOE approved the project definition for the Roosevelt High School Comprehensive Modernization Project, along with five other schools. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the campus while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.[8] Assessments of the school facilities, educational programming, and infrastructure were performed by industry professionals, as well as seismic and historic evaluations. The findings, coupled with input from community members, school users and stakeholders, called for improvements with an anticipated cost of over $100 million. To maximize the cost efficiency, the proposed Project suggests the demolition and rebuilding of certain campus buildings as outlined in the Project Description.[9]

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6 Johnson Favaro, 2010.

7 LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

8 LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

9 LAUSD 2015a.

The proposed Project would use approximately $173 million in funding made available through the LAUSD voter-approved Bond Program. Roosevelt High School was identified as one of 11 schools in the District as in need of upgrades and evaluation of structural issues for buildings built in the 1920s.

The proposed Project is being developed to focus on the most critical issues — failing buildings and / or building systems and buildings deemed through a detailed seismic evaluation to require seismic upgrades. The proposed Project will also enhance student and staff safety by providing safe controlled campus access and adequate pedestrian circulation. The modernization Project will improve the relationship between the residential streets and student drop-off/pick up as well as parking access.

2.0.7 PROJECT OBJECTIVES

Projects developed under LAUSD's SUP, which includes Comprehensive Modernization Projects are intended to provide facilities that improve student health, safety, and educational quality.

More specifically, the Board approved SUP goals and principals are:

- Schools Should be Physically Safe and Secure
- School Building Systems Should be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

Furthermore, six core objectives have been established for Comprehensive Modernization Projects undertaken under the SUP:

- The buildings that have been identified as requiring seismic upgrades must be addressed.
- The buildings, grounds and site infrastructure determined to have significant/severe physical conditions that already do, or are highly likely (in the near future) to pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate must be addressed.
- The school's reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.

- Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD)[10].

- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.

- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved.

As these objectives, goals and principals are applied to Roosevelt High School campus and community, the following Project-specific objectives have been developed:

1. Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.

2. Provide upgrades throughout the campus to improve accessibility for all students (in particular those with special needs) and for the Project to comply with the requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).

3. Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

4. Honor and enhance features of the Roosevelt High School campus that reflect its history and cultural identity.

5. Establish 4th Street as the primary frontage of the Roosevelt High School campus and enhance its presence in the Boyle Heights neighborhood.

6. Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members and visitors.

7. Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

8. Incorporate opportunities into the campus site plan for future expansion of the football and baseball fields.

9. Improve the visual relationship between Roosevelt High School and Hollenbeck Middle School to encourage and inspire middle school students to matriculate to Roosevelt High School.

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10 The Chanda Smith consent decree was reached in 1996; it is an agreement requiring Los Angeles Unified School District to identify and educate special education students in a manner consistent with state and federal special education and civil rights laws. In 2003–04 the Chanda Smith Consent Decree was replaced with the Modified Consent Decree (MCD). This revised consent decree establishes over 15 outcomes that the District must meet by June 30, 2006, to be released from the court. The outcomes focus on assessment, graduation/completion rates, suspensions, placement, transition, disproportionality, complaint response time, service delivery, parent participation, translations, teacher quality, and behavioral interventions.

10. Eliminate reliance on portable classrooms.
11. Maximize the use of limited bond funds to provide modern and permanent classroom facilities.
12. Replace buildings and infrastructure that have reached the end of their useful lives.
13. Reduce the amount of stormwater runoff drainage and improve the quality of stormwater runoff by increasing pervious surfaces on campus.
14. Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.
15. Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).
16. To undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

2.0.8 PROJECT CHARACTERISTICS

The proposed Project consists of the modernization of the campus for Roosevelt High School. The concept for the proposed Project is demonstrated in **Figure 2.0-10, Roosevelt High School Comprehensive Modernization Project Site Organization Diagram**. As is shown in the diagram, the campus is to be divided into two "segments" with the classrooms/educational facilities located on the west portion of the campus to the central quad and the athletics zone located along the eastern half of the Project site. The campus is further organized such that the joint use/public access facilities such as the gym and performing arts zone are located along the perimeter limiting public access into the interior of the site. Further, by relocating classroom buildings to the central and eastern zones of the campus (away from the athletics zone), there is an opportunity to expand both the baseball and football fields to regulation size in the future.[11]

The proposed building configuration is shown in **Figure 2.0-11, Proposed Project Site Plan**. Conceptual elevations are shown in **Figure 2.0-12 Proposed View of the Main Entry on 4th Street**, and **Figure 2.0-13 Proposed View of the Campus Courtyard/Quad Area**. **Figures 2.0-14 through 2.0-24** illustrate the Proposed Project's building elevations as well. In addition, **Figure 2.0-25**, **Proposed Project Demolition Plan**, illustrates the plans for demolition on the campus.

11 The expansion of the athletic fields is not part of this project as funding is not currently available for those specific improvements. If funding becomes available, LAUSD will conduct additional environmental analysis to determine the potential impacts of those facilities.

Proposed Project

The proposed Project would include the demolition of temporary buildings, as shown in **Figure 2.0-23 Proposed Project Demolition Plan**, that would be replaced by permanent structures and permanent buildings that have been determined to be structurally compromised beyond repair and/or aging; deteriorating; and which do not meet current educational requirements:

- Auditorium/classroom (Building #1)
- Music building (Building #4)
- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Gymnasium building (Building #19)
- Utility building (Building #20)
- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)
- Approximately thirty-one classrooms in 17 portable buildings

New Construction

The proposed Project would include the construction of the following new permanent structures to replace those that would be demolished or removed:

- Classroom/Administration Building North: This new 3-story approximately 70,000 square foot (sf) building would have general and specialty classrooms and administrative spaces and would act as the primary main entrance for campus visitors. This building would generally be located on the site of the existing tennis courts and gymnasium (Building #19).

- Auditorium and Performing Arts Building: This new 1-story approximately 35,000 sf building would have the auditorium and classroom spaces specifically designed for performing arts, including music, dance, drama, and choral arts, etc. This building would generally be located on the site of the existing athletic field on 4th Street and the gymnasium (Building #19)

- Classroom Building South: This new 3-story approximately 75,000 sf building would have general and specialty classrooms and support spaces, including flexible engineering labs, computer labs and science laboratory classrooms. This building would be generally located on the site of the existing auditorium and classroom building (Building #1).

- Gymnasium Building: The 2-story, approximately 43,000 sf Gymnasium Building would have competition and practice gymnasium floors, locker rooms (restrooms, showers, and dressing area), coaches' offices, and physical education support spaces along with support spaces for athletic storage and mechanical equipment. The gym would have approximately 800 bleacher seats. This building would generally be located on the site of the existing auditorium and classroom building (Building #1) and utility buildings (Buildings #20 and #47).

- Lunch Shelter: The new approximately 7,000 sf lunch shelter would be located at or near the location of the existing lunch shelter.

- Wellness Clinic: An approximately 6,000 sf wellness clinic would provide services to both students and the community. The clinic would be located near the Classroom/Administration Building, library building, and pool.

Site Upgrades

Site upgrades that would be implemented under the proposed Project include the following:

- Major Site-wide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.

- Access upgrades to comply with the ADA.

- Major Site-wide revamp of the campus landscaping and hardscaping, including relocation of the existing Japanese Garden. Existing trees removed by the Project would be reused to the extent feasible or replaced by an appropriate size and species selected from the LAUSD Approved Plant List.12

- Application of fresh paint to the exterior of the remaining Roosevelt High School buildings

The Project will be subject to local, state, and/or federal facilities requirements of the ADA, DSA, and CDE, as well as all District Standards and Specifications; such as those provided in LAUSD's Program EIR.[13] Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.[14]

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12 LAUSD, LAUSD Approved Plants List, 2012, http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf

13 LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

14 LAUSD, 2015a.

Access and Circulation

The major pedestrian access point to the Project site would be provided along 4th Street which will be the primary access point during school hours. After school hours it may be that a majority of the students will access the site via Mathews Street. Access to staff parking would remain on Mathews Street. Approximately 8-10 parking stalls would be provided on 4th Street for visitors, staff, and accessible parking near the new administration building.

Additional Site Upgrades

Site upgrades are also included in the Project plans. The Project involves the application of paint and repair where appropriate, masonry to be cleaned and repointed as necessary, and a revamp of the site's landscaping and hardscaping. Existing trees removed by the Project will be replaced at an appropriate size and selected from the LAUSD Approved Plant List.[15] Site-wide electrical, plumbing, and storm drain improvements will also be put into effect. The aesthetic and technical enhancements will greatly benefit Roosevelt High School, making it both a more attractive and suitable learning environment for students. The entire campus will be subject to local, state, and/or federal facilities requirements, such as the American Disabilities Act (ADA), Division of the State Architect (DSA), and the Office of the Independent Monitor (OIM). Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.[16]

Remedial Action Workplan

As a part of the construction activities, the District would implement a Removal Action Workplan (RAW) for the proposed Project. As identified in the Preliminary Environmental Assessment Equivalent (PEA-E) Report prepared for the Project, approximately 7,019 cubic yards of soil containing the chemicals of concern (COCs); specifically, arsenic, lead, and petroleum hydrocarbons, at levels that exceed the District's cleanup goals, would be removed from areas located throughout the Project site.[17] The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, and dump truck. Ancillary facilities (i.e., wastewater holding tank) would also be used during the removal action. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and

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15 LAUSD, LAUSD Approved Plants List, 2012, http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf

16 LAUSD, 2015a.

17 TRC Solutions. August 2017. Roosevelt Senior High School: Preliminary Environmental Assessment Equivalent Report.

workers may be required to use personal protective equipment to reduce exposure to the COCs. The depth of excavations may be limited due to physical constraints associated with the Project site. Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls.

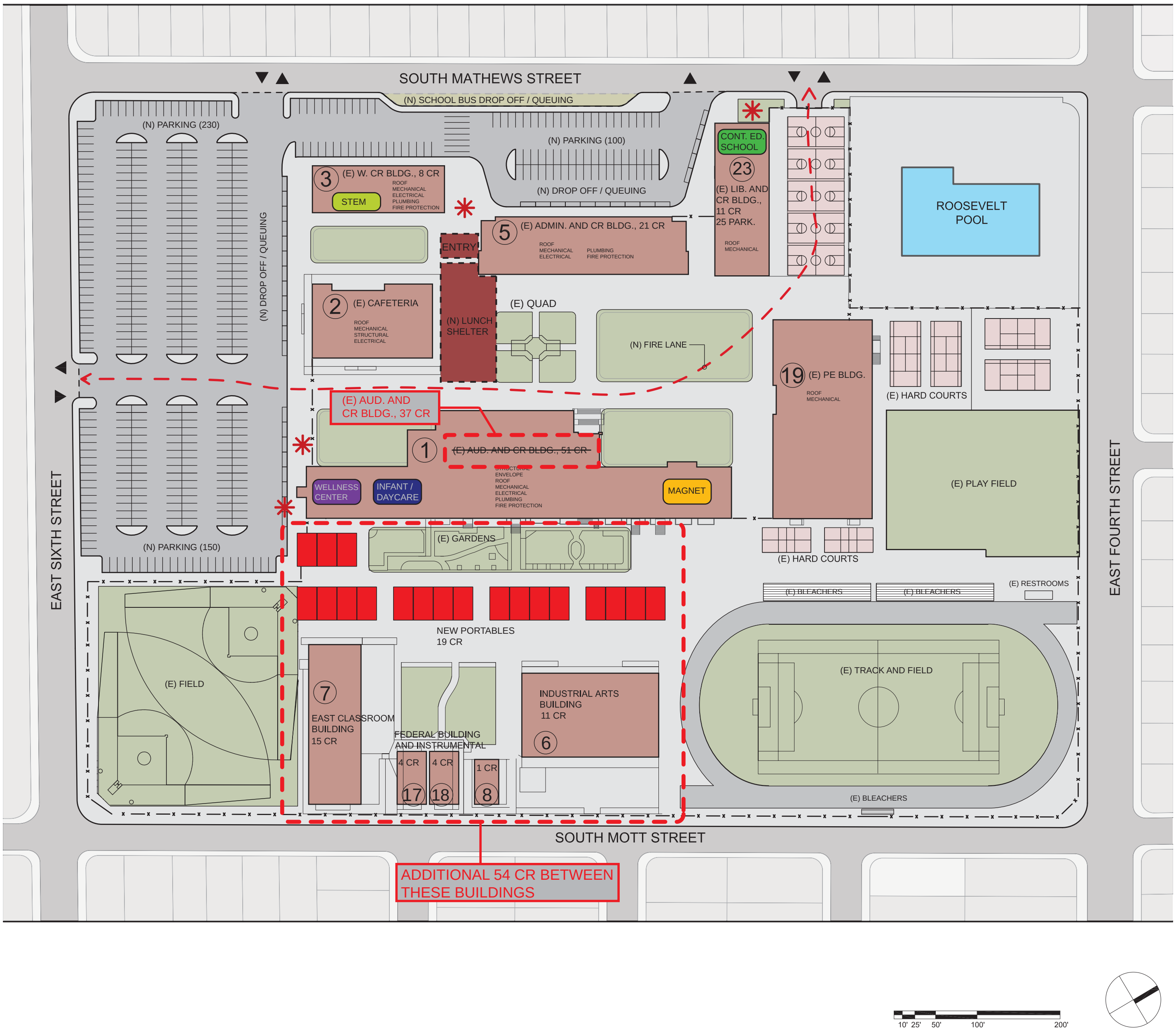
Excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Truck loading would take place concurrently with excavation operations associated with the Project. Clean, imported soil or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.

Project Schedule

Construction activities are anticipated to begin in Quarter 3-2018 and will be substantially completed in Quarter 4-2022.

The entire demolition, construction, and modernization activities are expected to take approximately 48 months. Because of active school operation, less than five acres (contiguous) on campus would be disturbed at any one time. An average of 50 workers would be on-site when students are present. A maximum of 150 workers will be on site during peak construction periods when school is not in session (i.e. winter, summer breaks).

As Roosevelt High School is an active campus, construction of the new buildings and modernization must be phased in a way to maintain the academic functions. To complete the comprehensive campus-wide modernization while school is in session, the construction process must be broken down into several phases so that the school can continue operating.



SOURCE: LAUSD, 2017

FIGURE **2.0-10**

IMPACT SCIENCES

Roosevelt High School Comprehensive Modernization Project Site Organization Diagram

0695.016•12/17

SOURCE: LAUSD, 2017

FIGURE **2.0-11**

Proposed Project Site Plan

IMPACT SCIENCES

0695.016•1/18

SOURCE: LAUSD, 2018

FIGURE **2.0-12**

Proposed View of Main Entry on 4th Street

IMPACT SCIENCES

0695.016•1/18

SOURCE: LAUSD, 2018

FIGURE **2.0-13**

Proposed View of Campus Courtyard/Quad Area

IMPACT SCIENCES

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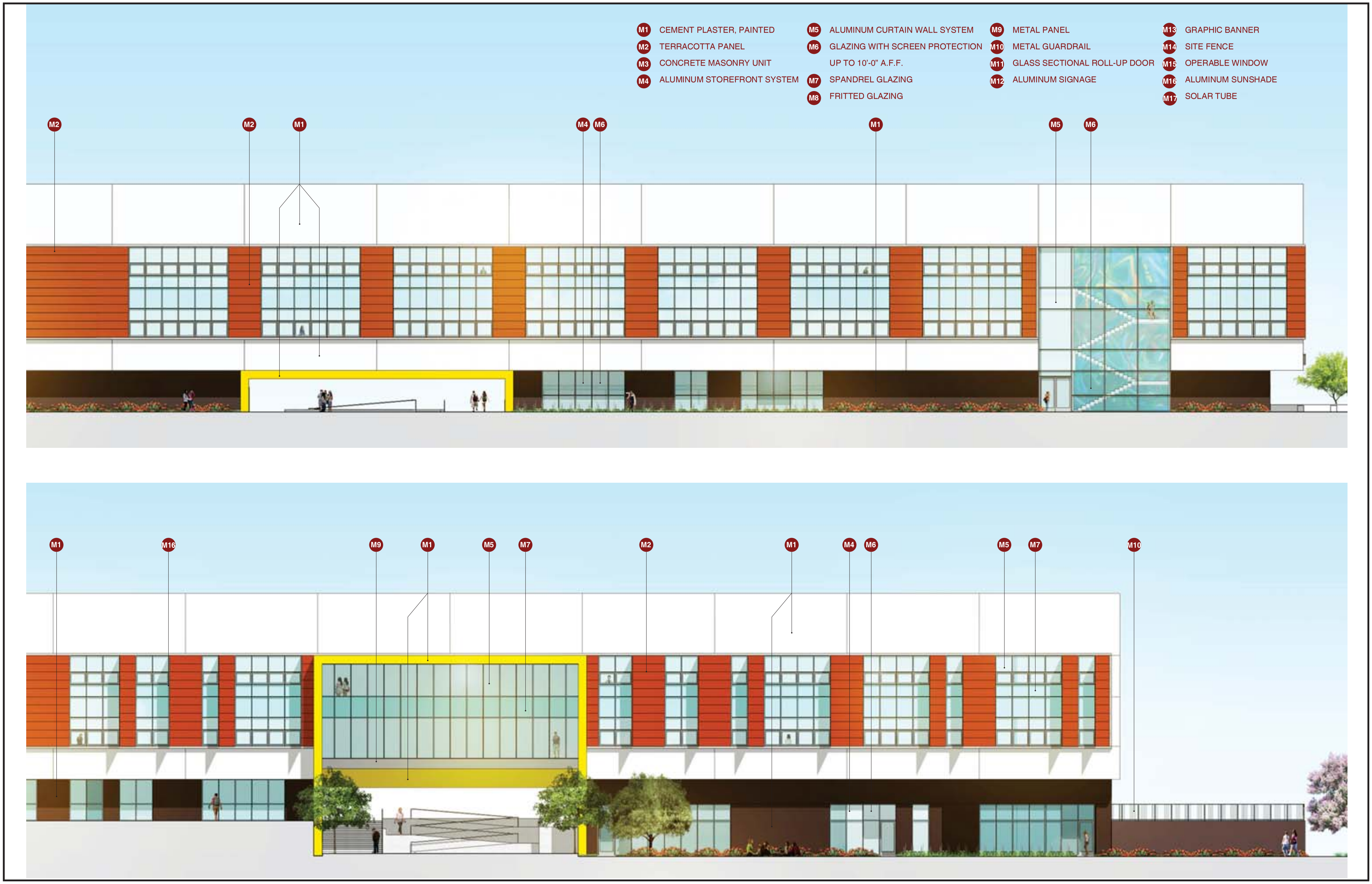


SOURCE: LAUSD, 2018

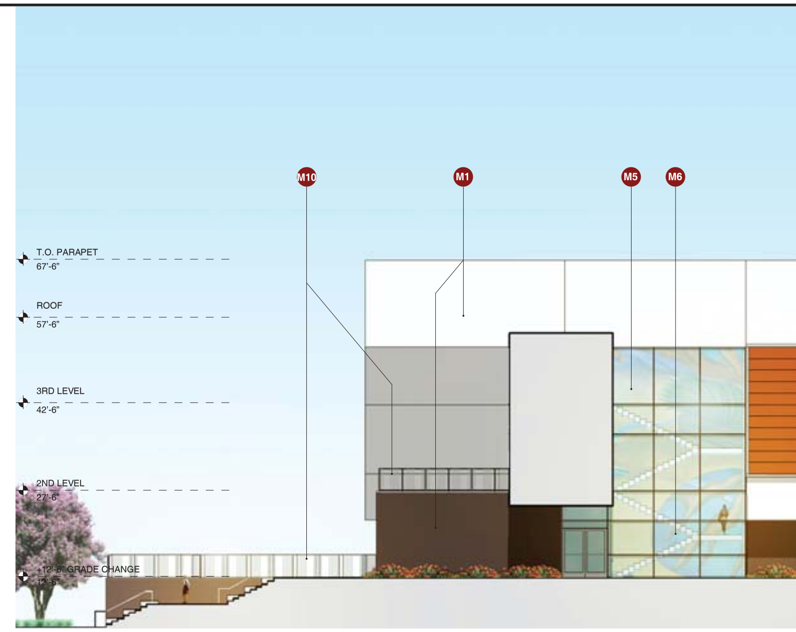
FIGURE **2.0-14**

IMPACT SCIENCES

Classrooms/Administration Elevations

0695.016•1/18

E.09 - NORTH ELEVATION



E.11 - EAST ELEVATION

E.10 - SOUTH ELEVATION

E.12 - WEST ELEVATION

SOURCE: LAUSD, 2018

FIGURE **2.0-15**

IMPACT SCIENCES

Classrooms/Administration Elevations–North, East, West, and South

0695.016•1/18

SOURCE: LAUSD, 2018

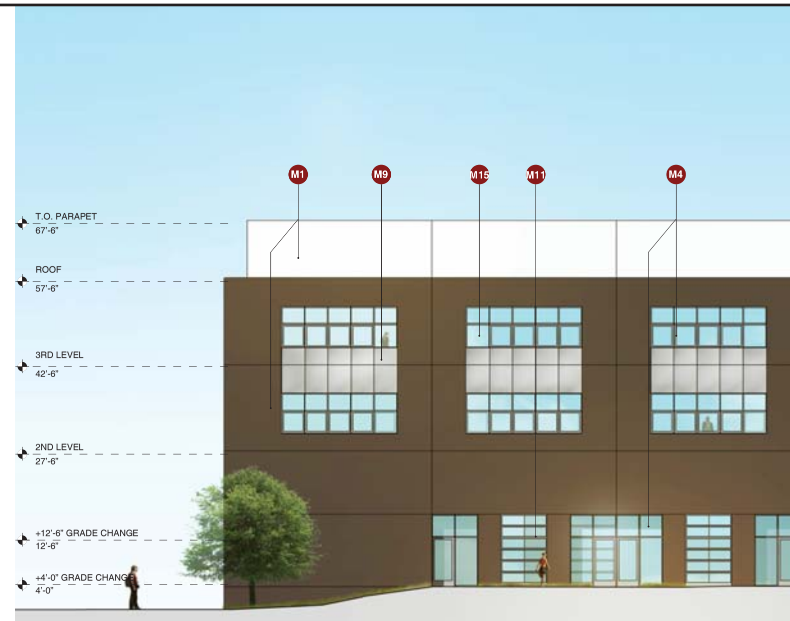
FIGURE **2.0-16**

IMPACT SCIENCES

Classrooms Elevations

0695.016•1/18

E.05 - NORTH ELEVATION



E.07 - EAST ELEVATION

E.06 - SOUTH ELEVATION

E.08 - WEST ELEVATION

SOURCE: LAUSD, 2018

FIGURE **2.0-17**

IMPACT SCIENCES

Classrooms Elevations – North, East, West, South

0695.016•1/18

E.01 - NORTH ELEVATION

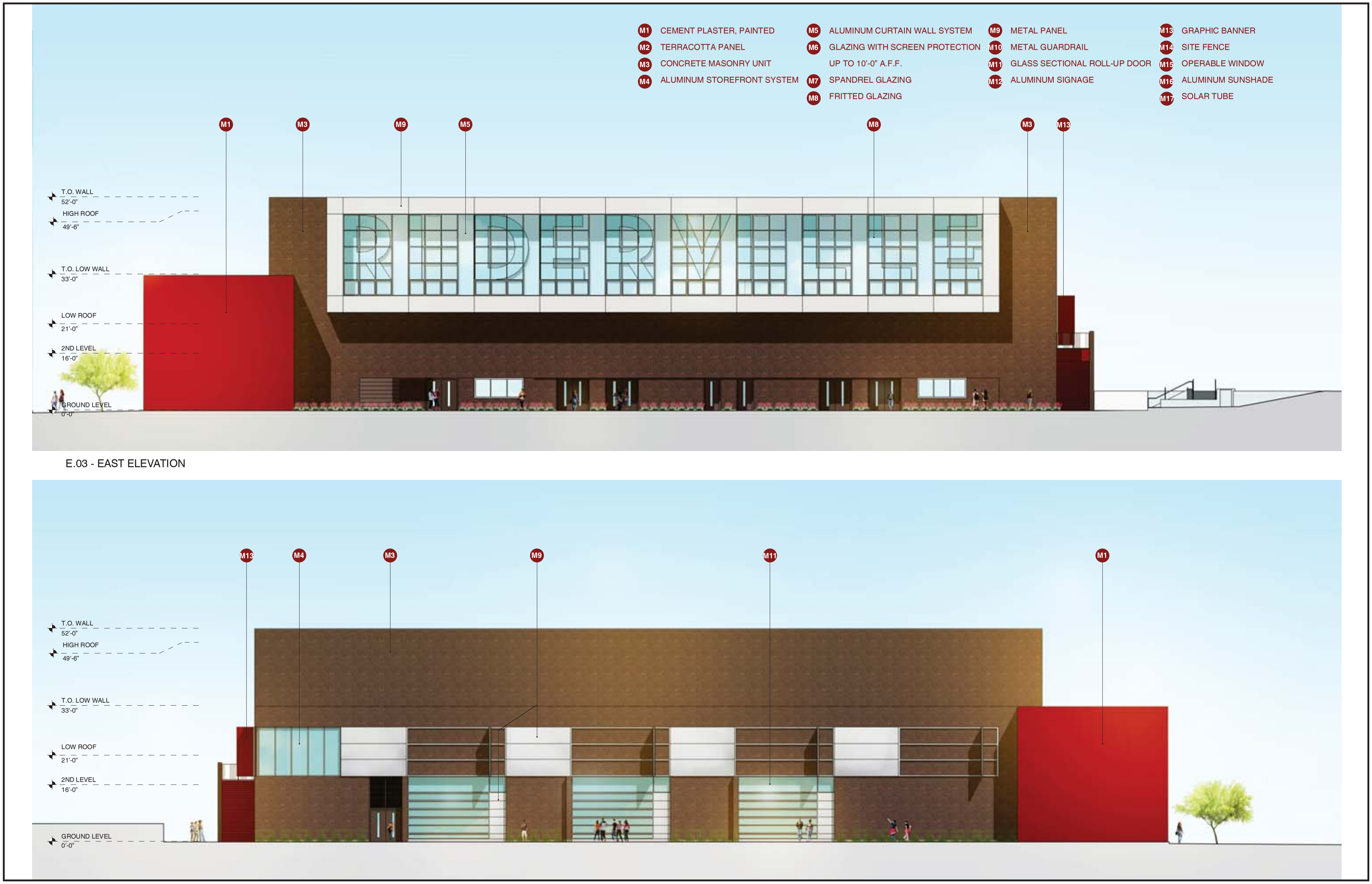
SOURCE: LAUSD, 2018

FIGURE **2.0-18**

IMPACT SCIENCES

Gymnasium Elevations – South

0695.016•1/18



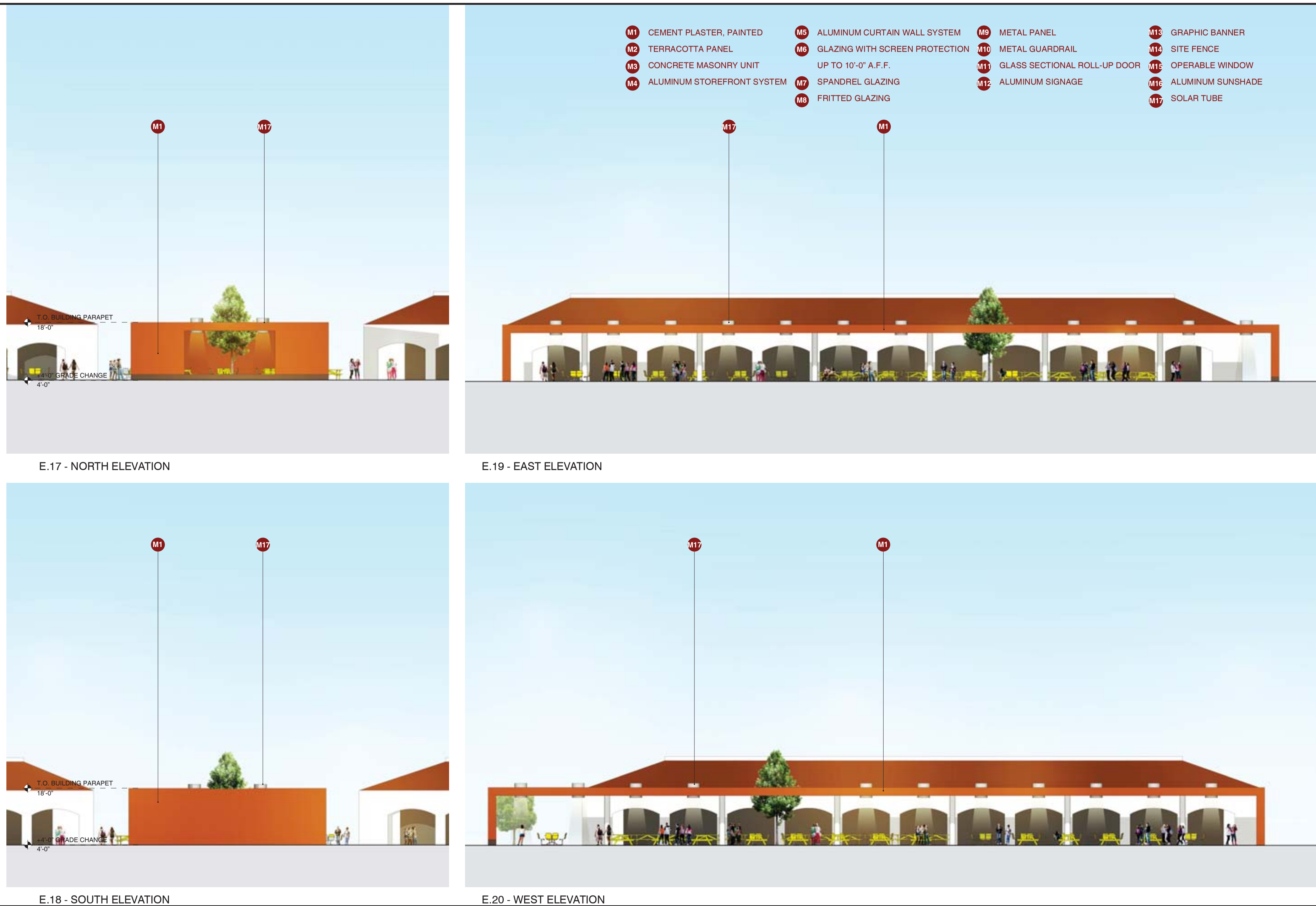
SOURCE: LAUSD, 2018

FIGURE **2.0-19**

Gymnasium Elevations – West

IMPACT SCIENCES

0695.016•1/18



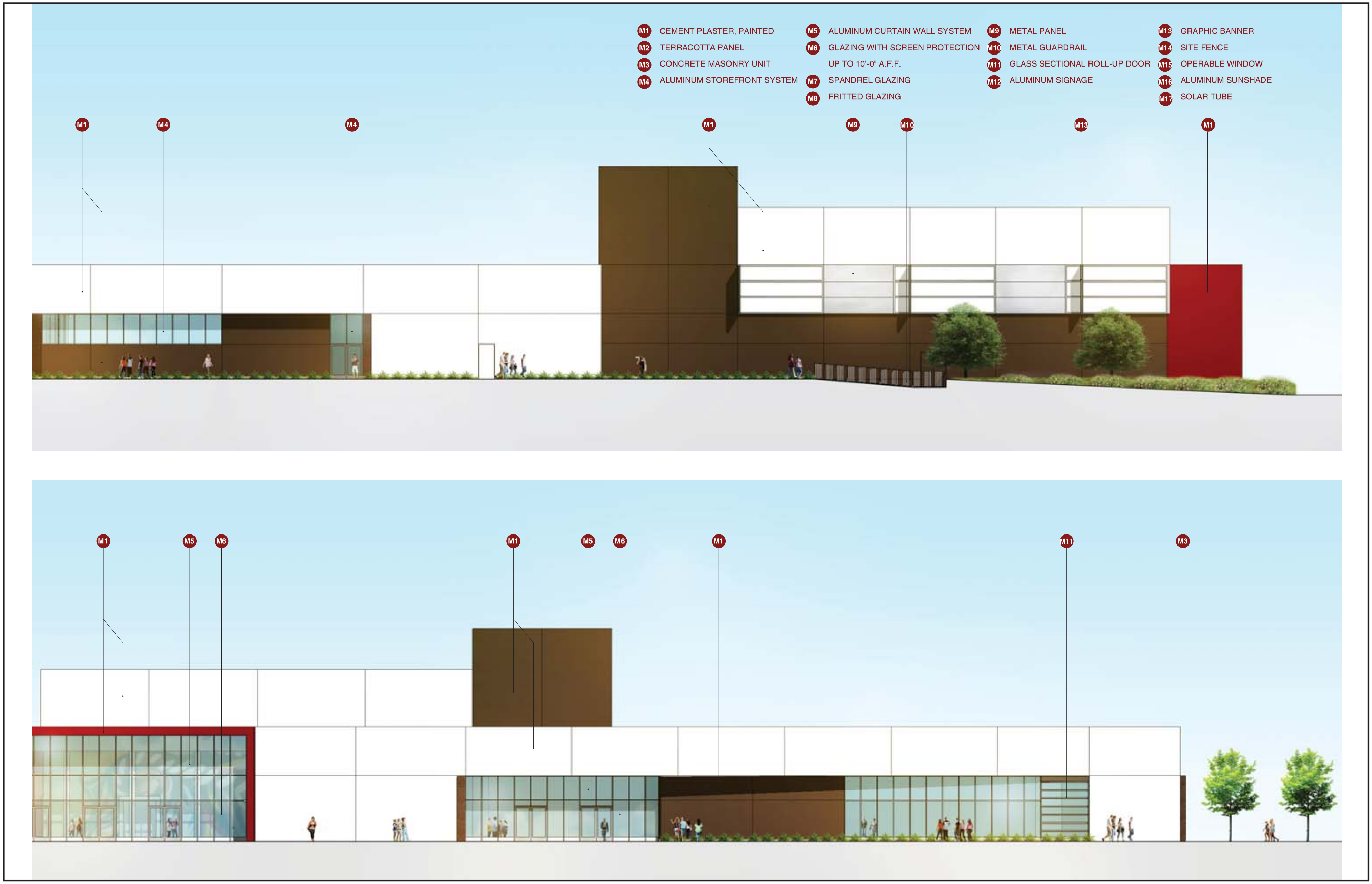
SOURCE: LAUSD, 2018

FIGURE **2.0-20**

IMPACT SCIENCES

Lunch Shelter Elevations – North, East, West, South

0695.016•1/18



SOURCE: LAUSD, 2018

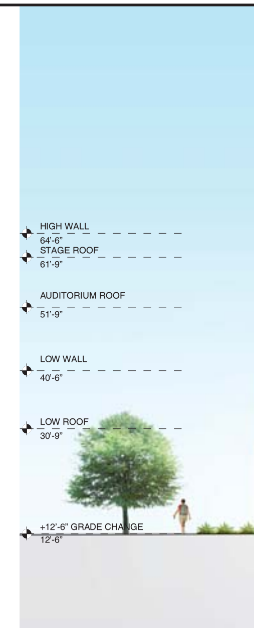
FIGURE **2.0-21**

IMPACT SCIENCES

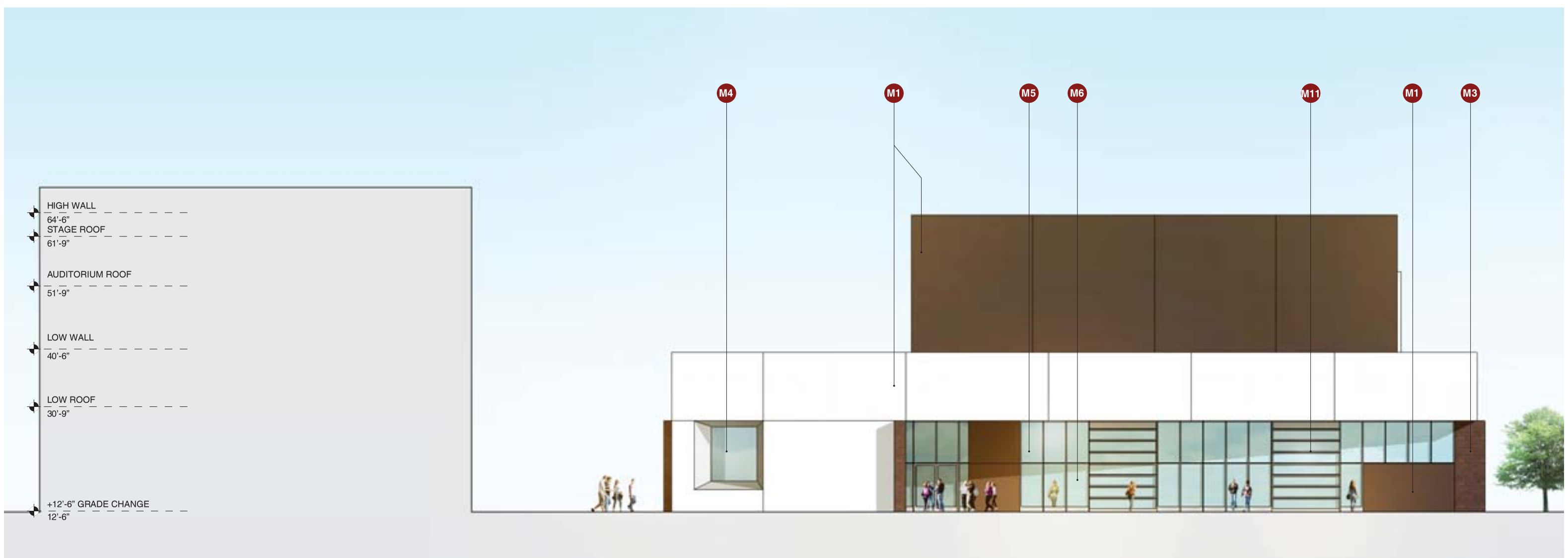
Performing Arts Center Elevations

0695.016•1/18

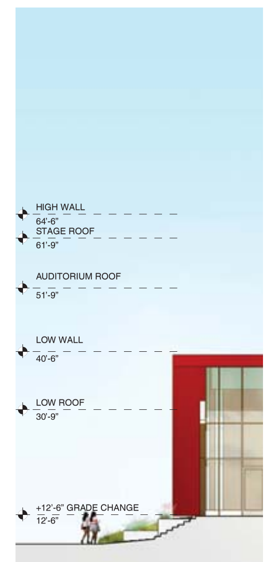
E.13 - NORTH ELEVATION



E.15 - EAST ELEVATION



E.14 - SOUTH ELEVATION



E.16 - WEST ELEVATION

SOURCE: LAUSD, 2018

FIGURE **2.0-22**

IMPACT SCIENCES

Performing Arts Center Elevations – North, East, West, South

0695.016•1/18

SOURCE: LAUSD, 2018

FIGURE 2.0-23

Proposed View of the Lindbergh Memorial Garden and Fountain

IMPACT SCIENCES

0695.016•1/18

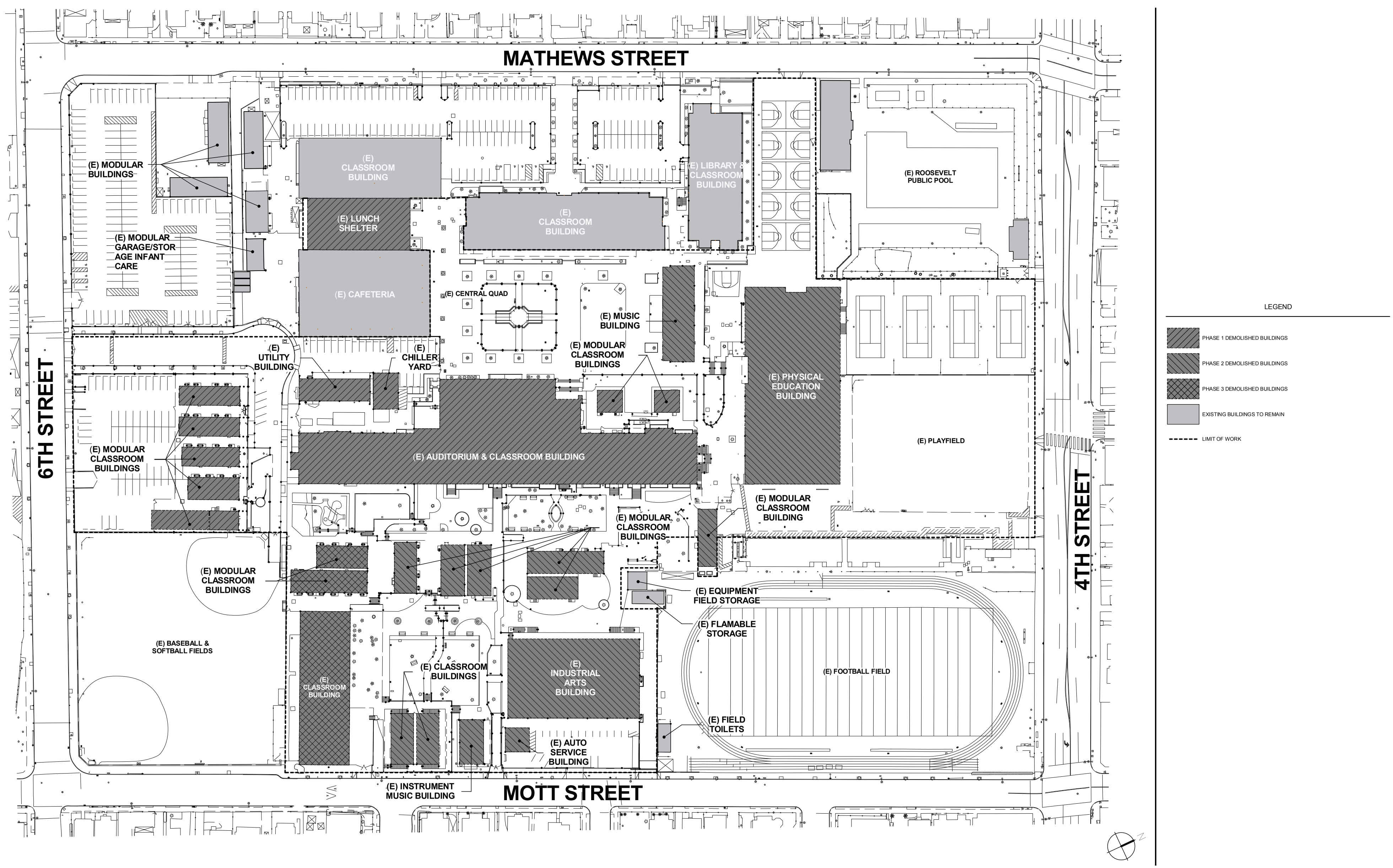
SOURCE: LAUSD, 2018

FIGURE **2.0-24**

Proposed View of the new Gymnasium

IMPACT SCIENCES

0695.016•1/18



SOURCE: Swinerton Builders and LPA, Inc, 2018

FIGURE **2.0-25**

Proposed Project Demolition Plan

IMPACT SCIENCES

0695.016•1/18

2.0.9 PROGRAM EIR FOR THE SCHOOL UPGRADE PROGRAM

The proposed Project is part of the District's School Upgrade Program (SUP), for which an EIR was prepared and certified by the District's Board of Education (Program EIR). Therefore, this EIR, where applicable, incorporates the Program EIR by reference, thereby providing project-level analysis that concentrates on site-specific issues related to the proposed Project. Applicable Standard Conditions of Approval (SC) provided in the Program EIR are cited in this EIR. The Program EIR is available for review online at http://achieve.lausd.net/ceqa.

2.0.10 LAUSD STANDARD CONDITIONS OF APPROVAL

LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were adopted by the LAUSD Board of Education in November 2015.[18] The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The conditions are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines and also includes Pedestrian Safety). For each Standard Condition of Approval compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required. The SC's applicable to the proposed Project are listed in Table **2.0-1 LAUSD Standard Conditions for Projects.**

18 LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: http://achieve.lausd.net/ceqa.

Table 2.0-1
LAUSD Standard Conditions for the Project

SC	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
Aesthetics				
SC-AE-3	Visual Character	Project design	Prior	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 new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction 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-6	Light and glare	Nighttime illumination	Lighting installation	During and after installation of lights, the Project shall comply with the School Design Guide, which outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
SC-AE-7	Light and glare	Nighttime illumination	During project design	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.
SC-AE-8:	Light and glare	Nighttime illumination	During project design	Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior. International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to: o Limit the amount of light that can be used o Minimize glare by controlling the amount of light that tends to create glare o Minimize sky glow by controlling the amount of uplight

SC	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				o Minimize the amount of off-site impacts or light trespass
Air Quality				
SC-AQ-2	Construction Emissions	Requires the use of large construction equipment	During construction	LAUSD's 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 Emissions	Requires a removal action for soil contamination	During construction	LAUSD's construction contractor shall: o Maintain slow speeds with all vehicles o Load impacted soil directly into transportation trucks to minimize soil handling o Water/mist soil as it is being excavated and loaded onto the transportation trucks. o Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. o Minimize soil drop height into transportation trucks or stockpiles, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. o Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. o Place stockpiled soil on polyethylene sheeting and cover with similar material. o Place stockpiled soil in areas shielded from prevailing winds.
Biological Resources				
SC-BIO-3	Biological Resources	Tree removal	During construction	If tree or building removal is required during nesting season, LAUSD shall either: o Retain a qualified biologist to conduct an intensive nest search in all trees and buildings slated for removal before construction begins. If nest with young are found, the LAUSD shall not remove the trees until the young have fledged or the nest has been abandoned, or, o Delay tree or building removal until September 1 to February 28 to ensure reproductive success for native species using the site for nesting
Cultural				
SC-CUL-18	Native American resource	Evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities	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.

SC	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-CUL-19	Paleontological resources	Ground disturbance	During construction	LAUSD shall have a paleontological monitor on-call during construction activities. This 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 during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain onsite for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
SC-CUL-20	Paleontological resources	Project area is deemed highly sensitive for paleontological resources	During grading, excavation, or other ground-disturbing activities	The paleontological monitor shall be site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.
Geology and Soils				
SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site	Soils and erosion	Ground disturbance	During construction	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
Greenhouse Gas				
SC-USS-1	Construction Waste Management	Generate construction and/or demolition debris	Prior to start and during construction	**School Design Guide.** Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. **Guide Specifications 2004 – Section 01340, Construction & Demolition Waste Management.** This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approval recyclers or reuse organizations, or transportation to legally designated landfills,

SC	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.
SC-GHG-1	Greenhouse gas emissions	Water use during operation	During operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	Greenhouse gas emissions	Water use for landscaping	During operation	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	Greenhouse gas emissions	Water use for landscaping	During operation	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	Greenhouse gas emissions	Water use/landscape planning	During project design and operation	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	Greenhouse gas emissions	Energy use	During project design	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is a 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
Hazards and Hazardous Materials				
SC-HAZ-3	Rail Hazards	Place new classrooms or outdoor play areas within 1,500 feet of a railroad track easement	Prior to project approval	**OEHS CEQA Specification Manual, Appendix K, Rail Safety Study Protocol.** This document provides a guidance protocol for conducting a Rail Safety Study (RSS). It is designed to assist in evaluating whether traffic on rail lines within a 1,500-foot radius of a school site poses an unreasonable safety hazard to students and staff at the school.
Hydrology and Water Quality				
SC-HWQ-1	Storm water	Project design	Project design	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). While these guidelines meet current post-construction SUSMP requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	Storm water	General Construction Permit	Construction	Compliance Checklist for Stormwater Requirements at a Construction Site: 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	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-HWQ-3	Storm water	General Construction Permit	Construction and operation	During construction and operation, miscellaneous requirements include: o Environmental Training Curriculum o Hazardous Waste Management Program o Medical Waste Management Program o Environmental Compliance Inspections o Safe School Inspections o Integrated Pest Management Program o Fats Oil and Grease Management Program o Solid Waste Management Program
SC-HWQ-4	Flood hazards	During site due diligence and environmental review	Prior to granting of entitlements	The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and, (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.
SC-HWQ-5	Flood hazards	During site review	During design of the project	Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).
SC-PED-5	Access to school	Construction of bus loading area, student drop-off/pick-up area and/or parking	Prior to project approval	School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely
SC-T-4	Construction traffic	Construction equipment to use public	Prior to construction	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.
Tribal Cultural Resources				
SC-TCR-1	Tribal Cultural Resources	Discovery of tribal resources	During project construction	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.
Utilities and Service Systems				
SC-USS-2	Water use	Upgrade of water	Prior to project	LAUSD shall coordinate with the City of Los Angeles DWP or other appropriate

SC	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		facilities	construction	jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service
SC-USS-1	Waste management	Disposal of solid waste	During project construction	Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75 percent by weight as defined in Specification 01340, Construction & Demolition Waste Management. (School Design Guide. January 2014) Specification 01340, Construction & Demolition Waste Management includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction [Construction & Demolition (C&D) Waste], to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75 percent of the C&D waste generated.
SC-USS-3	Waste management	Disposal of solid waste	During project operation	Provide easily accessible area serving the entire school that are 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 ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.

Collaborative for High Performance Schools Criteria

LAUSD is the first school district in the United States to adopt and implement the Collaborative for High Performance Schools (CA-CHPS) Criteria.[19] The LAUSD Board of Education in 2003 adopted a Resolution on High Performance School Facilities requiring Phase II of the New School Construction Program and future schools to be certified according to CHPS.[20] These measures are considered beneficial to improving environmental quality. LAUSD has incorporated these into the project design and operation of projects as part of standard LAUSD practices. The CHPS criteria are assumed to be part of the District's projects as they may apply to specific projects and are not included as mitigation measures. CHPS recommends flexible standards to promote energy efficiency, water efficiency, site planning, materials, and indoor environmental quality.

LAUSD Design Standards Best Management Practices

In addition to the CA-CHPS criteria, LAUSD applies best management practices (BMPs) in accordance with the 2016 School Design Guide for LAUSD, which are established and refined as part of LAUSD's current building efforts.[21] The mandatory CHPS criteria and standard LAUSD BMPs measures are presented below as they may be applied to this specific proposed project.

Noise/Acoustics. In accordance with CHPS Criteria EQ3.0: Minimum Acoustical Performance, unoccupied classrooms must have a maximum background noise level of no more than 45 dBA Leq. Background noise levels of 45 dBA are not sufficient for classrooms with young children, students with limited English proficiency, and those with hearing impairments or language disorders. Districts and designers are strongly encouraged to move beyond these prerequisites and achieve background noise levels of 35 dBA for all classrooms. An analysis of the acoustical environment of the proposed project site (such as traffic) and characterization of planned building components (such as heating, ventilation, and air conditioning) was conducted to achieve a classroom acoustical performance with 45 A-weighted decibels (dBA) at the equivalent sound level (Leq) for an interior background noise level (unoccupied with HVAC) or better.[22] Where excessive noise from operation of the new school site could disturb

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19 Collaborative for High Performance Schools. Available at: http://www.chps.net/dev/Drupal/node/133

20 Los Angeles Unified School District. 28 October 2003. Los Angeles City Board of Education Resolution, Sustainability and the Design and Construction of High Performance Schools. Los Angeles, CA. Available at: http://www.laschools.org/documents/download/sustainability%2Fhealthy_schools%2FBoard_Resolution_on_CHPS.pdf

21 Los Angeles Unified School District, Design Standards Department. October 2016. "School Design Guide: Los Angeles Unified School District." Available at: http://www.laschools.org/new-site/asset-management/schooldesign-guide

22 The unit of measurement of environmental noise is the decibel (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale was devised.

adjacent residential uses, the proposed project might incorporate buffers, such as masonry walls, between playgrounds and adjacent residential uses.

Hazards. In accordance with CHPS Criteria SS1.0: Code Compliance, locally or privately funded new schools, new buildings at existing schools, or major modernizations shall undertake an environmental evaluation that assesses possible environmental hazards from existing or formal hazardous waste sites; existing hazardous material pipelines (other than natural gas supplied to school); freeways and other busy traffic corridors, large agricultural operations, or rail yards within ¼ mile; and other operations that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous, or extremely hazardous materials, substances or waste.

Light and Glare. In accordance with CHPS Criteria SS5.1: Light Pollution Reduction, interior lighting shall be designed so that the angle of maximum candela from each interior luminaire as located in the building shall not exit out through the windows or maintain all non-emergency lighting on a programmable timer that turns lighting off during non-operable hours.[23] Additionally, exterior lighting shall only be provided when it is clearly required for safety and comfort and designed not to exceed 80 percent of the lighting power allowed by the California energy efficiency standards in effect at the time of submission of the project to the Division of the State Architect. For a new building on an existing campus, additions, and major modernizations, the exterior requirement applies to the entire school site, not just the lighting around the new building or the building(s) being modernized. In accordance with the 2014 School Design Guide, all luminaires or lighting sources in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers and to minimize light spilling onto adjacent properties.

Water Supply. LAUSD shall require its construction contractor to coordinate with the City of Los Angeles Department of Water and Power (LADWP) or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service. With respect to outdoor systems, in accordance with CHPS Criteria WE1.0: Create Water Use Budget, CHPS requires the landscape and ornamental water-use budget to conform to the California Model Water Efficient Landscape Ordinance.

Because the human ear is less sensitive to low-frequency sounds, the A-scale de-emphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel

23 Collaborative for High Performance Schools. 2009. California Criteria for High Performance Schools Best Practices Manual. Volume III. 2009 Edition. Available at: http://www.chps.net/manual/index.htm

Fire Protection. In accordance with the 2016 School Design Guide, LAUSD shall reduce impacts to fire protection services in connection with new construction projects by requiring local fire jurisdictions to review and approve site plans.

Energy Efficiency. Under CHPS Criteria EE1.0: Minimum Energy Performance, new school designs must exceed the California energy efficiency standards (Title 24 – 2008, Part 6) by 15 percent or energy-efficient lighting with occupancy controls and/or economizers on the package equipment must be included in the design.[24],[25] In addition, new buildings must meet 2013 Title 24 standards, which became effective on July 1, 2014.

Waste Reduction and Efficient Material Use. Under CHPS Criteria ME1.0: Storage and Collection of Recyclables, the proposed project must meet local ordinance requirements for recycling space and provide an easily accessible area serving the entire school that is dedicated to the separation, collection, and storage of materials for recycling including, at a minimum, paper, cardboard, glass, plastics, metals, and landscaping waste.

Indoor Air Quality. Under CHPS Criteria EQ2.0A: Minimum HVAC and Construction IEQ Requirements, the proposed project must meet the performance requirements of ASHRAE Standard 62.1-2007, which requires the design of building ventilation systems to ensure that the continuous delivery of outside air is no less than the governing design standard (Title 8, Sec. 5142), and occur at all times rooms are occupied. Ventilation rates shall be no less than required by California Title 24, Part 6, §121 or the outdoor ventilation rate calculated according to the outdoor air ventilation rate procedure in § 6.2 ASHRAE 62.1-2007. The design must ensure that the supply operates in continuous mode and is not readily defeated (i.e., blocked registers or windows) during occupancy periods.

Thermal Comfort. Under CHPS Criteria EQ2.0B: ASHRAE 55 Thermal Comfort Code Compliance and Moisture Control, the proposed project must comply, at minimum with the American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) Standard 55-2004 for thermal comfort standards, including humidity control within established ranges per climate zone. Indoor design temperature and humidity conditions for general comfort applications shall be determined in accordance with appropriate American National Standards Institute (ANSI) or ASHRAE standards.[26]

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24 Collaborative for High Performance Schools. 2009. California Criteria for High Performance Schools Best Practices Manual. Volume III. 2009 Edition. Available at: http://www.chps.net/manual/index.htm

25 California Energy Commission. 2008 Building Energy Efficiency Standards. Available at: http://www.energy.ca.gov/2008publications/CEC-400-2008-001/CEC-400-2008-001-CMF.PDF

26 Note: ASHRAE Standard 55-2013 -- Thermal Environmental Conditions for Human Occupancy (ANSI Approved) is the most up-to-date version of ASHRAE 55.

LAUSD Construction BMPs

Water Quality and Hydrology

LAUSD shall obtain a National Pollution Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB) with requirements for discharge, BMPs, and Stormwater Pollution Prevention Plan (SWPPP). LAUSD's construction contractor shall properly discharge any water accumulation within the excavation pit in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES General Construction Stormwater Permit. LAUSD's construction contractor shall prevent sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of the construction site area. The sediment trapped in these impounding areas shall be removed after each storm. LAUSD's construction contractor shall collect and discharge surface runoff into the storm water collection system. The design of the storm drain system (i.e., drain inlets and conveyances) must be adequate to prevent localized flooding due to foliage and debris entrapment from increased storm runoff and prevent contamination of any nearby water basins. To accommodate the additional storm water runoff and annual water yield resulting from the construction, storm drain improvements shall provide capacity to carry 25-year peak runoff rates. As required, an NPDES storm water permit application shall be submitted and the effluent quality criteria shall be specified in the permit, as determined by the Los Angeles RWQCB based on receiving water guidelines and waste load allocations. Monitoring of the outflow from the collection system may be required in the permit to ensure that the requirements and water quality criteria specified by the permit are achieved. The construction contractor shall use reclaimed water during the construction process, specifically for dust control, soil compaction, and concrete mixing, to the extent feasible.

Construction Traffic

LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by the State of California Department of Transportation (Caltrans), applicable transportation related safety measures shall be implemented during construction.

Construction Air Emissions

LAUSD shall comply with all applicable South Coast Air Quality Management District (SCAQMD) rules and regulations in carrying out its Program. To reduce the potential for significant hazardous emissions during a removal action, LAUSD or its construction contractor shall:

- Maintain slow speeds 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
- During dumping, minimize soil drop height into transportation trucks or stockpiles
- 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

Construction Noise

The LAUSD shall require the construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. The LAUSD shall require its construction contractor to provide advance notice of the start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area. The announcement shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints. During construction activities, LAUSD's construction contractor or Owner's Authorized Representative (OAR) shall serve as the contact person in the event that noise levels become disruptive to local residents. During construction activities, the construction contractor shall locate portable equipment and shall store and maintain equipment as far as possible from the adjacent residents. LAUSD shall require the construction contractor to comply with all applicable noise ordinances of the affected jurisdiction (e.g., City of Los Angeles). In the event of complaints by nearby residents or receptors, LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance. LAUSD shall include the applicable city or county ordinance in all construction contracts. LAUSD shall require its contractors to build a masonry wall or other noise reducing measures along the property line adjacent to residential uses when necessary to reduce noise levels on adjacent sensitive receptors. If project construction noise levels are expected to exceed noise thresholds of significance, LAUSD may require the construction contractor to install effective noise attenuation measures that may be identified as part of the environmental review of each individual project.

Hazardous Materials

For state-funded classroom construction projects, LAUSD shall assess and remediate hazardous materials under DTSC supervision. For classroom construction projects that do not receive DTSC oversight, LAUSD will assess and remediate hazardous material under supervision of the LAUSD OEHS.

Sewer Services

LAUSD or its construction contractor shall coordinate with the City of Los Angeles Department of Public Works, Bureau of Sanitation, and Bureau of Engineering or other appropriate jurisdictions and departments prior to the relocation or upgrade of any sewer facilities to reduce the potential for disruptions in service.

Waste Management

To ensure optimal diversion of solid resources generated by a project, the LAUSD shall require its contractors to prepare and implement, including reporting and documentation, a Waste Management Plan (Process) for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition [C&D] Waste), to foster material recovery and reuse and to minimize disposal in landfills. In accordance with the CHPS Criteria ME2.0: Minimum Construction Site Waste Management, all new construction work and major modernizations are required to recycle, compost, and/or salvage at least 50 percent (by weight) of the non-hazardous construction and demolition debris. In accordance with the 2014 School Design Guide, LAUSD shall establish a minimum non-hazardous construction and demolition debris recycling requirement of 75 percent of waste, as defined in Specification 01340, Construction & Demolition Waste Management. LAUSD has established procedures for C&D Waste management that must be complied with in meeting this requirement. The procedures establish a standard format for preparing the plan and monthly progress reporting.

2.0.11 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 in order to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

2.0.12 MITIGATION MEASURES

If after incorporation and implementation of federal,,state, and local regulations, Project Design Features, and Standard Conditions of Approval 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, Project Design Features, and Standard Conditions of Approval.

2.0.13 REQUIRED PERMITS AND APPROVALS

Consistent with Section 15065(b) of the *State CEQA Guidelines*, LAUSD is the lead agency for the project. As such, LAUSD would use this EIR to formulate its actions to either approve or deny the project. This section provides, to the extent the information is known to LAUSD, a list of the agencies that are expected to use the EIR in their decision-making and a list of permits and other approvals required to implement the project.

Lead Agency Approval

The Final EIR must be certified by the LAUSD Board of Education as to its adequacy in complying with the requirements of CEQA before action can be taken on the proposed project. The Board of Education shall consider the information contained in the EIR in making a decision to approve or deny the proposed project. The analysis in the EIR is intended to provide environmental review for the whole of the proposed project, including the planning of the proposed project, site acquisition, site clearance, excavation and grading of the site, construction of school buildings and appurtenant facilities, and ongoing operation of the school and associated school programs in accordance with CEQA requirements. This EIR is intended to provide environmental review for the proposed project in accordance with the requirements of CEQA.

Required Permits and Approvals

A public agency, other than the Lead Agency, that has discretionary approval power over a project is known as a Responsible Agency, as defined by State CEQA Guidelines. The Responsible Agencies and their corresponding approvals for this project include the following:

State of California

- Department of Education
  - School Facilities Planning Division (approval of final plan)
- Department of General Services
  - Division of State Architect (approval of construction drawing)

City of Los Angeles

- Department of Public Works Bureau of Engineering (approval of plans and work)
- Fire Department (approval of site plan for emergency access)

Regional Agencies

- Los Angeles Water Quality Control Board (NPDES permit, issuance of waste discharge requirement [WDR] permit, construction storm water run-off permits, 401 waiver of water quality certification

Reviewing Agencies

Reviewing agencies include those agencies that do not have discretionary powers, but that may review the EIR for adequacy. Potential reviewing agencies include the following:

State of California

- Environmental Protection Agency
- Office of Historic Preservation

- Department of Transportation
- Native American Heritage Commission

City of Los Angeles

- Department of City Planning
- Department of Transportation
- Police Department
- Bureau of Sanitation
- Department of Water and Power
- Department of Recreation and Parks

Regional Agencies

- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District

3.0 ENVIRONMENTAL IMPACT ANALYSIS

3.0.1 INTRODUCTION

The purpose of this section is to inform decision makers and the public of the type and magnitude of the change to the existing environment that would result from the proposed Project. Environmental topics addressed in this Draft Environmental Impact Report (Draft EIR) have been identified in the Notice of Preparation and Initial Study (NOP/IS) prepared by the District for the proposed Project. The environmental impact analysis sections of this Draft EIR provide a comprehensive discussion of the existing local and regional environmental conditions, evaluate expected Project level and cumulative impacts that would result from the proposed Project, and determine the level of significance of reasonably foreseeable impacts. The environmental impact analysis sections also identify mitigation measures intended to reduce potentially significant environmental impacts to the greatest extent feasible.

This EIR addresses the issues determined to be potentially significant based on the Project's IS, input from neighbors in the community, and responses to the NOP and scoping meetings. This EIR addresses these issues and identifies potentially significant environmental impacts of the Project and cumulative development in accordance with provisions set forth in the *California Environmental Quality Act (CEQA) Guidelines*. The EIR also recommends feasible mitigation measures, where possible, that would reduce or eliminate adverse significant environmental effects. Through this process, the District has determined that the EIR analysis should focus on Cultural (Historic) Resources, Air Quality, Hazardous Materials, Traffic, and Noise.

This section of the EIR addresses the potentially significant environmental impacts of the proposed Project for the resources listed above. Each environmental resource area is discussed under the following headings: Existing Conditions, Regulatory Framework, Methodology, Thresholds of Significance, Impacts and Mitigation Measures, and Cumulative Impacts.

3.0.2 CUMULATIVE IMPACT ANALYSIS

The technical analysis contained in **Section 3.0, Environmental Impact Analysis,** examines both the proposed Project-specific impacts and the potential environmental effects associated with cumulative development. CEQA requires that EIRs discuss cumulative impacts, in addition to the proposed Project-specific impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the proposed Project alone. According to Section 15355 of the *State CEQA Guidelines*:

> *Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*
>
> *(b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

Section 15130(a)(l) of the *State CEQA Guidelines* further states, "a cumulative impact consists of an impact which is created as a result of the combination of the proposed Project evaluated in the EIR together with other projects causing related impacts."

Section 15130(a) of the *State CEQA Guidelines* also requires that EIRs discuss the cumulative impacts of a project when the proposed Project's incremental effect is "cumulatively considerable."[1] Where a lead agency is examining a proposed project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but must briefly describe the basis for its conclusion. If the combined cumulative impact associated with the proposed Project's incremental effect and the effects of other projects is not significant, Section 15130(a)(2) of the *State CEQA Guidelines* requires a brief discussion in the EIR of why a cumulative impact is not significant and why it is not discussed in further detail. Section 15130(a)(3) of the *State CEQA Guidelines* requires supporting analysis in the EIR if a determination is made that a project's contribution to a significant cumulative impact is rendered less than cumulatively considerable and, therefore, is not significant. CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts, but instead should "be guided by the standards of practicality and reasonableness" (*State CEQA Guidelines* Section 15130(b)). The discussion of cumulative impacts in this Draft EIR focuses on whether the impacts of the proposed Project are cumulatively considerable.

The fact that a cumulative impact is significant does not necessarily mean that the proposed Project-related contribution to the cumulative impact analysis is significant as well. Instead, under CEQA, a project-related contribution to a significant cumulative impact is only significant if the contribution is "cumulatively considerable." To support each significance conclusion, the Draft EIR provides a cumulative impact analysis; and where project-specific impacts have been identified that, together with

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1 Under Section 15065(a)(3) of the *State CEQA Guidelines*, "cumulatively considerable" means that "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

the effects of other related projects, could result in cumulatively significant impacts, these potential impacts are documented.

Section 15130(b) of the *State CEQA Guidelines* defines consideration of the following two elements as necessary to provide an adequate discussion of cumulative impacts: "(a) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the City, or (b) a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions." In this Draft EIR, a combination of these two methods is used depending upon the specific environmental issue area being analyzed.

Cumulative impact discussions for each issue area provided in the technical analyses contained within **Chapter 3.0 Environmental Analysis**. As previously stated, and as set forth in the State CEQA Guidelines, Related Projects consist of closely related past, present, and reasonably foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area. LADOT identified 24 potential projects within the cumulative impact area of the proposed Project. These Related Projects are located within a 2-mile radius from the Project site and are listed in **Table 3.0-1, List of Related Projects**, along with their location and a brief description (**Figure 3.0-1, Map of Related Projects**).

It is noted that cumulative impacts analyzed in this EIR would likely represent a "worst-case" scenario for the following reasons:

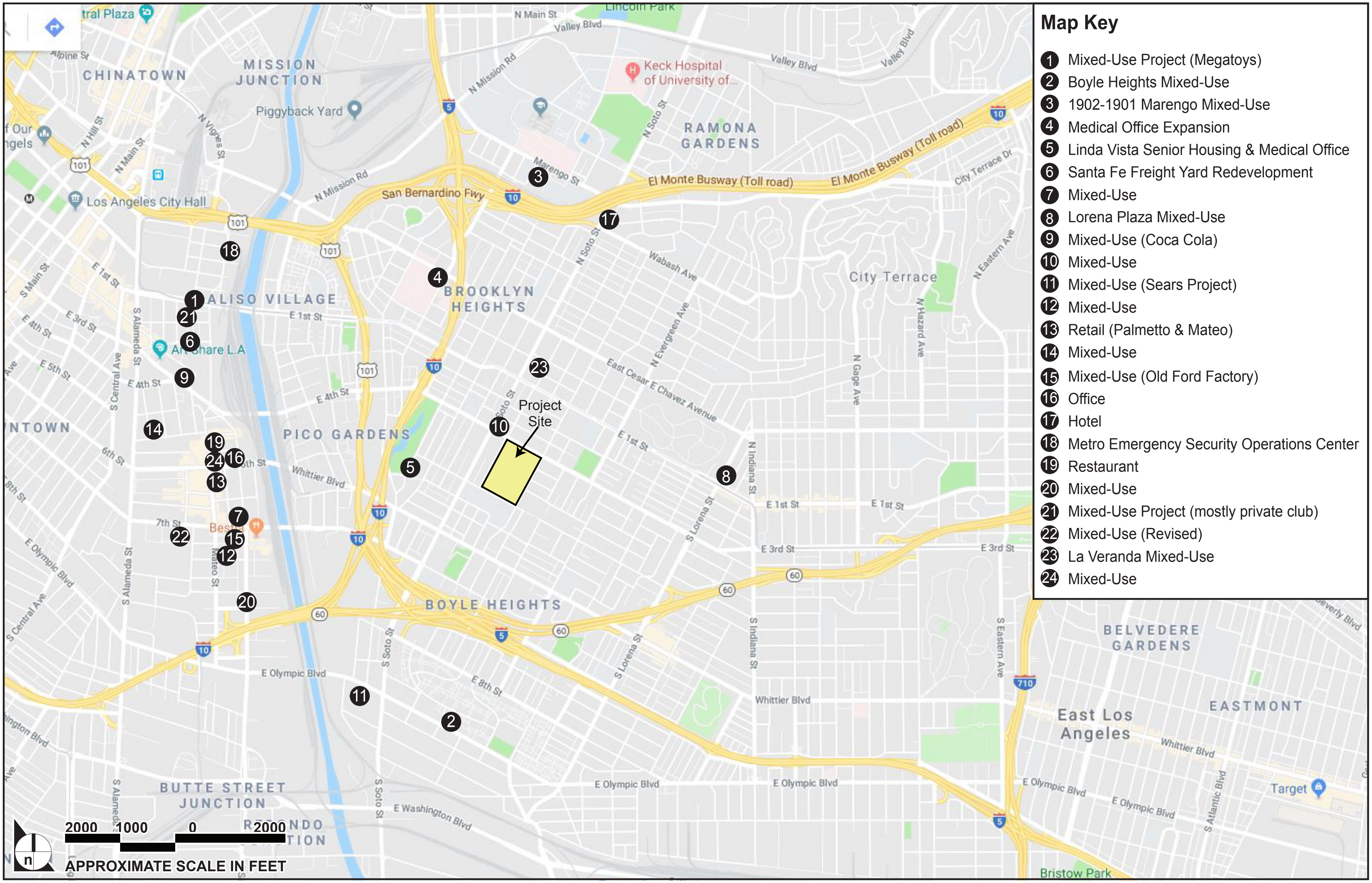
- Not all the related projects will be approved and/or built. Further, it is also likely that several of the related projects will not be constructed at the same time as the proposed Project or opened until after the proposed Project has been built and occupied.
- Impact projections for Related Projects would likely be, or have been, subject to unspecified mitigation measures, which would reduce potential impacts.
- Many related projects are expressed in terms of gross square footage or are conceptual plans such as master plans that assume complete development; in reality, such projects may be smaller because of the demolition or removal of existing land uses resulting from the development of the related projects.
- The proposed Project does not represent a change in overall capacity as the total number of students accommodated on the campus would remain the same with the proposed Project.

Table 3.0-1
List of Related Projects

Map Key	Project Name/Address	Description
1	Mixed-Use Project (Megatoys) 905 East 2nd Street	320 du of condominiums 18,716 sq ft of retail
2	Boyle Heights Mixed-Use 2901 East Olympic Blvd	4,400 du of apartments 185,000 sq ft of retail 125,000 sq ft of office 25,000 sq ft of medical office 15,000 sq ft of daycare 15,000 sq ft of library
3	1902-1901 Marengo Mixed-Use 1902 East Marengo Street	4,415 sq ft of retail 1,500 sq ft of fast food restaurant 4,500 sq ft of high-turnover restaurant 16,820 sq ft of medical office
4	Medical Office Expansion 1828 East Cesar Chavez Street	32,300 sq ft of medical office
5	Linda Vista Senior Housing & Medical Office 610 South St. Louis Street	97 du of condominiums 33,000 sq ft of medical office
6	Santa Fe Freight Yard Redevelopment 950 East 3rd Street	532 students 30,062 sq ft of retail 635 du of apartments
7	Mixed-Use 2051 East 7th Street	240 du of apartments 8,000 sq ft of retail 12,000 sq ft of restaurant
8	Lorena Plaza Mixed-Use 3401 East 1st Street	49 du of apartments 10,000 sq ft of retail
9	Mixed-Use (Coca Cola) 963 East 4th Street	78,600 sq ft of office 25,000 sq ft of retail 20,000 sq ft of restaurant
10	Mixed-Use 2407 East 1st Street	50 du of apartments 8,500 sq ft of office 3,400 sq ft of retail
11	Mixed-Use (Sears Project) 2650 East Olympic Blvd	1,000 du of apartments 34,000 sq ft of retail 46,000 sq ft of high-turnover restaurant 230,000 sq ft of office
12	Mixed-Use 826 South Mateo Street	90 du of condominiums 11,000 sq ft of retail 5,600 sq ft of restaurant
13	Retail (Palmetto & Mateo) 555 South Mateo Street	153,000 sq ft of retail

Map Key	Project Name/Address	Description
14	Mixed-Use 1147 East Palmetto Street	120 du of apartments 141 rooms of hotel 20,000 sq ft of restaurant
15	Mixed-Use (Old Ford Factory) 2030 East 7th Street	243,583 sq ft of office 40,000 sq ft of retail
16	Office 540 South Santa Fe Ave	65,812 sq ft of office
17	Hotel 1030 North Soto Street	81 rooms of hotel
18	Metro Emergency Security Operations Center 410 North Center Street	110,000 sq ft of office
19	Restaurant 500 South Mateo Street	12,882 sq ft of high-turnover restaurant
20	Mixed-Use 2130 East Violet Street	94,000 sq ft of office 3,500 sq ft of retail 4,000 sq ft of restaurant
21	Mixed-Use Project (mostly private club) 929 East 2nd Street	40,034 sq ft of retail ,985 sq ft of private retail 7,843 sq ft of event space 10,369 sq ft of drinking place 40,249 sq ft of private office 5,383 sq ft of private health club 49,000 sq ft of private movie theater
22	Mixed-Use (Revised) 1800 East 7th Street	122 du of apartments 136,000 sq ft of office
23	La Veranda Mixed-Use 2420 Cesar Chavez Ave	77 du of apartments 4,000 sq ft of bank 4,000 sq ft of health club
24	Mixed-Use 520 South Mateo Street	200 du of apartments 30,000 sq ft of office 15,000 sq ft of retail 15,000 sq ft of restaurant

du = dwelling unit sq ft = square feet
Source: KOA Corporation, 2017



SOURCE: Google Maps, 2018

FIGURE 3.0-1

IMPACT SCIENCES

Map of Related Projects

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3.1 AIR QUALITY

3.1.1 INTRODUCTION

This section of the Draft EIR presents existing air quality conditions in the Project area (including the Project site, the applicable air district jurisdiction, and the air basin) and analyzes the potential air quality impacts, both temporary (i.e., construction) and long-term (i.e., operational), from the implementation of the proposed Project. This section discusses regulatory framework for air quality management on a federal, state, regional, and local level. Effects related to odors were found not to be significant in the Initial Study prepared for the Project and included in **Appendix 1.0** and therefore are not included in this analysis.

Air Pollution and Potential Health Effects

Criteria Pollutants

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness, or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). These pollutants are discussed below.

- **Ozone (O_3).** Ozone is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- **Volatile Organic Compounds (VOCs)** are compounds comprised primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Several VOCs are classified as TACs, however, VOCs themselves are not criteria pollutants; but they contribute to the formation of criteria pollutants, including O_3, NO_2, and PM2.5.

- **Nitrogen Dioxide (NO_2)** is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO) and is also a byproduct of fuel combustion. NO_X is primarily emitted in the form of NO, but quickly reacts to form NO_2. NO_X is primarily a mixture of NO and NO_2. NO_2 acts as an acute irritant and, in equal concentrations, is more injurious than NO. According to the US EPA, NO_2 concentrations on or near major roads can be approximately 30 to 100 percent higher than concentrations in the surrounding community, which could contribute to health effects for at-risk populations, including people with asthma, children, and the elderly.1

- **Carbon Monoxide (CO)** is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. Inversions are an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air. The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- **Sulfur Dioxide (SO2)** is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO2 are coal and oil used in power plants and industries. Generally, the highest levels of SO2 are found near large industrial complexes. In recent years, SO2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO2 and limits on the sulfur content of fuels. SO2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO2 can also yellow plant leaves and erode iron and steel.

- **Particulate Matter (PM)** consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM2.5, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM2.5 can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM10, is about 1/7 the thickness of a human hair. Major sources of

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1 US EPA, Final Revisions to the Primary National Ambient Air Quality Standard for NO_2 General Overview, Office of Air and Radiation Office of Air Quality Planning and Standards, pgs. 11-12, https://www3.epa.gov/ttn/naaqs/standards/nox/fr/20100209.pdf, accessed October 17, 2016.

PM10 include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

  - PM2.5 and PM10 pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM2.5 and PM10 can increase the number and severity of asthma attacks, cause, or aggravate, bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM10 tends to collect in the upper portion of the respiratory system, PM2.5 is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- **Lead (Pb)** in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

- Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- **Toxic Air Contaminants (TAC)** are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

The determination of whether a region's air quality is healthful or unhealthful is made by comparing contaminant levels in ambient air samples to national and state standards. California and the United States Environmental Protection Agency (US EPA) have established health-based air quality standards for the following criteria air pollutants: O_3, CO, NO_2, SO_2, PM10, PM2.5, and lead. These standards were established to protect sensitive receptors with a margin of safety from adverse health impacts due to exposure to air pollution. The California standards are more stringent than the federal standards, and in the case of PM10 and SO_2, much more stringent. California has also established standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. The state and national ambient air quality standards and their effects on health are summarized in **Table 3.1-1, State and Federal Ambient Air Quality Standards**.

Table 3.1-1
State and Federal Ambient Air Quality Standards

Air Pollutant	Concentration/Averaging Time: State Standard (CAAQS)[1]	State Attainment Status[2]	Federal Primary Standard (NAAQS)[3]	Federal Attainment Status[4]	Most Relevant Health Effects
Ozone (O_3)	0.09 ppm, 1-hour avg.	Non-Attainment	None	None	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage
	0.070 ppm, 8-hour avg.	Non-Attainment	0.075 ppm, 8-hour avg. (three-year average of annual 4th-highest daily maximum)	Non-Attainment	
Nitrogen Dioxide (NO_2)	0.18 ppm, 1-hour avg.	Attainment	0.100 ppm, 1-hour avg. (three-year avg. of the 98th percentile of the daily maximum 1-hour avg.)	Attainment/ Unclassified	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extrapulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration
	0.030 ppm, annual arithmetic mean	Attainment	0.053 ppm, annual arithmetic mean	Attainment/ Unclassified	
Carbon Monoxide (CO)	20 ppm, 1-hour avg.	Attainment	35 ppm, 1-hour avg. (not to be exceeded more than once per year)	Attainment (Maintenance)	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses
	9.0 ppm, 8-hour avg.	Attainment	9 ppm, 8-hour avg. (not to be exceeded more than once per year)	Attainment (Maintenance)	
Sulfur Dioxide (SO_2)	0.25 ppm, 1-hour avg.	Attainment	0.075 ppb, 1-hour avg. (three-year avg. of the 99th percentile)	Attainment	Bronchoconstriction accompanied by symptoms, which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in person with asthma
	0.04 ppm, 24-hour avg.	Attainment	0.5 ppm, 3-hr avg. (not to be exceeded more than once per year)	Attainment	

Air Pollutant	Concentration/Averaging Time State Standard (CAAQS)[1]	State Attainment Status[2]	Federal Primary Standard (NAAQS)[3]	Federal Attainment Status[4]	Most Relevant Health Effects
Respirable Particulate Matter (PM10)	50 μg/m³, 24-hour avg. 20 μg/m³, annual arithmetic mean	Non-Attainment Non-Attainment	150 μg/m³, 24-hour avg. (not to be exceeded more than once per year on average over three years)	Attainment	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death
Fine Particulate Matter (PM2.5)	12 μg/m³, annual arithmetic mean	Non-Attainment	35 μg/m³, 24-hour avg. (three-year average of 98th percentile) 15 μg/m³, annual arithmetic mean (three-year average)	Non-Attainment Non-Attainment	a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death
Lead(Pb)	1.5 μg/m³, 30-day avg.	Attainment	0.15 μg/m³, three-month rolling average	Non-Attainment	(a) Learning disabilities, and (b) Impairment of blood formation and nerve conduction
Visibility-Reducing Particles	In sufficient amount such that the extinction coefficient is greater than 0.23 inverse kilometers at relative humidity less than 70%, 8-hour avg. (10:00 AM–6:00 PM)	Unclassified	None	N/A	Visibility impairment on days when relative humidity is less than 70 percent.
Sulfates	25 μg/m³, 24-hour avg.	Attainment	None	N/A	(a) Decrease in ventilatory function, (b) Aggravation of asthmatic symptoms, (c) Aggravation of cardio-pulmonary disease, (d) Vegetation damage, (e) Degradation of visibility, and (f) Property damage
Hydrogen Sulfide (H_2S)	0.03 ppm, 1-hour avg.	Unclassified	None	N/A	Odor annoyance
Vinyl Chloride	0.010 ppm, 24-hour avg.	Unclassified	None	N/A	Known carcinogen

Source: California Air Resources Board, Ambient Air Quality Standards Chart, 2016.
μg/m³ = microgram per cubic meter; ppm = parts per million by volume.
CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards.
1 CAAQS standards, CARB website, http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm, accessed August 21, 2017
2 State attainment status, CARB website, http://www.arb.ca.gov/desig/adm/adm.htm, accessed August 21, 2017
3 Federal standards, US EPA website, http://epa.gov/air/criteria.html, accessed August 21, 2017
4 Federal attainment status, CARB website, http://www.arb.ca.gov/desig/adm/adm.htm, accessed August 21, 2017
If a Basin satisfies the established regulatory agency criteria the Basin is in "attainment." If the Basin does not meet the established federal or state standard, the Basin is in "non-attainment."

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health, but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TACs can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). The California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has included 21 substances on the TAC identification list.

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million.2 The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on actual monitored data throughout the Basin and consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient

2 SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin*, May 2015.

concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Diesel Particulate Matter

DPM, which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 μm), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 μm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: aggravated asthma; chronic bronchitis; increased respiratory and cardiovascular hospitalizations; decreased lung function in children; lung cancer; and premature deaths for people with heart or lung disease.[3, 4]

3.1.2 EXISTING CONDITIONS

Regional Air Quality

The Project site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the

3 CARB, Diesel and Health Research, www.arb.ca.gov/research/diesel/diesel-health.htm, accessed August 21, 2017.

4 CARB, Fact Sheet March 2008, Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf, accessed August 21, 2017.

west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Local Air Quality

Criteria air pollutants during construction and operation are generated by mobile, stationary, and area-wide sources. Area source emissions during construction would be generated by construction activities including construction vehicle and equipment refueling and architectural coatings of buildings. During operation of the Project, area source emissions would include refueling of landscaping equipment. Mobile emissions during construction and operation would be generated by combustion of fuel and dust particulates blown into the air by trucks and vehicles travelling to and from the Project site. Motor vehicles are the primary source of pollutants in the local vicinity.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project site is located in SCAQMD's Central Los Angeles receptor area 1. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. **Table 3.1-2, 2014-2016 Ambient Air Quality Data in Project Vicinity** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2013 through 2015. The one-hour State standard for O_3 was exceeded 24 times during this three-year period while the new 8-hour federal standard was exceeded 59 times in the past two years. Meanwhile, the daily State standard for PM2.5 was exceeded twice. CO and NO_2 levels did not exceed the CAAQS from 2013 to 2015.

Table 3.1-2
2014-2016 Ambient Air Quality Data in Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.070 ppm (Federal 8-hour standard)	6	6	4
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	3	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	0	0	0
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.082	0.079	0.065
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	87	88	67
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	32	26	18
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	59.9	56.4	44.4
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	6	7	2
Sulfur Dioxide	Maximum 1-hour Concentration (ppm)	0.005	0.012	0.013
	Days > 0.25 ppm (State 1-hour standard)	0	0	0

Source: SCAQMD Annual Monitoring Data, 2017.
N/A: Not available at this monitoring station.

Sensitive Receptors and Locations

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

There are several existing or reasonably foreseeable sensitive receptors near the Project site, including:

- On-site students. Students located at the Project site are the nearest sensitive receptors to construction and operation activity.
- Single- and multi-family residences along South Mott Street. These residences are as near as approximately 50 feet east/southeast of the Project site.
- Single- and multi-family residences along South Mathews Street. These residences are as near as approximately 65 feet northwest of the Project site.
- Single- and multi-family residences along East 4th Street. These residences area as near as approximately 85 feet north/northeast of the Project site.
- Hollenbeck Middle School. This school is approximately 140 feet south/southeast of the Project site.
- Nichiren Shu Beikoku Betsuin Temple. This facility is located approximately 430 feet to the northeast of proposed construction activity.
- Promise Hospital of East Los Angeles. This facility is located approximately 440 feet to the northwest of the proposed construction activity on the Project site.
- Kingdom Hall of Jehovah's Witnesses. This facility is located approximately 465 feet to the northeast of the Project site.
- Evergreen Recreation Center. This facility is approximately 770 feet to the northeast of the Project site.
- Breed Street Elementary School. This school is located approximately 950 feet to the northwest of the Project site.
- First Street Elementary School. This school is located approximately 970 feet to the northeast of the Project site.

3.1.3 REGULATORY FRAMEWORK

Federal Regulations

United States Environmental Protection Agency (USEPA)

The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. It has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the State.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table 3.3-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, and attainment/unclassified for CO and NO_2.

State Regulations

California Air Resources Board (CARB)

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 3.1-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Local Regulations

South Coast Air Quality Management District (SCAQMD)

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers 6,745 square miles and is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino and San Jacinto mountains to the north and east, and San Diego County to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD regularly prepares an Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM2.5 strategy standard. On March 3, 2017, the SCAQMD approved the 2016 AQMP which includes strategies to meet the NAAQS for the 8-hour ozone standard by 2032, the annual PM2.5 standard by 2021-2025, the 1-hour ozone standard by 2023, and the 24-hour PM2.5 standard by 2019. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

Los Angeles Unified School District Standards

Standard Conditions of Approval

The School Upgrade Program (SUP) EIR included Standard Conditions of Approval (SCs) for minimizing impacts to air quality resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to air quality resource impacts associated with the proposed Project are provided below.

SC-AQ-1 Air Toxics Health Risk required when LAUSD proposes to place new classrooms or outdoor play areas: within ¼-mile of mobile and stationary emission sources; within 500 feet of a major transportation corridor (freeway, major rail line); within 500 feet of a major stationary source of emissions; on the LAUSD priority list of schools most at risk from air pollution; near a high-risk facility previously identified by the OEHS.

OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). This document includes guidance on HRA protocols for permitted, nonpermitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

SC-AQ-2 LAUSD's 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 LAUSD's construction contractor shall:

- Maintain slow speeds with all vehicles
- Load impacted soil directly into transportation trucks to minimize soil handling
- Water/mist soli as it 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 transportation 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 prepare an air quality assessment

If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.

LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:

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/or limit the number of haul trips per day.
- Route construction trucks off congested streets.
- Employ high pressure fuel injection systems or engine timing retardation
- Utilize 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 Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines idle time, to not more than five consecutive minutes.
- Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.
- Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.
- Utilize electric or alternatively fueled equipment, if feasible.
- Utilize construction equipment with the minimum practical engine size.
- Utilize 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 ten 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 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 construction access roads for at least 100 feet from the main road to the project site.
- Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.
- 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 five percent or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.
- Limit traffic speeds on unpaved road to 15 mph or less.
- Prohibit high emission causing 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

- Utilize 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)
- Develop 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 emissions impacts

- Require construction contractors to document compliance with the identified mitigation measures.

SC-AQ-5 LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of new school.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) assists in air quality planning efforts by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In April 2016, SCAG adopted its 2016-2040 RTP, a plan to invest $556.5 billion in transportation systems over a six-county region.

City of Los Angeles

The City's General Plan includes an Air Quality Element that provides a policy framework governing air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air vision.

In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it did not set new thresholds of significance for air quality, it did suggest a process for evaluating Projects and attempted to standardize analyses through prescribed protocols.

3.1.4 METHODOLOGY

The methodology used to evaluate the air quality impacts associated with construction and operation of the Proposed Project is based on SCAQMD guidelines and data, the California Emissions Estimator Model (CalEEMod), and information provided in the CalEEMod User's Guide.[5] Air quality impacts are also estimated based on information and estimated activity levels of the Proposed Project's construction and operation.

5 Air Quality Management District, *California Emissions Estimator Model User's Guide*, (2016). This document may be downloaded from the following website: http://www.aqmd.gov/caleemod/user's-guide

3.1.5 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the *State CEQA Guidelines*, a project would have a significant effect on the environment if the Project would:

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan

AQ-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation

AQ-3 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)

The proposed Project will not locate any sources of odors near sensitive receptors. Therefore, no odor impacts could occur at nearby receptors. Therefore the following thresholds are not required to be analyzed:

AQ-4 Expose sensitive receptors to substantial pollutant concentrations

AQ-5 Create objectionable odors affecting a substantial number of people

The proposed Project is located in Los Angeles County, which is included in the SoCAB. The SCAQMD has jurisdiction over air quality within the SoCAB. The SCAQMD CEQA Air Quality Handbook and related guidelines provide thresholds for assessing the significance of criteria air pollutants from construction and operation. Exceedance of the SCAQMD thresholds could result in a potentially significant air quality impact. Therefore, the proposed Project would result in a potentially significant impact to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Generate total criteria pollutant emissions during construction or operation (direct and indirect) in excess of the thresholds given in Table *3.1-3*, SCAQMD Regional Emissions Significance Thresholds;
- Expose sensitive receptors to substantial pollutant concentrations:
- Exceed the localized significance thresholds given in Table 3.1-4, SCAQMD Localized Significance Thresholds;
- Cause or contribute to the formation of CO Hotspots; and/or

- Result in an incremental increase in cancer risk greater than or equal to 10 in 1 million, a cancer burden greater than 0.5 excess cancer cases (in areas where the incremental increase in risk is greater than 1 in 1 million), and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.
- Expose sensitive receptors to objectionable odors affecting a substantial number of people.

If the Project exceeds the regional emissions significance thresholds shown in **Table 3.1-3**, the Project would also result in a cumulatively considerable contribution to air quality impacts and would be considered cumulatively significant even if it conforms to the applicable Air Quality Management Plan.

Table 3.1-3
SCAQMD Regional Emissions Significance Thresholds

	– Pollutant (pounds per day)					
Phase	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Construction	75	100	550	150	150	55
Operational	55	55	550	150	150	55

Source: South Coast Air Quality Management District, Air Quality Significance Thresholds, 2011.
VOC = volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides.
PM10 = respirable particulate matter; PM2.5 = fine particulate matter.

The localized significance thresholds are shown in **Table 3.1-4**. These thresholds are based on screening tables provided by the SCAQMD. The screening tables provide the maximum allowable daily emissions that would satisfy the thresholds without Project-specific dispersion modeling. Values are based on the Source Receptor Area (SRA) within which the Project site is located, the size of the Project area, and the distance to the nearest sensitive receptor. The Project is located in SRA 1, maximum daily grading will be restricted to 5 acres, and is within 25 meters of the nearest sensitive receptors.

Thus, a significant impact could occur during construction or operation if on-site emissions exceed the thresholds shown below.

Table 3.1-4
SCAQMD Localized Significance Thresholds

	Pollutant (pounds per day)[1,2]			
Localized Significance Threshold	**NO_X**	**CO**	**PM10**	**PM2.5**
Construction	161	1,861	16	8
Operational	161	1,861	4	2

Source: South Coast Air Quality Management District, Final Localized Significance Threshold Methodology (Appendix C), 2008.
1 The NO_X LST thresholds contained in the SCAQMD lookup tables are based on emissions of NO_X from construction of the Project and assume gradual conversion to oxides of nitrogen (NO_2) based on the distance from the Project site boundary.
2 Based on Central LA source receptor area and maximum grading of 5 acres per day and a receptor distance of 25 meters.

3.1.6 IMPACTS AND MITIGATION MEASURES

AQ-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan? *Less than significant*

According to the SCAQMD *CEQA Air Quality Handbook*, a project would have a significant impact if it conflicts with or delays implementation of the applicable air quality management plan (AQMP). A project is consistent with the AQMP if it meets the following indicators:

1. The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

2. The project will not exceed the assumptions in the AQMP in 2017 or increments based on the year of project buildout (2022).

As discussed later in this section, the proposed Project would not exceed the significance thresholds for construction or operational emissions. In addition, the Project would not exceed the screening criteria for the localized significance thresholds. Therefore, since the Project would not exceed the thresholds, it would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Accordingly, the proposed Project complies with the first consistency criterion.

Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. The *2016 Air Quality Management Plan* based its assumptions on growth forecasts contained in the Southern California

Association of Governments (SCAG) *2016 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS).[6] The 2016 RTP/SCS is based on growth assumptions through 2035 developed by each of the cities and counties in the SCAG region. The proposed Project is not expected to increase the number of students attending Roosevelt High School. Although the proposed Project adds 226,773 square feet of new classrooms, it will demolish 262,103 square feet of existing classrooms. There are 111 existing classrooms, and upon completion of the proposed Project there would still be 111 classrooms. This would result in a net decrease in building square footage, and no change in the amount of classrooms. This is a very minor change in school operations in the context of the air basin and local or regional governments. Therefore, the proposed Project is considered to be consistent with growth assumptions included in the AQMP. Accordingly, the proposed Project complies with the second consistency criterion. No impact would occur and no further analysis is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

AQ-2: Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation? *Less than significant*

Construction

Construction operations would result in emissions of air pollutants. These emissions were primarily modeled using CalEEMod, a land use and construction model used to calculate emissions generated from construction and operation of new development projects. Project-specific data was used where available. Where Project-specific information was not available, model default values provided by CalEEMod were used. Construction of the Project was estimated to take place over approximately three years beginning in the summer of 2018 and continue through the fall of 2022.

In addition to standard construction activities, there are approximately 7,019 cubic yards of contaminated soil that will need to be exported from the project site.[7] These haul trips for soil remediation are included

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6 South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, 2016.

7 For more information on the soil remediation process and findings, please refer to Appendix 3.3 for the Removal Action Workplan document.

in the CalEEMod estimates as site preparation phases during 2018, 2019, and 2020. According to the Removal Action Workplan (RAW) prepared for the Project, the following SCAQMD rules are applicable to the Project site, and will be applied to all work related to the movement of contaminated soils:

> **Rule 401**. This rule prohibits discharge of air contaminants based on "darkness in shade" measured by the Ringleman chart. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 402**. This rule prohibits discharge of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause or may cause injury or damage to business or property. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 403**. The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air as a result of manmade fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust sources. It requires the use of best available control measures to minimize fugitive dust emissions. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 1466**. This rule imposes requirements to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions associated with earth-moving activities, including soil excavation, handling, stockpiling, loading, etc. This is applicable to soil excavation and handling operations during the removal action.

Estimated maximum air pollutant emission rates for construction activities in the SoCAB are shown in **Table 3.1-5, Estimated Project Construction Emissions**. Emission rates for respirable particulate matter (PM10) and fine particulate matter (PM2.5) include both vehicle exhaust and fugitive dust emissions.

The Project will be required to implement dust control measures consistent with SCAQMD Rule 403 (Fugitive Dust) during the construction phases of new project development. In addition to this, the Project is required to implement the LAUSD Standard Conditions of Approval, some of which include rules designed to achieve compliance with Rule 403, requiring construction equipment be equipped with US EPA Tier 4 engine controls, use of electric equipment as feasible, and application of ultra-low or zero VOC surface coatings.

The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the dust generation source:

- Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).
- Replace ground cover in disturbed areas as quickly as possible
- Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.
- Water active grading sites at least twice daily during construction activities.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.
- Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.
- Install wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the sites each trip.
- Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.

The emissions values shown in **Table 3.1-5** reflect compliance with SCAQMD Rule 403 and implementation of LAUSD Standard Conditions of Approval.

Table 3.1-5
Estimated Project Construction Emissions

	Maximum Emissions in Pounds per Day					
Construction Year	**VOC**	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
2018	1	7	47	<1	8	4
2019	2	**15**	56	**<1**	**10**	**5**
2020	**51**	14	**64**	<1	10	5
2021	1	10	27	<1	3	1
2022	48	9	26	<1	3	1
Maximum Daily Emissions	51	15	64	<1	10	5
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Construction Year	Maximum Emissions in Pounds per Day					
	VOC	NOx	CO	SOx	PM10	PM2.5
Localized Emissions	50	7	50	<1	7	4
SCAQMD Localized Threshold	N/A	161	1,861	N/A	16	8
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Impact Sciences, Inc. Emissions calculations are provided in ***Appendix A****.*
Totals in table may not appear to add exactly due to rounding in the computer model calculations.

As shown in **Table 3.1-5,** above, the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction, impacts would be less than significant, and no mitigation is required.

Operational

Operation of the proposed Project would not generate any new operational traffic or result in a net increase in student population or facility square footage and there would be no change in school student capacity or pick-up and drop-off routes,. Further, newer buildings would be expected to be more energy efficient than the existing buildings. Nonetheless, the model outputs showed a slight increase in mobile source PM10 and PM2.5. In addition, the proposed Project would be required to comply with the LAUSD Standard Conditions of Approval, which include area, energy, and mobile source reduction strategies that would further reduce air quality effects as compared to existing conditions.

Table 3.1-6
Estimated Project Operational Emissions

Scenario	Maximum Emissions in Pounds per Day					
	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Existing Daily Emissions	16	49	161	<1	31	9
Maximum Project Daily Emissions	14	45	133	<1	41	11
Net Increase	-2	-4	-28	0	10	2
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Existing Emissions	6	<1	<1	<1	<1	<1
Localized Project Emissions	5	<1	<1	<1	<1	<1
Net Increase	1	0	0	0	0	0
SCAQMD Localized Threshold	N/A	161	1,861	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Impact Sciences, Inc. Emissions calculations are provided in ***Appendix A****.*
Totals in table may not appear to add exactly due to rounding in the computer model calculations.

As shown in **Table 3.1-6**, Estimated Project Operational Emissions, operation of the proposed Project would result in a slight decrease in operational emissions as compared to existing conditions for VOC, NOx, CO and SOx, and would, therefore, not result in significant net air pollutant emission. The increases in PM10 and PM2.5 would be minimal. Therefore, the proposed Project would not hinder, disrupt, or delay the implementation of any air quality control measures. The proposed Project would also comply with all applicable rules, regulations, and recommended actions. Therefore, the proposed Project is consistent with the applicable air quality plans. As shown in Table 3.1-6, the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during operation, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

AQ-3: Would the project 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 (including releasing emissions, which exceed quantitative threshold for ozone precursors)? ***Less than significant***

The SoCAB is in nonattainment of state and federal standards for ozone, PM10, and PM2.5, and in nonattainment of state standards for NOx. Los Angeles County is also in nonattainment for lead; however, this is due to exceedances from a small number of facilities, the nearest of which are located in the cities of Industry and Vernon. Ozone is formed in the atmosphere via chemical reactions of reactive organic gases (ROG) and NO_X in sunlight. Emissions of ROG are generated from combustion engines, such as those used in motor vehicles and construction equipment, and from architectural coatings and the use of solvents and cleaners. Emissions of NO_X are generated principally from combustion engines such as those used in motor vehicles and construction equipment. Emissions of PM10 are generated by both construction activities, such as grading, as well as by motor vehicles traveling over paved and unpaved surfaces.

The SCAQMD CEQA Guidelines state that SCAQMD emissions thresholds were developed such that emissions from an individual project that exceed the threshold would be cumulatively considerable. As emissions from this Project are below the threshold for all pollutants during both construction and operation, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality. As a result, no mitigation measures are required. As shown in **Tables 3.1-5 and 3.1-6,** the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations? *Less than significant impact.*

Sensitive receptors in the Project area are defined as residential areas adjacent to the proposed Project as well as students at the existing Hollenbeck Middle School campus. During construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. However, due to the limited scale and phasing of construction, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Additionally, the localized construction impacts summarized in **Table 3.1-5** reflect work done by the SCAQMD to provide conservative screening levels for potential health impacts for sensitive receptors near proposed Projects. That is, the thresholds shown in **Table 3.1-5** are considered by the SCAQMD to be minimum levels at which it is possible health impacts might occur given worst-case conditions for receptors within 25 meters of a project with a maximum of 5 acres graded per day. Emissions below those levels would not cause impacts to sensitive receptors, including students, even in worst-case conditions. The emissions shown in **Table 3.1-5** for each criteria pollutant are below the SCAQMD thresholds.

The proposed Project would not include any sources of risk to sensitive receptors during operation, but would include sensitive receptors such as school staff, faculty, and students. The surrounding land uses are primarily residential and commercial, with no substantial sources of toxic air contaminants. Consequently, operation of the proposed Project would not cause sensitive receptors to be exposed to substantial pollutant concentrations. Therefore, impacts would be less than significant, and no mitigation is required.

CO Hotspots

Motor vehicles are a primary source of pollutants within the Project vicinity. Traffic congested roadways and intersections have the potential to generate localized levels of CO. Localized areas where ambient concentrations exceed state and/or federal standards are termed CO "hotspots." Such hotspots are defined as locations where the ambient CO concentrations exceed the state or federal ambient air quality standards. CO is produced in greatest quantities from vehicle combustion and is usually concentrated at or near ground level because it does not readily disperse into the atmosphere. As a result, potential air quality impacts to sensitive receptors are assessed through an analysis of localized CO concentrations. Areas of vehicle congestion have the potential to create CO hotspots that exceed the state ambient air quality 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. The federal levels are less stringent than the state standards and are based on 1- and 8-hour standards of 35 and 9 ppm, respectively. Thus, an exceedance condition would occur based on the state standards prior to exceedance of the federal standard.

Long-term operations of the Project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[8] Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. According to the traffic report for the proposed Project, unacceptable level of service (LOS) values of F will not be caused by the Project, and therefore the Project will not create any significant project impacts.[9] In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

As a result, no significant project-related impacts would occur relative to future carbon monoxide concentrations. The impact would be less than significant, and no mitigation is required.

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8 Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

9 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization*, March 2017.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

3.1.7 CUMULATIVE ANALYSIS

As noted above in **Threshold 3.1-3**, according to the SCAQMD CEQA Handbook, Projects that result in emissions that do not exceed the Project-specific SCAQMD regional thresholds of significance should be considered to result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the Basin. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the Project's contribution to the cumulative impact on air quality in the Basin would not be cumulatively considerable. As presented previously in **Tables 3.1-5** and **3.1-6**, construction and operation of the Project would not result in daily construction emissions that would exceed the thresholds of significance recommended by the SCAQMD. Applying the SCAQMD criteria, the Project would not result in a cumulatively considerable contribution to regional air pollutant emissions. Therefore, cumulative impacts would be less than significant, and no mitigation is required.

Mitigation Measures

None required.

Residual Impacts

Impacts would be less than significant.

3.2 CULTURAL RESOURCES

3.2.1 INTRODUCTION

This section of the Draft EIR evaluates the potential for implementation of the proposed Project to impact cultural resources. This section discusses regulatory framework, along with the condition of existing cultural resources throughout the Project, and possible environmental impacts that may occur as the proposed Project is implemented.

Information used to prepare this section was taken from the following sources, which are incorporated herein by reference and included as Appendices to this Draft EIR:

- PCR Services Corporation, *Preliminary Historic Resource Evaluation Report for Theodore Roosevelt Senior High School, 456 South Mathews Street, Los Angeles, California, 90033*, June 19, 2015
- ESA, *Landscape and Cultural Analysis for Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California*, October 26, 2016
- ESA, *Theodore Roosevelt Senior High School Cultural Analysis*, February 13, 2017
- ASM Affiliates, Inc., *Supplemental Historical Resources Evaluation Report for Roosevelt High School, Los Angeles, Los Angeles County, California*, June 20, 2017.
- ASM Affiliates, Inc., *Draft Cultural Resources Technical Report for Roosevelt High School, Los Angeles, Los Angeles County, California* , January 2018.

3.2.2 TERMINOLOGY

Cultural resources. Places, objects, and settlements that reflect group or individual religious, archaeological, or architectural activities, or paleontological resources. Such resources provide information on scientific progress, environmental adaptations, group ideology, or human advancements.

Architectural resources. Buildings, structures, objects, and sites of the built environment.

Historical resources. Buildings, structures, objects, sites, and districts that have been formally evaluated and found to meet one, or more, of the significance criteria in CEQA Section 15064.5 (a)(3). While most historical resources will be 50 years old or older, resources that have achieved significance in less than 50 years may also be considered historic, provided that a sufficient time has passed to understand their historical importance.

Historic district. Unified geographic entities which contain a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background, and meet one of the criteria for significance set forth in California Code of Regulations (CCR) Title 14, Chapter 11.5, Section 4852(b).

Historic Context. "Patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) is made clear." A context may be organized by theme, geographic area, or chronology; regardless of the frame of reference, a historic context is associated with a defined area and an identified period of significance.

Property types. "A grouping of individual properties characterized by common physical and/or associative attributes." A historic context provides a framework for the evaluation of the significance of a potential historic resource.

Archaeological resources. Cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resources. The term "unique archaeological resources" is defined in Public Resources Code (PRC) Section 21083.2(g):

> … "unique archaeological resources" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> (1) Contains information need to answer important scientific research questions and there is a demonstrable public interest in that information.
>
> (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
>
> (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Paleontological resource. A natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil materials dating to any period preceding human occupation.

3.2.3 EXISTING CONDITIONS

Roosevelt High School was constructed in 1922 and opened in 1923 on a residential block in Boyle Heights. The school was developed to address an over-crowding problem within public schools in Los Angeles. By 1926, enrollment at Roosevelt High School necessitated the demolition residential structures that were remaining on the property. These structures were replaced with a playground, an athletic field, and a new building. The campus was remodeled and retrofitted extensively after the Long Beach

Earthquake in 1933 and in the 1960s the site expanded to incorporate an entire city block. In 1936, the campus began construction to strengthen Building 1 which included the removal of the third floor and above-roof protrusions to eliminate danger of toppling over.[1] Further and more extensive information relating to the existing buildings on Roosevelt High School can be found in **Section 2.0, Project Description** of the Draft EIR.

3.2.4 REGULATORY FRAMEWORK

Federal

United States Code, Title 16, Sections 470 et seq.

The National Historic Preservation Act of 1966 (NHPA) authorized the National Register of Historic Places and coordinates public and private effort to identify, evaluate, and protect the nation's historic and archaeological resources.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertaking on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review with assistance from State Historic Preservation Office (SHPO).

United States Code, Title 16, Sections 470aa-mm

The Archaeological Resources Protection Act became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

United States Code, Title 25, Sections 3001 et seq.

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

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1 ASM Affiliates, Inc., *Draft Cultural Resources Technical Report for Roosevelt High School, Los Angeles, Los Angeles County, California*, January 2018.

Code of Federal Regulations, Title 36, Chapter I, Part 60

The National Register of Historic Places (NRHP) is authorized by the NHPA. It is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service and currently consists of more than 90,000 listings, including all historic areas in the National Park System, more than 2,500 National Historic Landmarks, and properties that have been listed because they are significant to the nation, a state, or a community.

Properties are nominated to the NRHP by the State Historic Preservation Officer (SHPO) of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

Any individual or group may prepare a NRHP nomination. Thorough documentation of physical appearance and historic significance of the property is required. In California, completed nominations are submitted to the Office of Historic Preservation for review. It is then submitted to the State Historical Resources Commission, who determines whether or not the property meets criteria for evaluation and recommends approval or disapproval to the SHPO. Nominations approved by the SHPO are forwarded for consideration to the Keeper of the National Register at the National Park Service in Washington, D.C.

During the time the proposed nomination is reviewed by the SHPO, property owners and local officials are notified of the intent to nominate. Local officials and property owners are given the opportunity to comment on the nomination, and owners of private property are given an opportunity to object to or concur with the nomination. If the owner of a private property or the majority of owners objects to the nomination, the SHPO may forward the nomination to the National Park Service for a determination of eligibility only.

State

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered in the Project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Public Resources Code, Sections 5020–5029.5

This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

California Public Resources Code, Sections 5079-5079.65

This code defined the functions and duties of the SHPO. The SHPO is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

California Public Resources Code, Sections 5097.9-5097.991

This code provides protection to Native American historical and cultural resources and sacred sites, and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Public Resources Code, Sections 5097-5097.994

Native American Historic Resource Protection Act; Archaeological, Paleontological, and Historical Sites; Native American Historical, Cultural, and Sacred Sites (Public Resources Code Section 5097-5097.994) specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. California Public Resources Code 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

> No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres.

California Public Resources Code, Section 5024.1

The California Register of Historical Resources (CRHR) is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historical resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR.

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be "recognizable as historic resources and to convey the reasons for their significance." Under CRHR regulations, "it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register." SHPO has consistently interpreted this to mean that a CRHR–eligible property must retain "substantial" integrity. Because CRHR regulations do not provide substantial written guidance on evaluating integrity, the NRHP bulletin, "How to Apply the National Register Criteria for Evaluation," is used.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; or are city and county-designated landmarks or districts (if criteria for designation are determined by SHPO to be consistent with CRHR criteria).

California Art Preservation Act

Described in California Civil Code §987, the California Art Preservation Act protects the artist's moral rights of integrity and paternity and contains specific provisions covering the right of integrity for art incorporated into buildings. Passed in 1979, The California Art Preservation Act provides protection for "fine art" which includes paintings, murals, sculptures, drawings, or works of art in glass of "recognized quality." These rights exist for fifty years past the artist's death.

Special accommodations are provided for integrity rights for art attached to buildings. If the art cannot be removed from the building without damage to the art, the owner is free from liability for damage caused by such removal, unless the owner waives the right of removal in an instrument in writing signed by the building owner.

If this right is waived and the instrument is properly recorded, then subsequent building owners are bound by the writing. Art which can be removed from a building without damage to the art is protected by the statute. In the latter circumstance, if the owner has made a diligent attempt to notify the artist, without success, or if after receiving such notice, the artist fails to remove or pay for the art's removal within ninety days, then the moral rights protections do not apply.

Local

City of Los Angeles Mural Ordinance

On October 12, 2013, the City of Los Angeles adopted a Mural Ordinance No. 182706 to allow for the creation of new Original Art Murals on private property which seeks to establish a comprehensive network of mural activity and engagement by muralists, property owners, community stakeholders, educators, technicians, technologists, and preservationists in an effort to stimulate Los Angeles' mural resurgence. The City's Department of Cultural Affairs administers the Citywide Mural Program (http://culturela.org/murals/).

Standard Conditions of Approval

The Program EIR included Standard Conditions of Approval (SCs) for minimizing impacts to cultural resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to cultural resource impacts associated with the proposed Project are provided below.

SC-CUL-2 *School Design Guide*: LAUSD shall re-use rather than destroy historical resources, where feasible. LAUSD shall take the following steps when dealing with historical resources:

- Retain and preserve the historic character of a building, structure, or site, where feasible
- Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity, where feasible.
- Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems, wherever feasible.
- Undertake surface cleaning historic structures with the gentlest means possible. Avoid sandblasting and chemical treatments.

SC-CUL-3 *Design Guidelines and Treatment Approaches for Historic Schools*: This document outlines the use of design guidelines as an effective tool for planning and implementing projects that avoid significant adverse impacts to historic resources.

SC-CUL-4 LAUSD shall engage a design team, consisting of an architect and structural engineer, as necessary, with five (5) years' experience applying the *Secretary of the Interior's Standards* *for the Treatment of Historic Properties* (*Standards*). The Design Team, in consultation with the Master Reviewer, shall consider whether and to what extent the proposed project could have a significant impact on the site's historical resources. If the Design Team determines that the proposed project could have a significant impact on the site' historical resources, and the Master Reviewer concurs with that determination, the Design Team shall develop and consider mitigation measures and alternates that could minimize, avoid, or substantially reduce the impacts.

SC-CUL-6 LAUSD shall retain a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture (preservation architect) to review and comment upon project plans through the design development phase for conformance with the adopted mitigation measure or alternative

SC-CUL-7 The preservation architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with the *Standards* and/or avoidance of a material impairment of the historical resources.

SC-CUL-8 LAUSD shall retain a professional architectural photographer and an architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation or closely following the HABS Level II outline format. Documentation shall include drawings, photographs, and written data for each building/structure/element. For all levels of documentation, the following quality standards shall be met:

Large format photographs: Photographic documentation shall include of the current status of all recognized historic resources or any contributors to a historic district and the existing surrounding setting. Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure, or object. Each view shall be perspective corrected and fully captioned. All shall be archivally processed and prints shall be made on fiber-based paper. Two original negatives (large format 4-inch by 5-inch black and white negatives) shall be made at the time the photographs are taken, two sets of contact prints, and three sets of 8-inch by 10-inch prints shall be processed.

- One set of negatives and one set of contact prints shall be archived at the National Park Service for entry into the HABS collection in the Library of Congress

- One set of negatives and one set prints shall be archived at Los Angeles Public Library at the Central Library.
- One set of prints shall be archived at the Los Angeles City Historical Society.
- One set of prints shall be archived at LAUSD.

Narrative description: 1) Written history and description shall be based on primary sources to the greatest extent possible. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project; 2) the architectural historian shall prepare a narrative description (closely following the HABS Level II outline format) of historical architectural resources, including Department of Parks and Recreation (DPR) series forms.

Document Submittal: The draft documentation shall be assembled by the architectural historian and submitted to the LAUSD Architectural Master Reviewer for review and comment. Architectural Master Reviewer shall give final approval prior and receive final documentation prior to submittal to the repositories and prior to work on the project. LAUSD shall submit the LAUSD-approved final documentation to the Los Angeles Public Library at the Central Library and the South Central Coastal Information Center.

SC-CUL-9 LAUSD shall provide SHPO and the Los Angeles Conservancy copies of all negative declarations and environmental impact reports.

SC-CUL-10 LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.

SC-CUL-11 LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.

SC-CUL-13 In the event historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.

3.2.5 METHODOLOGY

Five historic resource evaluations have been completed for the Project site, including the 2018 CRTR prepared by ASM.

PCR Services Corporation (now ESA) completed a Historic Resource Evaluation (HRE) Report in 2015 regarding Roosevelt High School that included a site visit, historical research, and evaluation of the campus against NRHP and CRHR criteria.

ESA's Architectural Historians conducted an initial site visit with the project team on June 2, 2016, to document the landscape and features associated with the school's historic and cultural significance. The site visit included intensive-level survey of the campus and the immediate surrounding vicinity with the project team including digital photography and visual inspection. All survey work was consistent with procedures previously established by local, state, and federal guidelines for conducting historic preservation work. The site inspection yielded the identification of landscape and cultural resources on the Roosevelt High School campus. Features, no matter how small, were considered. Identified features include the following: entrance steps to the Auditorium and Classroom Building, the Lindberg Fountain located in the small quad, the Japanese Garden, Quad, murals, class tiles, and benches.

A follow-up visit by ESA Architectural Historian was conducted on September 19, 2016, to complete onsite research at the school's library and complete a secondary site inspection, including digital photography and visual inspection, of Roosevelt High School to document the landscape features associated with the school's historic and cultural significance. The secondary site inspection yielded results concurrent with the first site inspection.

ESA staff conducted site-specific research on the campus, including a review of Sanborn Fire Insurance Maps (Sanborn Maps), historical aerials and architectural plans, California Index, Avery Index, Online

Archive of California, USC Digital Collections, historical Los Angeles Times, American Institute of Architects (AIA) historical directory, SurveyLA, and other published sources. In addition, on site library research was conducted. Yearbooks from 1928, 1933-36, 1942, 1950, and 1997 were studied in order to understand key moments in the history of the school's landscape and potential historic resources. Given that Japanese students were removed from Roosevelt High School during World War II (WWII), the 1942 and 1950 yearbooks were considered in order to understand how WWII affected the demographics of the campus and campus culture. Commemorative plaques and murals were also reviewed on the secondary site visit in order to see how the landscape and cultural features have changed over the course of the school's history from its construction in 1922 to its current status and condition today.In addition to the site visits and archival research, interviews with several alumni were conducted to gain insight from those affiliated with the school and its landscape and cultural resources. Roosevelt High School

Subsequently, a Supplemental Historic Resource Evaluation Report (HRER) for Roosevelt High School, Los Angeles, Los Angeles County, California was completed by ASM Affiliates, Inc. (ASM) for the Project site. The evaluation was limited to the school's eligibility for listing in the NRHP under Criteria A and B and the CRHR under Criteria 1 and 2, and as a CEQA historical resource. The evaluation was conducted in conformance with NRHP guidance on conducting historic evaluations (specifically NRHP Bulletin *How to Apply the National Register Criteria for Evaluation* [1998]) and the SHPO *Instructions for Recording Historical Resources 1995, with Status Codes updated 2003*, Technical Assistance Series #7 *How to Nominate a Resource to the California Register of Historical Resources*, and CEQA. The focus of this fourth evaluation was to determine the association of Roosevelt High School with significant themes and events in Latino history.

To begin this evaluation, ASM conducted background research into the Blowouts and the Roosevelt High School campus, concentrating on the Chicano civil rights activities in 1968 and 1970. Sources included databases of historic newspapers such as the *Los Angeles Times* and *La Raza*, Los Angeles County Assessor's maps, historic photographs, documentary and fictionalized video accounts of the Chicano civil rights movement at schools in East Los Angeles, and historic aerial photographs. Historic architectural drawings and construction documents provided by the LAUSD Office of Environmental Health and Safety (OEHS) were reviewed prior to visiting the campus. A number of academic and professional sources were consulted, including PhD dissertations and articles from scholarly periodicals, and a number of books on the subject of the Blowouts were consulted (titles are listed in the HRER, Attachment C: Bibliography). Attempts were made to contact teachers and students who were associated with Roosevelt High School during the walkouts, including teachers who taught students about the Blowouts in subsequent years. Roosevelt High School yearbooks from 1968 through 1971 held at the Roosevelt High School Library were searched for information about the campus at the time of the protests. Los

Angeles Board of Education minutes available at the UCLA Special Collections were examined for pertinent information. A site survey was conducted by ASM Architectural Historians Shannon Davis and Marilyn Novell on February 9, 2017, to document the campus through photographs and extensive notes. Particular attention was paid during the survey to identifying on-campus sites associated with the 1968 walkouts, based on background research.

ASM carefully considered the Roosevelt High School campus as potentially significant under NRHP and CRHR, for its association with important events in Chicano history (Criteria A/1) and important people (Criteria B/2) associated with the 1968 walkouts at Roosevelt and other LAUSD high schools, as well as protest activities that continued at Roosevelt through 1970.

ASM reviewed the SurveyLA findings for Boyle Heights and other prior reports, including a preliminary historic resource evaluation report.[2] ASM referred to the *LAUSD Historic Context Statement, 1870-1969* (LAUSD 2014) for guidance in the evaluation of the Roosevelt High School campus as a historic district within the context of LAUSD's nearly 800 campuses and the *Latino Los Angeles Historic Context Statement* prepared for City of Los Angeles Department of City Planning.

As part of the ASM report, an intensive archaeological survey was conducted of the entire Roosevelt High School campus. No previously undocumented archaeological resources were identified as a result of the survey. However, the records search revealed the potential subsurface presence of an historic water conveyance feature, a branch of the Zanja Madre, that ran across the northwest corner of the Project site in the late nineteenth century.

National Register of Historic Places (NRHP) Criteria

The NRHP Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. Properties significant for their association or linkage to events or persons important in the past are examples of areas for Criterion A and B.[3] ASM cites Criteria A and B as being significant for the Project site:

Criterion A An event, a series of events or activities, or patterns of an area's development.

According to the NRHP Bulletin *How to Apply the National Register Criteria for Evaluation*, A property can be associated with two types of events:

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2 GPA and Nicolaides, *SurveyLA Latino Los Angeles Historic Context Statement*, 2015

3 National Register Bulletin. *How to Apply the National Register Criteria for Evaluation*. 1998.

- A specific event marking an important moment in American pre-history or history
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Criterion B Association with the life of an important person.

Applications of Criterion B can be seen with a significance of the individual, association with the property, comparison to related properties, association with groups, association with living persons, association with architects/artisans, and/or Native American sites.

California Register of Historical Resources (CRHR) Criteria

The CRHR Criteria by to the SHPO refers to definitions of an historical resource. An historical resource must be significant at the local, state, or national level, under one or more of the four criteria.[4] ASM cites Criteria 1 and 2 as being significant for the Project site:

Criteria 1 It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criteria 2 It is associated with the lives of persons important to local, California, or national history.

3.2.6 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the *State CEQA Guidelines*, a project would have a significant effect on the environment if the Project would:

CUL-1 Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;

CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;

CUL-3 Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature; and/or

CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

4 California Office of Historic Preservation. Technical Assistance Series #7 *How to Nominate a Resource to the California Register of Historical Resources*. 1997

An Initial Study was prepared that determined the Project would have a less than significant impact or no impact related to the following thresholds:

CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;

CUL-3 Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature; and/or

CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

Therefore these thresholds are not analyzed in this EIR. The Initial Study is provided in Appendix 1.0 of this EIR.

3.2.7 IMPACTS AND MITIGATION MEASURES

CUL-1 Would the **Project would cause a substantial adverse change in the significance of a historical resource?** ***Significant and unavoidable impact***

The HRER completed by PCR Services Corporation in 2015 found that the campus and its building are too altered from its period of significance (1922-1936) to retain enough integrity to be considered for local, state, or national designation although it is associated with several themes, including: Progressive Educational Movement, Pre-1933 Long Beach Earthquake Plants (1910-1933), Mediterranean Revival and Spanish Colonial Revival, post 1933 Long Beach Earthquake Schools (1933-1945), and the Educating the Baby Boom: Postwar Modern Functionalist School (1945-1969). The Auditorium and Classroom Building and another classroom building date to the period of significance, but most buildings date to the 1960s. In addition, Roosevelt High School has been significantly altered and expanded since 1936 and fails to express the original plan or design. As such, the study found the school is ineligible for listing as an historical resource at either the federal or state or local levels and was assigned a California Historical Resource status code of 6Z.

As a result of the surveys, research, and oral interviews carried out by ESA in 2016, seven features on campus were analyzed further:

- Auditorium and Classroom Building 1 Entrance Steps,
- Lindberg Memorial Fountain and Courtyard,
- Class Tiles,
- Japanese Garden,

- Central Quad and Gazebo,
- Benches,
- Murals.

Auditorium and Classroom Building 1 and Entrance Steps

Roosevelt High School opened to students in 1923 with one main building, the Auditorium and Classroom Building 1, fronting S. Fickett Street. This building, designed by Hunt and Burns, was damaged in the 1933 Long Beach earthquake and subsequently retrofitted for safety. In 1936, the architectural firm of Hibbard, Gerity, and Kerton was hired to renovate and strengthen the original 1923 building. The remodel lacked its original decorative brickwork and ornamentation but obtained a distinctly Art Deco/Streamline Moderne, 1930s look. Currently this building no longer retains the ornamental integrity as a result of extensive alterations.

In 1923 when the school opened, the entrance steps to the Auditorium and Classroom Building 1 lead from Fickett Street to the school. Traditionally, formal school class and club photographs were taken on the front steps, especially for early yearbooks. In addition, images of the front entrance and steps appear in yearbooks as front and back matter throughout the history of the school. Often in these yearbook cover photographs students are absent from the images thereby showing this entrance symbolized the identity of Roosevelt High School. However, as the school expanded in the 1960s, Fickett Street was vacated and its land incorporated into the school's campus; direct views and access to the Auditorium and Classroom Building 1 had been compromised and, currently, the steps are only seen by those on campus rather than passers-by and, as such, are and can no longer be considered the image and identity of the school.

The primary entrance of the Auditorium and Classroom Building 1 is located on the west elevation and consists of four sets of single-pane Kalamein double doors (alteration, metal security screens) and steel multi-pane fixed transom windows divided by a fluted column (alteration, once had decorative cast stone capital). Concrete stairs with two landings lead to the primary entrance. This building has beel altered extensly; however, the front entrance steps do not appear to have been altered except for new paint colors. The primary elevation of Auditorium and Classroom Building 1 has lost its original relationship to Fickett Street and now the elevation fronts a landscaped Quad with gazebo.

Lindberg Memorial Fountain and Courtyard

Located near the northern end of the rear elevation of Classroom and Auditorium Building 1, the Lindbergh Memorial Fountain occupies the center of a rectangular quad enclosed by a covered walkway. The Lindbergh Memorial Fountain was dedicated on January 28, 1930 to commemorate the accomplishments of Charles Lindberg. An account of the dedication ceremony was published in the *Los Angeles Times* and described the fountain as follows:

> *The fountain is of colored cement and was designed and built by the class in manual training under the supervision of Thomas Fellows, instructor. It forms a modernistic ellipse in the center of the patio, the modeled likeness of a winged Lindbergh rearing up from the waters of the pool. Two years were required in completing it.*

Based upon historical yearbook photographs and the Los Angeles Times article, the Lindbergh Memorial Fountain appears to have been constructed of integrally colored concrete, flanked by urns on pedestals, and surrounded by a concrete pathway centered in a landscaped rectangular quad. The original fountain contained water and lily pads. Along the rear elevation of the Auditorium and Classroom Building 1 was an arcade where class year concrete medallions and a wall fountain were attached. The arcade encircled the rectangular quad. At an unknown date the central decorative water bubbler was replaced with a collection of stacked rocks.

The Lindbergh Memorial Fountain and courtyard functioned as the primary gathering area on campus from its completion up to the 1960s expansion. Yearbooks photographs indicate this area was a popular spot for photographs and social meetings.

By the early 1990s the Lindbergh Memorial Fountain had fallen into disrepair and a fundraising campaign was initiated in 1995 for its restoration. In 2005, the Lindbergh Memorial Fountain was restored. A commemorative plaque installed adjacent to the fountain as part of the restoration effort describes a similarity between Lindberg's first non-stop transatlantic flight and the diversity of Roosevelt High School's demographics, and states "Roosevelt High School Students Who Hail From All Over The Globe." The restoration included the installation of colorful enamel tiles to the concrete water fountain and a new central water feature, and paved the concrete walkway with square Spanish tiles while preserving a small section of original concrete with writing.

The fountain has an elliptical shape and is covered by colorful enamel tiles (alteration). At the center of the fountain is a modern tiered concrete water fountain (alteration); however it does not currently contain any water. Surrounding the fountain is an original walkway connecting the west and east portions of the campus that has been covered with Spanish red tiles (alteration). The remainder of the quad is planted with grass and four original palm trees shade the east side of the fountain. Red benches are arranged in pairs along the perimeter of the courtyard.

Class Tiles

Little historical background information is available on the class tiles. A grouping of small class tiles above a circular medallion is located on the rear (east) elevation of the Classroom and Auditorium Building 1 that commemorate the graduating classes of 1956 to 1969. Each tile presents the letter "R" and a date of the class graduation. The concrete medallion appears to have the date of 1930 incorporated within the design. The tiles appear to be ceramic and are either glazed or painted to emphasize the content. Historically the class tiles were located on the arcade (now removed) that once encircled the Lindbergh Memorial Fountain and courtyard and were relocated to their present location at an unknown date. It appears that some of the class tiles are missing.

Japanese Garden

In 1931, the Roosevelt High School Japanese Club students, led by Shigeo Takayama (president), created a 200 square foot Japanese garden at the northern side of the Edith Roosevelt House, a structure that once housed Roosevelt High School social activities for the entire school. A formal dedication ceremony, announced in the *Los Angeles Times*, was held on December 11, 1931. Prominent members of the Japanese community joined teachers and students:

> *The Program included addresses by T. Satow, Japanese Consul K. Shimano, principal of the First Japanese-American Teacher's Institute, and Prof. Ken Nakazaws, University of Southern California, and musical numbers and dances by Miss Clara Suski, accompanied by Miss Mary Shibato, Tatsuko Nakajuma by Miss Tsuyako Mayeda, Miss Ruth Watanabe, and Miss Grace Sumida. Among the guests were Eizo Masuyama, representing the alumni of the Japanese Chamber of Commerce, Roy Yamadera, president of the Japanese Club of Roosevelt High School, Mrs. Elysabeth Louise Clark of the Board of Education, G. Millage Montgomery, principal of Roosevelt High School, and Mrs. C. H. Richmond, philanthropist.*

Based on yearbook photographs from 1932 to 1936, the focal point of the garden appears to have been a wooden bridge arching over the pond known as the "Bridge of Sighs." A concrete lantern placed on a large rock near the bridge symbolically provided light to the garden. The garden also included rocks, trees, shrubs, and a wood pavilion, and was enclosed by a fence that separated the space from the rest of the campus.

The Japanese garden appears to have been an important aspect of the Roosevelt High School campus for students. A full page is dedicated to the Japanese Club in the 1933 yearbook and expressly mentions the role the club played in building a Japanese garden on campus. In addition, the full-page spread notes that the club first started in 1928 and was involved in the school and local community. In reviewing Roosevelt High School yearbooks since the garden's construction, the garden was an important backdrop that appears regularly in photographs. In the 1935 yearbook, for example, non-Japanese students are photographed sitting on the garden's bridge at least three times. Japanese cultural activities were important to Roosevelt High School's student life and include "Japanese Belles", a picture of Japanese girls in traditional attire.

Due to the political climate of World War II, the original garden was destroyed shortly after the bombing of Pearl Harbor (December 7, 1941) and Japanese American Roosevelt High School students along with their families were sent to Japanese internment camps. The 1942 Roosevelt High School yearbook does not include photographs of students in the garden. Instead, students and faculty were photographed around the Lindbergh Memorial Fountain.

The garden would later be reconstructed in 1996 by Roosevelt High School students who learned about the history of the former garden while studying constitutional rights and the Japanese language. Interested in bringing back the school's cultural history and making peace with past injustices, the students teamed with faculty and alumni, including Bruce Kaji, Jun Yamamoto and Bud Weber, to re-create the garden in front of the southern end of the Auditorium and Classroom Building 1's rear elevation. Yosh Kuromiya volunteered to design the garden and contractor Ko Endo supervised the work. Upon completion of the garden, the school held a rededication ceremony to celebrate the new garden, similar in some ways to a tree planting ceremony held at the original garden in 1937. Photographs of the re-created garden show the garden as very simple with a handrail-less arched bridge over a dry creek bed.

In 2005 the garden was once again revitalized with a pond, arched bridge, and plantings. Through the generous donations of Shigeo Takayama, a former student and president of the Japanese Club, landscape contractor Haruo Yamashiro was hired to enhance the Garden. At this time the garden was renamed the 'Garden of Peace.'

The present Japanese garden is inspired by the original Roosevelt High School garden, as well as traditional Japanese garden design. The focal point of the tiered garden is a 'natural' shaped koi pond with rock waterfall and arched wood bridge. The waterfall creates a pleasant background sound to the tranquil garden to appeal to all senses. Other features scattered within the garden include meandering concrete pathways, concrete lanterns, variety of rocks, paver stones, a concrete water basin, a vertical standing stone, and concrete bamboo-style edging. There are two monuments, a bronze plaque mounted on a rock and the 'Garden of Peace' marble monument, located at entrances to the garden explaining the history and meaning of the garden. The garden's asymmetrical design offers organic views through the unpredictable growth of its plantings. There are many different types of plants including ferns, shrubbery, bamboo, and trees. A pine tree has been trained to arch over the pond.

Central Quad and Gazebo

The central quad and gazebo was created after the campus expanded to the west and the Administration and Classroom Building 5 was constructed in 1969. The gazebo has a Division of the State Architect construction date of 1975. Buildings 1, 2, 4, and 5 frame the central quad and gazebo. The quad is a formally designed space with clearly designated pathways and grassy areas with the focal point being a gazebo. Students use the quad during lunch time and as a central social space.

Benches

A collection of red benches dated 2005 are located throughout the Roosevelt High School campus. Benches are located adjacent to the Lindbergh Memorial Fountain courtyard, in the courtyard between the East Classroom Building and the Industrial Arts Building, and in front of the Physical Education Building. The benches are generic and appear to be made of concrete. Three elements, however, provide decoration: two tiles that match the tiles on the Lindberg Memorial Fountain are on either side of the benches, a Rough Rider relief is centrally located along the back of the benches, and a commemorative plaque surrounds the relief. An artist named Licari signed the Rough Rider reliefs. Plaques such as "donated by the Enriquez Family, 1962, '64, '66, '67" or "Ellis Paint Company, RSHBeautification.com" suggest the community sponsored the benches.

Murals

Roosevelt High School has a long-standing history of student involvement with social issues affecting the community and education. The book *Critical Media Pedagogy: Teaching for Achievement in City School,* co-written by Roosevelt High School teacher Jorge Lopez, states:

> *Roosevelt High has a long history of community engagement, demonstrating a culture of resistance that dates back to the 1940s and characterized by radical Jewish youth clubs, community organizing against the 1954 "Operation Wetback," the student walkouts of the late 1960s, and student's continuing involvement in both the Chicano movement and the immigrant rights struggle. Students have always been at the forefront of movements of resistance that address unjust wars and laws and overcrowded schools and demand ethic studies classes, educational justice and equitable school conditions, and an end to the criminalization of youth*.

The author states student meetings would occur in classrooms during lunch or after school; however, not all meetings were held exclusively at Roosevelt High School. During the 1960s walkouts, students from the Eastside would meet in a community space across the street from Roosevelt High School, while other meetings would occur in classrooms or during lunch, or in community spaces, such as Primera Taza Café, Self-Help Graphics, Casa 101, Corazon del Pueblo, or InnerCity Struggle.

The campus murals are powerful expressions of the Roosevelt High School student social activism, culture, and community struggles. The Art for Revolutionary Teens Club (ART Club) was founded in 2009 by a small group of students who received a grant to paint a mural incorporating elements of the urban graffiti art style. Eventually the ART Club earned the financial support of the Salesian Boys and Girls Club and became a weekly club meeting where students would plan mural and oral history projects. In part, Mr. Lopez is responsible for the success of the afterschool art program through his relentless proposal and grant writing campaigns that would garner financial aid to support the program. Mr. Lopez also brought in the support of prominent community muralists, including Raul Gonzalez from Mictlan Murals and Wenceslao Quiroz, a former Roosevelt High School student, who would help the club develop the social themes, iconography, and designs of the murals.

Four exterior murals and one interior mural will be discussed further in this section, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural.

Harvey Milk Day of Service Mural

The Harvey Milk Day of Service mural is painted on the north wall of the lobby in the Auditorium and Classroom Building 1. The mural wraps around the corners to the east and west walls. This mural project was led by prominent muralist Wenceslao Quiroz, along with the ART Club, Taking Action, Student Voices, and the Gay Straight Alliance. Painted in a street style and inspired by famous muralist Diego Rivera, the mural addresses the "community's history of struggle and resistance and empowers young people with images of youth protesting and engaging in direct action to secure ethnic studies and educational justice." The mural includes images of the Mexican Revolution, the Zoot Suite riots, the 1968 walkouts, the student struggle for Chicano/a studies, and Harvey Milk. At the top center of the mural, above the display case, is Ramona, a Zapatista indigenous leader from Chiapas, Mexico who symbolizes mother earth. With her out-stretched arms, Ramona is shackled from her wrists and chains are connected to students protesting below her. The background is infilled with multi-colored dots representing protestors, some of whom are holding signs exclaiming 'Si Se Puede,' 'Arte es Vida,' 'Resist' and 'Knowledge of Self.' A photo of the mural taken shortly after completion shows an image of Harvey Milk was painted within the display case, but at the time of ESA's site visit, paper was covering this area. At the bottom of the east wall, the following is written 'Harvey Mike Day of Service = Roosevelt, CNMT, Ben Gertner, Principal" along with a list of organizations and donors. The mural is not signed by the artists involved with the work or dated.

Agricultural Murals (3)

Mr. Lopez worked with local artist Raul Gonzalez, local artist Sonji Mictlan, and Roosevelt High School students to create the murals on portable buildings 38 and 39 facing the planting beds in March 2012. The mural on the south elevation of building 39 depicts a hummingbird flying over a surrealist agricultural landscape where the continental land masses are pulling away from earth. Hummingbirds and butterflies are imagery often depicted in Ms. Mictlan's work. While the mural on the north elevation of building 38 is more realistic; a contemporary Hispanic woman and Monarch butterfly tends to vegetable plots with a Mayan temple in the background. Neither of these murals is signed or dated.

The third mural is located on the south elevation of portable building 38. The focal point is two pairs of hands dropping seeds in an open book. The left background shows a traditional agricultural landscape with workers toiling in the fields contrasted against the right background showing Downtown Los Angeles amidst the protests of students and a young man balancing the weight of culture on his shoulders. This mural is signed by the following artists at the bottom left corner: Jorge Lopez, Basilio Carmona, Michael Estrada, Now Ramos, Alexis Resendiz, Keyla Ramos, and Claudia Torres. The bottom right corner is dated 2013 and lists the following organizations and artists: Cornerstone Theater Food Justice Class, David Hernandez, Cesar Ramos, Brian Mora, Saul Rosas, and Francisco "Enuf" Garcia.

Avenue of the Athletes

Avenue of the Athletes mural by Carlos Callejo (class of 1969), Alvaro Alvares (class of 1979), and Mike Moline (class of 1979) is located just north of the entrance steps to the Auditorium and Classroom Building on the north elevation of portable building 39. ESA interviewed Carlos Callejo regarding his participation in creating the Avenue of the Athletes mural. Mr. Callejo attended Roosevelt High School and participated in the Chicano Liberation Movement, including the 1968 East Los Angeles walk-outs at Roosevelt High School. Mr. Callejo, now a renowned muralist, was asked to create a mural about Roosevelt High School athletes, which portrays students from the school that went on to become professional athletes. Mr. Callejo explained that the project was a pleasure to work on and he expressed that he still feels a connection to Roosevelt High School and the Boyle Heights community.

The composition of the Avenue of the Athletes mural is divided into colorful triangles. The middle triangle depicts the Los Angeles Memorial Coliseum and is flanked by the Roosevelt High School school mascots in circles. At the forefront of the mural are a collection of prominent athletes and in the background are other athletes actively engaging in their sports. Each athlete is identified by name. The mural's artists are identified in the bottom right hand corner of the mural. The mural is not dated. In front of the mural is a bronze plaque naming the area the 'Avenue of the Athletes' and providing acknowledgements to individuals and companies involved with the beautification project.

Preliminary Historic Resource Evaluation Report Findings

The *Preliminary Historic Resource Evaluation Report for Theodore Roosevelt Senior High School* (PCR 2015) considered Roosevelt High School under several LAUSD themes: *Progressive Education Movement: Pre-1933 Long Beach Earthquake School Plants (1910-1933)*, *Post-1933 Long Beach Earthquake School Plants (1933-1945)*, and *Educating the Baby Boom—The Postwar Modern, Functionalist School Plant (1945-1969)*. The evaluation found the campus not eligible under any of these themes because of lack of integrity. However, the discussion is restricted to the school's significance as it relates to architecture (Criteria C/3), whereas these themes are clearly defined in the LAUSD Historic Context Statement (LAUSD 2014) as associated with significant events (Criteria A/1).

Under Criteria A/1, the PCR report found Roosevelt High School not eligible as it relates to activities by the Chicano Liberation Front (CLF), which "do not appear to have been a significant event that shaped the history of the campus or the pursuits of the terrorist group" (PCR 2015:10). This report appears to disregard the 1968 Blowouts (further described below), in which the CLF could not have participated because the group was not formed until 1970 or 1971. A self-described revolutionary organization, the group claimed responsibility for numerous bombings in Southern California, including those at Roosevelt High School in 1970 (Notes from Aztlán 2014).

Under Criteria B/2, the PCR report found Roosevelt High School not eligible because it "is not identified with the productive life of any individual District teachers, principals, administrators, students, or any other persons important in our past" (PCR 2015:10).

BACKGROUND AND HISTORY OF THE EAST LOS ANGELES BLOWOUTS

The SurveyLA *Latino Los Angeles Historic Context Statement* describes the roots of segregation and discrimination against Mexican students in Los Angeles public schools in the Progressive era, when "Americanization" was the goal in educating immigrants. Mexican-Americans at the time had a similar attitude, and in 1929, the oldest Latino civil rights group in the U.S., the League of United Latin American Citizens (LULAC), was founded with a mission of empowering Mexican-Americans through assimilation. A combination of good intentions and prejudice against Mexicans over decades led to the placement of Mexican students in vocational rather than academic programs and resulted in widespread segregation in the schools. These conditions had become institutionalized by the 1940s, setting the stage for the 1954 landmark *Brown v. Board of Education* decision that officially ended school segregation, although factors such as ethnically separate neighborhoods, language, and economic status contributed to a continuation of de facto segregation.

Although it is difficult to trace the East L.A. Blowouts (also known as the Walkouts?) to one particular group or person, the Mexican American Youth Leadership Conferences for high school students held at Camp Hess Kramer were certainly a contributing factor. Hundreds of Mexican-American student leaders gathered at the annual conferences, which were intended to promote citizenship but also became forums for discussing problems at the schools. In 1963, Sal Castro had just begun his teaching career at Belmont High and volunteered at the conference. There he found hundreds of students from all over L.A. County who all expressed similar grievances about poor conditions in the schools and lack of opportunity for Mexican-American students. At the time, dropout rates for Mexican-American students in 1968 in East L.A. were among the highest in the nation: 45 percent at Roosevelt, 57 percent at Garfield, 39 percent at Lincoln, and 35 percent at Belmont. Castro described the conferences and the 1968 Blowouts as "one big package" (Ochoa 2010). The low rumble of unrest became clearly audible when Castro came across the infamous article in *Time* magazine called "Minorities: Pocho's Progress," which described "the bleak barrios" of East L.A. as full of "rollicking cantinas with the reek of cheap red wine and greasy taco stands and the rat-tattat of low-riding cars down the avenue." Castro was enraged that his community and people were viewed in that way and began organizing meetings with students from Lincoln, Wilson, Roosevelt, and a few other schools. This loose organization eventually led to the 1968 Blowouts.

Under this cloud of unrest, in the fall before the Blowouts took place, Castro was teaching at Lincoln High. Students there told him they wanted to walk out in protest and asked for his help. "Don't walk out," Castro advised them, "organize." A Blowout Committee was formed at four East L.A. schools (Roosevelt, Lincoln, Garfield, and Wilson), and another committee included students from all four schools. Belmont High was not among the original four schools that organized the Blowouts. Belmont had a lower percentage of Mexican-American students, but they formed their own Blowout Committee soon after and walked out on March 8, along with the other schools. The result was what some called the "Mexican-American revolution of 1968." In the largest chain of events of its kind, for a week and a half students, parents, activists, and teachers participated in walkouts and demonstrations, made speeches, and held sit-ins. Anxious LAUSD officials responded by calling in law-enforcement and holding emergency sessions of the Board of Education.

Heeding Castro's advice, students had taken their grievances to the Board before organizing the walkouts. The Board invited them to speak at the upcoming meeting, but the students notified Board member Julian Nava of their intention to walk out of school and instead requested that Board members meet with them the following morning at a neutral location—either Hazard Park or adjacent to a nearby school district office. Nava, the only Mexican-American on the Board, played an important role in this meeting. He introduced the students' list of demands, a Brown Berets pamphlet, and an anti-walkout flyer by a Mexican-American student organization with a headline reading "NO MORNING WALKOUT!!!" The documents illustrated a lack of unity among the Mexican-American students regarding the walkouts.

The first round of Blowouts took place at five LAUSD schools in East L.A. and near downtown. Roosevelt, as well as the other high schools that participated in the first round of protests—Lincoln, Garfield, Belmont, and Wilson,had predominately Mexican-American student populations (80 to 82 percent at Roosevelt) (Reich 1968). Preceding the planned Blowouts, on March 1, 1968, approximately 500 student protesters walked out of Wilson High in a spontaneous reaction to the cancellation of a school play that was considered inappropriate. In solidarity, the central Blowout Committee swiftly called for walkouts at the remaining schools. Then, on Tuesday, March 5, the first organized "official" walkouts took place simultaneously at Garfield, Roosevelt, and Lincoln high schools.

At first, school and police officials did not know how to respond to the walkouts. At Lincoln High, administrators allowed the students to leave the school grounds peacefully, and police escorted them to a nearby park where they held rallies. When the walkouts began to spread to other schools, officials from the school district and the Los Angeles Police Department (LAPD) took a harder line. At Roosevelt High on March 5, administrators locked the gates that surrounded the school to prevent striking students from leaving, and LAPD squad cars massed around the campus to intimidate the strikers.

On Wednesday, March 6, students at Roosevelt walked out again and gathered outside the school on 4th Street and on Mott Street. At about 2 p.m., police broke up the groups of students and took several into custody. Two days later, when Roosevelt principal Thomas C. Dyer heard students discussing whether or not to walk out, he invited them to attend an assembly in the school auditorium. At the assembly, he emphasized restraint in the protests and pledged that there would be no disciplinary action as long as there was no violence. After the assembly, Dyer decided to dismiss school early and enlisted 10 or 12 teachers to escort students to exits where they would not have to cross police lines. Meanwhile, students were coming up to Dyer to report on ongoing violence against Roosevelt students. Although Dyer believed that some of the reports were exaggerated, he later stated he thought both the police and the students had overreacted.

Other reports of the events vary from the account provided by Dyer. According to reports to the Board, officials alleged that students at Roosevelt left classes at the urging of outsiders, including members of the Brown Berets. Another account adds that Victoria Castro, a college student who was formerly at Roosevelt, attached her car to the locked gate in the chain-link fence and pulled it open, allowing the students out in the street. The crowd walked to Evergreen Park and returned to the school to urge other students to leave classes, whereupon the crowd assembled on the sidewalks outside the school. The students purportedly began hurling objects at passing motorists. The police arrived and declared an unlawful assembly, attempting to clear the sidewalks and break up the crowd. Violence reportedly ensued, and a police officer was hospitalized. The police took numerous youths into custody and placed a 15-year old under arrest in connection with the injured officer. The administration dismissed classes, and the student demonstrators soon left.

On March 7, Belmont students walked out. Later that day, a large crowd began to assemble at the Board meeting. The group included African American students, parents, community organizers, and Chicano students and activists from East L.A. Although African American students at Jefferson High in South-Central L.A. were simultaneously protesting, they took a different approach than the Chicanos. The African American students presented only four demands, whereas the East L.A. students presented many more. The East L.A. students also had to contend with dissent from other students within the school as well as the community. Although the Jefferson students appeared to be walking out in solidarity with the Mexican-American students, these differences resulted in separate demonstrations and distinctly different calls for change.

On Friday, March 8, more than 1,000 students boycotted classes for the fourth straight day at Roosevelt, Garfield, Lincoln, and Wilson high schools. The same day, teachers at predominately black Jefferson High dismissed classes as a concession to student militants (McCurdy 1968). Nineteen juveniles and one young adult were arrested at two other schools. Student leaders vowed to continue the boycott unless the Board agreed to meet with them at Lincoln High or on some other neutral ground. The students convened at Hazard Park, 2230 Norfolk Avenue, for a mass protest. Also at the meeting were Board members Julian Nava and Ralph Richardson, and state representative Edward Roybal. Nava pledged that no disciplinary action would be taken as long as no violence [by protesters] occurred.

At a special meeting on March 11, 1968, student body representatives from Garfield, Lincoln, Wilson, Belmont, Roosevelt, Jefferson, Hamilton, and Marshall high schools spoke before the Board and presented a list of 36 demands. Meanwhile, District Superintendent Jack Crowther was seeking ways to establish control over students. In a memo dated the same day addressed to selected school administrators, Crowther set forth mandates that would assign responsibility for future demonstrations "on or adjacent to school sites caused by an individual or a group whether students or otherwise." The memo stated that law enforcement would "be in charge of all law enforcement aspects of the situation utilizing all appropriate means available" and that school officials or community organizations were not to interfere with the operations of law enforcement. Crowther singled out "Garfield, Lincoln, Roosevelt, and Wilson in East Los Angeles; Belmont in downtown Los Angeles; and Jefferson and Carver Junior High School in South Central Los Angeles." By establishing a policy that applied to those specific schools and not the District as a whole, all students attending these schools became suspect, regardless of their degree or lack of participation in the demonstrations.

At a subsequent special Board meeting on March 26, held at the Lincoln High School auditorium at the request of the students, the Board presented their responses to each of the 36 demands. Sal Castro, advisor to the protesting students, presented a student representative of the Blowout Committee from each of four schools (Lincoln, Roosevelt, Wilson, and Garfield). Presentations were also made by students, parents, and teachers from the high schools, and a member of the Brown Berets (Board 1968b). Although the Board was in agreement with many of the demands, the responses essentially refuted or defended against each, citing inaccuracy of statements regarding conditions and financial constraints. The Board also presented figures to illustrate their claim that the pupil-to-teacher ratios at the four schools were comparable to or lower than those of schools in more privileged areas.

Thirteen activists (who came to be called the East L.A. 13), including Lincoln High teacher Sal Castro, were indicted by the County Grand Jury a few months after the protests. Charged with conspiracy for having planned the demonstrations, the organizers faced a total of 66 years in prison if convicted. Charges were struck down two years later by the California State Appellate Court.

The Legacy of the Blowouts

In the immediate aftermath of the Blowouts, a lengthy *Los Angeles Times* article was titled with the query "Start of a Revolution?". The story placed the recent demonstrations within the context of the past and speculated about the future of education in East L.A. Since WWII, leaders of the Mexican-American community had been calling for "unity, change, better education, civil rights, economic opportunity, and an end to what they called second-class citizenship." When the students walked out in March of 1968, the community supported them. People of a previously conservative older generation jammed the school Board meetings and shouted their approval of the demonstrations, and parents joined their sons and daughters in marches and sit-ins. Within a week after the Blowouts, claims were already being made that they heralded a powerful new unity in "brown power" that was drawing national attention and enthusiasm. Some were less optimistic about the long-term effects, saying "they'll wait a while before they'll believe a few thousand school children can lead the typically divided, splintered Mexican-American millions into becoming a unified power."

The 1968 Blowouts focused national attention, for the first time, on urban Chicanos as a vocal, assertive minority group. "It was a definite break with the past," stated Mexican-American historian Rudy Acuña. "Before the walkouts," he continued, "all through the civil rights movement, people said Chicanos didn't do things the way the blacks did. But when they saw the results of the blowouts, there was no turning back." Dr. Julian Nava, a member of the Board of Education during the walkouts, said "[t]he schools will not be the same hereafter."

The 1968 Blowouts differed from previous protests by Mexican-Americans in that the students who walked out of schools in Los Angeles were explicit in insisting that it was education as a social institution that was failing for Latinos and in demanding educational equality. As one Latino scholar put it, "[t]he walkouts of 1968 were fundamentally important because, far from simply turning away from schooling, Chicana/o students intended to take back their schooling." Concurrent with the national climate of unrest surrounding civil rights in the 1960s, Mexican-American students in Los Angeles began to request and demand smaller classes, more Latino teachers, bilingual classes, counseling for college entrance rather than automatically channeling Latino students into vocational programs, and a curriculum that addressed Latino history and interests.

As an indication of the significance and continuing influence of the walkouts to the Mexican-American community and the population at large, the Blowouts have been the subject of numerous books and articles, both popular and academic. The events were also memorialized in a 2006 HBO film directed by Edward James Olmos titled "Walkout." The movie, filmed at Garfield High, presents a fairly accurate but fictionalized account of the events of 1968. A 1996 four-part PBS documentary titled "Chicano!" featured the Blowouts in an episode called "Taking Back the Schools."

Many of the student organizers went on to live lives of accomplishment. Paula Crisostomo, a Lincoln High student, became a school administrator where she continues to fight for reform in education. Victoria Castro was elected to the LAUSD Board, where she served as president from 1998 to 2001 (Smith 1998). Moctesuma Esparza, one of the students charged with disrupting the schools, became a successful film producer and remains an activist by creating opportunities for Chicanos in entertainment and in other fields. Harry Gamboa, Jr., became an artist and writer. Carlos Muñoz, Jr., went on to a distinguished teaching and research career in the Department of Ethnic Studies at the University of California, Berkeley.

On the tenth anniversary of the walkouts, the effects of the protests were still being felt. The *Los Angeles Times* published an article following up on some of the major players in the 1968 events titled "No Regrets, Chicano Students Who Walked Out Say: '68 Protest Brought Better Education, Most Believe Strike Helped, Ex Students Say." However, accounts on the twentieth anniversary of the Blowouts depicted East L.A. schools as having changed little, citing dropout rates of 30 percent to 49 percent at five schools (Belmont, Garfield, Lincoln, Roosevelt, and Wilson), although the number of Latino teachers and administrators had increased markedly, and at that time there were 6,000 bilingual classrooms. In another look back 40 years later, a *Los Angeles Times* story titled "'68 to '08—We're Not Finished" claimed that although there had been improvements in the conditions of Latino students, such as the end to the previous ban on speaking Spanish in school, there was much more to be accomplished. Regardless of the failure to achieve all the goals of the protesters, the Blowouts had a broad effect on the equal treatment of all minorities in the educational system and on civil rights in general.

Teaching materials reflecting on the fortieth anniversary of the Blowouts emphasized the importance of teaching Chicana/Chicano high school students about their history in the schools to enable them to see that so-called student failure is not rooted in individual students, families, and teachers but in an ongoing legacy of educational injustice. Thus, the Blowouts continue to be taught today, at Roosevelt as well as at other schools.

ASM SURVEY FINDINGS

An intensive pedestrian site survey of the Roosevelt campus conducted on February 9, 2017, by ASM architectural historians found the campus essentially unchanged from the conditions reported in the June 19, 2015, preliminary evaluation (PCR 2015). During the survey, each extant building constructed by 1968 and earlier was viewed and recorded through extensive photography and field notes. Interiors were recorded when accessible, including the halls, steps, and auditorium in Building 1, which were confirmed to be directly related to the 1968 Blowouts. Careful attention was paid to potential historic district boundaries and integrity of potential contributing resources and the district as a whole to the period of the Blowouts.

SurveyLA Latino Los Angeles Historic Context Statement

ASM reviewed the SurveyLA findings for the Boyle Heights neighborhood and other prior reports, including the preliminary HRER for Roosevelt High School (PCR).

The SurveyLA report for Boyle Heights found Roosevelt High School to be an excellent example of an LAUSD high school under Criteria A/1 and C/3. SurveyLA recommended the school as significant under Criteria A/1 for its association with the Blowouts. The period of significance for this context is 1968, the year that the Blowouts occurred. The campus was found to be a significant example of institutional development of high schools associated with the Chicano civil rights movement under the theme of *Education and Ethnic/Cultural Associations, 1876-1980.* According to the Boyle Heights survey report, "the walkouts represent a pivotal moment in the Chicano civil rights movement of the 1960s and 1970s."

The SurveyLA report also recommended the campus eligible under Criteria C/3. According to the report:

> *the school represents LAUSD campus planning and design concepts from the post-1933 Long Beach Earthquake period of school construction, with a period of significance of 1936, when the campus was reconstructed to its present configuration. Although multiple phases of development are represented on the campus, the evaluation pertains only to the former administration building and a classroom building that date to the 1930s [Building 1 and Building 7]. The classroom building is the work of noted Los Angeles architect Sumner Spaulding.*

Although Roosevelt High School was not considered for eligibility under Criteria B/2, the SurveyLA report mentions several significant people who graduated from Roosevelt over the course of the years, including former Los Angeles mayor Antonio Villaraigosa.

In the SurveyLA *Latino Los Angeles Historic Context Statement*, prepared after the Boyle Heights survey was conducted, the student walkouts of 1968 are cited as an important early activity of the growing Chicano movement.

To evaluate the significance of Roosevelt High School, ASM referred to the *Latino Los Angeles Historic Context Statement* prepared for City of Los Angeles Department of City Planning. The SurveyLA Latino context identifies Roosevelt High School as a known resource associated with Latino history. Applicable themes are *Education 1930–1980* and the *Civil Rights Movement, 1920-1980.* The historic context narrative related to the theme includes a section titled "1940-1980: The Struggle for Educational Equity," which discusses the landmark court cases that addressed segregation in California schools and the student walkouts at Roosevelt High School and other schools in the 1960s. The Latino context cites the 1968 Blowouts as an important early Chicano activity and states that youth activism was a critical factor in the Chicano movement, noting the actions of groups like the Brown Berets, a group of activists who helped organize and participated in the 1968 Blowouts, and student protestors at high schools and colleges demanding educational equity and cultural recognition. Applicable contexts and themes are as follows:

Theme 3: EDUCATION

A resource evaluated under this theme may be significant in the areas of education, ethnic heritage, and/or social history for its association with the Latino community. Although Latinos played a central role in the creation of the public school system in Los Angeles, they were marginalized by the end of the nineteenth century and spent much of the twentieth century struggling for equal treatment.

Period of Significance: 1930-1980

Period of Significance Justification: The period of significance begins in 1930. Even though Latinos were primarily responsible for creating the public school system in Los Angeles, the earliest known resources related to this theme do not appear until the 1930s. 1980 is the end date for SurveyLA and may be extended as part of future survey work.

Geographic Locations: Citywide, but with the highest concentration in the areas between Downtown and Boyle Heights

Area(s) of Significance: Education, Ethnic Heritage, Social History

Criterion: NRHP A/CRHR 1/Local 1

Associated Property Types: Institutional–Elementary School, Middle School, High School, and Language School

Property Type Description: Property types under this theme include public elementary, middle, and high schools and private language schools or institutions that sought to teach Mexican immigrants English as well as American values and customs

Property Type Significance: Properties significant under this theme represent the limitations and opportunities of education for Latinos in Los Angeles

Eligibility Standards: Represents an important association with the Latino community in Los Angeles

Character-Defining/Associative Features

- For NRHP, properties associated with events that date from the last 50 years must possess exceptional importance
- Retains most of the essential character-defining features from the period of significance
- As a whole, retains most of the essential character-defining features from the period of significance (for campuses)
- May be important for its association with historic figures (who attended a school) for the cumulative important of those figures to the community
- May represent a significant event or movement in the social history of Los Angeles
- May represent issues relating to equal access to education or school desegregation

Integrity Considerations

- Should retain integrity of Location, Design, Feeling, and Association from the period of significance
- Integrity is based on the period during which the significant institution occupied the property
- Some original materials may have been removed or altered
- The mid-1930s may be considered a baseline for evaluating integrity of Design, Materials, and Workmanship as virtually every school in Los Angeles was rehabilitated after 1933

Theme 4: CIVIL RIGHTS MOVEMENT, 1920-1980

Theme: Important Events and Institutions in the Latino Civil Rights Movement

A resource evaluated under this theme may be significant in the areas of ethnic heritage and social history for its association with the Latino civil rights movement. By 1900, Mexicans began forming organizations to foster community cohesion and mutual support. The Latino civil rights movement gained critical momentum in the 1930s as it intersected with the labor movement. In the 1960s and 1970s, the struggle for civil rights accelerated with the rise of the Chicano movement.

Geographic Locations: Citywide, but with the highest concentration in the areas between Downtown and Boyle Heights

Area(s) of Significance: Ethnic Heritage, Social History

Criteria: NRHP A/CRHR 1/Local 1

Associated Property Types:

- Institutional – Church Building and Courthouse
- Commercial – Retail Building and Office Building

Property Type Description: Property types under this theme include commercial and institutional buildings used by groups that played an important role in the Latino civil rights movement. In addition, property types include the locations of important events such as demonstrations.

Eligibility Standards: Is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement

Character-Defining/Associative Features

- For NRHP, properties associated with events that date from the last 50 years must possess exceptional importance
- Retains most of the essential character-defining features from the period of significance
- Interior spaces that functioned as important gathering/meeting places must remain readable from the period of significance
- May be associated with Chicano women's groups and organizations

Integrity Considerations: Should retain integrity of Location, Feeling, Design, and Association from the period of significance

Theme: Important Persons in the Latino Civil Rights Movement

A resource evaluated under this theme may be significant in the area of ethnic heritage and social history for its association with persons who played an important role in the Latino civil rights movement. In many cases, significant individuals were involved with numerous groups, some of which only functioned briefly. Thus, the residence of an individual is often the property that best represents their productive life.

Period of Significance: 1920-1980

Justification: The period of significance begins in 1920 with the rise of mutual aid societies, or *mutualistas*. 1980 is the end date for SurveyLA and may be extended as part of future survey work.

Geographic Locations: Citywide, but with the highest concentration in the areas between Downtown and Boyle Heights

Area(s) of Significance: Ethnic Heritage, Social History

Criteria: NRHP B/CRHR 2/Local 2

Associated Property Types: Residential – Single-Family Residence and Multi-Family Residence

Property Type Description: Property types under this theme include single-family and multi-family residential buildings that were the homes of prominent Latino leaders in the civil rights movement

Property Type Significance: Properties significant under this theme are directly associated with important persons in the Latino civil rights movement

Eligibility Standards

- Individual must be proven to have played a significant and influential role in the Latino civil rights movement
- Is associated with a person who made important individual contributions to the Latino civil rights movement
- Is directly associated with the productive life of the person

Character-Defining/Associative Features

- For NRHP, properties associated with individuals whose significant accomplishments date from the last 50 years must possess exceptional importance
- For residential properties, the individual must have resided in the property during the period in which he or she achieved significance
- For multi-family properties, the apartment or room occupied by the person must be readable from the period of significance
- Retains most of the essential character-defining features from the period of significance

Integrity Considerations

- Should retain integrity of Location, Feeling, and Association from the period of significance
- Some materials may have been removed or altered

Los Angeles Unified School District Historic Context Statement

The *LAUSD Historic Context Statement, 1870–1969* (HCS) establishes guidelines for evaluating the significance of LAUSD campuses. The HCS outlines historic contexts and themes, with eligibility standards, character-defining features, and integrity considerations for each. The Roosevelt High School campus was considered under the appropriate contexts and themes, and associated property types, period of significance, areas of significance, and geographic location. The applicable context framework, applicable eligibility standards, and integrity considerations for both individual significance and significance as a historic district are provided in the HCS and reiterated below.

Context: Public and Private Institutional Development / Education

Theme: LAUSD and the Civil Rights Movement, 1954–1980

Property Type: Institutional/Educational

Property Subtypes: Elementary Schools, Junior High Schools, and High Schools

Period of Significance: 1954 to 1980

Area of Significance: Education/Ethnic Heritage

Geographic Location: Citywide

Criteria: A/1 and/or B/2

Eligibility Standards

- Was constructed during the period of significance
- Was the site of significant integration initiatives, challenges, or activities related to the Civil Rights Movement and school integration
- Directly reflects the movement for equal access to schools and/or to employment opportunities in LAUSD schools
- Has a well-established, long-term association with a figure who was significant in the Civil Rights Movement and school integration (eligibility under B/2)
- Is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement (Latino context)

Character-Defining Features

- Retains most of the associative and character-defining features from the period of significance

Integrity Considerations

- Retains integrity of Location, Design, Setting, Feeling, and Association
- Some materials may have been removed or altered
- If there are multiple buildings on campus constructed during the period of significance, these should be evaluated as a potential historic district

EVALUATION OF ELIGIBILITY

Historic District Evaluation

ASM carefully considered whether the Roosevelt High School campus is eligible as a historic district for the NRHP or CRHR under Criteria A/1 for its association with events that have made a significant contribution to the broad patterns of local or regional history, and/or under Criteria B/2 for an association with the lives of persons important to local, California, or national history. Particular attention was paid to applicable themes related to the Chicano Civil Rights movement as defined in SurveyLA *Latino Los Angeles Historic Context Statement* and the LAUSD Historic Context Statement.

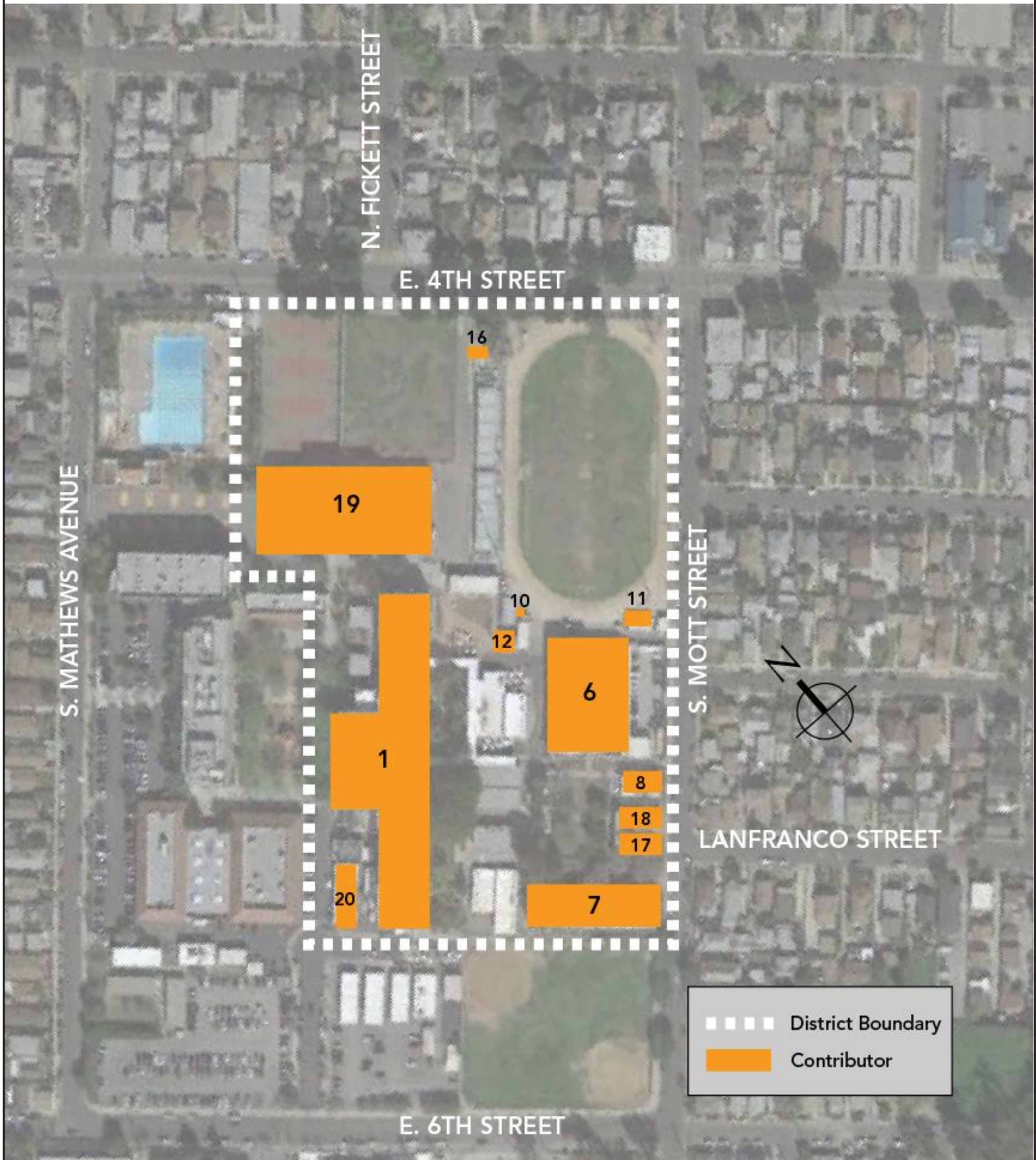
The Roosevelt High School campus meets all of the eligibility criteria listed in the LAUSD HCS under the theme of *LAUSD and the Civil Rights Movement, 1954–1980.* Specifically, the recommended historic district and its contributors were constructed or extant during the period of significance; the campus was the site of significant integration initiatives, challenges, or activities related to the Chicano Civil Rights Movement and school integration; the campus directly reflects the movement for equal access to schools in LAUSD schools; the campus has a well-established, long-term association with Sal Castro, who was significant in the Chicano Civil Rights Movement and school integration (eligibility under B/2); and it is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement (from the SurveyLA Latino context). The campus retains most of the associative and character-defining features from the period of significance. Following the LAUSD guidelines, the multiple buildings extant during the period of significance are evaluated in this report as comprising a potential historic district.

ASM recommends all buildings present on the campus in March 1968 at the time of the Blowouts be considered contributors to the proposed Roosevelt Senior High School Historic District (**Figure 3.2-1, Roosevelt Senior High School Historic District Boundary**). The contributors and the priority of significance of each are listed below in **Table 3.2-1 Roosevelt Senior High School Historic District Contributors.**

Table 3.2-1
Roosevelt Senior High School Historic District Contributors

Building No.	Building Name	Year Built	Priority
1	Auditorium and Classroom Building	1922	Primary
7	Classroom	1937	Primary
6	Industrial Arts Building	1968	Secondary
8	Instrumental Music Building	1959	Secondary
17	Classroom Building	1964	Secondary
18	Classroom Building	1964	Secondary
19	Physical Education Building	1968	Secondary
10	Flammable Storage Building	1953	Tertiary
11	Field Sanitary Building	1958	Tertiary
12	Equipment Field Storage	1941	Tertiary
16	Field Light Controls	1949	Tertiary
20	Utility Building	1968	Tertiary
	Track		Tertiary
	Portions of Landscaping		Tertiary

Source: ASM June 2017



SOURCE: ASM, 2017

FIGURE **3.2-1**

IMPACT SCIENCES

Roosevelt Senior High School Historic District Boundary

ASM considered whether any of the current buildings or landscaped areas were built in response to the protests, and whether Fickett Street, which at one time cut through the campus in front of/west of Building 1, was vacated in response to the protests. A master plan for the campus had already been submitted by 1966, when plans for $1,730,725 in new facilities for Roosevelt High School were approved by the Board. Projects included a new physical education building, renovation of an industrial arts building, and a new industrial arts building. A 1966 street profile plan and as-built civil drawings from the same year show Fickett Street passing through the school (LAUSD dwg. 8829.00.023 and 8829.00.024). Further indication that the master plan had been initiated previous to 1968 is the early filing of a redrawn tract map that shows Fickett Street vacated and incorporated into the campus. An historic aerial dated January 3, 1968 (University of California 1968), shows that these projects were complete by the time of the 1968 protests, rather than in response to them. A cafeteria and domestic science building and a shop building, shown southeast of Building 1 in 1966 LAUSD drawings (LAUSD Vault dwg. 8829.00.027) and in a 1968 aerial view, have since been demolished. As such, ASM concluded that there were no buildings or modifications to the school that were the direct result of the Blowouts.

Primary Contributors

Auditorium and Classroom Building (Building 1). Building 1 appears to have been a primary location of activities related to the 1968 Blowouts. Built in 1922 and redesigned after the 1933 Long Beach earthquake, the former administration building remains an iconic representation of the campus. The Deco features of the main entrance, in particular, are recognizable as the entrance to the school, with a focus on the Bauhaus-style raised metal lettering spelling out the name of the school. Leading to the entrance are two flights of a wide concrete stairway set between sets of simple beveled-edge stucco stoops. Four sets of single-light double doors are recessed into a two-story plain stucco wall with a fluted column at the center and two sets of high multi-light transoms above.

The interior of Building 1 was closely associated with the walkouts. Immediately inside, the primary entrance is a lobby with a ticket booth and entrances to the auditorium to the right and a flight of concrete stairs beneath a concrete arch leading to the main hallway straight ahead. This area was associated with an assembly called by the school administration two days after the original walkouts, in which the principal urged the students to avoid violence in further protests. Brian Gibbs, a teacher at Roosevelt for 15 years (1995-2010), included the Blowouts in his curriculum at the school. Gibbs based his lessons on research and personal conversations with other teachers and individuals with first-hand knowledge of the events, and continued the curriculum that had been taught for years before his tenure at Roosevelt. According to Gibbs, after the assembly, the students staged a sit-in on the lobby stairs. Police entered and began trying to disperse the students, using violent means. To escape, the students ran up the stairs, down the central hall, and out the other side of Building 1. At that point they ran to the right, through one of the classroom buildings, and onto Mott Street. Later, Gibbs used the lobby and stairs leading to the main hallway to teach how the built environment can be seen as a "text" that tells a story. After showing his students an episode of the PBS series *Chicano!* (Part 3: "Taking Back the Schools"), which includes scenes from Roosevelt, he gathered them on the stairs and told the story of the Blowouts. After the students had observed first-hand the place where the conflict took place, Gibbs reports "[t]heir school's stairwell [became] a monument to be recognized and honored."

Classroom Building 7. On the day of the sit-ins at Roosevelt, students were said to have run out of the back of Building 1 toward Mott Street and toward the right, where Building 7 is located. Oral histories say the students ran through Building C, which has been demolished but was located "where the current ball field is," and into Mott Street. Photo evidence showing Building 7 at the time of the walkouts and the location of the building, with an entrance toward the interior of the campus and a second entrance immediately on Mott Street, suggest it is more likely the students ran through Building 7 and into the street.

Secondary Contributors

Major buildings extant in early 1968 are considered secondary contributors. These include the Instrumental Music Building (Building 8), which was built in 1959. Buildings constructed in the 1960s—the Industrial Arts Building (Building 6), Classroom Building 17, Classroom Building 18, and the Physical Education Building (Building 19)—were all completed by the time of the walkouts.

Tertiary Contributors

Tertiary contributors are utilitarian buildings that were extant at the time of the walkouts and that are some of the earliest on campus. These include the Equipment Field Storage (Building 12), which dates from 1941, and the Field Light Controls (Building 16), with a built year of 1949. Buildings from the 1950s that were extant are the Flammable Storage Building (Building 10; 1953) and the Field Sanitary Building (Building 11; 1958). The Utility Building (Building 20), built in 1968, is also a tertiary contributor to the historic district.

Because of the changing nature of landscaping, fields and landscaped areas around the primary contributing buildings are considered tertiary contributors. Although the bleachers have been replaced, the track configuration remains the same as it was in 1968.Although the track at Roosevelt has not been confirmed as directly related to the protests, the track was a gathering place for protesters during the walkouts at some of the other participating schools, and it is likely that the track at Roosevelt served the same purpose. The playing field to the northeast of the physical education building remains an open space, as it was in 1968. The mature trees and other landscaping, especially the shady areas southeast of Building 1 toward Building 7 and Mott Street, are included in this category.

Integrity

All of the recommended contributors retain integrity to the period of significance of location, design, setting, materials, workmanship, feeling, and association.

Period of Significance

ASM considered whether the recommended period of significance would be limited to 1968, when the Blowouts occurred, or continue through 1970 or later, when a series of additional protests took place. A major protest in 1970 at Roosevelt High School appears to be of a different nature than the well-organized and generally non-violent events of 1968. The 1970 Chicano Moratorium against the Vietnam War is arguably related to the Blowouts, but was organized and took place after the student walkouts in 1968. In 1970 and after, Roosevelt, as well as many other schools in East L.A. and nationwide, was affected by this less organized, more violent movement. Unlike the 1968 protests, in 1970, the school was heavily vandalized and severely damaged by fires, breaking of windows, and bombs. The 1970 protest also appears to have been a more spontaneous event and to have involved more non-students. In the later events, the CLF, a militant Marxist-Leninist group that advocated violence as a means to an ends, became involved. Multiple smaller protests also took place into the 1970s, but none that had the broad implications and significance of the Blowouts. For these reasons, the recommended period of significance is limited to 1968.

Area of Significance: A/1

ASM carefully considered whether the Roosevelt High School campus is eligible as a historic district under Criteria A/1 for its association with the 1968 Blowouts, in which Mexican-American students and their parents and sympathizers staged nearly simultaneous walkouts at five East L.A. high schools. Roosevelt High School students walked out of classes repeatedly in the first weeks of March 1968. Roosevelt students conducted a second protest two days later, when they attended an assembly in the auditorium and staged a sit-in on the steps in the lobby of Building 1.

Building on the legacy of Mexican-Americans who had been protesting school segregation as early as the 1930s and 1940s, the Blowouts were widely considered the first major protest against racism and educational inequality staged by Mexican-Americans in the United States. The East Los Angeles students were said to have ignited the Mexican-American civil rights movement. Considered in context with the black Civil Rights movement, the historical significance of the Blowouts had similarities with the 1960 student sit-ins in Greensboro, North Carolina. As an indication that the Blowouts were a significant contributor to the broader Chicano civil rights movement, one of the Blowout participants, Carlos Munoz, describes a National Chicano Youth Conference held in Denver the following year, bringing together for the first time activists who were in involved in both campus and community Chicano politics.

The Blowouts were an important event in the Chicano Civil Rights movement that focused national attention, for the first time, on Chicanos, and served as a catalyst for the movement in Los Angeles that spread throughout the U.S. Therefore, Roosevelt High School is recommended eligible as a historic district under Criterion A/1 for its association with an event important in our history.

Area of Significance: B/2

The Roosevelt High School campus was found to be associated with the lives of significant persons in the LAUSD Civil Rights movement. Sal Castro, who took the lead in organizing students at the East L.A. high schools who initiated the Blowouts, was a charismatic Mexican-American teacher at Lincoln High at the time of the protests, and at Lincoln High earlier in his career, where he began to observe the lack of opportunity for Mexican-American students compared to Anglos. At Belmont, he encouraged students to speak Spanish, not realizing that it was not allowed. Castro encouraged students to make their grievances public after they failed to get the attention of school administrators and the Board. Castro was instrumental in the coordinated walkouts at Roosevelt, as well as Garfield, Lincoln, Wilson, and Belmont high schools. Castro was one of the "East L.A. 13" who were arrested and indicted for conspiring to plan the demonstrations. After firing Castro, the Board received numerous letters from students, parents, and other teachers both in support and objecting to his reinstatement when the charges were dropped two years later. Castro is highlighted in the SurveyLA Latino context for the active role he played in the struggle for educational equality associated with the Blowouts. Castro was so well-regarded by the District that on June 5, 2010, a school was dedicated in his honor (Sal Castro Middle School, adjacent to Belmont HS).

Because of the importance of Sal Castro in encouraging Chicano students to assert their rights to an equal education and his role in helping organize the Blowouts, Roosevelt High School is recommended eligible as a historic district under Criterion B/2 for its association with a person important in our past.

The evaluation in the Supplemental HRER was limited to Roosevelt High School as a potential historic district under Criteria A/1 and B/2 of the NRHP and the CRHR. ASM carefully considered the potential significance of Roosevelt High School under these criteria, as described above. ASM recommended the campus eligible as a historic district for the NRHP and the CRHR under Criteria A/1 and B/2. The campus is also historically significant under the guidelines set forth by the *SurveyLA Latino Los Angeles Historic Context Statement* and the *LAUSD Historic Context Statement, 1870-1969*. As such, ASM found that Roosevelt High is a historical resource in accordance with CEQA.

As part of the EIR process, ASM has prepared a Cultural Resources Technical Report (CRTR) (Appendix 3.2. The CRTR supports ASM's original findings, but additionally recommends that Building 1, as the primary location of activities related to the 1968 walkouts, is also individually eligible for the NRHP and the CRHR under Criteria A/1 and B/2. As such Roosevelt High and Building 1 are both historical resources in accordance with CEQA. ASM also identified five potentially eligible historical resources within the area of indirect impacts, which include Hollenbeck Middle School, and four residential properties (all of which were recorded by SurveyLA).

Project Impacts

As discussed in Section 2.0, Project Description, the proposed Project includes the demolition of temporary buildings (portable) that would be replaced by permanent structures as well as the following permanent buildings:

- Auditorium/classroom (Building #1)
- Music building (Building #4)
- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Gymnasium building (Building #19)
- Utility building (Building #20)
- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)

Site upgrades are also included in the Project plans. The Project involves the application of fresh paint to the exterior of the remaining Roosevelt High School buildings and a revamp of the site's landscaping and hardscaping; existing trees removed by the Project will be replaced in accordance with the City of Los

Angeles Tree Ordinance (as applicable). Site-wide electrical, plumbing, and storm drain improvements will also be put into effect. The entire campus will be subject to local, state, and/or federal facilities requirements, such as the ADA, DSA, and the OIM. Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.

Substantial adverse change to a historical resource includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The *State CEQA Guidelines* provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.

The Project site's identified historic district as determined by ASM has a boundary of East 4th Street to South Mott Street for the eastern corner; designation lining adjacent to the baseball field, but not including the field and wrapping along and including the auditorium/classroom building to make the western corner; and completing to include the gymnasium (refer to **Figure 3.2-1)**.

According to the proposed Project design, the construction and modernization will involve the demolition of both primary contributors of the historic district (Building 1, 7), of which Building 1 is also an individual eligible historical resource. As described above, the interior of Building 1 was closely associated with the Blowouts. Immediately inside the primary entrance is a lobby with a ticket booth and entrances to the auditorium to the right and a flight of concrete stairs beneath a concrete arch leading to the main hallway straight ahead. This area was associated with an assembly called by the school administration two days after the original walkouts, in which the principal urged the students to avoid violence in further protests. On the day of the sit-ins at Roosevelt, students were said to have run out of the back of Building 1 toward Mott Street and toward the right, where Building 7 is located. Building 7 is also identified as the other primary contributor.

The secondary contributors include those buildings that were constructed at the time of the walkout but were not closely associated with these activities: these include the Instrumental Music Building (Building 8), which was built in 1959. Buildings constructed in the 1960s—the Industrial Arts Building (Building 6), Classroom Building 17, Classroom Building 18, and the Physical Education Building (Building 19). All of the secondary contributors would be demolished as part of the proposed Project. Several tertiary contributors would remain on campus: these include the Equipment Field Storage (Building 12), which dates from 1941, and the Field Light Controls (Building 16), with a built year of 1949. Buildings from the 1950s that were extant are the Flammable Storage Building (Building 10; 1953) and the Field Sanitary

Building (Building 11; 1958). As such the proposed Project would substantially alter the significance given in Criteria A/1 and B/2. Due to the removal of all primary and secondary contributors to the historic district, a significant and unavoidable impact to this historical resource would occur.

As required by **SC-CUL-8** (and further defined by **MM-CUL-1**), historical resources at Roosevelt HS will be properly photo-documented prior to demolition. **MM-CUL-3** requires the provision of an Interpretive Plan to be developed in coordination with the community to commemorate the events, people, and places involved in the 1968 walkouts at Roosevelt High School. Potential elements of such an Interpretive Plan could include:

1) *Intensive surveys and evaluations of similar resources.* The other East L.A. schools directly associated with the significant events of the 1968 Blowouts, specifically Garfield, Wilson, Lincoln, Belmont, and Jefferson, as well as Hazard Park, could be evaluated at the level of evaluation of Roosevelt SH. This evaluation would focus on each school's associations with the Blowouts under Criteria A/1 and with any significant individuals, such as Sal Castro or other members of the East L.A. 13, under Criteria B/2. The evaluation reports should be done following the guidelines provided by the *LAUSD Historic Context Statement, 1870–1969* under the theme *of LAUSD and the Civil Rights Movement, 1954-1980*, and the *SurveyLA Latino Los Angeles Historic Context Statement* under the themes of *Education 1930–1980* and *The Civil Rights Movement, 1920–1980* and comply with CEQA. The *Supplemental Historic Resource Evaluation Report* (ASM 2017) could serve as a model and provide background for these evaluations.

2) *Development of features for the Roosevelt High School website.* This mitigation effort would include developing content, including narrative and graphics, for a section of the Roosevelt High School website (*rooseveltlausd.org*). A full narrative history of the vents including historic photographs, to fully interpret this significant event, as well as student leaders and other activists' involvement with the Blowout Committee at Roosevelt, could be provided. As part of this activity, efforts should be made to gather additional historic photographs, including those by photographer Oscar Castillo, housed at UCLA Chicano Studies Research Center, and *LA Times* historic photos, held in the Los Angeles Times Photographic Archives in the Library Special Collections at UCLA.

3) *Oral histories with teachers.* A series of oral histories could be conducted with teachers and students who can be identified as present at Roosevelt in 1968, or who have extensive knowledge of the events. Interviews should be conducted following the Principles and Best Practices established by the Oral History Association,5 including the recommended

methods for digital recordation and translation. Oral histories should be conducted by historians who meet the Secretary of the Interior's Professional Qualification Standards or individual who have participated in training to conduct oral histories. Release forms should be signed by each narrator through which he or she transfers his or her rights to the interview to the repository or designated body. Oral histories should be recorded using at least two separate audio recorders, utilizing at least one external microphone, as well as one video recorder. Oral histories should be archived at UCLA through the Oral History Program, and also in consultation with the UCLA Chicano Studies Research Center.

4) *Commemorative events for the 50th anniversary of the Blowouts.* Organize commemorative events to recognize the importance of the Blowouts events and this period of Roosevelt SH's history. Activities in March 2018 could include screenings of the PBS documentary "Chicano!" and the film "Blowout!" to be held on the Roosevelt High School campus. Activities in the fall of 2018 could include first-hand recounting of the events by any teachers or students before an audience. Teachers who were not present at the Blowouts but who taught the events over the years would also be likely participants. Coordination with the organizers of the Roosevelt High School Class of 1968 reunion could be accomplished to arrange a medium to collect stories from the students attending the reunion.

5) *Presence at class of 1968 50th Roosevelt High School Reunion.* Coordinate with the organizers of the Roosevelt High School Class of 1968 reunion to arrange a medium to collect stories from the students attending the reunion. For example, a recording booth/area could be arranged during the reunion events in which students could be free to stop by and provide on-camera a less than five-minute account of their recollections and feelings about the events. The recording booth would be organized and monitored by professional historians who would then contact those students with the most direct involvement in the Blowouts after the reunion and ask them to be part of an oral history Project.

6) *Oral histories with students.* Conduct a series of oral histories with students who can be identified as present at Roosevelt in 1968. Interviews should be conducted following the Principles and Best Practices established by the Oral History Association, including recommended methods for digital recordation and translation. Oral histories should be conducted by historians who meet the Secretary of the Interior's Professional Qualification Standards or individual who have participated in training to conduct oral histories. Release forms should be signed by each narrator through which he or she transfers his or her rights to the interview to the repository or designated body. Oral histories should be recorded

using at least two separate audio recorders, utilizing at least one external microphone, as well as one video recorder. Oral histories should be archived at UCLA through the Center for Oral History Research and also in consultation with the Chicano Studies Research Center.

7) *Interpretive panels.* Develop content for interpretive panel to be placed on campus at Roosevelt High School, as well as the other East L.A. schools that participated in the Blowouts. Panels should include approximately 200 words of narrative text, as well as maps, photographs, and images that tell the story of the Blowouts.

However, even with implementation of these mitigation measures, given demolition of the majority of the historic district buildings, the residual impacts from the proposed Project would be significant and unavoidable.

Archeology

As mentioned previous, the Zanja Madre runs through the northwestern portion of the Project area. The Zanja Madre (Mother Ditch) is the original aqueduct that brought water to the Pueblo de Los Angeles from the Rio Porciuncula (Los Angeles River); it developed into an extensive water conveyance system that was vital to the early development of the city of Los Angeles. It was originally an open, earthen ditch which was completed by community laborers within a month of founding the pueblo in 1871, and eventually become more than 92 mi. of complex irrigation channels throughout the city and beyond, serving as the city's first municipal water system—and primary source of irrigation for more than a century. The zanjas served the city until 1902, when they were replaced with a system of underground pipes (waterandpower.org n.d.). The Zanja Madre has been nominated several times over the years to the NRHP but the applications were repeatedly denied because "there wasn't enough of it to represent the whole system" While no surface manifestation of this resource is extant, it is currently unknown whether any remains of this water system exist in subsurface contexts within the Project area. The presence in the past of a portion of the historic Zanja Madre water conveyance system within the Project area opens the possibility that previously undocumented physical remains may be found subsurface. Therefore Mitigation Measure CUL-2 is included below to require monitoring during construction activities on the northwestern portion of the campus. With implementation of MM-CUL-2 impacts to archeological resources would be less than significant.

LAUSD Standard Conditions

The following Standard Conditions shall be applied to assist in mitigation of the proposed Project: **SC-CUL-4**, **SC-CUL-6**, **SC-CUL-7**, **SC-CUL-8**, **SC-CUL-9**, **SC-CUL-10**, **SC-CUL-11**, and **SC-CUL-13**.

Mitigation Measures

MM CUL-1 HISTORICAL RESOURCE DOCUMENTATION, ROOSEVELT HIGH SCHOOL COMPREHENSIVE MODERNIZATION PROJECT

A qualified historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards shall prepare HABS-like historic documentation for the historical resources slated for demolition.

The HABS-like package will document in photographs as well as descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon available primary- and secondary-source research as well as available studies previously prepared for the project.

The HABS documentation package will incorporate available architectural drawings on file with the Los Angeles Unified School District. New measured drawings shall not be required for the project.

The specifications for the HABS-like documentation package follow:

Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.

Descriptive and Historic Narrative: The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.

Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.

Upon completion of the descriptive and historic narrative, all materials will be compiled in an electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the following repositories, in order to make the documentation available to researchers:

1. Roosevelt High School, for filing with the school library/archive
2. Los Angeles Public Library (Central Library)
3. Los Angeles Historical Society
4. South Central Coastal Information Center
5. Other repositories as recommended by the historian or architectural historian

MM-CUL-2 ARCHEOLOGICAL MONITORING

Monitoring of construction-related ground disturbance and excavation is recommended in the northern portion of the Project area. This is due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through this portion of the Project area. As the depth or type of potential remains is unknown, monitoring by a qualified archaeologist is recommended during all ground disturbance and excavation in this area.

MM-CUL-3 To communicate stories, information, and experiences pertinent to the historic events that took place on the Roosevelt High School campus to students, faculty, alumni, and the general public, an Interpretive Plan shall be developed in collaboration with the

Boyle Heights community. An interpretative program shall be developed in coordination with the community.

Residual Impacts

Despite the implementation of the Interpretive Plan, impacts to historical resources on the Roosevelt High School campus would remain significant and unavoidable.

3.2.8 CUMULATIVE ANALYSIS

Each related project has the potential to result in significant impacts to cultural resources and, as required by the *State CEQA Guidelines,* each project site would need to be surveyed prior to development during the environmental review process. Historical resources impacts associated with a proposed project usually occur on a project-by-project basis rather than cumulatively. In this case, the eligibility of the resource is due to its association with events that happened on the Project site. Other projects that would be cumulative to this Project include those that are locations where other Blowouts occurred, including the other schools: Wilson, Lincoln, Garfield, and Belmont highs which joined the Roosevelt students in walking out of class to draw attention to educational inequality. Based on the 24 identified related projects, none of the other schools are currently anticipated for modernization, nor are any of the related projects known to be associated with the Blowouts. Further, each individual school site undergoes site specific review prior to modernization and in accordance with LAUSD's standard conditions, any identified resources would be evaluated to determine its individual eligibility and documented. Although this Project has identified significant site specific impacts, this Project in combination with known projects, would not contribute to a cumulatively considerable loss of historic resources. As such, impacts would be less than significant.

Mitigation Measures

None required.

Residual Impact

Impacts would be less than significant and would not be cumulatively considerable.

3.3 HAZARDS AND HAZARDOUS MATERIALS

3.3.1 INTRODUCTION

This section of the Draft EIR evaluates potential environmental impacts on human health and the environment due to exposure to hazards and hazardous materials present or potentially present on the Project site. This section also evaluates the potential effects on the surrounding area as a result of the implementation of the proposed Project. For the purpose of this analysis, the terms hazards and hazardous materials include substances that, because of their quantity, concentration, or characteristics, may present moderate danger to public health, welfare, or the environment upon being released.

Information used to prepare this section was taken from the following sources, which are incorporated by reference herein and included as Appendices to this Draft EIR:

- Converse Consultants, ***Phase I Environmental Site Assessment Report***, Theodore Roosevelt High School 456 South Mathews Avenue, Los Angles California 90033, August 30, 2016;
- TRC Solutions, Inc., ***Roosevelt High School: Revised Summary of Proposed Excavation Areas***, June 28, 2017; and
- TRC Solutions, Inc., ***Draft Removal Action Workplan, Theodore Roosevelt High School*** 456 South Mathews Avenue, Los Angles California 90033, August 29, 2017.

Additional information and analysis regarding potential air quality, noise, and haul truck impacts can be found in sections **3.1, Air Quality**, **3.4, Noise**, and **3.6, Transportation and Traffic**, of this Draft EIR.

3.3.2 EXISTING CONDITIONS

Hazardous Material

A number of properties may cause a substance to be considered hazardous, including toxicity, ignitability, corrosivity, or reactivity. Hazardous materials are defined as any solid, liquid, or gas that can harm people, other living organisms, property, or the environment. A hazardous material may be radioactive, flammable, explosive, toxic, corrosive, biohazards, an oxidizer, an asphyxiant, a pathogen, an allergen, or may have other characteristics that render it hazardous in specific circumstances. Issues associated with hazardous materials develop when such materials are improperly stored, transported, used, or released into the environment.[1]

Hazardous Waste

Once a hazardous material is ready for discard, it becomes a hazardous waste. For the purposes of this EIR, hazardous waste is any hazardous material that is abandoned, discarded, or recycled.[2] In addition, hazardous wastes occasionally may be generated by actions that change the composition of previously non-hazardous materials. The same characteristics that define a hazardous material are also applied to hazardous waste, toxicity, ignitability, corrosivity, or reactivity.

Past Uses and Operations on the Project Site

Roosevelt High School was constructed in 1922 and opened in 1923. By 1926, the growth of Roosevelt High School necessitated the demolition of all remaining residential structures on the property, which were replaced with a playground, an athletic field, and a new building. The campus was retrofitted after the Long Beach Earthquake in 1933 and in the 1960's the site expanded to incorporate an entire city block. The campus is a rectangular-shaped property consisting of approximately 23.70 acres.

In 1970, Roosevelt High School was subject to arson and small bombing events by the Chicano Liberation Front on three separate occasions. Although no one was injured, two main buildings necessitated repairs. In the following years, new buildings were constructed for childhood education aide, music, new classrooms, and a cafeteria. The school would continue to be developed with the addition of contemporary buildings, athletic fields and an outdoor swimming pool until 1990.

A 2010 evaluation of the school by LAUSD found major structural issues for the main auditorium/classroom building. Further, four of the buildings: Industrial Arts, shed, gymnasium, and auditorium/classroom were found to meet the criteria for the AB 300 (Corbett) Seismic Safety Inventory of California Public Schools, Department of General Services Building List. The AB 300 list identifies those school buildings that are of concrete tilt-up construction and those with non-wood frame walls that do not meet the minimum requirements of the 1976 Uniform Building Code (UBC).

The current campus facilities consist of 16 structures, including an administration/classroom building, a lunch pavilion, a cafeteria, a library/classroom, a music building, a gymnasium, an auditorium/classroom building, Industrial Arts building, a former auto shop building, and seven classroom buildings. The

1 California Code of Regulations, Title 22, Section 66084.

2 California Health and Safety Code, Section 25124

property also includes multiple portable classroom buildings. Athletic fields and facilities are located along the northeast portion of the proper ty, as well as in the southeast corner of the property.

Site Investigations

In August 2016, a Phase I Environmental Site Assessment (Phase I ESA) was conducted to identify any recognized environmental conditions (RECs), contaminants of concern (COCs), or environmental issues associated with the site.[3] The Phase I ESA states that it was completed in accordance with the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM Standard E 1527-13). The Phase 1 ESA included research of available site background information, including regulatory agency database lists and agency file searches, and did not reveal documentation of any known release(s) of hazardous materials at the site.

Based upon the information derived from the Phase 1 ESA, the site is not identified as a known hazardous waste disposal site, hazardous substance release site, or landfill, and no hazardous materials pipelines are located beneath or adjacent to the site. A gas transmission line owned by Sempra Energy is located adjacent to the northeast side of the Project site along 4th Street and diverts further north to South Fickett Street. According to information from the Sempra Energy website, this pipeline is generally equipped with a larger diameter and operates at pressures above 200 psi. This pipeline transports gas from supply points to the gas transmission system. According to information from the City of Los Angeles Planning Department, the Project site is located within a methane zone within the City of Los Angeles.[4]

Based on the findings of the Phase 1 ESA, Converse provided the following recommendations for follow-up investigations as related to the several identified on-site RECs:

- Based on the age of the site buildings, collect shallow soil samples around the drip lines of the existing and former buildings and analyze them for the potential presence of lead-based paint (LBP) residue, and from around the foundations of the existing and former buildings and analyze them for organochlorine pesticides (OCPs).

- Based on the potential presence of arsenic and polychlorinated biphenyls (PCBs) in shallow soils, collect shallow soil samples across the site and analyze them for arsenic and PCBs.

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3 Converse Consultants, *Phase I Environmental Site Assessment Report, Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California 90033*, August, 30, 2016.

4 Converse Consultants, *Phase I Environmental Site Assessment Report, Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California 90033*, August, 30, 2016.

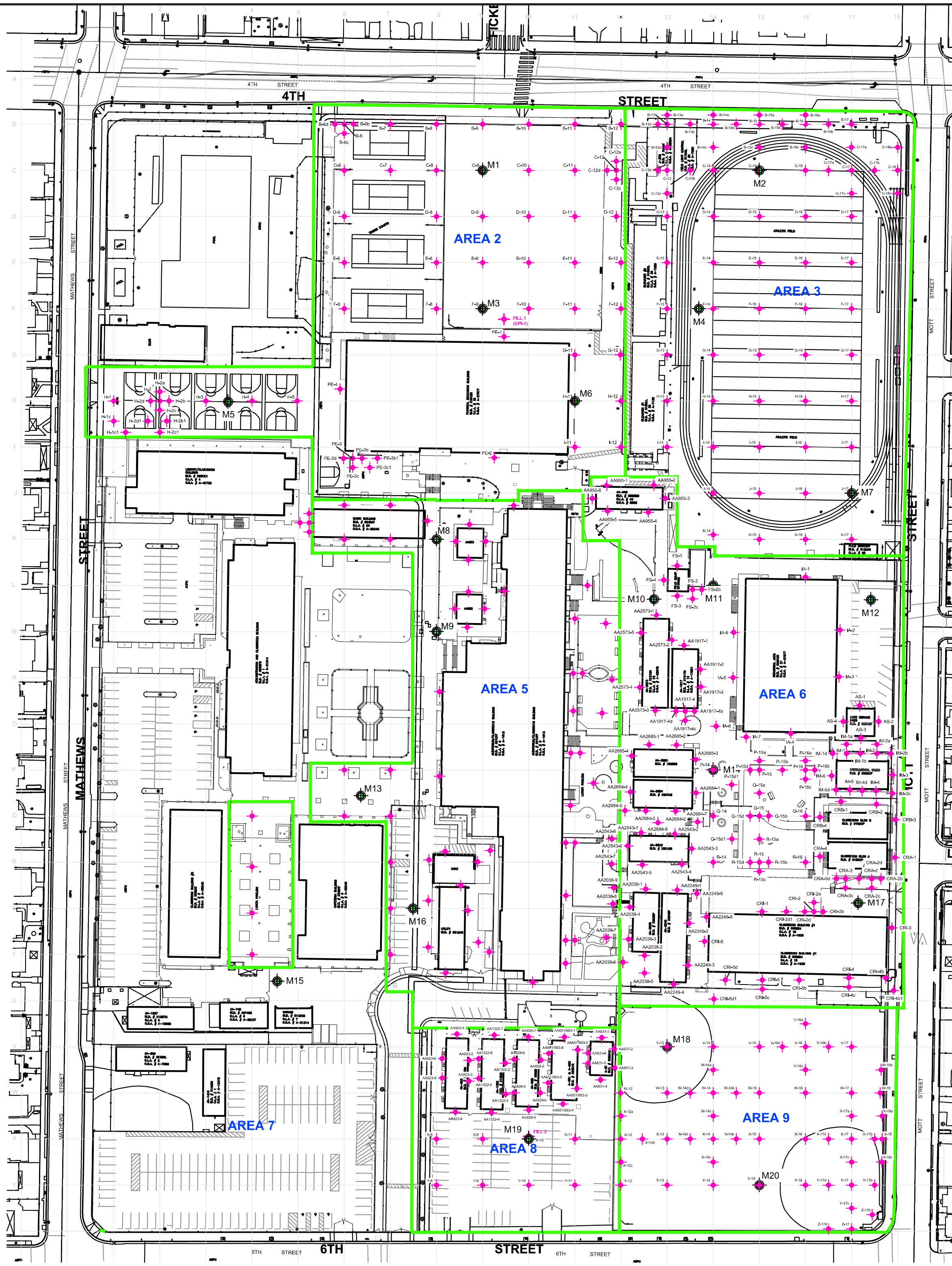
- Based on the presence and historical use of the hydraulic hoists and 3-stage clarifier associated with the former auto shop operations (Industrial Arts Building) at the mid-eastern portion of the site, collect soil samples in these locations to determine whether the subsurface has been impacted from these features, specifically contamination by petroleum hydrocarbons.

- Considering that the site is located within the Boyle Heights Oil Field and is within a designated methane zone within the City of Los Angeles, conduct a methane survey in accordance with Los Angeles Department of Building and Safety (LADBS) Site Testing Standards.

Lead and lead-based paint (LBP), arsenic, organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs) and petroleum hydrocarbons are all recognized contaminants of concern (COCs).

Based on the recommendations outlined above, TRC Solutions, Inc. (TRC) completed a Preliminary Environmental Assessment (PEA) Equivalent investigation consisting of an extensive soil and soil gas sampling program to investigate the RECs and COCs identified in the Phase I ESA and to prepare the site for the modernization and construction activities. The site was divided into six separate investigation areas (Areas 2, 3, 5, 6, 8, and 9; see **Figure 3.3-1, Environmental Testing Areas**) based on the planned renovation phases.

The PEA sampling program consisted of shallow soil sampling in the areas of existing buildings, common areas, athletic fields, and parking lots planned for removal/replacement and construction, and soil gas sampling was conducted across the entire site to evaluate for the potential presence of subsurface methane. The PEA soil sampling program and protocol varied by boring type and considered the analyte(s) of interest at each respective boring location and site area. Depending on the analytical results of the shallowest soil sample relative to either accepted background concentrations or selected human health-based screening levels, deeper soil samples were subsequently collected and analyzed to define the vertical extent of impact, and step-out borings were sampled to further define the lateral extent of apparent impact. For the purpose of this evaluation, human health-based screening levels were established based on a combination of the EPA Region IX RSLs and California EPA (CalEPA) Department of Toxic Substances Control (DTSC)-modified Screening Levels (DTSC-SLs; DTSC, 2015).



LEGEND

Proposed LBP and OCP Sample Location

Undocumented Fill Sampling Location

Methane Probe Location

N

APPROXIMATE SCALE (FEET)

0 100 200

NOTES:

LBP = lead based paint.
OCP = organochlorine pesticides.

SOURCE: TRC, 2017

FIGURE **3.3-1**

IMPACT SCIENCES

Environmental Testing Areas

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The decision criteria for determining whether analysis of deeper soil samples from a specific boring or collection of step-out samples lateral to an initial boring location was warranted is outlined below:

- Arsenic soil samples were screened utilizing the accepted background concentration of 12 milligrams per kilogram (mg/kg);
- Lead soil samples were screened utilizing the DTSC Residential Screening Level of 80 mg/kg;
- Petroleum hydrocarbons were screened using 100 mg/kg for gasoline-range hydrocarbons (TPH-G), 1,000 mg/kg for diesel-range hydrocarbons (TPH-D), and 1,000 mg/kg for oil-range hydrocarbons (TPH-O);
- Volatile organic compounds (VOCs) were screened utilizing a combination of RSLs and human health-based screening criteria based on the individual chemical or compound;
- PCBs were screened utilizing the RSLs for Residential Land Use (value varies by PCB constituent); and
- OCPs were screened utilizing the RSLs for Residential Land Use (value varies by OCP constituent).

Initial PEA investigation activities were conducted in October 2016, and field sampling activities included the following:

- collection of shallow soil samples at a total of 283 locations across the site, including 47 locations in Area 2 (physical education building and courts), 48 locations in Area 3 (athletic field and bleachers), 47 locations in Area 5 (auditorium and lunch pavilion), 80 locations in Area 6 (east-central portion of campus), 38 locations in Area 8 (south-central portion of campus), and 23 locations in Area 9 (southeast portion of campus);
- collection of soil samples at two (2) locations to evaluate undocumented fill beneath the site;
- collection of soil samples at eight (8) locations near the hydraulic hoists and two (2) locations near the clarifier to evaluate subsurface conditions; and
- installation of nested, multi-depth soil gas probes at 20 locations to evaluate subsurface methane and hydrogen sulfide concentrations.

Based on results of the initial investigation activities, additional investigations were conducted in November and December 2016, and March and June 2017. These field sampling activities consisted of the following:

- collection of shallow soil samples from an additional 190 borings to further assess the vertical extent (42 borings in previously sampled locations) and lateral extent (148 borings in new locations) of soil impacts identified in the initial 283 locations sampled in October 2016; and
- collection of additional soil gas samples from the nested, multi-depth soil gas probes installed in October 2016.

The results of the PEA investigation indicated the following:

- Arsenic was detected in soil at concentrations exceeding the screening level of 12 mg/kg in 48 boring locations across the site (maximum 66 mg/kg).
- Lead was detected in soil at concentrations exceeding the screening level of 80 mg/kg in 66 boring locations across the site (maximum 6,300 mg/kg).
- OCPs were detected in multiple composite samples across the site; however, all OCP concentrations were below their respective health-based screening levels.
- No PCBs, VOCs, semi-volatile organic compounds (SVOCs), or TPH-G were detected in soil above laboratory reporting limits during this investigation.
- TPH-D and TPH-O were detected in soil at concentrations exceeding the screening level of 1,000 mg/kg in one sample collected at one of the four hydraulic hoists (maximum 1,900 mg/kg TPH-D and 4,700 mg/kg TPH-O).
- Additional metals concentrations detected beneath the site are consistent with background concentrations for California soils.
- The maximum concentrations of methane and hydrogen sulfide in soil gas measured in the field included 24,500 parts per million by volume (ppmv) and 34.5 ppmv, respectively. The maximum concentrations of methane and hydrogen sulfide in soil gas detected in the laboratory samples included 11,000 ppmv methane and no detectable hydrogen sulfide. Detectable VOCs were also reported at low concentrations in the soil gas samples collected for analysis.

Based on the methane concentrations detected beneath the site, a methane mitigation system will be required as part of future redevelopment of the site which will prevent or retard potential methane gas seepage into the buildings. The methane mitigation system or techniques to be implemented will be sufficient to mitigate the low concentrations of VOC concentrations detected.

Specifically, the following concentrations of COCs were found in these areas on the campus:

- **Area 2** – 541.20 cubic yards (811.81 tons) of lead-affected soil, including 123.89 cubic yards (185.83 tons) of Cal-Haz lead-affected soil.

- **Area 3** – 708.33 cubic yards (1,062.50 tons) of lead- and arsenic-affected soil, including 168.98 cubic yards (253.47 tons) of Cal-Haz lead-affected soil.
- **Area 5** – 1,640.19 cubic yards (2,460.28 tons) of lead-affected soil, including 1,444.44 cubic yards (2,166.67 tons) of Cal-Haz lead-affected soil.
- **Area 6** – 2,945.00 cubic yards (4,417.50 tons) of lead- and arsenic-affected soil, including 1,176.57 cubic yards (1764.86 tons) of Cal-Haz lead-affected soil.
- **Area 9** – 1,137.19 cubic yards (1,705.78 tons) of lead- and arsenic-affected soil, including 138.89 cubic yards (208.33 tons) of Cal-Haz lead-affected soil.
- **Hydraulic Hoists and Clarifier** – 46.67 cubic yards (70 tons) of hydrocarbon-affected soil.

Identification and Screening of Remedial Action Technologies

As a part of the modernization and construction activities, the Los Angeles Unified School District (LAUSD) would implement a Removal Action Workplan (RAW) for the proposed Project. Various potentially feasible remedial technologies for remediation of the impacted soil beneath the site are available and were reviewed. The following criteria were considered while selecting a remedy to be implemented under the RAW:

- Technical analysis for effectiveness, practicality, and reliability;
- Ability to remove contaminates of concern (COCs) from soil;
- Economic considerations, including anticipated time to reach the desired cleanup levels; and
- Site-specific conditions such as depth and types of contamination present beneath the site, soil properties, and soil stratigraphy.

The following general remediation alternatives or process options were considered for the site:

- No Further Action;
- On-Site Containment; and
- Source Removal (Excavation) with Off-Site Disposal.

The selected removal action alternative includes the excavation, transportation, and disposal of soil impacted with arsenic, lead, and/or petroleum hydrocarbons at concentrations above removal action goals. The estimated volume of soil to be remediated is approximately 7,019 cubic yards. The excavated soil would be segregated in stockpiles and, based on the waste profiles, the impacted soil would be loaded and transported to appropriately permitted landfills for disposal. The majority of the soil will be classified as a California regulated, Class 2, non-hazardous waste (approximately 3,966 cubic yards), with some lead impacted classified as a California regulated, Class 1 hazardous waste (up to 3,053 cubic yards). This is based on previous PEA analytical results, in which lead was detected in multiple locations at elevated concentrations; however, this will be confirmed by additional analyses following soil removal.

After excavation of the impacted soil at the designated locations across the site, confirmation samples would be collected from the bottom and sides of the individual excavations and analyzed. Once the removal of soils exceeding the cleanup goals has been completed and confirmed, clean soil would be imported and the excavations would be graded and compacted to facilitate future development activities.

Both short-term and long-term effectiveness is achieved as this removal action alternative involves physical removal from the site of contaminants above removal action goals in the site soils. The excavation and off-site disposal of impacted soil would have an immediate short-term beneficial effect by dramatically reducing the extent of contaminants at the site. The excavation process would increase the potential exposure risks in the short term for workers and the surrounding community to increased noise levels, dust, and air emissions containing the primary constituents of concern (arsenic, lead, and petroleum hydrocarbons). However, the use of appropriate personal protective equipment by on-site workers and the implementation of appropriate noise control measures, dust control measures, and an air quality monitoring plan would mitigate these problems. Refer also to sections **3.1, Air Quality** and **3.4, Noise** of this Draft EIR for additional information and analysis of these topic areas.

With respect to the long-term effectiveness, excavation and off-site disposal of impacted soil will permanently and significantly reduce the extent of soil contaminants at the site by removing soil that exceeds the established cleanup goals. Since the excavated areas will also be backfilled with clean imported soil, all hazards otherwise associated with direct exposure, inhalation, and ingestion would be eliminated by the remediation process. Additionally, the clean backfill would provide further protection to the environment by limiting infiltration of surface water and mobility of contaminants remaining. This layer of backfill would also eliminate human contact with any impacted soil remaining.

The excavation and off-site disposal alternative can be implemented with minimal difficulties. Numerous removal actions of similar nature, performed in the past without incident, have demonstrated that the potential for exposure to the soil and airborne contaminants can be mitigated if appropriate best management practices are used. Additionally, there are no land-banned disposal restrictions for the waste, based on the contaminant concentrations reported in the investigative reports. Removing impacted soil from the site will limit exposure and protect human health and the environment.

It is anticipated that no grading permit will be required from the LADPW for work associated with the proposed removal action. However, given the number of trucks needed to transport impacted soil off site for disposal, approval of the waste transportation route may be required from the LADPW (refer also to section **3.6, Transportation and Traffic**, for information regarding haul truck traffic and routes).

Work activities will comply with all provisions of South Coast Air Quality Management District (SCAQMD) Rules 401 (Visible Emissions), 402 (Odor and Nuisance), 403 (Fugitive Dust), and 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants).

All contractors will be responsible for operating in accordance with the most current OSHA regulations, including 29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response," and 29 CFR 1926, "Construction Industry Standards," as well as other applicable Federal, State and local laws and regulations. A site-specific Health and Safety Plan (HSP) has been prepared in accordance with current safety standards as defined by the USEPA, the OSHA, and the National Institute of Occupational Safety and Health (NIOSH). Additionally, the HSP was prepared in accordance with guidelines set forth in Title 8 of the CCR, Section 5192. The project Site Safety Officer (SSO) will be responsible for maintaining onsite compliance with the HSP. The HSP will be employed during all investigative and remedial activities.

Before initiating the recommended remedial activities, the selected LAUSD contractor will prepare a HSP consistent with the HSP included in Appendix B of the RAW. This HSP will be prepared under the direct supervision of a certified industrial hygienist.

Site security will be controlled in accordance with the requirements of this security plan. During removal activities, security and facilities to protect work areas from unauthorized entry, vandalism, or theft shall be maintained. Wrought iron and chain-link fencing is already in place along the perimeter of the site to prevent unauthorized entry to the school. Additional 6-foot tall, chain-link fencing with wind screen will be installed around individual excavation areas to prevent unauthorized entry to the work areas during working and non-working hours, and to minimize fugitive dust emissions during work activities. Gates will be locked at all times when construction and site personnel are not in attendance.

Construction access to the site will be from the existing gates on South Mathews Street, East 4th Street, East 6th Street, and South Mott Street. Construction traffic must utilize these points of access throughout the duration of the work. In general, the proposed removal action incorporates the following site access controls:

- Site and work areas will be enclosed by fencing at all times. In addition, active work areas will be enclosed by 6-foot tall, chain-link fencing with wind screen (per SCAQMD Rule 1466 requirements);

- Access to the site will be limited to the gates along South Mathews Street, East 4th Street, East 6th Street, and South Mott Street. The gates will be locked after work hours;
- Site and work area access will be limited to authorized personnel;
- All personnel entering the work areas will be required to have appropriate health and safety training and will sign the site-specific HSP each morning;
- All visitors will be registered and must sign in upon entering the work areas; and
- Access to the excavation and stockpile areas with exposed impacted soils will be restricted in accordance with the HSP.

During all soil excavation and handling operations, appropriate steps will be implemented to minimize impacts from dust to other areas of the site, the adjacent properties, and the surrounding community. Air monitoring and dust mitigation procedures will be implemented, and dust control during loading and soil transportation operations will be addressed as required by the SCAQMD. Vehicles and equipment used in the handling of impacted soil will be decontaminated before leaving the site. Due to the small size of the proposed excavation areas, a Storm Water Pollution Prevention Plan (SWPPP) will not be prepared specifically for this removal action; however, Best Management Practices (BMPs) will be implemented to minimize issues associated with storm water runoff.

In addition to the DTSC and Caltrans requirements for safely removing and transporting contaminated soils, the BMPs listed below will reduce the field generation of contaminated or uncontaminated dust and mobilization of VOCs.

- Work will not be conducted when sustained 15-minute average wind speeds exceed 15 miles per hour (mph), or when instantaneous wind speeds exceed 25 mph.

Dust and vapor suppression will be performed by lightly spraying or misting the active work areas (the working face and other points of dust generation) with water. If additional vapor control measures are necessary, only a non-toxic commercial suppressant (i.e., Simple Green®) will be added to the dust control water spray.

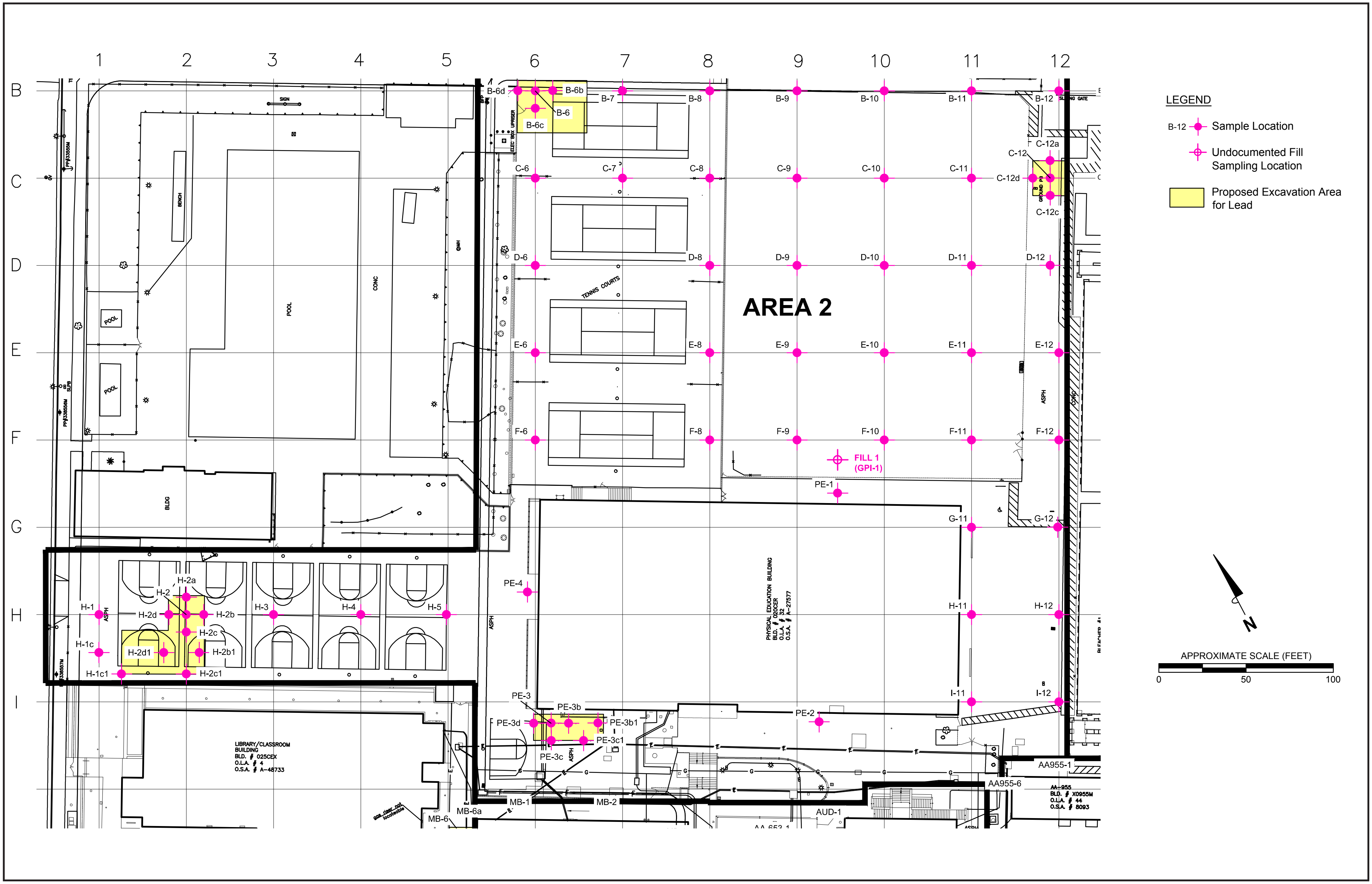
- The soil drop height from the excavator or loader bucket into the transport trucks will be kept to a minimum to reduce potential dust generation
- Temporary stockpiles for non-VOC contaminants, if generated, will be kept moist during working hours and covered with plastic sheeting at the end of the day to control dust. Temporary VOC-contaminated stockpiles, if generated, will be immediately covered with plastic sheeting.
- All vehicles onsite will maintain slow speeds (i.e., less than 5 mph).

- Soil loaded into transport trucks will be covered.
- Installation of shaker plates to minimize vehicle tracking of sediment and soil across non-work areas or offsite.

The proposed excavation areas are shown in **Figures 3.3-2** through **3.3-7** for soil impacts identified in Areas 2, 3, 5, 6, 9, and the Industrial Arts Building in Area 6, respectively. The excavated material will include non-impacted soil, impacted soil, and debris. Where possible, soil may be direct loaded onto trucks for off-site transport and disposal. For waste materials that are not directly loaded onto trucks, specific areas will be identified where temporary stockpiles may be located.

Excavated materials will be confined within the designated perimeters. The stockpile locations will vary depending upon the excavation work area(s), but will generally be located in close proximity to the excavation area(s) for staging and loading for off-site transport. Impacted soil stockpiles will be placed on top of and covered with plastic sheeting, and the stockpiles will remain covered during all periods of inactivity. All soil stockpiles will be visually inspected to ensure integrity of the plastic covered surfaces.

For each excavation area, soil will be segregated based on the type of impacts. The excavated soil will initially be segregated according to existing soil analytical data, field observation, and field monitoring results.



SOURCE: TRC, 2017

FIGURE 3.3-2

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Area 2 Remediation Areas

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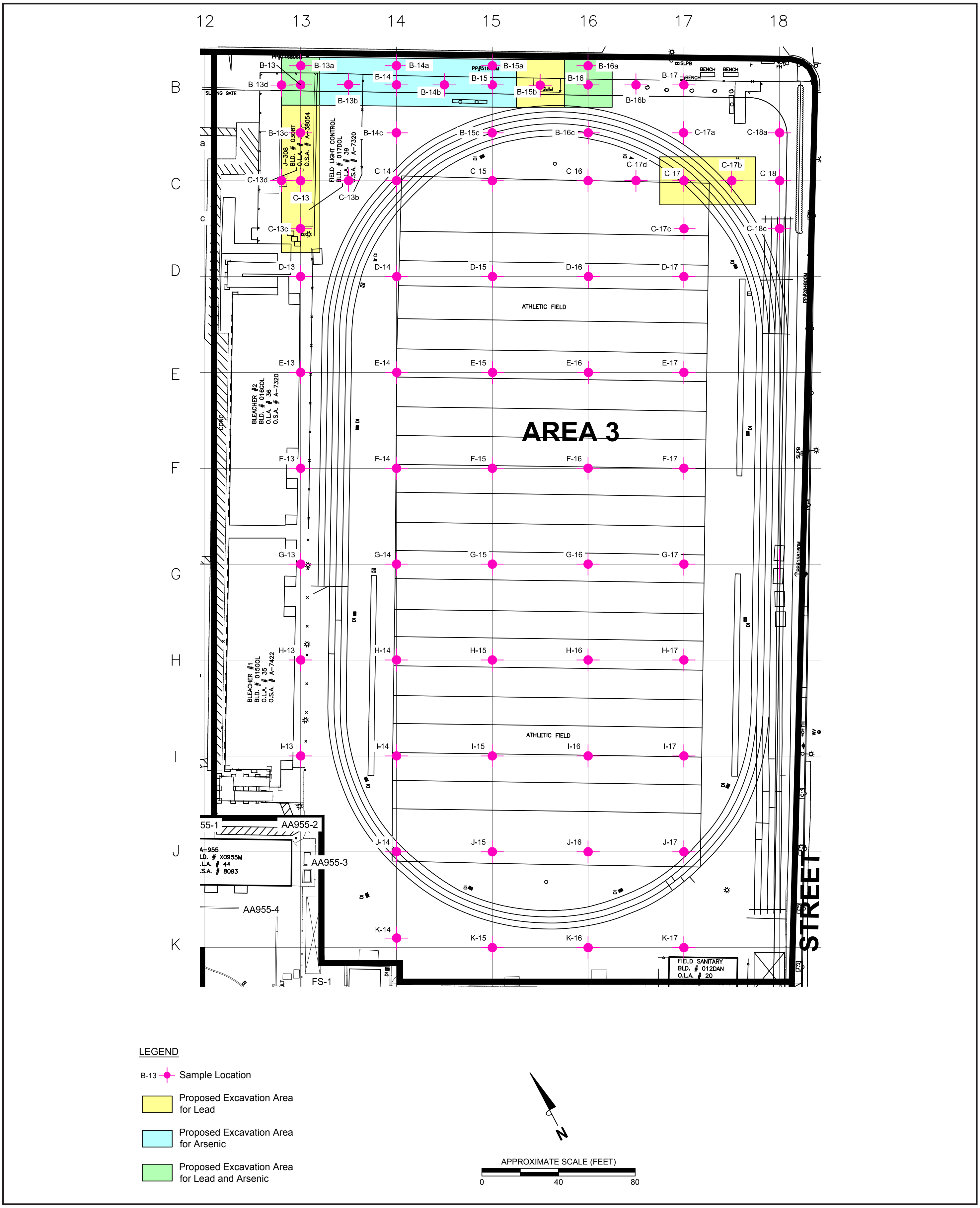

SOURCE: TRC, 2017

FIGURE **3.3-3**

IMPACT SCIENCES

Area 3 Remediation Areas

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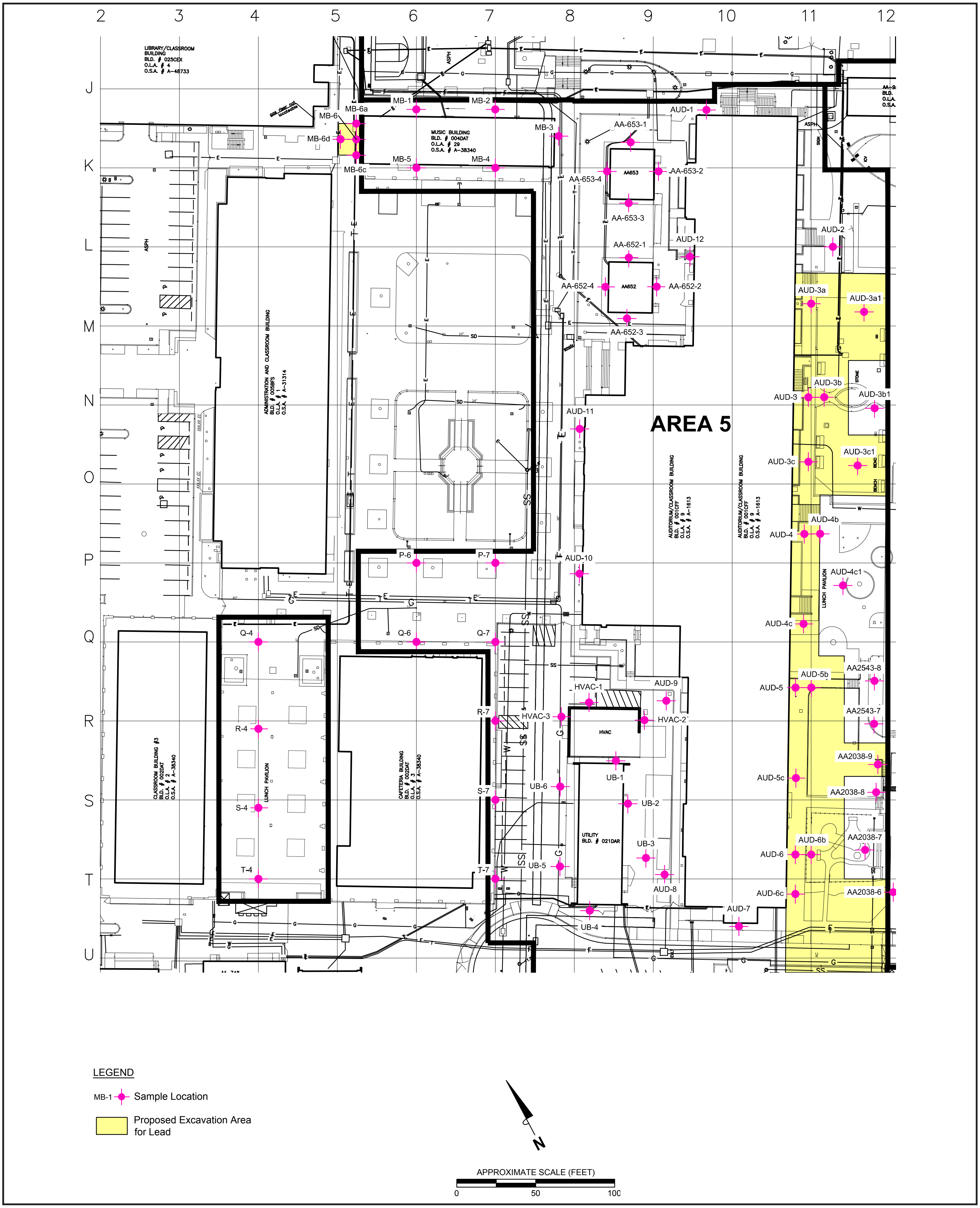

SOURCE: TRC, 2017

FIGURE 3.3-4

IMPACT SCIENCES

Area 5 Remediation Areas

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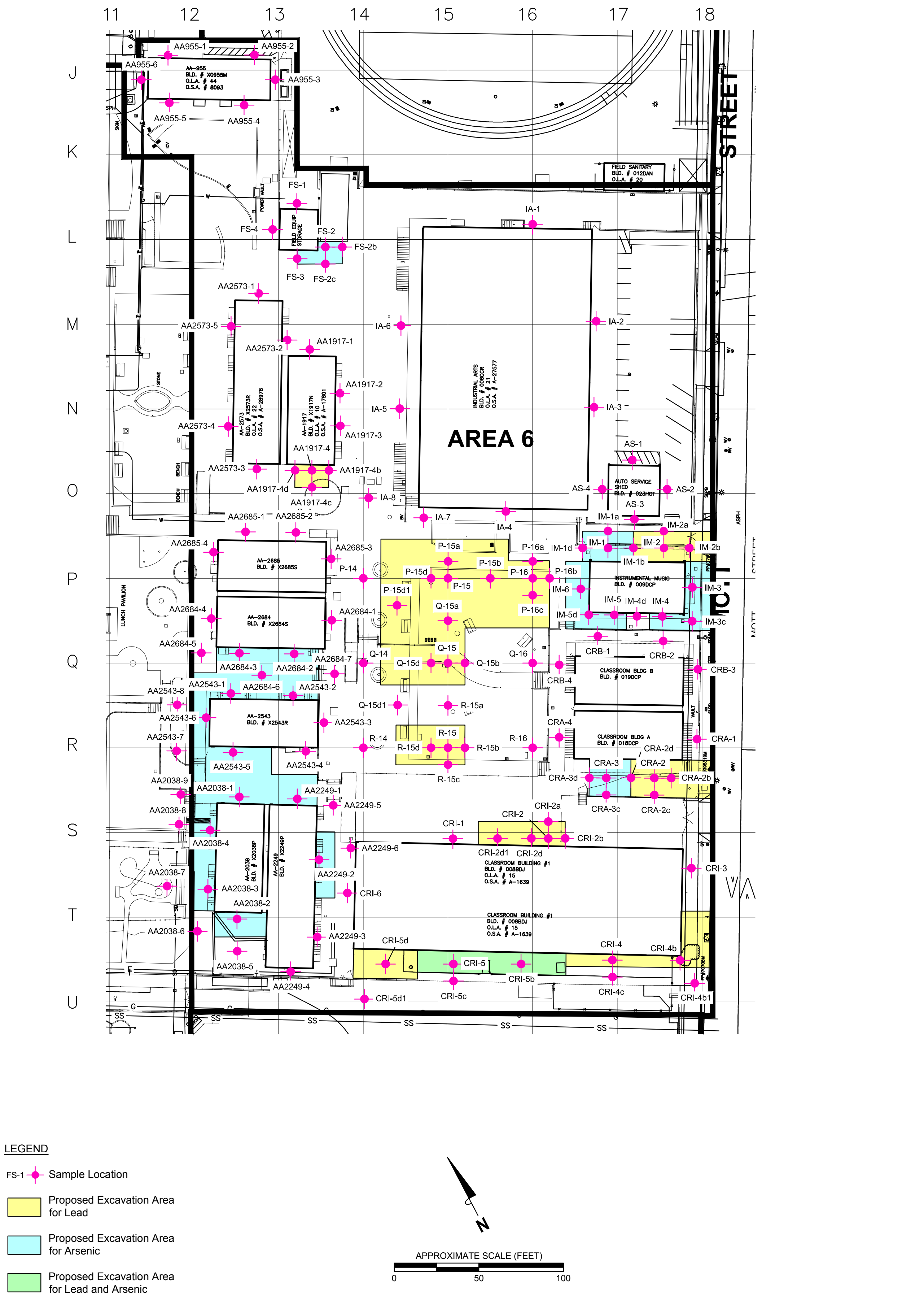

SOURCE: TRC, 2017

FIGURE 3.3-5

IMPACT SCIENCES

Area 6 Remediation Areas

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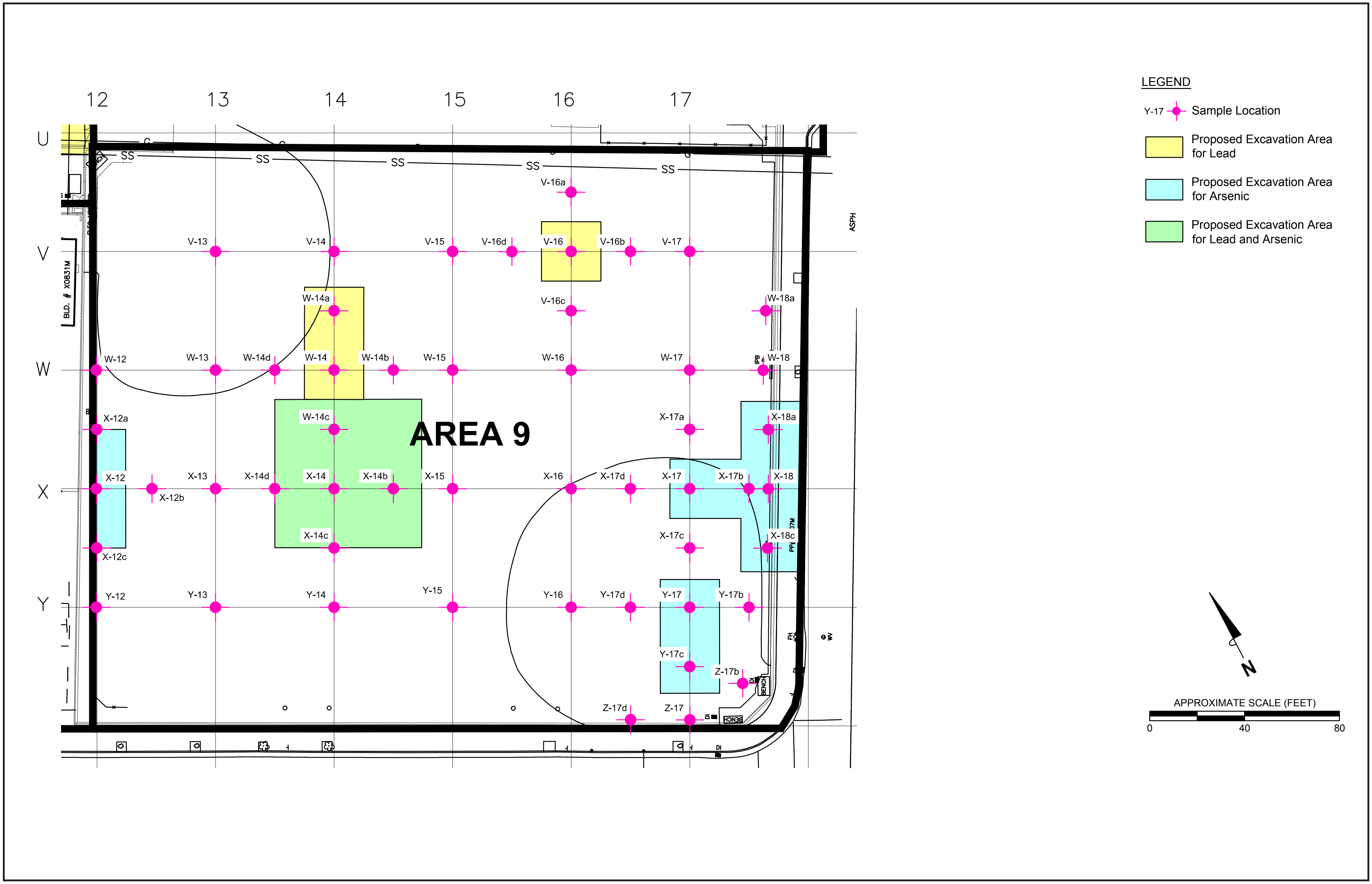

SOURCE: TRC, 2017

FIGURE **3.3-6**

IMPACT SCIENCES

Area 9 Remediation Areas

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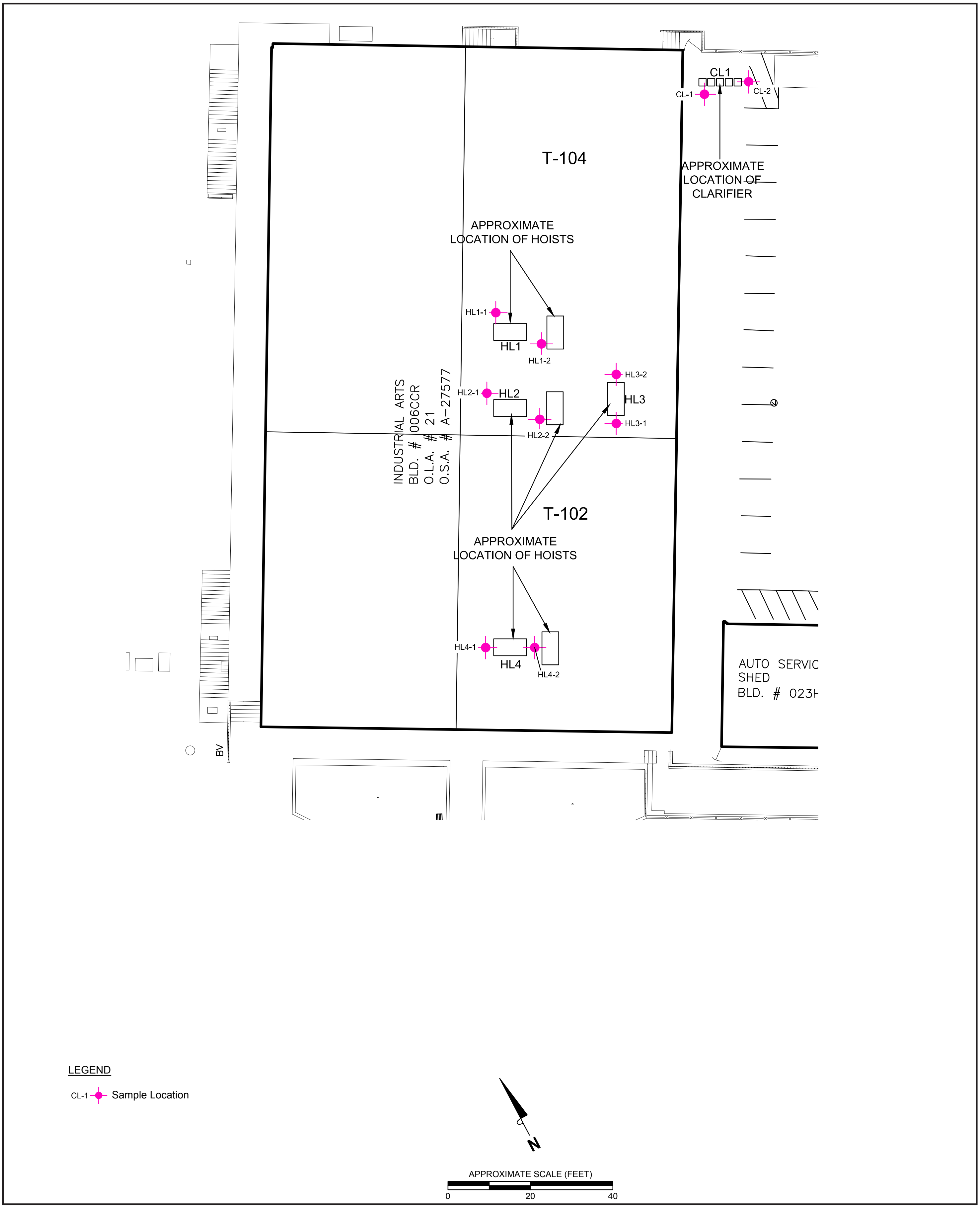

SOURCE: TRC, 2017

FIGURE **3.3-7**

IMPACT SCIENCES

Industrial Arts Building Remediation Areas

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Five distinct and separate stockpiles will be created:

- Non-hazardous arsenic- and lead-impacted soil;
- California hazardous (non-RCRA) lead-impacted soil;
- Non-hazardous petroleum hydrocarbon-impacted soil;
- Non-impacted soil; and
- Demolition debris (e.g., steel, concrete, asphalt, etc.).

The soil will be stockpiled and managed as specified in SCAQMD Rule 1466 and according to the following criteria:

- Impacted soil (arsenic, lead, and petroleum hydrocarbons) will be segregated from non-impacted soil in separate stockpiles so that mixing of the stockpiles does not occur. The soil will be segregated based on previous analytical data and field observations (e.g., soil staining or discoloration for petroleum hydrocarbon-impacted soil). Soil suspected of being impacted with arsenic, lead, and petroleum hydrocarbons based on previous investigations will be stockpiled in appropriate staging areas for waste characterization and off-site disposal. Soil that is suspected of being clean will be stockpiled separately and samples will be collected for analysis. If results of analyses confirm the soil is clean, it will be transferred to clean stockpile areas for future reuse on site as fill material. If the suspected clean soil is determined to be impacted, it will be transferred to the impacted soil stockpile to await off-site transport and disposal. Soil with suspected elevated lead impacts in excess of Soluble Threshold Limit Concentration (STLC) limits, based on previous PEA investigation findings, will be stockpiled separately and samples will be collected for analysis. Based on analytical results, this soil will either remain in a separate stockpile to be handled and transported off site as a California hazardous waste, or be transferred to the non-hazardous soil stockpile to await off-site transport and disposal.
- The soil stockpile locations will vary depending upon the excavation work area(s). In general, impacted soil stockpiles will be in close proximity to the excavation area(s) for staging and loading for off-site transport. Clean soil and demolition debris will be stockpiled separately in each area for reuse and off-site disposal, respectively.
- Soil stockpiles will be placed on top of and covered with plastic sheeting. The plastic sheeting seams will overlap a minimum of 24 inches and be secured with duct tape.
- Soil stockpiles will be sprayed with water and covered with plastic sheeting for all periods of inactivity.

- Soil stockpiles with arsenic and lead impacts will not exceed 400 cubic yards per stockpile, and will not be stockpiled higher than the surrounding fencing. There is no limitation on the volume of clean soil that can be stockpiled on site.
- Soil stockpiles with arsenic and lead impacts will be labeled with "SCAQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants Applicable Soil".
- All soil stockpiles will be visually inspected daily to ensure integrity of the plastic covered surfaces.
- Soil loading into trucks for off-site transport will be conducted either directly during soil excavation or from the stockpiles of soil. All transportation and treatment/disposal activities will be performed in accordance with applicable Federal, State, and local laws, regulations, and ordinances.
- Impacted soil will be removed from the site no greater than 5 days from the time of excavation.
- A record of the identification and business addresses of the generator, transporter, and storage/treatment facilities will be maintained. Such record (manifest) will be signed by each party at the time custody is transferred.

All equipment used during removal action activities will be decontaminated prior to leaving the site following use. Vehicles and excavation equipment will be decontaminated in a track-out prevention zone.

This will consist of a rumble plate or asphalt pad along construction/work exits. Stray waste material on vehicles, the tires, etc., that cannot be covered or protected, will be cleaned off manually. The dump truck will then be covered with a tarp to prevent soil and/or dust from spilling out of the truck during transport to the treatment/disposal facility. Soil sampling equipment (i.e., hand auger) will be cleaned and decontaminated before and after each use at each individual excavation location by scrubbing in a non-phosphate detergent and tap water wash, followed by a tap water rinse, and an initial and final rinse in deionized water to prevent cross contamination.

Waste materials generated during vehicle/excavation equipment cleaning will be temporarily stored on site in designated areas pending waste profiling and disposal with excavation waste materials. Decontamination fluids generated during cleaning of hand-held equipment will be placed in labeled, Department of Transportation (DOT)-approved, 55-gallon drums pending waste profiling and disposal at an appropriate facility

3.3.3 REGULATORY FRAMEWORK

Federal Regulations

Environmental Protection Agency (EPA)

The Environmental Protection Agency (EPA) is the main federal agency responsible for enforcing regulations relating to hazardous materials and wastes, including evaluation and remediation of contamination and hazardous wastes. The EPA works collaboratively with other agencies to enforce materials handling and storage regulations and site cleanup requirements. The Occupational Safety and Health Administration (OSHA) and the Department of Transportation (DOT) are authorized to regulate safe transport of hazardous materials.

Asbestos Hazard Emergency Response Act

The Asbestos Hazard Emergency Response Act (AHERA) provides guidance for the management of asbestos-containing materials (ACM) in schools. The Asbestos School Hazard Abatement Reauthorization Act (ASHARA) extended AHERA regulations to cover public and commercial buildings. AHERA established regulatory standards for inspections, abatement, and transport and disposal of ACM.[5]

The Occupational Safety and Health Administration (OSHA)

OSHA is authorized to regulate safe transport of hazardous materials. Specifically, OSHA implements regulation related to materials handling. OSHA requirements are intended to promote worker safety, worker training, and a worker's right-to-know.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 was the first major federal act regulating the potential health and environmental problems associated with hazardous and nonhazardous solid waste. RCRA and the implementation regulations developed by the EPA provide the general framework of national hazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous waste management facilities. RCRA allows individual states to develop their own program for the regulation of hazardous wastes as long as state regulations are at least as stringent as the RCRA.

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5 US Code, Title 15, Section 2641 et seq. "Asbestos Hazard Emergency Response," contains the codified requirements of both AHERA and ASHARA.

The Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as the Superfund Act, outlines the potential liability related to the cleanup of hazardous substances, available defenses to such liability, appropriate inquiry into site status under Superfund, which is the federal government's program to clean up the nation's uncontrolled hazardous waste sites, statutory definitions of hazardous substances and petroleum products, and the petroleum product exclusion under CERCLA

State Regulations

Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) is authorized by EPA to administer the hazardous waste laws and oversee remediation of hazardous wastes sites. Regulations require that DTSC "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC)."[6]

The hazardous waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under the HSC, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.[7]

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) is mandated by Section 3106 of the Public Resources Code to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells for the purpose of preventing (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. The regulations can be found in the California Code of Regulations (CCR) Title 14.

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6 California Government Code, Title 22, Section 65962.5.

7 California Health and Safety Code, Section 25187.5.

DOGGR's Well Review Program assists developers in addressing issues associated with development near oil and gas wells.[8]

Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government, and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including the Cal EPA, CHP, the RWQCB, and the local fire department. The Los Angeles County Fire Department provides first response capabilities, if needed, for hazardous materials emergencies within the project area.

California EPA

The California EPA oversees the DTSC whose mission it is to protect California's people and environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation, and pollution prevention. The DTSC regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff ensure that companies and individuals handle, transport, store, treat, dispose of, and clean-up hazardous wastes appropriately. Through these measures, DTSC contributes to greater safety for all Californians, and less hazardous waste reaches the environment.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal OSHA) has set forth work requirements for disturbance of Asbestos Containing Construction Materials (ACCMs) including removal operations for all types of ACCMs. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials, an informational program describing any exposure during operations and the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

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8 California Division of Oil, Gas, and Geothermal Resources, *Well Review Program Introduction and Application*, 2007 ftp://ftp.consrv.ca.gov/pub/oil/Well_Review_Program.pdf.

California Office of Emergency Services

The California Office of Emergency Services (CAL OES) Hazardous Materials (HazMat) Section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

California Code of Regulations Title 8

This section of the California Code of Regulations (CCR) regulates asbestos exposure in all work defined in the Code's Section 1502 including demolition or salvage of structures where asbestos is present, removal or encapsulation of materials containing asbestos, construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos, installation of products containing asbestos, asbestos spill/emergency cleanup, transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed, and excavation which may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to but more stringent than the federal Resource Conservation and Recovery Act program. The Act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program

Elements consolidated under the Unified Program are: Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (a.k.a. Tiered Permitting); Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC); Hazardous Materials Release Response Plans and Inventory Program (a.k.a. "Hazardous Materials Disclosure" or "Community Right To Know"); California Accidental Release Prevention Program (Cal ARP); Underground Storage Tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

Hazardous Waste Source Reduction and Management Review Act of 1989

This Act requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste (such as asbestos and polychlorinated biphenyls).

California Vehicle Code

The California Vehicle Code (Title 13 of the CCR) establishes regulations for motor carrier transport of hazardous materials. For example, all motor carrier transporters of hazardous materials are required to have a Hazardous Materials Transportation license issued by the California Highway Patrol. In addition, placards identifying that hazardous materials are being transported must be displayed on the vehicle.

California Health and Safety Code

The transport of hazardous waste materials is further governed by the California Health and Safety Code Section 25163 and Title 22, Chapter 13, of the CCR. Specifically, Section 25163 of the California Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste. Additionally, Title 22, Chapter 13 of the CCR includes a number of requirements, which include, but are not limited to, the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC.
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued.
- To be registered as a hazardous waste transporter, an application must be submitted.
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter.
- Hazardous waste shall be delivered to authorized facilities only.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) maintains rules and regulations pertaining to asbestos abatement. Air Quality Management District (AQMD) Rule 1403, adopted by the SCAQMD on October 6, 1989, establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities.

Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the EPA. As such, AQMD Rule 1403 incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M.

The EPA delegated to SCAQMD the authority to enforce the federal asbestos NESHAP and the SCAQMD is the local enforcement authority for asbestos.

CEQA Statute, PRC§21151.8; 14 CCR §15186[c], [d]

CEQA contains special requirements that apply to school site acquisition and construction projects in PRC§21151.8; 14 CCR §15186[c], [d]. These sections require school districts to carefully evaluate potential risks to students, faculty, and other school district employees that may be posed by on-site and off-site sources of hazardous materials. In addition, new school acquisition and/or construction projects that receive funds from the State must undergo specific hazardous materials review process. For school projects that do not involve state funds, LAUSD OEHS oversees the environmental review process.

Local Regulations

Los Angeles Unified School District Standards

Standard Conditions of Approval

These standard conditions of approval (SCs) are included within the Los Angeles Unified School District, School Upgrade Program EIR (Program EIR).

SC-AQ-1 *OEHS CEQA Specification Manual, Appendix J, Air Toxic Health Risk Assessment (HRA)*

This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

SC-CUL-10 LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.

SC-T-4: LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

SC-USS-1 *School Design Guide*

Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.

Guide Specifications 2004 – Section 01340, Construction & Demolition Waste Management.

This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

SC-HWQ-3 During construction and operation the following programs will be implemented:

- Environmental Training Curriculum
- Hazardous Waste Management Program
- Medical Waste Management Program
- Environmental Compliance Inspections
- Integrated Pest Management Program
- Fats Oil and Grease Management Program
- Solid Waste Management Program

3.3.4 METHODOLOGY

To evaluate potential impacts, existing and proposed on-site hazards were identified and compared against the established safety standards and regulations to determine if the proposed Project would result in impacts related to hazardous materials. The analysis of the potential impacts regarding hazardous materials management was based on site evaluations, plans and operational information provided by the LAUSD.

3.3.5 THRESHOLDS OF SIGNIFICANCE

The following thresholds for determining the significance of impacts related to hazards and hazardous materials are contained in the environmental checklist form contained in Appendix G of the CEQA Statutes and Guidelines. Impacts related to hazards and hazardous materials are considered significant if the proposed project would:

HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;

HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;

HAZ-4 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;

HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;

HAZ-6 For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;

HAZ-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

HAZ-8 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;

Title 5 of the California Code of Regulation Section 14010 incorporates health and safety factors provided in the California Department of Education's (CDE) *School Site Selection and Approval Guide*. In combination with the thresholds provided in the *State CEQA Guidelines*, these thresholds (**Thresholds HAZ-9** through **HAZ-19**, below) ensure that schools provide a safe learning environment for students. Impacts related to hazards and hazardous materials are considered significant if the proposed project would:

HAZ-9 Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood;

HAZ-10 Be located on a site where the property line is less than the following distance from the edge of respective power line easement:

- 100 feet of a 50-133 kV line
- 150 feet of a 220-230 kV line, or
- 350 feet of a 500-550 kV line;

HAZ–11 Be located on a site that is within 1,500 feet of a railroad track easement;

HAZ–12 Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard;

HAZ–13 Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines;

HAZ–14 Be located within 1,500 feet of a pipeline that may pose a safety hazard;

HAZ–15 Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised;

HAZ–16 Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students;

HAZ–17 Be located on a site that contains, or is near, propane tanks that can pose a safety hazard;

HAZ–18 Be located on a site with traffic pattern for school buses that can pose a safety hazard; or

HAZ–19 Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste.

An Initial Study was prepared that determined the Project would have a less than significant impact or no impact related to the following thresholds:

HAZ-4 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;

HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;

HAZ-6 For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;

HAZ–7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

HAZ–8 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;

HAZ-9 Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood;

HAZ-10 Be located on a site where the property line is less than the following distance from the edge of respective power line easement:

– 100 feet of a 50-133 kV line

– 150 feet of a 220-230 kV line, or

– 350 feet of a 500-550 kV line;

HAZ-11 Be located on a site that is within 1,500 feet of a railroad truck easement;

HAZ–12 Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard;

HAZ–13 Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines;

HAZ–15 Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised;

HAZ–16 Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students;

HAZ–17 Be located on a site that contains, or is near, propane tanks that can pose a safety hazard;

HAZ–18 Be located on a site with traffic pattern for school buses that can pose a safety hazard; or

HAZ–19 Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste.

Therefore these thresholds are not analyzed in this EIR. The Initial Study is provided in Appendix 1.0 of this EIR.

3.3.6 IMPACTS AND MITIGATION MEASURES

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? ***Less than significant***

Construction

A significant impact would occur if the proposed Project would create a significant hazard through the routine transfer, use, or disposal of hazardous materials. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities.

As previously discussed, as a part of the construction activities, LAUSD would implement a RAW for the proposed Project. Approximately 7,019 cubic yards of soil containing contaminants of concern (COCs); specifically, arsenic, lead, and petroleum hydrocarbons, at levels that exceed the LAUSD's cleanup goals would be removed from areas located throughout the Project site.[9]

Implementation of the RAW would entail excavation and off-site removal as a part of the proposed Project. The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, and dump truck. Ancillary facilities (i.e., wastewater holding tank) would also be used during the removal action. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to the COCs. The depth of excavations may be limited due to physical constraints associated with the site.

9 TRC Solutions. June 27, 2017. Roosevelt High School: Revised Summary of Proposed Excavation Areas.

Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls.

As detailed above, excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Truck loading would take place concurrently with excavation operations associated with the project. Clean, imported soil or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

Based on the foregoing, implementation of the proposed RAW and modernization Project will be closely monitored and will occur in accordance with local, state and federal requirements. The proposed modernization would not subject people to substantial hazards from lead, arsenic, or petroleum hydrocarbons. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Operation

The proposed Project is the renovation of an existing educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site.

The design and operation of the proposed Project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances (i.e., collecting hazardous materials on a regular basis to minimize the quantity stored on campus), installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant. No further analysis is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ***Less than significant***

A significant impact would occur if the proposed Project created a significant hazard to the public, or environment, due to a reasonably foreseeable release of hazardous materials. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids.

Construction

As discussed above, the proposed Project includes various remedial activities that would remove approximately 7,019 cubic yards of contaminated soil from the Project site. Although the proposed remedial activities could potentially create a significant hazard to the public or the environment through the release of hazardous materials into the environment, as noted in the discussion of the RAW and threshold **HAZ-1** above, compliance with federal, state and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. Further, the RAW incorporates BMPs to reduce the potential for release of hazardous materials. Therefore, impacts related to the accidental release of hazardous materials would be less than significant. No further analysis is required.

Operation

The proposed Project would not create a hazard through upset or accident conditions involving hazardous materials. As discussed in threshold **HAZ-1** above, the use of hazardous materials and substances at school facilities during operations would be minimal and in small quantities. Additionally, all materials and substances would be subject to applicable health and safety requirements stipulated by LAUSD's Office of Environmental Health and Safety (OEHS) including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.[10] This would include affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of hazardous materials. Potential operation impacts related to hazardous materials would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

HAZ-3: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? *Less than significant*

There are six schools within a quarter-mile of the proposed Project site, including the Project site itself. Hollenbeck Middle School is directly across E. 6th Street, approximately 75 feet south of the Project site. Further south, approximately 1,200 feet southwest of Roosevelt High School is the SEA Charter School. To the east and northeast are the Our Lady of Talpa School (approximately 1,160 ft.) and First Street Elementary School (approximately 1,240 feet), respectively. Breed Street Elementary School, is about 1,250 feet northwest of the site.

Construction

As discussed in threshold **HAZ-1** above, the proposed Project includes various remedial activities that would remove approximately 7,019 cy of contaminated soil from the Project site. Although the proposed

[10] Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at http://achieve.lausd.net/Page/2562.

remedial activities could potentially create a significant hazard to the public or the environment through the release of hazardous materials into the environment, as noted in the discussion of the RAW and threshold **HAZ-1** above, compliance with federal, state and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. Further, the RAW incorporates BMPs to reduce the potential for release of hazardous materials. Therefore, impacts related to hazardous emissions, or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would be less than significant.

Operation

As the proposed Project is a school, impacts could occur if hazardous materials were released on the Project site during operation. Operation of the proposed Project may require a limited quantity of hazardous materials (e.g., for landscaping, custodial, and educational purposes) be stored on the Project site.

Examples of such materials could include, but are not limited to, cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable regulations set forth by LAUSD OEHS including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.11

Further, procedures for the systematic evacuation of students from classrooms and other school facilities are established and practiced by the LAUSD at all schools. Each school's Safe School Plan describes procedures to be followed in the event of a biological or chemical release.

Compliance with applicable laws, regulations, and standard LAUSD policies and practices during Project operation would ensure that impacts associated with upset or accidental conditions which could cause a release of hazardous materials are less than significant, and no further analysis is necessary.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

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11 Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at http://achieve.lausd.net/Page/2562

HAZ-14: Would the Project be located within 1,500 feet of a pipeline that may pose a safety hazard?
Less than significant with mitigation.

Pursuant to CEC Section 17213(a)(3), a school district shall not approve a Project involving the acquisition of a school site that contains one or more aboveground or underground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood. Under CCR, Title 5, Section 14010(h) the school site shall not be located near a fuel storage tank or within 1,500 feet from the easement of an aboveground or underground pipeline that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional, which may include certification from a local public utility commission. In addition, LAUSD has guidelines for Pipeline Safety Hazard Assessments for existing schools located within 1,500 feet of high pressure natural gas pipelines.[12]

The CDE has also developed and published guidance procedures for evaluating safety hazards associated with natural gas and hazardous liquid releases from underground and aboveground pipelines, as well as flooding associated with releases from large-diameter water pipelines. Pipeline risk reduction measures include, but are not limited to, the following:

- Develop and implement emergency response procedures allowing students and staff to shelter in place inside the school.
- Install or develop warning systems to improve evacuation time.
- Provide staff with safety training and develop better communication and coordination with emergency response personnel.
- Require that a school be notified of any third party construction near an existing pipeline.
- Establish emergency telephone communication with school office.

No pipelines are located on the Project site. A gas transmission line owned by Sempra Energy is located adjacent to the northeast along 4th Street and diverts further north to South Fickett Street. According to information from the Sempra Energy website, this pipeline is generally equipped with a larger diameter and operates at pressures above 200 psi. This pipeline transports gas from supply points to the gas transmission system.[13] The Project site has been in use as a school since 1923, very likely well before the gas line was put in place. The renovation of the existing school site would not expose new students to an existing hazard, as there is no change in student population proposed. In addition, compliance with LAUSD guidelines for Pipeline Safety Hazard Assessments and CDE assessment procedures would ensure that measures are taken to reduce impacts associated with the existing pipeline, as detailed in

12 LAUSD Office of Environmental Health and Safety. *User Manual: Pipeline Safety Hazard Assessment.* March 2005, with updates.

13 Converse Consultants, *Phase I Environmental Site Assessment Report, Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California 90033*, August, 30, 2016.

Mitigation Measure **MM-HAZ-1**. Hazard impacts associated with hazardous substances or materials, or hazardous waste pipelines would be less than significant.

Mitigation Measures

MM-HAZ-1 Prior to occupancy of the new school buildings, LAUSD shall conduct a Pipeline Safety Hazard Assessments in accordance with LAUSD's *User Manual: Pipeline Safety Hazard Assessment*. If determined to be necessary, LAUSD shall also develop and implement emergency response procedures for the school based on the assessed risk. The plan shall include the following as appropriate:

- Emergency response procedures allowing students and staff to shelter in place inside the school.
- Warning systems to improve evacuation time.
- Safety training for staff
- Communication and coordination protocols with emergency response personnel.
- Requirement that a school be notified of any third party construction near an existing pipeline.
- Establish emergency telephone communication with school office.

Residual Impacts

With implementation of Mitigation Measure MM HAZ-1, impacts would be less than significant.

3.3.7 CUMULATIVE ANALYSIS

With the recommended design, the proposed Project would have a less-than-significant hazardous materials impact to the public or the environment within the vicinity of the Project site. Hazard impacts associated with a proposed project usually occur on a project-by-project basis rather than cumulatively. Other foreseeable development within the area, although likely increasing the potential to disturb existing contamination and the handling of hazardous materials, would be required to comply with the same regulations as the proposed Project. This includes federal and state regulatory requirements for transporting (Cal EPA and Caltrans) hazardous materials or cargo (including fuel and other materials used in all motor vehicles) on public roads or disposing of hazardous materials (Cal EPA, DTSC,). Therefore, the Project would not contribute to a cumulatively considerable hazardous materials impact and cumulative impacts associated with the proposed Project are, therefore, considered less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant and would not be cumulatively considerable.

3.4.1 INTRODUCTION

This section of the EIR describes the existing noise environment on the Project site and in the surrounding area and evaluates the potential for noise impacts associated with implementation of the proposed Project. The analysis focuses on the potential for the project to result in impacts on adjacent noise-sensitive uses. Results of the noise monitoring study performed for the proposed project are provided in **Appendix 3.4**. Effects related to aircraft noise were found not to be significant in the Initial Study prepared for the project and included in **Appendix 1.0** and therefore are not included in this analysis.

FUNDAMENTALS OF NOISE AND VIBRATION

Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies; for example, it is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dB(A), is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dB(A) increase in noise level. In general, changes in a community noise level of less than 3 dB(A) are not typically noticed by the human ear.[1] Changes from 3 to 5 dB(A) may be noticed by some individuals who are extremely sensitive to changes in noise. A greater than 5 dB(A) increase is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound.

On A-weighted scale, the range of human hearing extends from approximately 3 to 140 dB(A). **Table 3.4-1, A-Weighted Decibel Scale**, provides examples of A-weighted noise levels from common sources.

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1 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.

Table 3.4-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dB(A), Leq)
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conversation Technical Manual, 1999.

Noise sources occur in two forms: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large number of point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dB(A) at acoustically "soft" sites.[2] For example, if a noise source produces a noise level of 89 dB(A) at a reference distance of 50 feet, the noise level would be 83 dB(A) at a distance of 100 feet from the noise source, 77 dB(A) at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dB(A) over hard surfaces and 4.5 dB(A) over soft surfaces for each doubling of distance.

Sound levels also can be attenuated by man-made or natural barriers (e.g., sound walls, berms, ridges), as well as elevational differences. Noise is most audible when traveling by direct line-of-sight, a visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barrier s can reduce sound levels by up to 20 dB(A) or more. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Solid walls and berms may reduce noise levels by 5 to 10 dB(A) depending on their height and distance relative to the noise source and the noise receptor.[3] Sound levels may also be attenuated 3 to 5 dB(A) by a

2 Federal Highway Administration, *Highway Noise Fundamentals*, (1980) 97. Examples of "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft, sand, plowed farmland, grass, crops, heavy ground cover, etc.

3 Federal Highway Administration, *Highway Noise Mitigation*, (1980) 18.

first row of houses and 1.5 dB(A) for each additional row of houses.[4] The minimum noise attenuation provided by typical structures in California is provided in **Table 3.4-2, Outside-to-Inside Noise Attenuation**.

Table 3.4-2
Outside-to-Inside Noise Attenuation (dB(A))

Building Type	Open Windows	Closed Windows
Hotels/Motels	17	25
Residences	17	25
Schools	17	25
Churches	20	30
Hospitals/Convalescent Homes	17	25
Offices	17	25
Theaters	20	30

Source: Gordon, C.G., W.J. Galloway, B.A. Kugler, and D.L. Nelson. NCHRP Report 117: Highway Noise: A Design Guide for Highway Engineers. Washington, D.C.: Transportation Research Board, National Research Council, 1971.

Sound Rating Scales

Various rating scales approximate the human subjective assessment to the "loudness" or "noisiness" of a sound. Noise metrics have been developed to account for additional parameters, such as duration and cumulative effect of multiple events. Noise metrics are categorized as single event metrics and cumulative metrics, as summarized below.

In order to simplify the measurement and computation of sound loudness levels, frequency weighted networks have obtained wide acceptance. The A-weighted (dB(A)) scale has become the most prominent of these scales and is widely used in community noise analysis. Its advantages are that it has shown good correlation with community response and is easily measured. The metrics used in this analysis are all based upon the dB(A) scale.

Equivalent Noise Level

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the "acoustic energy" average noise level during the period of the sample. It is

4 T. M. Barry and J. A. Reagan, *FHWA Highway Traffic Noise Prediction Model*, (1978) 33.

based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dB(A). Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24-hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1-hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

Community Noise Equivalent Level

Community Noise Equivalent Level (CNEL) is a 24-hour, time-weighted energy average noise level based on the A-weighted decibel. It is a measure of the overall noise experienced during an entire day. The term "time-weighted" refers to the penalties attached to noise events occurring during certain sensitive periods. In the CNEL scale, 5 dB are added to measured noise levels occurring between the hours of 7:00 PM and 10:00 PM For measured noise levels occurring between the hours of 10:00 PM to 7:00 AM 10 dB are added. These decibel adjustments are an attempt to account for the higher sensitivity to noise in the evening and nighttime hours, and the expected lower ambient noise levels during these periods. Existing and projected future traffic noise levels in this section use the CNEL scale.

Day-Night Average Noise Level

The day-night average sound level (Ldn) is another average noise level over a 24-hour period. Noise levels occurring between the hours of 10:00 PM and 7:00 AM are increased by 10 decibels (dB). This noise is weighted to take into account the decrease in community background noise of 10 dB(A) during this period. Noise levels measured using the Ldn scale are typically similar to CNEL measurements.

Adverse Effects of Noise Exposure

Noise is known to have several adverse effects on humans, which has led to laws and standards being set to protect public health and safety, and to ensure compatibility between land uses and activities. Adverse effects of noise on people include hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts on people is briefly discussed in the following narrative.

Hearing Loss

Hearing loss is generally not a community noise concern, even near a major airport or a major freeway. The potential for noise induced hearing loss is more commonly associated with occupational noise exposures in heavy industry, very noisy work environments with long term exposure, or certain very loud recreational activities, such as target shooting, motorcycle or car racing, etc. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dB(A) for 8 hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud to cause hearing loss.

Communication Interference

Communication interference is one of the primary concerns in environmental noise problems. Communication interference includes speech interference and interference with activities such as watching television. Noise can also interfere with communications within school classrooms, as well as classroom activities. Normal conversational speech is in the range of 60 to 65 dB(A) and any noise in this range or louder may interfere with speech.

Sleep Interference

Noise can make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and cause awakening. Noise may even cause awakening that a person may or may not be able to recall.

Physiological Responses

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, etc. Studies to determine whether exposure to high noise levels can adversely affect human health have concluded that, while a relationship between noise and health effects seems plausible, there is no empirical evidence of the relationship.

Annoyance

Annoyance is the most difficult of all noise responses to describe. Annoyance is a very individual characteristic and can vary widely from person to person. Noise that one person considers tolerable can be unbearable to another of equal hearing capability. The level of annoyance depends both on the characteristics of the noise (including loudness, frequency, time, and duration), and how much activity interference (such as speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that 2 to 10 percent of the population is highly susceptible to annoyance from any noise not of their own making, while approximately 20 percent are unaffected by noise.[5] Attitudes may also be affected by the relationship between the person affected and the source of noise, and whether attempts have been made to abate the noise.

Vibration

Vibration consists of waves transmitted through solid material. Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be comprised of a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating, measured in Hertz (Hz). Most environmental vibrations consist of a composite, or “spectrum” of many frequencies, and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than one Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak particle velocity (PPV) in inches per second (in/sec) when considering impacts on buildings or other structures, as PPV represents the maximum instantaneous peak of vibration that can stress buildings. Because it is a representation of acute vibration, PPV is often used to measure the temporary impacts of short-term construction activities that could instantaneously damage built structures. Vibration is often also measures by the Root Mean Squared (RMS) because it best correlates with human perception and response. Specifically, RMS represents “smoothed” vibration levels over an extended period of time and is often used to gauge the long-term chronic impacts of a project’s operation on the adjacent environment. RMS amplitude is the average of a signal’s squared amplitude. It is most commonly measured in decibel notation (VdB).

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High frequency vibrations reduce much more rapidly than low frequencies, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss (i.e., the foundation of the structure does not move in sync with the ground vibration), but the vibration can also be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows or of items on shelves, or the motion of building surfaces. At high levels, vibration can result in damage to structures.

Manmade groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne

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5 Wayne County Airport Authority. *Background information on noise & its measurement, 2009*

vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Human annoyance by vibration is related to the number and duration of events. The more events or the greater the duration, the more annoying it will be to humans.

3.4.2 EXISTING CONDITIONS

According to the L.A. CEQA Thresholds Guide, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. There are a number of noise-sensitive receptors in the vicinity of the Project site. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the project site:

- Roosevelt High School. It is anticipated that construction activities would occur at the Project site while school is in session. Students would be exposed to elevated noise and vibration levels as a result.
- Single- and multi-family residences along South Mott Street. These residences are as near as approximately 50 feet east/southeast of the Project site.
- Single- and multi-family residences along South Mathews Street. These residences are as near as approximately 65 feet northwest of the Project site.
- Single- and multi-family residences along East 4th Street. These residences area as near as approximately 85 feet north/northeast of the Project site.
- Hollenbeck Middle School. This school is approximately 140 feet south/southeast of the Project site.
- Nichiren Shu Beikoku Betsuin Temple. This facility is located approximately 430 feet to the northeast of proposed construction activity.
- Promise Hospital of East Los Angeles. This facility is located approximately 440 feet to the northwest of the proposed construction activity on the Project site.
- Kingdom Hall of Jehovah's Witnesses. This facility is located approximately 465 feet to the northeast of the Project's site.

On April 11, 2017, Impact Sciences took short-term 15-minute noise readings at all four locations to determine these receptors' ambient noise conditions.[6] Noise readings were taken by using a Larson David 820 Sound Level Meter. Ambient noise levels range from 56.5 dB(A) Leq at Hollenbeck Middle School to 68.1 dB(A) Leq at the corner of 4th Street and Fickett Street.[7] These receptors were selected due to their proximity to the site, other receptors would be further away and would likely experience decreased noise levels compared to the selected receptors. Ambient noise levels for all receptors are shown in **Table 3.4-3, Ambient Sound Level Readings** for reference.

Table 3.4-3
Ambient Sound Level Readings

Monitoring Location	Location Number (Figure 4)	Start Time of Reading	Existing Ambient (dB(A), Leq)	Notes
Residences Along Mott Street	1	9:43 AM	60.5	Moderate car traffic, barking dogs in distance
Residences Along 4th Street	2	10:06 AM	68.1	Automobile and Bus traffic
Hollenbeck Middle School	3	9:24 AM	56.6	Van unloading
Residences Along Mathews Street	4	9:00 AM	57.1	Helicopter flyover

Source: Impact Science, 2017.

3.4.3 REGULATORY FRAMEWORK

Federal Regulations

Federal noise standards do not regulate environmental noise associated with short-term construction or long-term operation of development projects. As such, temporary and long-term noise and vibration impacts produced by the Project will largely be evaluated and regulated by City of Los Angeles and LAUSD standards designed to protect public health. In the evaluation of construction-related vibration impacts, City standards are used.

6 Noise measurements were taken using a Larson Davis 820 Sound Level Meter. This meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Noise monitoring locations and results can be found in this document's noise appendix.

7 Noise measurements at sensitive receptors establish the existing sound levels at nearby residences that could be affected by the Project.

Federal Transit Administration

The Federal Transit Administration has established guidelines that provide significance thresholds for ground-borne vibration disrupting various land uses. **Table 3.4-4 Land Use Disruption Vibration Thresholds**, summarizes these thresholds, which are measured in VdB. Project construction activity would be considered a frequent event.

Table 3.4-4
Land Use Disruption Vibration Thresholds (VdB)

	Significance Thresholds (VdB)		
Land Use	**Frequent Events**	**Occasional Events**	**Infrequent Events**
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep	72	75	80
Institutional land uses with primarily daytime uses	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80

Source: Federal Transit Administration, 2006

The Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, non-engineered timber and mason buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage, while reinforced-concrete, steel, or timber buildings can be exposed to ground-borne vibration levels of 0.5 inches per second.[8]

The FTA has also set standard that address the effect of long-term vibration on human annoyance. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. The RMS amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration. For residential land uses which experience occasional events of ground-borne vibration or noise, the FTA has

8 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

established a threshold of 75 VdB.[9] Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria.

State Regulations

California 2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines establish guidelines for acceptable exterior noise levels for each county and city. The California Department of Health Services established these guidelines for acceptable exterior noise levels for each county and city. These standards and criteria are incorporated into the land use planning process to reduce future noise and land use incompatibilities. **Table 3.4-**5 illustrates State guidelines that allow the City to consider the compatibility between land uses and outdoor noise.

State interior noise standards were established in 1974, when the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (Title 24, Part 2, California Code of Regulations). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels of 60 dB Day-Night Average Noise Level (Ldn) or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB Ldn for any habitable room.

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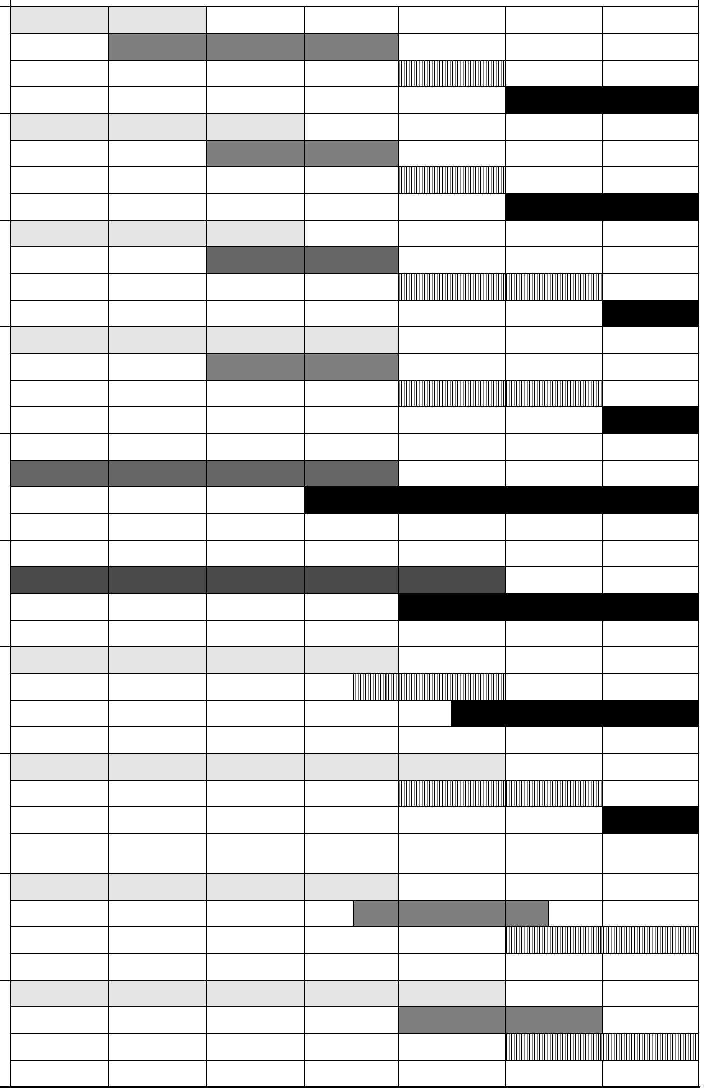
9 Ibid.

Table 3.4-5
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL) 55 60 65 70 75 80
Residential - Low Density Single-Family, Duplex, Mobile Homes	
Residential - Multi-Family	
Transient Lodging - Motels Hotels	
Schools, Libraries, Churches, Hospitals, Nursing Homes	
Auditoriums, Concert Halls, Amphitheaters	
Sports Arena, Outdoor Spectator Sports	
Playgrounds, Neighborhood Parks	
Golf Courses, Riding Stables, Water Recreation, Cemeteries	
Office Buildings, Business Commercial and Professional	
Industrial, Manufacturing, Utilities, Agriculture	



Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D)", 2017.

California Department of Transportation Vibration Standard

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when considering the impacts construction-related vibrations. **Table 3.4-6 Building Damage Vibration Guidelines** summarizes Caltrans' vibration guidelines for building and structural damage.

Table 3.4-6
Building Damage Vibration Guidelines (PPV)

	Significance Thresholds (in/sec PPV)	
Structure and Condition	**Transient Sources**	**Continuous/Frequent/Intermittent Sources**
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New Residential Structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, 2013

This same manual also contains vibration guidelines for human annoyance potential, summarized in **Table 3.4-7 Human Annoyance Vibration Guidelines (PPV).**

Table 3.4-7
Human Annoyance Vibration Guidelines (PPV)

	Significance Thresholds (in/sec PPV)	
Human Response	**Transient Sources**	**Continuous/Frequent/Intermittent Sources**
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: California Department of Transportation, 2013

California Code of Regulations, Title 5, Section 14040(q)

Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

Local Regulations

City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC) contains a number of regulations that apply to temporary construction activities and long-term operations. Section 41.40(a) would prohibit project construction activities from occurring between the hours of 9:00 p.m. and 7:00 a.m., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 a.m. or after 6:00 p.,. on any Saturday, or on any Sunday or national holiday.

> <u>*SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.*</u>
>
> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
>
> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…*

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

<u>SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS</u>

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

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

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the s property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a), below, would prevent HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

> *SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT*
>
> *It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.*

City of Los Angeles CEQA Thresholds Guide

In 2006, the City released the L.A. CEQA Thresholds Guide to provide further guidance for the determination of significant construction and operational noise impacts. According to the Guide, a project would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00p.m. on Saturday, or at any time on Sunday.
- For a project's operational impacts:
- The ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category…
- Any 5 dBA or greater noise increase.

These "normally unacceptable" and "clearly unacceptable" categories refer to those outlined by the State's noise and land-use compatibility chart, shown in Table 3.4-4.

LAUSD School Upgrade Program EIR

LAUSD has developed a set of policy statements and thresholds related to impacts for on-site school operations. In particular, these thresholds are designed to maintain a safe, comfortable educational environment for children attending LAUSD schools. Noise thresholds for LAUSD classrooms are:

- Maximum exterior noise level 70 dB(A) L10 or 67 dB(A) Leq

- Maximum interior classroom noise level 55 dB(A) L10 or 45 dB(A) Leq
- Maximum permanent increase of noise levels at nearby noise-sensitive land uses of 3 dB(A) or higher
- Classroom acoustical performance shall be 45 dB(A) Leq background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.

Standard Conditions of Approval

These standard conditions of approval (SCs) are included within the Program EIR.

SC-AQ-2 LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive noise is not generated by unmaintained equipment.

SC-NOI-1 LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L10 or 67 dBA L_{eq}.

SC-NOI-9 LAUSD shall prepare a noise assessment. If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:

Source Controls:

- Time Constraints – prohibiting work during sensitive nighttime hours
- Scheduling – performing noisy work during less sensitive time eriods (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
- Noise Restrictions – specifying stringent noise limits
- Substitute Methods – using quieter methods and/or equipment
- Exhaust Mufflers – ensuring equipment have 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 onsite
- Noise Compliance Monitoring – technician on site to ensure compliance

- Quieter Backup Alarms – manually-adjustable or ambient sensitive types Path Controls
- 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

Receptor Controls:

- 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 contractor and the District. In the event of noise complaints the District shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.
- Temporary Relocation – in extreme otherwise unmitigatable cases. Temporarily move residents or students to facilities away from the construction activity.

3.4.4 METHODOLOGY

The methodology for the noise analysis includes a comparison of existing ambient noise levels to those with the project for both construction and operation. The thresholds for determining impacts are described below.

3.4.5 THRESHOLDS OF SIGNIFICANCE

For the purposes of this analysis, noise impacts of the proposed Project would be considered significant if they would exceed the following standards of significance, which are based on Appendix G of the State CEQA Guidelines. According to these guidelines, a project would normally have a significant impact related to noise if it would:

NOI-1: Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

NOI-2: Expose persons to or generate excessive groundborne vibration or groundborne noise levels

NOI-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project

NOI-4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project

NOI-5: 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 expose people residing or working in the project area to excessive noise levels

NOI-6: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels

The proposed Project is not located within an airport land use plan or within two miles of a public airport or public use airport, nor is it within the vicinity of a private airstrip. Therefore, no noise impacts could occur associated with airports. Therefore the following thresholds are not required to be analyzed:

NOI – 5: 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 expose people residing or working in the project area to excessive noise levels

NOI – 6: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels

3.4.6 IMPACTS AND MITIGATION MEASURES

NOI-1: Would the Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ***Significant and unavoidable***

Construction

Construction, demolition (or removal of existing classroom building and other structures), ground clearing, grading, structural, and other noise-generating activities would occur between 7:00 AM and 9:00 PM in accordance with the LAMC. Construction activities would vary over several phases of development and would include off-road larger equipment such as tractors, loaders, and smaller equipment such as saws, hammers, and pneumatic tools. Construction of the Project is estimated to take place over approximately three years beginning in the summer of 2018 and continuing through the fall of 2022.

Table 3.4-8 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential and school uses. Construction noise would generally peak during site preparation and soil remediation, where up to seven pieces of noise generating construction equipment could produce a cumulative 87.6 dB(A) at 50 feet of distance. This would not increase ambient noise levels above 75 dB(A) (the City of Los Angeles threshold) at adjacent off-site sensitive receptors; however, it would represent increases of more than 5 dB(A) at three off-site receptors. In the absence of mitigating sound attenuation measures, construction activities would generate maximum off-site noise levels of up to 72.4 dB(A) at the residences along South Mott Street, an increase of up to 11.9 dB(A).

Table 3.4-8
Construction Noise Levels – Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dB(A))	Existing Ambient (dB(A), Leq)	New Ambient (dB(A), Leq)	Increase
Adjacent Residences Along South Mott Street	150	72.1	60.5	72.4	11.9
Adjacent Residences Along South Mathews Street	165	71.2	57.1	71.4	14.3
Adjacent Residences Along East 4th Street	185	70.2	68.1	72.3	4.2
Hollenbeck Middle School Exterior	240	68.0	56.6	68.3	11.7
Hollenbeck Middle School Interior	240	43.0	31.6	43.3	11.7
Nichiren Shu Beikoku Betsuin Temple	530	58.1	68.1	68.5	0.4
Promise Hospital of East LA	540	57.9	57.1	60.5	3.4
Kingdom Hall of Jehovah's Witnesses	565	57.5	68.1	68.5	0.4
Roosevelt High School On-site Exterior	150	72.1	57.1	72.2	15.1
Roosevelt High School On-site Interior	150	47.1	32.1	47.2	15.1

Source: Impact Science, 2017.
** Assumes equipment operations are set back from property line on average approximately 15% of the total depth of the property facing the adjacent use.*

Because construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dB(A) Leq) at one or more of the adjacent sensitive receptors, as well as exceed the City's threshold of resulting in an increase of more than 5 dB(A). Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce construction noise level increases primarily by requiring the use of sound attenuation walls between construction activities and sensitive receptors. The proposed Project would result in a potentially significant construction noise impact related to on-site construction equipment noise.

Construction haul trucks would generate noise off-site during demolition, site preparation, and building construction. This would include removal of materials from the Project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished structures. According to the traffic study prepared for the Project, this could produce up to 100 haul trips per day during the peak phase of construction, incrementally adding traffic volumes to local roads.[10] Although these trips are not enough to increase ambient traffic noise due to regular truck travel, there could be instantaneous noise level increases (an empty truck hitting a pothole, or the application of air brakes near residences, etc.) from haul trucks that could reach levels of up to 88 dBA at 50 feet.[11] Mitigation Measures **MM-NOI-11** through **MM-NOI-12** would reduce noise level increases primarily by designing a haul route that would avoid sensitive receptors to the highest extent feasible. This could result in potentially significant noise impact related to off-site construction haul truck noise.

Mitigation Measures

Construction Noise – General On-Site Construction Activities

MM-NOI-1 The Project shall comply with the City of Los Angeles Building regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

MM-NOI-2 Construction and demolition activities shall be scheduled so as to avoid, to the extent feasible, simultaneously operating several pieces of equipment that cause high noise levels.

MM-NOI-3 The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers.

MM-NOI-4 Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the

10 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization*. December 2017.

11 FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

MM-NOI-5 Barriers such as plywood structures or flexible sound control curtains shall be erected between the proposed Project and adjacent sensitive receptors to minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 10 dB(A) and block the line-of-sight between the Project site and these adjacent land uses. This specification shall be included on all project plans.

MM-NOI-6 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. This specification shall be included on all project plans.

MM-NOI-7 Demolition of concrete/asphalt shall not be done during school hours when children are playing in the adjacent athletic fields.

MM-NOI-8 The construction staging area shall be as far from sensitive receptors as possible.

MM-NOI-9 Two weeks prior to commencement of construction, notification shall be provided to the off-site residential, school, and church uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

MM-NOI-10 A sonic pile driver shall be used in place of an impact pile driver to reduce noise and vibration during pile drilling/driving activities. This specification shall be included on all project plans.

Construction Noise – Off-Site Haul Truck Activities

MM-NOI-11 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. This specification shall be included on all project plans.

MM-NOI-12 Any haul route for haul trucks shall avoid residential streets to the extent possible.

Residual Impacts

As shown in **Table 3.4-9, Construction Noise Levels – Mitigated,** the new ambient exterior noise levels during construction, after implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-10**, would be 58.9 dB(A) Leq at Hollenbeck Middle School and 64.7 dB(A) Leq at on-site uses, below LAUSD's 67 dB(A) Leq threshold. The new ambient exterior noise levels during construction at off-site residences would be a maximum of 68.4 dB(A) Leq, which is below the City's 75 dB(A) threshold.

During mitigated construction activities, the interior ambient noise level would also be reduced to below the LAUSD threshold (45 dB(A)) for classrooms located on the Hollenbeck Middle School, as well as on-site classrooms (**Table 3.4-8)**. Thus, construction related impacts would be less than significant and no further analysis is required.

Table 3.4-9
Construction Noise Levels – Mitigated

Sensitive Receptor	Distance from Site (feet)*	Maximum Construction Noise Level (dB(A))	Existing Ambient (dB(A), L_{eq})	New Ambient (dB(A), L_{eq})	Increase
Adjacent Residences Along Mott Street	150	59.1	60.5	62.8	2.3
Adjacent Residences Along Mathews Street	165	58.2	57.1	60.7	3.6
Adjacent Residences Along 4th Street	185	57.2	68.1	68.4	0.3
Hollenbeck Middle School Exterior	240	55.0	56.6	58.9	2.3
Hollenbeck Middle School Interior	240	30.0	31.6	33.9	2.3
Nichiren Shu Beikoku Betsuin Temple	530	45.1	68.1	68.1	0.0
Promise Hospital of East LA	540	55.3	57.1	59.3	2.2
Kingdom Hall of Jehovah's Witnesses	565	55.1	68.1	68.3	0.2
Roosevelt High School On-site Exterior	150	63.8	57.1	64.7	7.6
Roosevelt High School On-site Interior	150	38.8	32.1	39.7	7.6

Source: Impact Sciences, 2017.
** Assumes equipment operations are set back from property line on average approximately 15% of the total depth of the property facing the adjacent use.*

Mitigation Measures **MM-NOI-11** through **MM-NOI-12** are intended to minimize off-site noise from haul trucks that could increase noise levels in adjacent residential neighborhoods. However, it would not be possible to have a haul route that would completely avoid passing by any of the nearby sensitive receptors. It is also not feasible to restrict the use of air brakes or to have trucks completely avoid driving activities that could cause significant noise increases (pulling in and out of driveways, hitting potholes, etc.). Although implementation of Mitigation Measures **MM-NOI-11** through **MM-NOI-12** would reduce noise impacts from haul truck activities, these impacts would likely remain significant and unavoidable.

Operational

During Project operation, the school would produce both direct noise impacts from student activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. Direct impacts would include stationary noises from sources associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems.

The Project would not increase the student population or generate an increase in vehicle trips, and therefore it is not anticipated that there would be an increase in the amount of noise generated by motor vehicle operations.

Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dB(A) above ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and air conditioning (HVAC) systems typically generate noise levels between 50 and 65 dB(A) at 50 feet. Rooftop mounted equipment typically produces noise levels of up to approximately 56 dB(A) at 50 feet. However, there is not anticipated to be a significant increase in HVAC system noise, as the existing buildings on the Project site have similar systems with similar noise levels. Therefore, stationary noise would result in a less than significant impact.

Buildings included in the proposed Project will meet LAUSD's construction and design standards, including the maximum interior classroom noise level threshold. Therefore, on-site impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

NOI-2: Would the Project expose persons to or generate excessive groundborne vibration or groundborne noise levels? ***Less than significant with mitigation***

Construction

Groundborne vibration generated by construction activities associated with the proposed Project would affect both on- and off-site sensitive uses located in close proximity to the Project construction. The closest off-site receptors are the residential buildings to the east across Mott Street. As shown in **Table 3.4-10,**

Vibration Source Levels for Construction Equipment, vibration velocities could range from 0.003 to 0.644 inch/sec peak particle velocity (PPV) at 25 feet from the source activity, with corresponding vibration levels (VdB) ranging from 58 VdB to 104 VdB at 25 feet from the source activity, depending on the type of construction equipment in use. **Table 3.4-11, Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated**, shows the vibration velocity and levels that would occur at these off-site sensitive uses during construction at the Project site.

Table 3.4-10
Vibration Source Levels for Construction Equipment

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**
Impact Pile Driver	0.644	0.228	0.173	0.124	0.081	104	95	93	90	86
Sonic Pile Driver	0.170	0.060	0.046	0.033	0.021	93	84	82	79	75
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006

The vibration velocities predicted to occur at the nearest off-site sensitive receptors would be 0.228 in/sec PPV at the closest receptors on South Mott Street. These structures are non-engineered timber and masonry buildings, and could experience a PPV groundborne vibration level that exceeds the FTA's 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be 0.644 in/sec. These structures are engineered concrete and masonry buildings, and could experience a PPV groundborne vibration level that exceeds the FTA's 0.3 inch per second threshold. Therefore, vibration impacts associated with building damage due to construction activities would result in significant but mitigable construction vibration impacts.

Table 3.4-11
Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Estimated PPV (in/sec) [a]	Estimated Vibration Levels (VdB) [b]
Roosevelt High School (on-site)	25	0.644	104
Adjacent Residences Along Mott Street	50	0.228	95
Adjacent Residences Along Mathews Street	65	0.154	92
Adjacent Residences Along 4th Street	85	0.103	88
Hollenbeck Middle School	140	0.049	82
Nichiren Shu Beikoku Betsuin Temple	430	0.009	67

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Estimated PPV (in/sec) [a]	Estimated Vibration Levels (VdB) [b]
Promise Hospital of East LA	440	0.009	67
Kingdom Hall of Jehovah's Witnesses	465	0.008	66

Source: Impact Sciences, 2017.

[a] The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where PPV_{equip} = peak particle velocity in in/sec of equipment, PPV_{ref} = reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receive.

[b] The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: Lv(D) = Lv(25 ft) – 30 log (D/25), where Lv = vibration level of equipment, D = distance from the equipment to the receiver, Lv(25 ft) = vibration level of equipment at 25 feet.

In terms of human annoyance, the vibration levels experienced by off-site sensitive receptors would range from 66 VdB at the Kingdom Hall of Jehovah's Witnesses to 95 VdB at the nearest residential receptors along South Mott Street. The vibration levels experienced at Roosevelt High School (on-site), Hollenbeck Middle school, and adjacent residential receptors along Mott Street, Mathews Street, and 4th Street would exceed the FTA's 80 VdB threshold for residential uses and 83 VdB for institutional land uses such as schools. Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce vibration levels primarily by limiting the distance between construction equipment and sensitive receptors, and restricting high impact construction equipment. Therefore, vibration impacts associated with building damage due to construction activities would result in significant but mitigable construction vibration impacts.

Mitigation Measures

MM-NOI-1 through **MM-NOI-10** are required to reduce construction related vibration impacts.

Residual Impacts

As shown in **Table 3.4-12, Vibration Levels at Off-site Sensitive Uses from Project Construction – Mitigated,** the vibration velocities predicted to occur at the nearest off-site sensitive receptors would be 0.033 in/sec PPV at the closest receptors on South Mott Street. This vibration level does not exceed the FTA 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be 0.046 in/sec. This vibration level does not exceed the FTA 0.3 inch per second threshold. With implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, impacts would be less than significant.

Table 3.4-12
Vibration Levels at Off-Site Sensitive Uses from Project Construction - Mitigated

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Estimated PPV (in/sec) [a]	Estimated Vibration Levels (VdB) [b]
Roosevelt High School (on-site)	60	0.046	82
Adjacent Residences Along Mott Street	75	0.033	79
Adjacent Residences Along Mathews Street	75	0.033	79
Adjacent Residences Along 4th Street	85	0.027	77
Hollenbeck Middle School	140	0.013	71
Nichiren Shu Beikoku Betsuin Temple	430	0.002	56
Promise Hospital of East LA	440	0.002	56
Kingdom Hall of Jehovah's Witnesses	465	0.002	55

Source: Impact Sciences, 2017.

[a] *The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report:* $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$*, where* PPV_{equip} *= peak particle velocity in in/sec of equipment,* PPV_{ref} *= reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receive.*

[b] *The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: Lv(D) = Lv(25 ft) – 30 log (D/25), where Lv = vibration level of equipment, D = distance from the equipment to the receiver, Lv(25 ft) = vibration level of equipment at 25 feet.*

In terms of human annoyance, with mitigation, the vibration levels experienced by off-site sensitive receptors would range from 55 VdB at the Kingdom Hall of Jehovah's Witnesses to 79 VdB at the nearest residential receptors along South Mott Street. The vibration levels experienced at Roosevelt High School (on-site), Hollenbeck Middle school, and adjacent residential receptors along Mott Street, Mathews Street, and 4th Street would not exceed the FTA's 80 VdB threshold for residential uses or 83 VdB for institutional land uses such as schools with mitigation. With implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, impacts would be less than significant.

Operational

During operation of the proposed Project, there would not be significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose residential land uses during long-term operations to a vibration and noise level of far less than the FTA's 80 VdB threshold for residential uses and would be considered less than significant.

Mitigation Measures

No mitigation measures are required.

NOI-3: Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? ***Less than significant***

The majority of any long-term noise impacts will come from traffic traveling to and from the Project area. However, as discussed above, the site is currently in use as a school and the proposed Project would not change the use nor generate additional vehicle traffic as compared to existing conditions, and would therefore not contribute to long-term cumulative traffic noise impacts. Therefore, the Project's individual and cumulative mobile source noise impacts would be considered less than significant. No further analysis is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

NOI-4: Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project? ***Significant and unavoidable***

As discussed under Threshold NOI-1, the proposed Project's individual contribution to temporary or periodic increases in ambient noise (i.e., construction related noise) would be reduced through application of Mitigation Measures **MM-NOI-1** through **MM-NOI-12** for general construction and haul truck noise; however, haul truck noise is expected to remain significant and unavoidable. As shown in Table 3.0-1, there are 24 Related Projects that are proposed for development in the area that would also contribute to increases in ambient noise. Of these, none are within 1,000 feet of the proposed Project with potential to cause audible increases at identified sensitive receptors.

Any construction noise from any future site, were it to occur concurrently with the proposed Project, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from this site to the nearby receptors. Additionally, any such projects would be subject to the City's noise ordinance, which limits the hours of allowable construction activities and the extent to which direct noise impacts can affect adjacent land uses. With conformance with the City's noise ordinance and incorporation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, the Project's cumulative construction noise impact would be greatly reduced. However, because construction haul truck noise would be considered significant and unavoidable, noise increases on local roadways resulting from off-site haul truck noise that occurs on the same streets as the haul route for the Proposed Project would result in a significant and unavoidable impact.

Mitigation Measures

Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Residual Impacts

Haul truck noise would result in a substantial temporary or periodic increase in ambient noise levels. These impacts would increase if construction haul truck traffic from other related projects were to happen concurrently and on the same roadways as the Proposed Project. Although implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12** would reduce impacts related to construction noise, haul truck noise would remain significant and unavoidable.

3.4.7 CUMULATIVE ANALYSIS

As discussed, 24 Related Projects may be built concurrently with the proposed Project that could further contribute to noise increases in the vicinity of the Project site. These Related Projects are listed in **Section 3.0, Environmental Impact Analysis.** However, given the distance of the Related Projects from Project receptors, their respective scales of development, and their location, it is unlikely that their on-site construction and operational noises would be capable of contributing to cumulatively considerable noise increases at Project receptors. However, haul truck noise from related projects occurring concurrently with haul truck activities for the Proposed Project would result in a significant impact. Therefore, the Project could contribute to a cumulatively considerable noise impact.

Mitigation Measures

Mitigation Measures **MM-NOI-1** through **MM-NOI-12** would be required to reduce construction noise impacts.

Residual Impacts

As discussed above, off-site construction haul truck activities would result in a significant and unavoidable impact. These noise increases on local roadways, when combined with haul truck noise from other related projects occurring concurrently, would result in a significant and unavoidable cumulatively considerable noise impact. Although Mitigation Measures **MM-NOI-11** through **MM-NOI-12** are designed to reduced noise from haul truck activities, they would not reduce noise level increases to a less than significant level. Therefore, this cumulatively considerable impact would remain significant and unavoidable.

3.5 PEDESTRIAN SAFETY

3.5.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for implementation of the proposed Project to impact pedestrian safety. The analysis includes an estimate of the number of pedestrians who would be walking to and from the proposed school, an inventory of the existing pedestrian-oriented traffic controls and sidewalks within 0.25 mile of the proposed project location, a map of the recommended pedestrian routes to the proposed project site, and a review of the potential safety concerns for pedestrians. Data used to prepare this section were taken from the pedestrian safety study conducted as part of the circulation study, ***Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California***, December 19, 2017.

3.5.2 EXISTING CONDITIONS

Pedestrian Access

Pedestrian access to the Project site is available via all corners of the campus. The intersections at the north end of the existing school site (Mathews Street/4th Street and Mott Street/4th Street) are both signalized with pedestrian crosswalks on all corners. Sidewalks extend from these intersections around the school campus and into the adjacent neighborhoods. Major sidewalk gaps do not exist in the immediate vicinity of the school site. The intersections at the south end of the campus (Mathews Street/6th Street and Mott Street/6th Street) are all-way stop-sign controlled intersections with striped crosswalks. A mid-block stop-sign controlled crosswalk also exists between these two intersections on 6th Street.

3.5.3 REGULATORY FRAMEWORK

Federal

Americans with Disabilities Act of 1990 (ADA)

Titles I, II, III, and V of the United States Codes are codified in Title 42, Chapter 126 (Equal Opportunity for Individuals with Disabilities) beginning at Section 12101. Chapter 126, Subchapter III (formerly Title III) prohibits discrimination on the basis of disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes standards for accessible design establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

SAFETEA-LU Section 1404

Enacted in 2005, the Safe, Accountable, Flexible, Efficient Transportation equity Act: A Legacy for Users represents the largest surface transportation investment in the nation. This federal funding program delegates each State Department of Transportation to implement the objectives in SAFETEA-LU. Section 1404 of SAFETEA-LU encourages primary and secondary school children to walk and bicycle to school. Both infrastructure-related and behavioral projects will be geared towards providing a safe, appealing environment for walking and biking that will improve the quality of children’s lives.

State

Streets and Highways Code Section 2331, 2333, and 2333.5

Safe Routes to School (SRTS) is a California Department of Transportation (Caltrans) program resulting from the 1999 passage and signing of Assembly Bill 1475 (Soto). AB1475 called for Caltrans “to establish and administer a ‘Safe Routes to School’ construction program... and to use federal transportation funds for construction of bicycle and pedestrian safety and traffic calming projects.” School districts are responsible for establishing and enforcing school route plans and for siting and developing school facilities that foster a good walking environment. These responsibilities include choosing school locations that balance vehicle access with pedestrian safety needs, constructing adequate pedestrian facilities along the perimeter of the school site, and working with the local public works agency to fund and install adequate crossing protection at key points. School districts are responsible for distributing walk-route maps to parents and students prior to school opening and a pedestrian safety plan for the safe arrival and departure of students in accordance with the California Manual of Uniform Traffic Control Devices, Part 7, Traffic Control for School Access.

Complete Streets Act (Assembly Bill 1358)

Assembly Bill (AB) 1358, the Complete Streets Act, was signed into law in September 2008. AB 1358 requires cities and counties, when updating the part of a local general plan that address traffic and roadways, to ensure that those plans account for the needs of all roadway users. The goal of the legislation is to improve safety, access, and mobility for all travelers in California; and recognize that active transportation modes (i.e., bicycle and pedestrian) and transit modes as integral elements of the transportation system. The legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of all users as well as motorists.

Local

The California Legislature granted school districts the power to exempt school property from local zoning requirements, so long as the school district complies with Government Code Section 53094. This section States:[1]

> *(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.*
>
> *(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.*
>
> *(c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b). If the governing board has taken such an action, the city or county may commence an action in the superior court of the county whose zoning ordinance is involved or in which is situated the city whose zoning ordinance is involved, seeking a review of the action of the governing board of the school district to determine whether it was arbitrary and capricious. The city or county shall cause a copy of the complaint to be served on the board. If the court determines that the action was arbitrary and capricious, it shall declare it to be of no force and effect, and the zoning ordinance in question shall be applicable to the use of the property by the school district.*

Nonetheless, the District considers local plans and policies for the communities surrounding its campuses.

LAUSD Traffic and Pedestrian Safety Requirements for New Schools

LAUSD developed the *Traffic and Pedestrian Safety Requirements* for new schools to guide site planning and identify performance requirements to minimize potential pedestrian safety risks to students, staff,

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1 California Legislative Information, Article 5 Section 53094, Website: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=53094, accessed 08/05/2016

and visitors at LAUSD schools. The performance guidelines include requirements for student drop-off areas, vehicle access, and pedestrian routes to school.

Standard Conditions of Approval

These standard conditions of approval (SCs) are included within the Los Angeles Unified School District, School Upgrade Program EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 **Caltrans SRTS Program:** The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

- **SC-PED-2** **Traffic and Pedestrian Safety requirements:** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

- **SC-PED-3** **Sidewalk requirements for New Schools:** LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc (2) Install new walkway and/or sidewalk segments where none exist (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

- **SC-PED-4** **School Traffic Safety Reference Guide REF – 4492.1:** Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

- **SC-PED-5 School Design Guide:** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

- **SC-T-3** Coordinate with the local City or County Jurisdiction and agree on the following:

  - Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project

  - Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds

  - Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events

  - Loading zones will be analyzed to determine adequacy of pick-up and dropoff points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

- **SC-T-4** LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

City of Los Angeles Vision Zero Program

The Vision Zero program of the City of Los Angeles has the goal of creating safer streets for pedestrians (especially children and older adults) and bicyclists. As part of the planning for this program, LADOT conducted a citywide traffic collision analysis and identified a network of streets known as the High Injury Network (HIN). This Network is a map of roadways with high severe collision rates for vulnerable road users.

LADOT traffic study guidelines incorporate concepts from the Vision Zero program. Treatments that are encouraged to be considered by proposed projects include curb extensions, leading pedestrian intervals (at signalized intersections), controlled mid-block crosswalks, pedestrian refuge islands, protected bicycle lanes, bike boxes, exclusive bicycle signal phases, and protected left-turn lanes.

Additionally, site access plans for proposed Projects on roadways identified within the HIN are asked to avoid or minimize the number of proposed driveways on that street.

There are no identified HIN network roadway segments ni the immediate vicinity of the proposed school site.

Boyle Heights Community Plan

The Boyle Heights Community Plan, adopted in 1998, designates land use throughout the Boyle Heights Community Plan Area (CPA) in the City of Los Angeles. The Community Plan is currently being revised by the Los Angeles Department of City Planning. In the 1998 Community Plan, there are a number of land use policies that influence pedestrian safety.

The applicable goals and objectives for traffic, circulation, and safety in the CPA are listed below:

Commercial

Policy 8: That new commercial development be oriented so as to facilitate pedestrian access by locating parking to the rear of structures and provide entrances oriented toward the east/west commercial streets to preserve the continuity of the streetscape and enhance the pedestrian environment.

Libraries

Policy 2: Encourage flexibility in siting libraries in mixed use projects, pedestrian oriented areas, transit oriented districts, and similarly accessible facilities.

Freeways and Streets

Objective 1: To provide for a circulation system coordinated with land uses and densities in order to accommodate the movement of people and goods.

Objective 2: To minimize the detrimental impact of all existing freeways in the Community.

Objective 3: To minimize the conflict between vehicular and pedestrian traffic.

3.5.4 METHODOLOGY

The analysis of potential impacts to pedestrian safety associated with the proposed Project is based on information provided in the *Traffic Impact Study* from KOA Corporation (**Appendix 3.6**).

3.5.5 THRESHOLDS OF SIGNIFICANCE

In accordance with the LAUSD Program EIR, Project impacts would be considered significant if any of the following would occur:

PED-1 Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses

PED–2 Create unsafe routes to schools for students walking from local neighborhoods

PED–3 Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard

An Initial Study was prepared that determined the Project would have a less than significant impact or no impact related to the following threshold:

PED–3 Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard

Therefore this threshold is not analyzed in this EIR. The Initial Study is provided in Appendix 1.0 of this EIR.

3.5.6 IMPACTS AND MITIGATION MEASURES

PED-1: Would the Project substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses? ***Less than significant***

PED-2: Would the Project create unsafe routes to schools for students walking from local neighborhoods? ***Less than significant***

Construction Impacts

During construction, construction vehicles would need to access the Project site. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete. The limited number of construction vehicles accessing the site would therefore not result in substantially increase pedestrian safety hazards due to incompatible uses.

Construction traffic would be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety in accordance with **SC-T-4** from the LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. As discussed in **Section 3.6, Transportation and Traffic,** construction vehicle access to the Project site would be provided via Mathews Street on the west, Mott Street on the east, 4th Street on the north, and 6th Street on the south. Haul trucks would travel to the Project site from the I-10 via 4th Street. This route would ensure travel in the surrounding residential neighborhoods is minimized and that construction vehicles travel along arterial roadways to access the Project site rather than through the neighborhoods along pedestrian routes. Over the course of the proposed Project construction, truck operators should be directed by the construction manager to obey residential area speed limits, either as posted, or the prima facie speed limit of 25 mph, if not posted.

Construction loading areas would not overlap with the Roosevelt High School bus/vehicle loading areas. Areas of active construction would remain fenced and construction staging (i.e., storage of equipment and materials) would be contained on the Project site.

Any potential interference with pedestrian safety would be mitigated with the compliance of **SC-T-4** from the LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. To further ensure pedestrian safety during construction, **MM-PED-1** would be implemented to prohibit construction vehicles from accessing the site during the peak AM and PM hours. With the implementation of **MM-PED-1,** construction impacts associated with the creation of unsafe routes to schools, at the proposed Project site or any other nearby schools including Hollenbeck Middle School, would be less than significant.

Operation

The proposed Project will continue to provide seats for approximately 2,600 students. The current and future student population is estimated to generate 1,014 weekday a.m. peak-hour vehicle trips (544 inbound and 468 outboard) and 338 weekday p.m. peak-hour trips (159 inbound and 179 outbound).[2].Pick-up/drop-off operations occur informally along the perimeter of the campus, and the proposed campus improvements will not change this.

As required by **SC-T-3**, all local pedestrian routes will have adequate sidewalk facilities, per LADOT standards. As described in the existing conditions, there are yellow striped crosswalks at all four intersections surrounding the Project site including one across East 6th Street between Roosevelt High

2 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California*, October 21, 2017.

School and Hollenbeck Middle School across the street and across East 4th Street adjacent to South Fickett Street as well as across South Mott Street adjacent to East 5th Street.

Furthermore, the City of Los Angeles Vision Zero program promotes traffic calming and speed reduction. In the Vision Zero LA Action Plan,[3] Soto Street from Wabash Avenue to 8th Street is identified as a priority corridor. Additional traffic calming measures along Soto Street as part of the Vision Zero program implemented by the City of Los Angeles would further serve to increase safety for pedestrians along the route. As the Project site is currently in operation as a school site, no new pedestrian safety improvements are necessary and impacts related to pedestrian safety during operation would be less than significant.

LAUSD Standard Conditions

Standard Conditions SC-PED-1, SC-PED-2, SC-PED-3, SC-PED-4, SC-PED-5, SC-T-3, SC-T-4

Mitigation Measures

MM-PED-1: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD. This requirement shall be included on all construction documents.

Residual Impacts

Mitigation Measure **MM-PED-1** would maintain safety of pedestrian routes of local neighborhoods during Project construction activities by limiting construction truck access during peak school drop-off/pick-up hours. With implementation of this measure, impacts would be less than significant.

3.5.7 CUMULATIVE ANALYSIS

The proposed Project has the potential to combine with reasonably foreseeable development to result in significant cumulative impacts to pedestrian safety related to vehicle access. A listing of Related Projects and a map of their locations have been provided in **Section 3.0 Environmental Impact Analysis.** The nearest projects to Roosevelt High School are located at 2407 East 1st Street and 610 South St. Louis Street; approximately 1,350 and 1,640 feet from the Project site, respectively. Given their proximity, these

[3] City of Los Angeles, Vision Zero Los Angeles Action Plan 2015-2025, January 2017, http://visionzero.lacity.org/wp-content/uploads/2017/04/VisionZeroActionPlan-2017.pdf

projects could potentially result in a cumulative pedestrian safety impact. However, the Project includes sufficient pedestrian safety measures (i.e., clearly marked pedestrian pathways, implementation of a construction worksite traffic control plan) to ensure site specific impacts would not occur and the Project would not result in an individual pedestrian safety impact. Therefore, the proposed Project would not contribute to a cumulatively considerable impact related to pedestrian safety impacts would not be cumulatively considerable.

Mitigation Measures

No mitigation is required.

Residual Impact

The Project would not contribute to a cumulatively considerable pedestrian safety impact. Impacts are considered to be less than significant.

3.6 TRANSPORTATION AND TRAFFIC

3.6.1 INTRODUCTION

This section of the Draft EIR evaluates the potential for implementation of the proposed Project to impact transportation and traffic. This section discusses regulatory framework, along with the existing traffic conditions throughout the project area, and possible environmental impacts that may occur as the proposed Project is implemented. The analysis in this section is based on the technical study *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California*, prepared by KOA Corporation on December 19, 2017 (Appendix 3.6).

3.6.2 EXISTING CONDITIONS

Existing Street System

Regional access to the area is provided by a number of freeways including Interstate 10 (I-10) which typically runs in an east-west direction, but for a couple miles goes in a north-south direction approximately a half-mile from the Project site; State Route 60 (SR-60) which runs east-west approximately a half-mile south of the Project site; U.S. Highway 101 (US-101) runs north-south approximately a half-mile east of the Project site; and Interstate 710 (I-710) runs north-south approximately 2.5 miles west of the Project site. Soto Street provides regional access to the Project site as well and 4th Street provides both regional and direct access to the Project site. Neighborhood streets near the Project site include: Mathews Street, 6th Street, and Mott Street. Brief descriptions of studied intersection in the circulation study for the proposed Project are provided below:

East 4th Street – 4th Street is an east-west street that provides two travel lanes in each direction. Parking restrictions include no stopping at any time from 4 PM to 6 PM northbound/eastbound; no stopping 7 AM to 9 AM and 1 hour parking 9 AM to 6 PM southbound/westbound. The posted speed limit is 25 mph. The land use on this street is generally residential and commercial uses.

East 6th Street – 6th Street is an east-west street providing one lane of travel in either direction. Two hour parking is permitted between 9 AM to 1:30 PM; and passenger loading only from 6:30 AM to 9 AM and from 1:30 PM to 4 PM. The land uses are residential and public facilities (Hollenbeck Middle School and Roosevelt High School) and therefore have a speed limit of 25 mph.

South Mathews Street – This street is a north-south street providing one travel lane in each direction. Parking is permitted on either side of the street with an assumed speed limit of 25 mph. The general land use on this street is primarily residential with two public facilities (Roosevelt High School and Hollenbeck Middle School).

South Mott Street – This street contains one lane each for north-south bound travel. Parking is permitted with posted restrictions for street cleaning. Land uses on this street are generally residential/school with a speed limit of 25 mph.

Existing Public Transit Service

Currently, the Project site is served by bus transit lines that traverse major roadway corridors in the immediate vicinity of the Project site. Transit use by students is expected to be typical for a school site. **Figure 3.6-1, Existing Area Transit Lines** depicts the existing transit lines within the Project vicinity. The area transit lines within walking distance of the Project site are as follows:

- East 4th Street – Stops can be found directly adjacent to the campus at the intersection of South Mott Street. These bus stops serve Metro Local Bus 106 and 605 as well as Montebello Line 40.

- East 6th Street – Stops can be found at the intersection of Soto Street, west of the campus. These bus stops serve Metro Local Bus 106, 251, and 252.

- South Soto Street – Stops can be found at the intersection of Soto Street and East 4th Street, west of the campus. These bus stops serve Metro Local Bus 106, 251, 252, 605, and 751.

The following describes the routes and frequencies of the public transit services mentioned above. Metro Local Bus 106's route comes from East Los Angeles to Boyle Heights via 4th Street and Soto Street and has a peak frequency of 50-60 minutes. Metro Local Bus 251's route (as well as 252 which runs a similar route) to the proposed Project comes from Lynwood and ends in Cypress Park via Soto Street with a 15 to 20 minute frequency. Metro Local Bus 605 serves Boyle Heights via 4th Street and Soto Street at a 15 minute frequency. Metro Local Bus 751 comes from Huntington Park to Cypress Park through Soto Street at a 12-15 minute peak frequency. Montebello line 40 goes from Montebello to Downtown Los Angeles via 4th Street at a 15 minute peak frequency.

In addition, public transit service is provided by Metro's nearby light rail service, the Metro Gold Line, which has a stop at South Soto Street and 1st Street about a half-mile away from the campus. The Gold Line connects riders from East Los Angeles to Azusa including Union Station and other light rail/subway lines in the network.

Pedestrian Facilities

Pedestrian access to the Project site is available via all corners of the campus. The intersections at the north end of the existing school site (Mathews Street/4th Street and Mott Street/4th Street) are both signalized with pedestrian crosswalks on all corners. Sidewalks extend from these intersections around the school campus and into the adjacent neighborhoods. Major sidewalk gaps do not exist in the immediate vicinity of the school site. The intersections at the south end of the campus (Mathews Street/6th Street and Mott Street/6th Street) are all-way stop-sign controlled intersections with striped crosswalks. A mid-block stop-sign controlled crosswalk also exists between these two intersections on 6th Street.

Study Area

The traffic analysis study area (study area) is generally comprised of those locations which have the greatest potential to experience significant traffic impacts due to the project. The area studied for potential impacts generally includes those intersections that are:

- Immediately adjacent or in close proximity to the project site;
- In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and
- In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

The Project site is located within the City of Los Angeles community of Boyle Heights. As the proposed Project would not generate new trips, a traffic impact study as defined by LADOT is not required. Based on consultation with LADOT, it was determined that a "circulation evaluation" which analyzes existing traffic conditions, circulation patterns, and level of service (LOS) at key intersections immediately surrounding the school would be appropriate. Based on the guidance provided by LADOT, a list of study intersections was selected for analysis of potential impacts due to the proposed Project based on the above criteria, as well as peak hour vehicle trip generation, the anticipated distribution of vehicular trips and existing intersection operations. The study locations are listed below and illustrated in **Figure 3.6-2**. Existing lane configurations are shown in **Figure 3.6-3**.

1. Soto Street & 4th Street
2. Mathews Street & 4th Street
3. Mott Street & 4th Street

4. Mathews Street & 6th Street*

5. Mott Street & 6th Street*

*Unsignalized intersection

SOURCE: KOA Corporation, 2017

FIGURE **3.6-1**

IMPACT SCIENCES

Existing Area Transit Lines

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SOURCE: KOA Corporation, 2017

FIGURE **3.6-2**

Study Area Intersections

IMPACT SCIENCES

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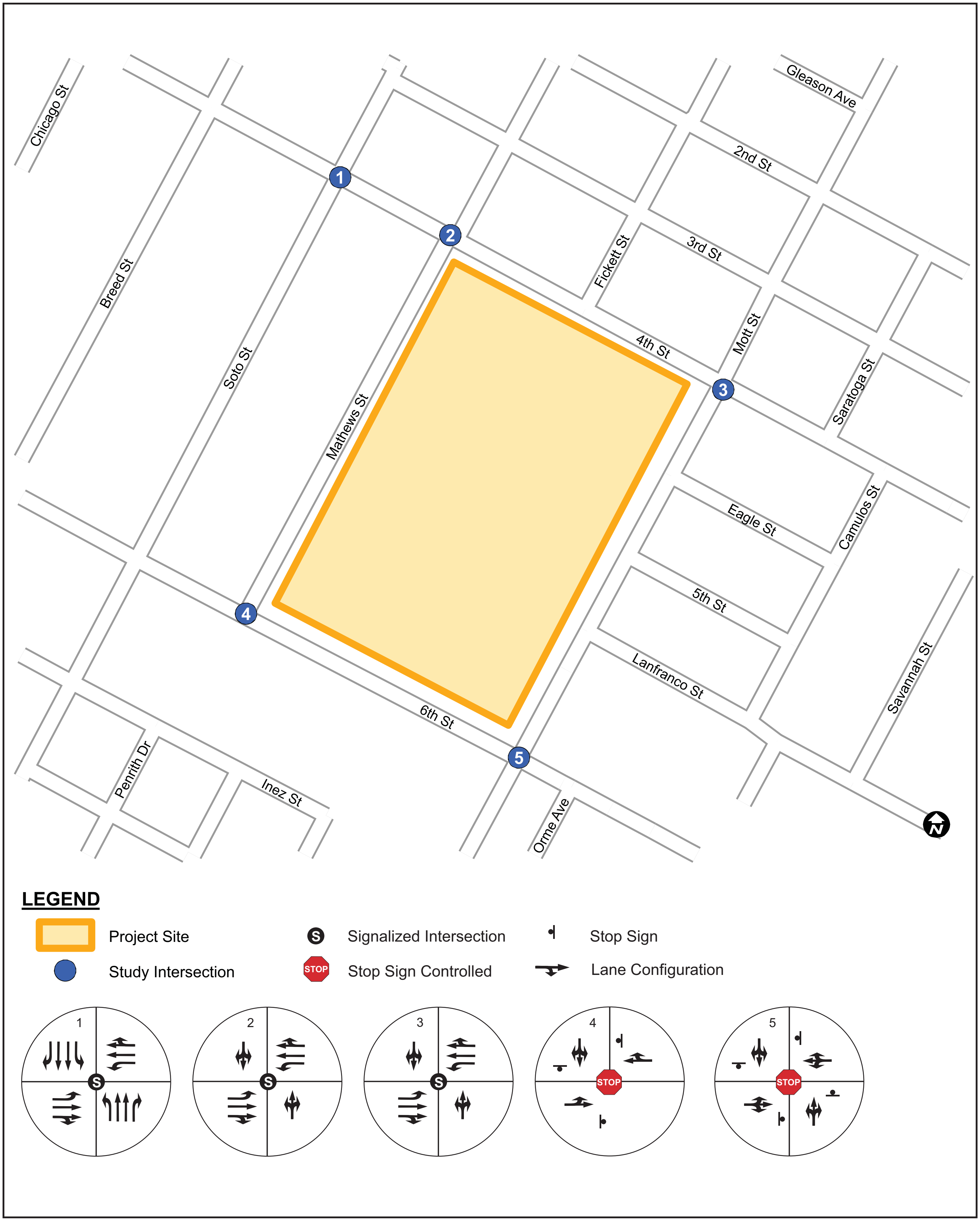


SOURCE: KOA Corporation, 2017

FIGURE **3.6-3**

Existing Lane Configurations

For analysis of LOS at signalized intersections within the City of Los Angeles, LADOT has designated the Circular 212 Planning methodology as the desired tool. The concept of roadway LOS under the Circular 212 method is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility. A facility is "at capacity" (V/C of 1.00 or greater) whereby extreme congestion occurs. This volume/capacity ratio value is a function of hourly volumes signal phasing, and approach lane configuration on each leg of the intersection.

SB 743 requires that the State Office of Planning and Research (OPR) change State CEQA guidelines for traffic significance thresholds to utilize new metrics, including vehicle miles traveled (VMT), in addition to LOS values. At the time of the Notice of Preparation for this EIR, OPR has not issued guidance upon these thresholds, and LADOT has not adopted such thresholds for traffic impact studies. The intersection-based LOS analysis is currently required by LADOT. Therefore, VMT data was not used as the basis for assessing significance of impacts.

LOS values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. **Table 3.6-1 Level of Service Definitions** defines the level of service criteria applied to the study intersections.

Table 3.6-1
Level of Service Definitions

Level of Service	Signalized Intersection Volume to Capacity Ratio (CMA)	Signalized Intersection Average Delay (HCM)	Stop-Controlled Intersection Average Stop Delay (HCM)	Definition
A	0.00 – 0.600	<10 seconds	<10 seconds	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.
B	0.601 – 0.700	>10 and 20 seconds	10 and 15 seconds	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.
C	0.701 – 0.800	>20 and 35 seconds	>15 and 20 seconds	Good operation. Occasionally drivers may have to wait for more than 60 seconds, and back-ups may develop behind turning vehicles. Most drivers feel somewhat restricted.
D	0.801 – 0.900	>35 and 55 seconds	>35 and 35 seconds	Fair operation. Cars are sometimes required to wait for more than 60 seconds during short peaks. There is no long-standing traffic queues. This level is typically associated with design practice for peak periods.

Level of Service	Signalized Intersection Volume to Capacity Ratio (CMA)	Signalized Intersection Average Delay (HCM)	Stop-Controlled Intersection Average Stop Delay (HCM)	Definition
E	0.901 – 1.00	>55 and 80 seconds	>35 and 50 seconds	Poor operation. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.
F	Over 1.000	>80 seconds	>50 seconds	Forced flow. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the intersections approach lanes; therefore, volumes carried are not predictable. Potential for stop-and-go type traffic flow.

Source: Highway Capacity Manual, Special Report 209, Transportation Research Board, Washington D.C., 2000 and Interim

Existing Intersection Levels of Service

Fieldwork within the Project study area was undertaken to identify the conditions of major roadways, to identify traffic control and approach lane configuration at each study intersection. Traffic counts conducted during the year 2016 were factored to existing year (2017) conditions. KOA compiled new manual intersection turn movement counts that were conducted at the study intersections on Wednesday, December 14, 2016 between 7:00 AM to 10:00 AM and 3:00 PM to 6:00 PM

Based on the AM and PM peak period traffic counts at the study area intersections, a volume-to-capacity ratio or average vehicle delay value in seconds and corresponding LOS value were determined for each of the study area intersections. **Table 3.6-2 Existing Peak Hour Level of Service Summary** provides the LOS results at each study intersection under Existing (Year 2017) baseline conditions.

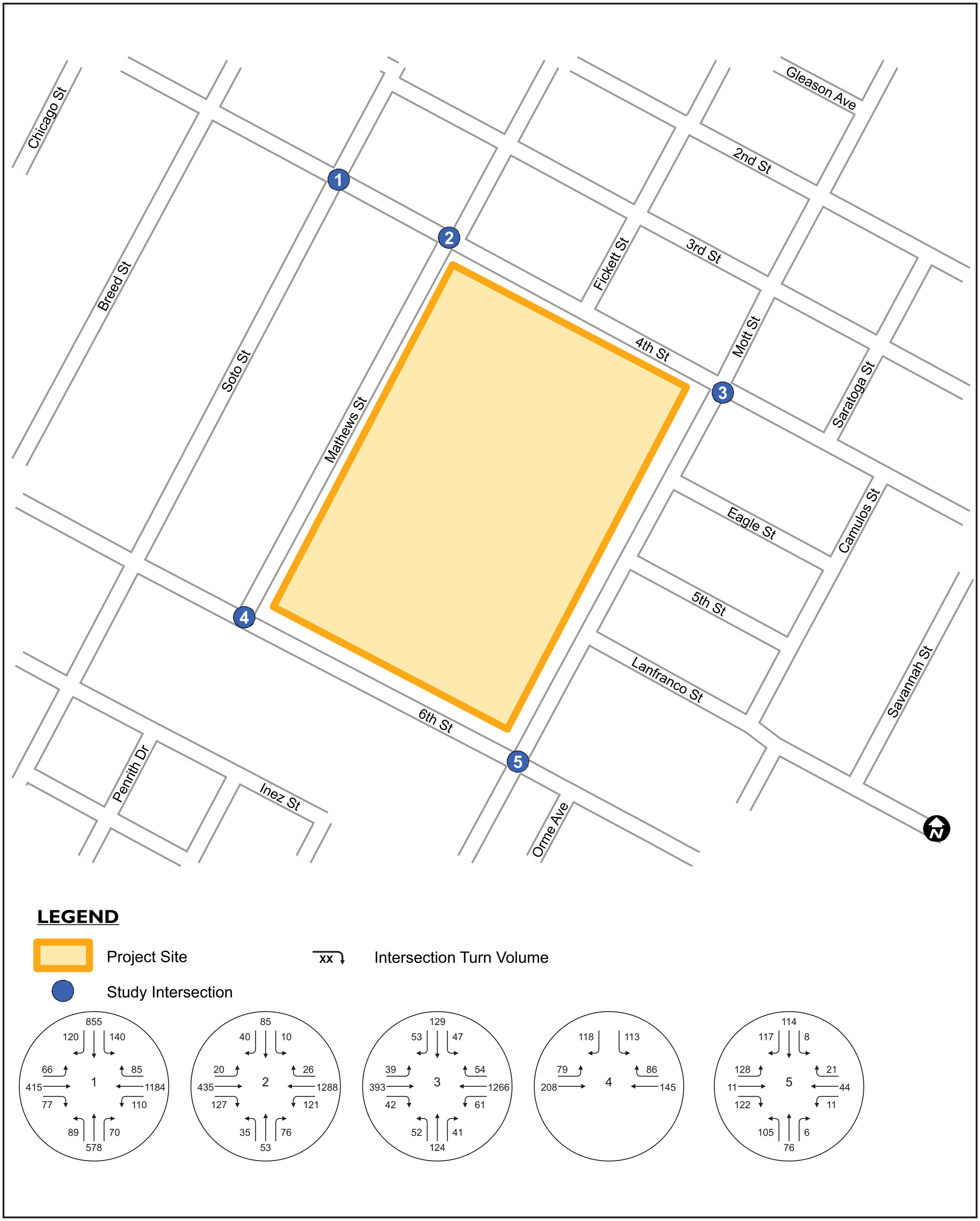
Table 3.6-2
Existing Peak-Hour Level of Service Summary

Map Reference	Intersection	Peak Hour	Seconds of Delay	LOS
1	Soto Street/4th Street	AM	0.854	D
		PM	0.895	D
2	Mathews Street/4th Street	AM	0.567	A
		PM	0.575	A
3	Mott Street/4th Street	AM	0.653	B
		PM	0.556	A
4	Mathews Street/6th Street*	AM	10.1	B
		PM	8.1	A

Map Reference	Intersection	Peak Hour	Seconds of Delay	LOS
5	Mott Street/6th Street*	AM	9.9	A
		PM	8.4	A

**Unsignalized Intersection*
*Source: KOA Corporation, 2017 Traffic Study for LAUSD Roosevelt High School (**Appendix 3.4**)*

Generally, LOS values of E and F are considered poor levels of service. The analysis, as shown in Table 3.6-2, indicates that all of the study intersections are currently operating at LOS D or better during the AM and PM peak hours under the existing conditions. Soto Street/4th Street operates at the poorest level of service condition while the other intersections operate at LOS A or B. The existing peak-hour study intersection volumes are illustrated on **Figure 3.6-4a Existing AM Peak Hour Traffic Volumes** and **Figure 3.5-4b Existing PM Peak Hour Traffic Volumes.**



SOURCE: KOA Corporation, 2017

FIGURE **3.6-4a**

IMPACT SCIENCES

Existing AM Peak Hour Traffic Volumes

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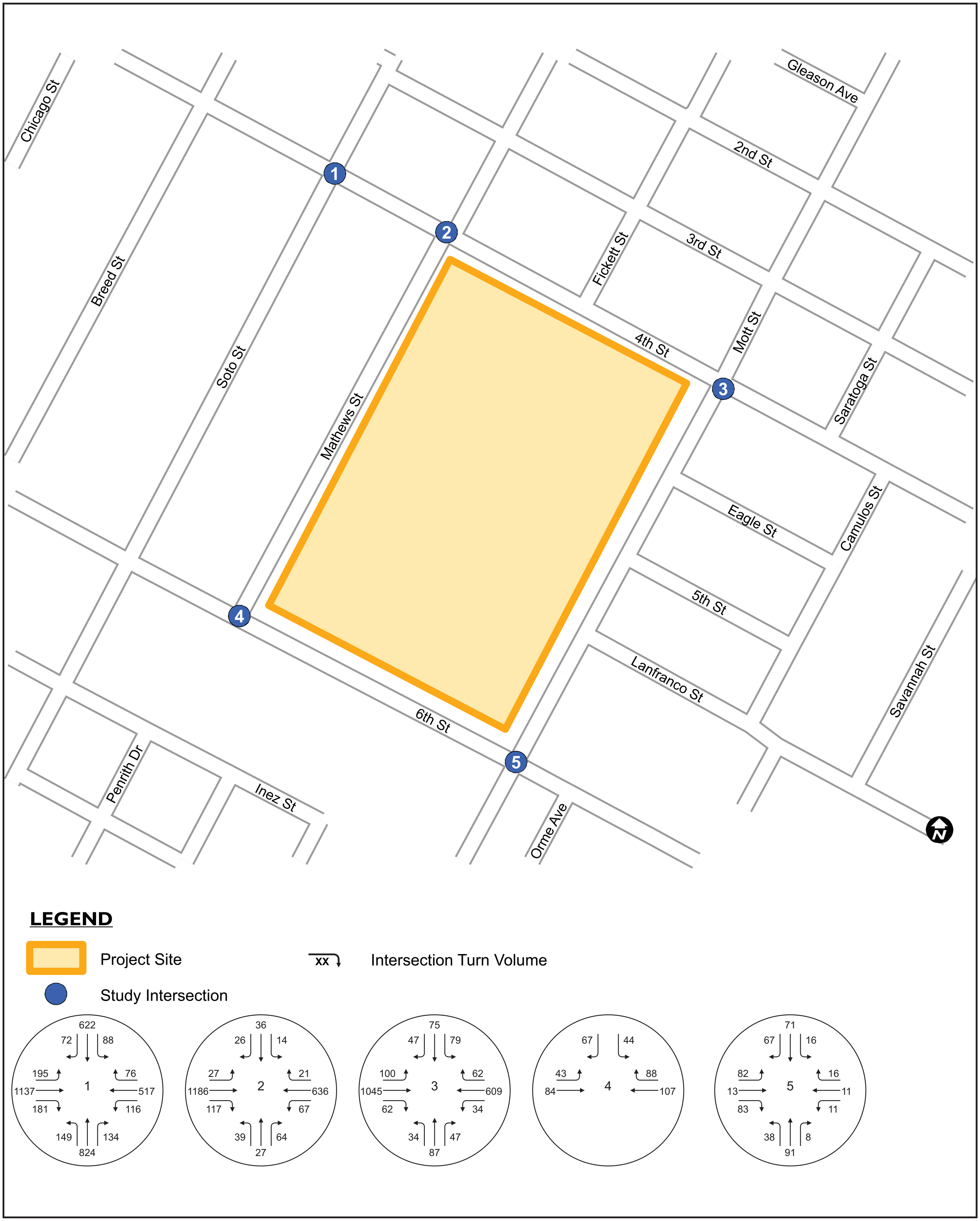

SOURCE: KOA Corporation, 2017

FIGURE **3.6-4b**

IMPACT SCIENCES

Existing PM Peak Hour Traffic Volumes

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3.6.3 REGULATORY FRAMEWORK

Federal

There are no federal regulations related to transportation that apply to the proposed Project.

State

Congestion Management Program (CMP)

The CMP was enacted by the California Legislature in 1989 to improve traffic congestion in urban areas. The program became effective with the passage of Proposition 111 in 1990, which also increased the State gas tax. Funds generated by Proposition 111 are available to cities and counties for regional road improvements, provided these agencies are in compliance with CMP requirements. The intent of the legislation was to link transportation, land use, and air quality decisions by addressing the impact of local growth on the regional transportation system. State statute requires that a congestion management program be developed, adopted, and updated biennially for every county that includes an urbanized area, which shall include every city and county government within that county.

Under this legislation, regional agencies are designated within each county to prepare and administer the CMP for agencies within that county. Each local planning agency included in the CMP has the following responsibilities:

- Assisting in monitoring the roadways designated within the CMP system
- Adopting and implementing a trip reduction and travel demand ordinance
- Analyzing the impacts of local land use decisions on the regional transportation system
- Preparing annual deficiency plans for portions of the CMP system where LOS standards are not maintained

The Los Angeles County Metropolitan Transportation Authority (Metro) is the CMP agency for Los Angeles County. Metro has the responsibility to review compliance with the CMP by agencies under its jurisdiction. For any agency out of compliance, after receiving notice and after a correction period, a portion of state gas tax funds may be withheld if compliance is not achieved. In addition, compliance with the CMP is necessary to preserve eligibility for state and federal funding of transportation projects.

Metro adopted the County's first CMP in 1992, and completed its most recent update in 2010. In connection with the CMP, Metro has issued CMP Traffic Impact Analysis Guidelines (CMP TIA Guidelines). The statute requires that all state highways and principal arterials be included within the CMP roadway system.

Complete Streets Act (Assembly Bill 1358)

Assembly Bill (AB) 1358, the Complete Streets Act, was signed into law in September 2008. AB 1358 requires cities and counties, when updating the part of a local general plan that address traffic and roadways, to ensure that those plans account for the needs of all roadway users. The goal of the legislation is to improve safety, access, and mobility for all travelers in California; and recognize that active transportation modes (i.e., bicycle and pedestrian) and transit modes as integral elements of the transportation system. The legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of all users as well as motorists.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) Regional Comprehensive Plan, Regional Transportation Plan and Sustainable Communities Strategy, and Regional Housing Needs Assessment (RHNA) are tools for coordinating regional planning and development strategies in Southern California. Policies contained in the Regional Comprehensive Plan and Guide identified as relevant to the proposed Project are identified in **Table 3.6-3**, **SCAG Regional Comprehensive Plan and Guide Policies Applicable to Transportation/Traffic**. This table also includes an assessment of the proposed project's consistency with these policies.

Table 3.6-3
SCAG Regional Comprehensive Plan Policies Applicable to Transportation/Traffic

Policy		Project Consistency
4.01	Transportation investments shall be based on SCAG's adopted Regional Performance Indicators	LAUSD considers SCAG Regional Performance Indicators when making transportation investments.
4.03	Transportation Control measures shall be a priority.	The Project is consistent with traffic reduction measures by allowing zone of Zone of Opportunities in Local District Northwest.
4.16	Maintaining and operating the existing transportation system will be a priority over expanding capacity.	LAUSD considers maintenance of the existing system prior to expansion when making improvements.

Source: SCAG Regional Comprehensive Plan and Guide, 1996

Local

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The City of Los Angeles General Plan (General Plan) addresses community development goals and policies relative to the distribution of public and private land use. The General Plan integrates the citywide elements and community plans, and gives policy direction to the planning regulatory and implementation programs.

Transportation Element

The Transportation Element of the General Plan sets forth goals, objectives, and policies which establish a City-wide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The General Plan states that not all of the policies set forth in the Transportation Element can be achieved in any given action, and in relation to any specific decision on a proposed project.[1] City decision-makers are to decide how to best implement the adopted policies of this element so as to best serve the health, safety, mobility, and general welfare of the public on a case-by-case basis.

City of Los Angeles Mobility Plan 2035 (Element of the General Plan)

City Council adopted the amended Mobility Plan 2035 and associated EIR on January 20, 2016. The Plan provides a roadmap for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), Mobility Plan 2035 incorporates "Complete Streets" principles that will provide safe and efficient transportation for bicyclists, transit riders, and car and truck drivers. The amended Mobility Plan 2035 replaced both the existing City of Los Angeles General Plan Transportation Element and the existing City of Los Angeles Bicycle Plan.

LAUSD Traffic and Pedestrian Safety Requirements for New Schools

LAUSD developed the *Traffic and Pedestrian Safety Requirements*[2] for new schools to guide site planning and identify performance requirements to minimize potential pedestrian safety risks to students, staff,

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1 *City of Los Angeles General Plan, Transportation Element, first page of Chapter IV, Objectives and Policies.*

2 http://www.laschools.org/documents/download/asset_management%2fstudies_and_reports%2fOEHS_Traffic_and_Pedestrian_Safety_Requirements_for_new_schools.pdf?version_id=310976423

and visitors at LAUSD schools. The performance guidelines include requirements for: student drop-off areas, vehicle access, and pedestrian routes to school.

LAUSD Standard Conditions of Approval

These standard conditions of approval (SCs) are included within the Los Angeles Unified School District, School Upgrade Program EIR (Program EIR). Listed below are all applicable transportation SCs to be included in the Project.

SC-PED-1 **Caltrans SRTS Program:** The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 **Traffic and Pedestrian Safety requirements:** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 **Sidewalk requirements for New Schools:** LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc (2) Install new walkway and/or sidewalk segments where none exist (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 **School Traffic Safety Reference Guide REF – 4492.1:** Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 **School Design Guide:** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3: LAUSD will coordinate with the City of Los Angeles to agree on the following:

- Compliance with the City's design guidelines for access, parking, and circulation in the vicinity of the Project.
- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices.
- Fair share contribution and/or other mitigation measures for potential traffic impacts
- Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.
- Traffic study will use the latest version of ITE Trip Generation manual to determine trip generation rates based on the size of the school facility, unless otherwise required by local jurisdiction
- Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

SC-T-4: LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of South Gate for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction. All measures identified in the detailed Traffic Control Plan shall be implemented during construction to ensure that adequate and safe access remains available on-site.

SC-T-5: LAUSD shall incorporate applicable Best Management Practices (BMPs) including but not limited to: LAUSD shall encourage ride-sharing programs for students and teachers.

3.6.4 METHODOLOGY

Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)

- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

Level of Service

Traffic impacts are identified by local agencies if the proposed project will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable level of service value and project traffic will cause a further decline below the applicable threshold.

LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. The analysis of study locations focused on LOS values only and long-term traffic impacts were not analyzed, as the Project would not cause any changes in vehicle trip generation. Construction period effects on the study intersection LOS values were analyzed for the peak period of construction.

City of Los Angeles

The City of Los Angeles Department of Transportation has established specific thresholds for project related increases in the volume-to-capacity ratio (V/C) of signalized study intersections. The following increases in peak-hour V/C ratios are considered "significant" impacts:

Table 3.6-4
City of Los Angeles LOS Threshold Criteria

Level of Service	Final V/C*	Project Related v/c increase
C	< 0.701 – 0.800	Equal to or greater than 0.040
D	< 0.801 – 0.900	Equal to or greater than 0.020
E	0.901 or 1.000	Equal to or greater than 0.010
F	Greater than 1.000	Equal to or greater than 0.010

Note: Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient and related project growth, and without proposed traffic impact mitigations

LADOT does not define impact thresholds for unsignalized intersections. The analysis of these locations focused on level of service values only and specific impact thresholds were not applied.

Traffic Signal Synchronization

Automated Traffic Surveillance and Control (ATSAC) is a computer-based traffic signal control system whereby engineers can monitor traffic conditions and system performance as the system selects appropriate signal timing (control) strategies and performs equipment diagnostics and alert functions. Sensors in the street detect the passage of vehicles, vehicle speed, and the level of congestion. This information is received on a real-time basis and is analyzed on a minute-by-minute basis at the ATSAC Operations Center to determine if better traffic flow can be achieved by changing the signal timing.

If required, the signal timing is either automatically changed by the ATSAC computers or manually changed by the operator using communication lines that connect the ATSAC Center with each traffic signal. To supplement the information from electronic detectors, closed-circuit television (CCTV) surveillance equipment has been and continues to be installed at critical locations throughout the City.

Adaptive Traffic Control System (ATCS) is the latest enhancement to ATSAC and uses a personal computer-based traffic signal control software program which provides fully traffic adaptive signal control based on real-time traffic conditions. The ATCS automatically adjusts traffic signal timing in response to current traffic demands by simultaneously controlling all three critical components of traffic signal timing – namely cycle length, phase split and offset.

For capacity analysis, LADOT guidelines suggest a 0.10 reduction in volume-to-capacity ratio with the implementation of ATSAC/ATCS. This reduction represents field measured benefits in flow and capacity increase by operation of this combined program.

Based on information obtained from LADOT, all signalized study intersections within the City of Los Angeles are currently equipped with both ATSAC and ATCS functionality.

Project Trip Generation

The applied rates are based on Trip Generation (9th Edition), published by the Institute of Transportation Engineers (ITE). Estimated Project trip generation was based on public high school rates. Private school rates were also applied, due to the operational characteristics of the proposed Project and the potential for students to travel longer distances via automobile to reach the school. The school would be both a neighborhood school and a regional school, based on its specialty curriculum. **Table 3.6-5 Project Trip Generation** describes trip generation rates and forecast generation. The Project is not expected to create new vehicle trips, so these calculations are provided for reference. Impact calculations are therefore not included in this traffic study for any new generated trips from the school campus for the long-term period.

Table 3.6-5
Project Trip Generation

Trip Generation Rates									
Land Use	**Units**		**Daily Total**	**Weekday AM Total**	**Weekday AM IN**	**Weekday AM OUT**	**Weekday PM Total**	**Weekday PM IN**	**Weekday PM OUT**
High School	students		1.71	0.39	0.21	0.18	0.13	0.06	0.07
Project Trip Generation									
Land Use	**Intensity**	**Units**	**Daily Total**	**Weekday AM Total**	**Weekday AM IN**	**Weekday AM OUT**	**Weekday PM Total**	**Weekday PM IN**	**Weekday PM OUT**
High School	2,600	students	4,466	1,014	546	468	338	159	179

**AM rates for high school derived from Memorandum of Cooperation (MOC), City of Los Angeles/LAUSD, June 2005; PM rates for high school taken from ITE*
Trip Generation, 9th edition. Student rates for the high school use provide total trips for students, staff, visitors, and other trips.

Based on these trip rates, the 2,600 seats provided by the proposed Project would generate 4,446 daily trips, including 1,014 weekday AM peak-hour trips (546 inbound and 468 outbound) and 338 weekday PM peak-hour trips (159 inbound and 179 outbound). These include trips by vehicles for pick-up/drop-off activity, staff/faculty trips, and utility/delivery trips.

The peak roadway traffic rate was used for the AM and PM peak analysis to calculate the project trip generation.

The construction truck trip generation totals were determined based on the most intense period of demolition activity for the project. In converting trucks to passenger car equivalents, a Passenger Car Equivalent (PCE) factor of 2.5 was assumed. The applied value matches typical factors used in area studies that include trips generated by trucking activities. The factor is based on conservative factors defined by the Southern California Association of Governments (SCAG) Heavy Duty Truck Model. Each round trip by truck would generate the equivalent of 2.5 inbound vehicle trips and 2.5 outbound vehicle trips.

The proposed Project construction would require up to 100 daily round-trip truck loads for demolition and excavation activities. During Project demolition and excavation activities, daily truck haul activities will occur over an eight-hour period that begins during the AM peak period and is completed during the PM peak period.

Based on these assumptions, up to 100 daily truck trips would generate 125 weekday AM peak-hour trips (63 inbound and 62 outbound) and 125 weekday PM peak-hour trips (63 inbound and 62 outbound). The peak construction activities would generate a daily total of 500 truck trips. Table 3.6-6 summarizes the construction truck trips, including the applied PCE factor of 2.5.

Table 3.6-6
Project Trip Generation

Land Use	Daily Total	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out
Trip Generation Estimates							
Construction	500	125	63	62	125	63	62
Total	500	125	63	62	125	63	62

Note: The Total of construction trucks was based on the Transportation Plan of August 2017.

Project Trip Distribution

Trip distribution is the process of assigning the directions from which traffic will access a project site. Trip distribution is dependent upon the land use characteristics of the project, the local roadway network, and the general locations of other land uses to which project trips would originate or terminate. Project trip distribution would not be expected to change from existing conditions. Construction truck trips and constriction employee vehicle trips would likely access the Project site via the freeway network, area arterials, and then local roadways. This trip distribution pattern would generally include the I-5 freeway to the west, the 4th Street interchange, the 4th Street roadway, and the local roadways of Mathews Street, Mott Street, and to a lesser extent 6th Street.

Project Trip Assignment

Based on the trip generation and distribution assumptions described above, Project construction traffic was assigned to the roadway system based on the anticipated haul routes and construction phasing and access locations and the roadways that would likely to be used to access the regional highway system.

Existing (2017) Baseline Conditions

Fieldwork within the Project study area was undertaken to identify the conditions of major roadways, to identify traffic control and approach lane configuration at each study intersection, and to identify the locations of on-street parking and transit stops.

Future (2018) No Project Conditions

In order to acknowledge regional traffic growth that would affect operations at the study intersections during the anticipated peak construction activity year of 2018, an ambient/background traffic growth rate was applied. An annual ambient growth rate of two percent was utilized to estimate future baseline traffic volumes. The applied growth rate represents regional population and employment growth outside of the study area.

In addition to future ambient growth, traffic from cumulative/area projects (approved and pending development) was also included as part of the future-period analysis. These Related Projects are identified in Section 3.0.

Significant Traffic Impacts

As defined by the local agency traffic study guidelines, significant impacts of a proposed project at an intersection must be mitigated to a level of insignificance. In cases where capacity increases are possible, KOA analyzed mitigation measures that would restore operations commensurate with the removal of the incremental impacts of the Project.

The analysis of study locations focused on LOS values only and long-term traffic impacts were not analyzed, as the Project would not cause any changes in vehicle trip generation. Construction period effects on the study intersection LOS values were analyzed for the peak period of construction.

3.6.5 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the *State CEQA Guidelines*, a project would have a significant effect on the environment if the Project would:

TRA-1 **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)**

TRA-2 **Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways**

TRA-3 **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.**

TRA-4 **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)**

TRA-5 **Result in inadequate emergency access**

TRA-6 **Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)**

The Initial Study indicated that the Project is not located within an airport land use plan or in the vicinity of a public airstrip. Further, there are no changes proposed to the design or configuration of roadways surrounding the Project site that would result in increased design hazards or conflict with emergency response. Therefore, no further analysis of these topics is required in the EIR. Please also see the Initial Study provided in **Appendix 1.0**.

3.6.6 IMPACTS AND MITIGATION MEASURES

TRA-1 **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).** ***Less than significant.***

Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future (2018) No Project Conditions
- Future (2018) Conditions with Project Construction

Future (2018) No Project

This section provides an analysis of future traffic conditions in the study area with ambient growth and related/cumulative projects. The year 2018 was selected for analysis, as this is the anticipated year that construction activity would reach their peak intensity. Future period forecast includes an ambient growth rate for both regional population and employment growth of the study area of two percent. In addition, pending area/cumulative project data provided by LADOT is considered in impact analysis. Related Projects near the Project site are illustrated in **Table 3.0-1** of **Section 3.0 Environmental Impact Analysis**.

Future peak-hour level of service analysis was conducted at the identified intersections. **Table 3.6-7 Future Year (2018) Peak-Hour Level of Service Summary without Project,** illustrates volume-to-capacity ratios and level of service designations compared to existing 2017 conditions. The peak-hour study intersection volumes for this scenario are illustrated on **Figure 3.6-5a Future without-Project AM Peak Hour Traffic Volumes** and **Figure 3.6-5b Future without-Project PM Peak Hour Traffic Volumes**

Table 3.6-7
Future Year (2018) Peak-Hour Level of Service Summary without Project

			Existing (2017) Conditions		Future (2018) No Project	
Map Reference	Intersection	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
1	Soto Street / 4th Street	AM	0.854	D	0.905	**E**
		PM	0.895	D	0.969	**E**
2	Mathews Street / 4th Street	AM	0.567	A	0.592	A
		PM	0.575	A	0.606	B
3	Mott Street / 4th Street	AM	0.653	B	0.679	B
		PM	0.556	A	0.588	A
4	Mathews Street / 6th Street*	AM	10.1	B	11.3	B
		PM	8.1	A	9.0	A
5	Mott Street / 6th Street*	AM	9.9	A	11.1	B
		PM	8.4	A	9.3	A

*Source: KOA Corporation, 2017 Traffic Study for Roosevelt High School, (**Appendix 3.6-1**)*
Notes:
/a/ Units for Delay are in Seconds
/b/ Bolded intersections have LOS E
/c/ Change in V/C or Delay has been rounded to the nearest hundredth place
**denotes unsignalized intersection*

Based on the scenario analysis, four of the five study intersections would continue to operate at LOS D or better during both AM and PM peak hours. Operations at the intersection of Soto Street and 4th Street would worsen to LOS E during both AM and PM peak hours, as a result of new vehicle trips generated by the Related Projects.

Future (2018) with Project Construction

Future traffic conditions in the study area with ambient growth and Related Projects, and the proposed Project construction is anticipated to have peak intensity during the year 2018.

During construction, truck trips and construction employee vehicle trips would likely access the Project site via the freeway network, area arterials, and then local roadways. The trip distribution pattern would generally include the I-5 freeway to the west, the 4th Street interchange, the 4th Street roadway, and the local roadways of Mathews Street, Mott Street, and to a lesser extent 6th Street.

In order to be consistent with the City of Los Angeles Building Construction Noise Ordinance, construction would occur Monday through Friday from 7:00 AM to 5:00 PM No construction would occur on Sundays or holidays. Therefore, construction workers would typically arrive before the weekday morning commute peak period when construction commences at 7:00 AM and would likely leave during the weekday afternoon commute peak period, but no overlap the peak afternoon pick-up and outbound trip period of the campus.

Construction employees would park in a number of campus areas, depending on the Project construction phase:

- South side of 6th Street, west of Mathews Street
- North side of 6th Street, adjacent to ball fields at southeast corner of campus
- Adjacent to Mott Street, east side of campus

Project demolition and construction is anticipated to start in the third quarter of 2018, and this would be the peak activity period in terms of daily truck trips generated. Excavation and cleanup activities would start in November 2018 and occur through the end of February 2019, in a non-continuous manner. Final excavation and cleanup activities would occur between June 2020 and November 2020.

The major phases of construction include the Gymnasium & Parking Lot, the Classroom Building, and the Administration Building. Work focused during the summer months will include Interim Housing, special work on utilities, the lunch shelter, the pool parking lot, exterior renovation of existing buildings, and interior maintenance in Building 1. The study area construction peak-hour traffic assignment for the construction trips only are illustrated on **Figure 3.6-6a Project Construction Trip Assignment – AM Peak Hour and Figure 3.6-6b Project Construction Trip Assignment – PM Peak Hour.**

Project construction would potentially disrupt traffic flow within the study area. The impact analysis included the assignment of construction haul/delivery trips to the study area, for the review of the significance of traffic impacts during the peak period of construction.

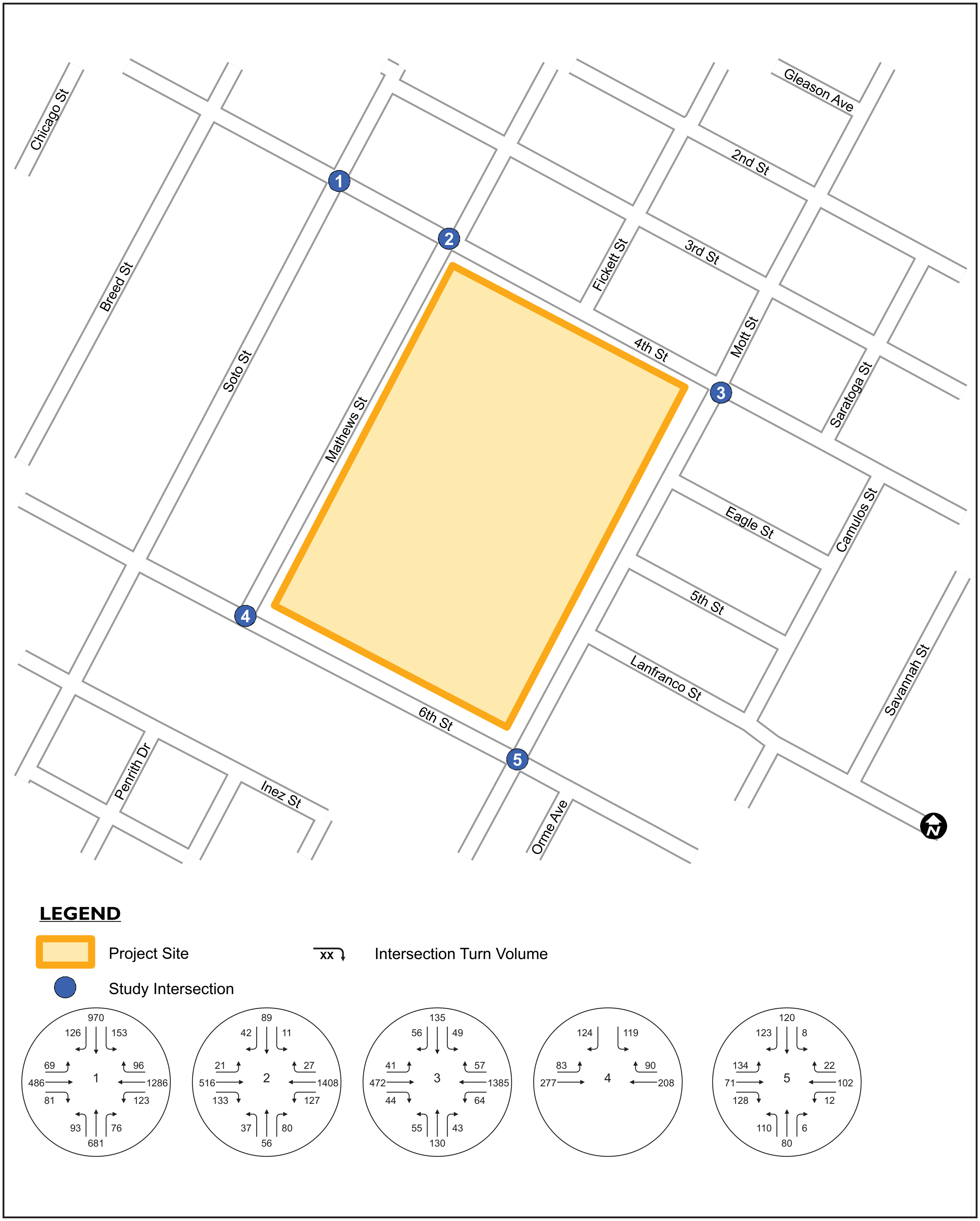
Table 3.6-8 Future Year (2018) Peak-Hour Level of Service Summary with Project, provides a comparison of existing conditions scenario to future year-2018 conditions with Project construction. LOS values of E or F are shown below in bold text.

Table 3.6-8
Future Year (2018) Peak-Hour Level of Service Summary with Project

			Existing (2017) Conditions		Future (2018) with Project	
Map Reference	**Intersection**	**Peak Hour**	**V/C or Delay**	**LOS**	**V/C or Delay**	**LOS**
1	Soto Street / 4th Street	AM	0.854	D	0.949	**E**
		PM	0.895	D	0.991	**E**
2	Mathews Street / 4th Street	AM	0.567	A	0.618	B
		PM	0.575	A	0.627	B
3	Mott Street / 4th Street	AM	0.653	B	0.715	C
		PM	0.556	A	0.631	B
4	Mathews Street / 6th Street*	AM	10.1	B	12.3	B
		PM	8.1	A	9.2	A
5	Mott Street / 6th Street*	AM	9.9	A	11.5	B
		PM	8.4	A	9.3	A

*Source: KOA Corporation, 2017 Traffic Study for Roosevelt High School, (**Appendix 3.6-1**)*
Notes:
/a/ Units for Delay are in Seconds
/b/ Bolded intersections have LOS E
/c/ Change in V/C or Delay has been rounded to the nearest hundredth place
**denotes unsignalized intersection*

The study area traffic volumes for the future with-Project construction period scenario are illustrated on **Figure 3.6-7a Future with Construction Period AM Peak Hour Traffic Volume** and **Figure 3.6-7b Future with Construction Period PM Peak Hour Traffic Volumes**.



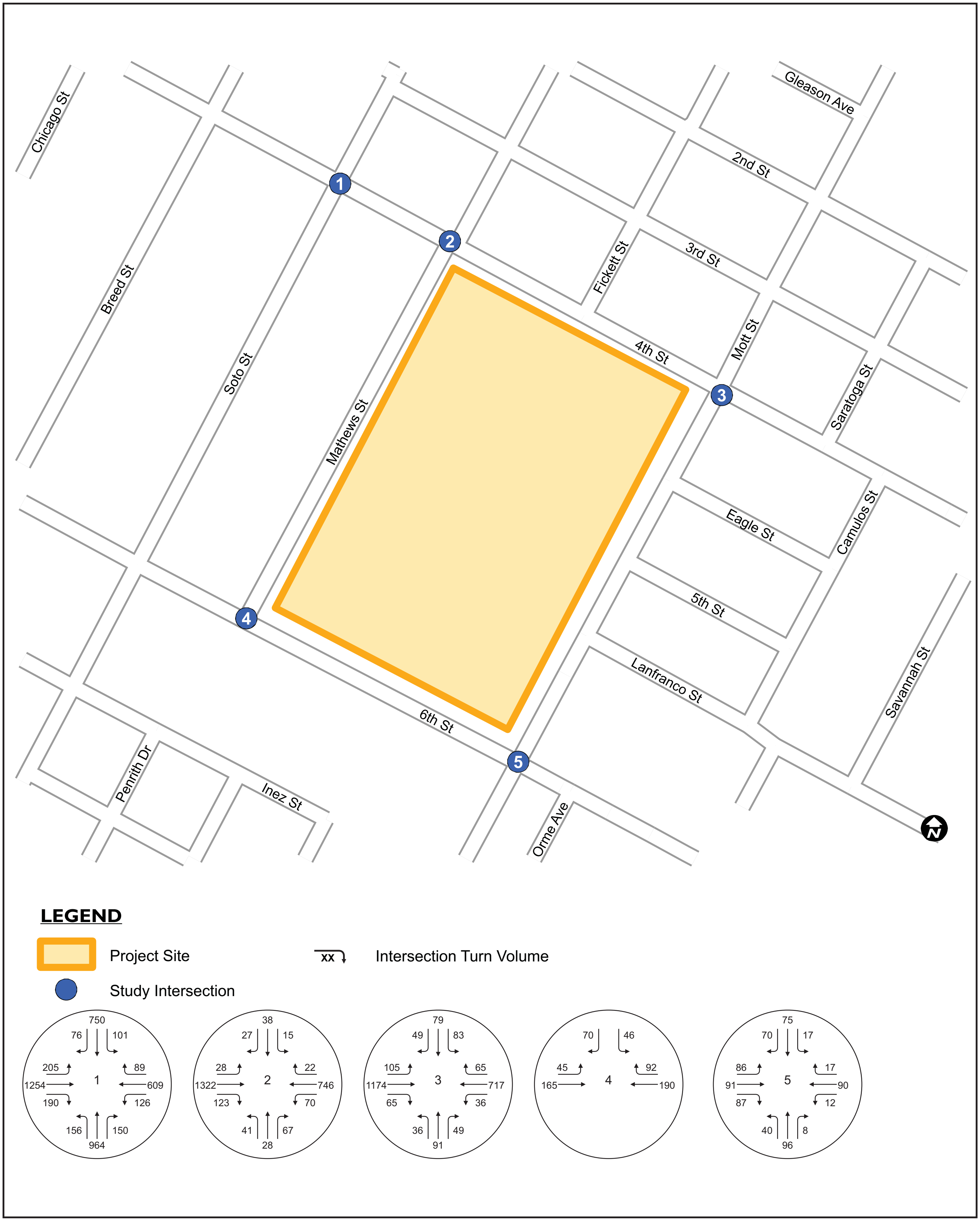
SOURCE: KOA Corporation, 2017

FIGURE **3.6-5a**

IMPACT SCIENCES

Future Without-Project AM Peak Hour Traffic Volumes

0695.016•1/18



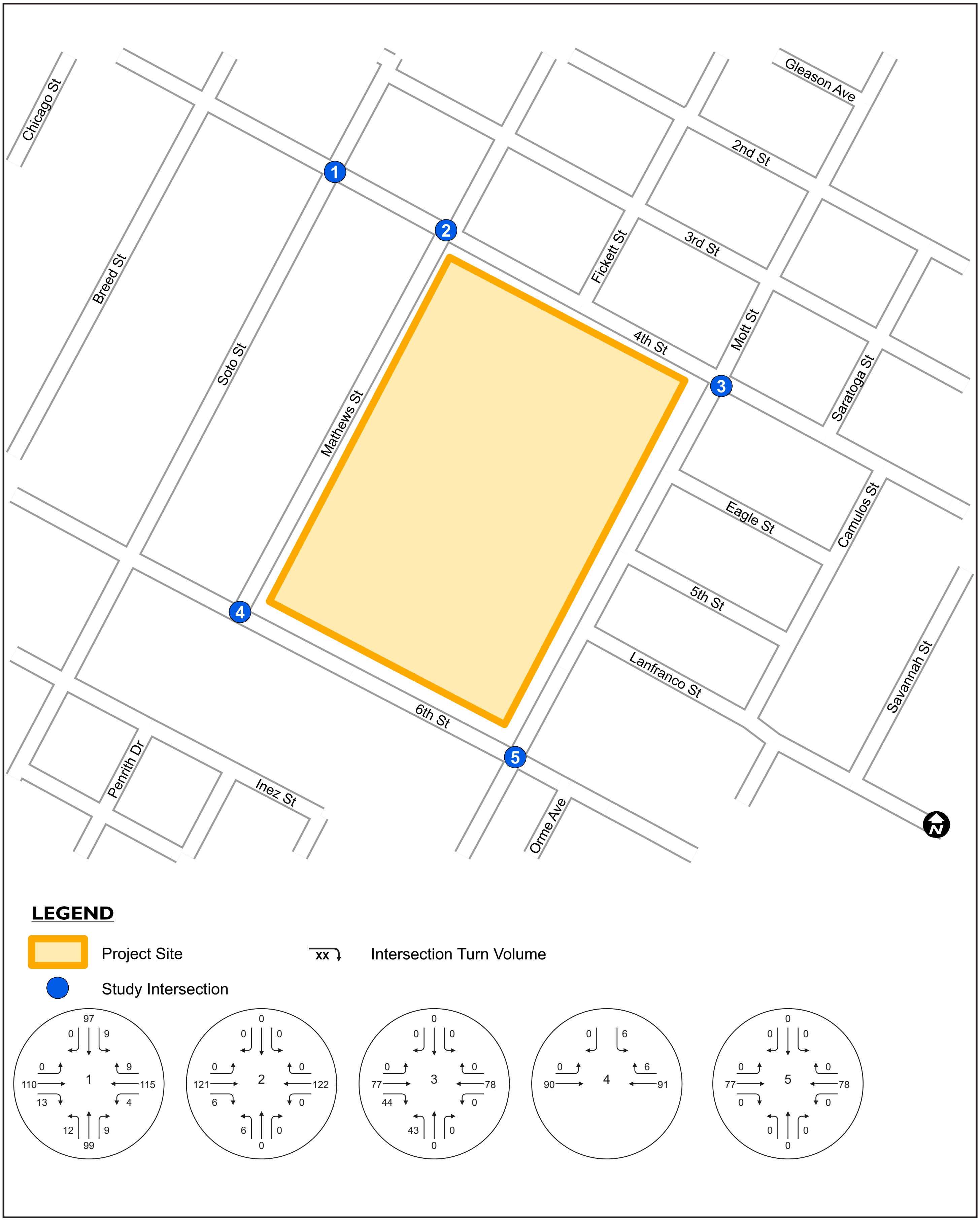
SOURCE: KOA Corporation, 2017

FIGURE **3.6-5b**

IMPACT SCIENCES

Future Without-Project PM Peak Hour Traffic Volumes

0695.016•1/18



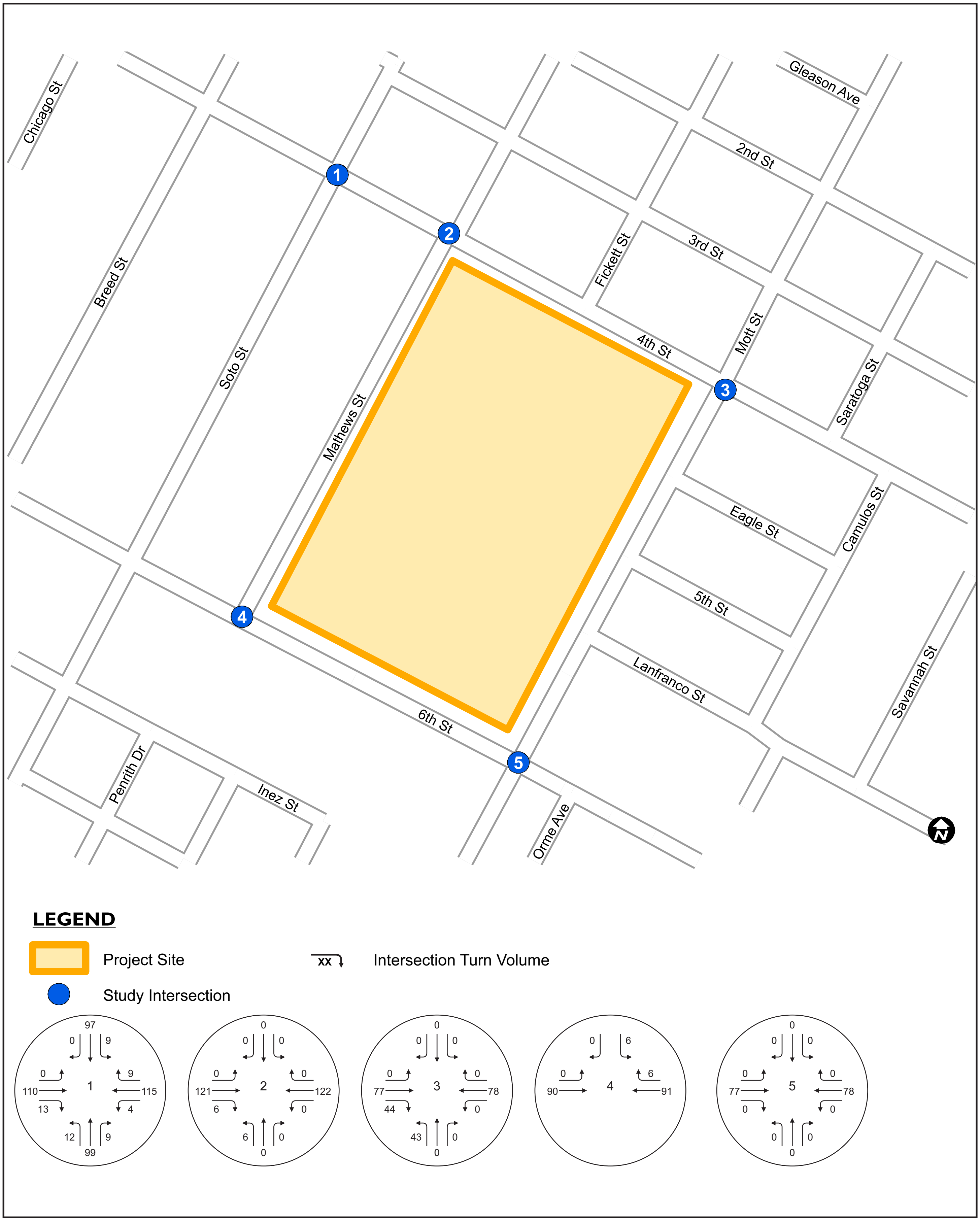
SOURCE: KOA Corporation, 2017

FIGURE **3.6-6a**

IMPACT SCIENCES

Project Construction Trip Assignment – AM Peak Hour

0695.016•1/18



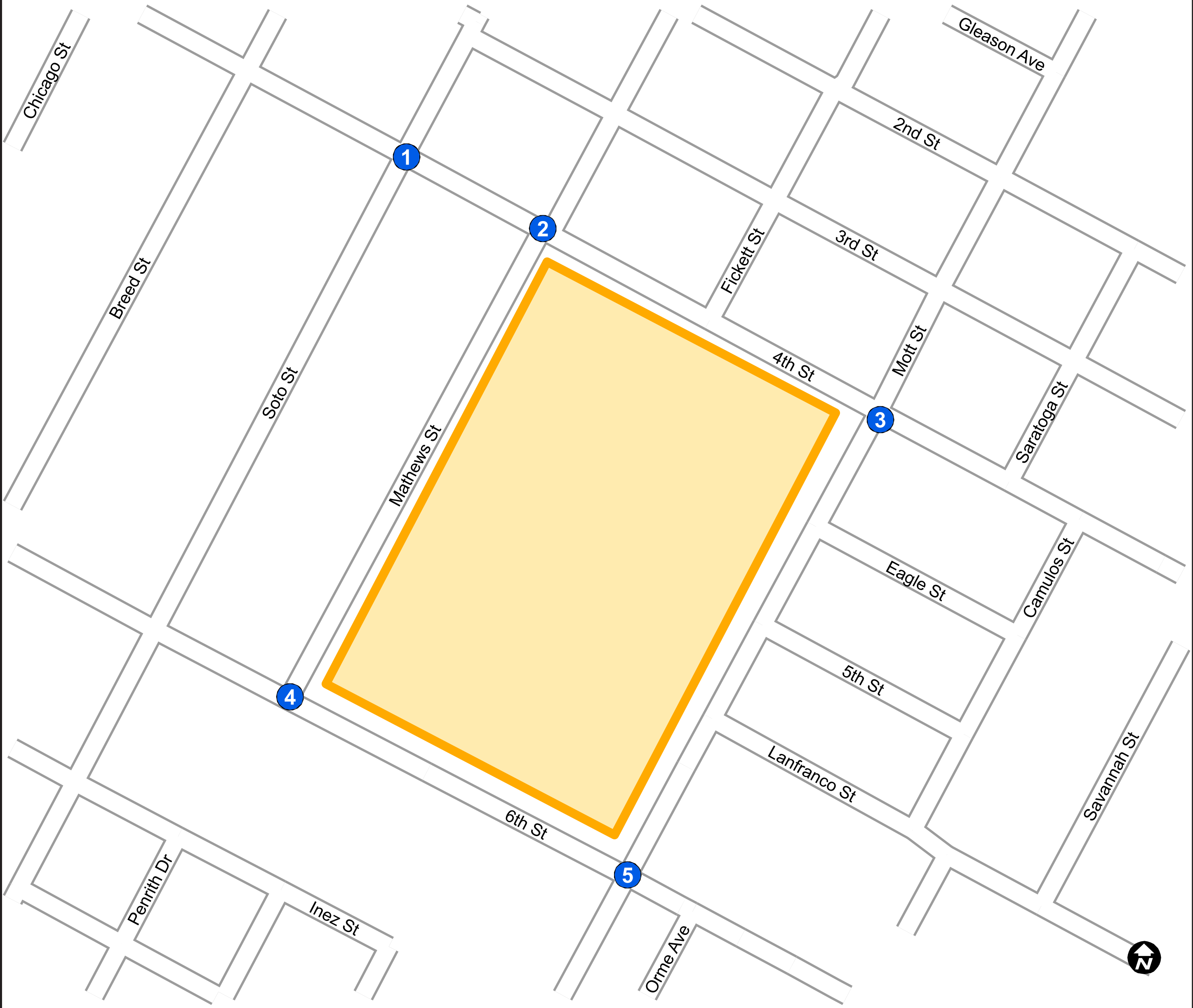
SOURCE: KOA Corporation, 2017

FIGURE **3.6-6b**

IMPACT SCIENCES

Project Construction Trip Assignment – PM Peak Hour

0695.016•1/18

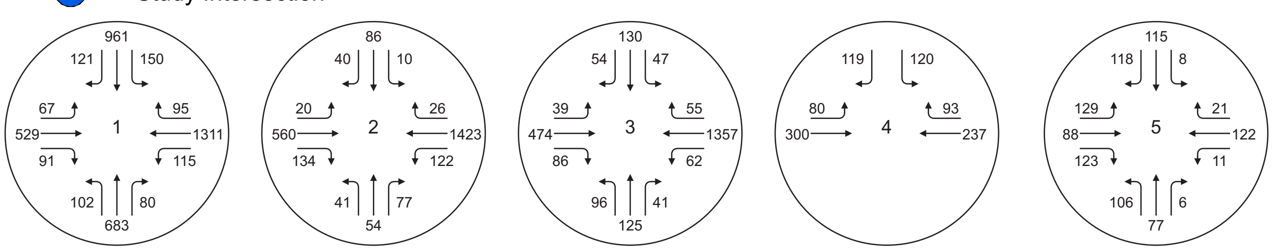


LEGEND

Project Site

Study Intersection

xx Intersection Turn Volume



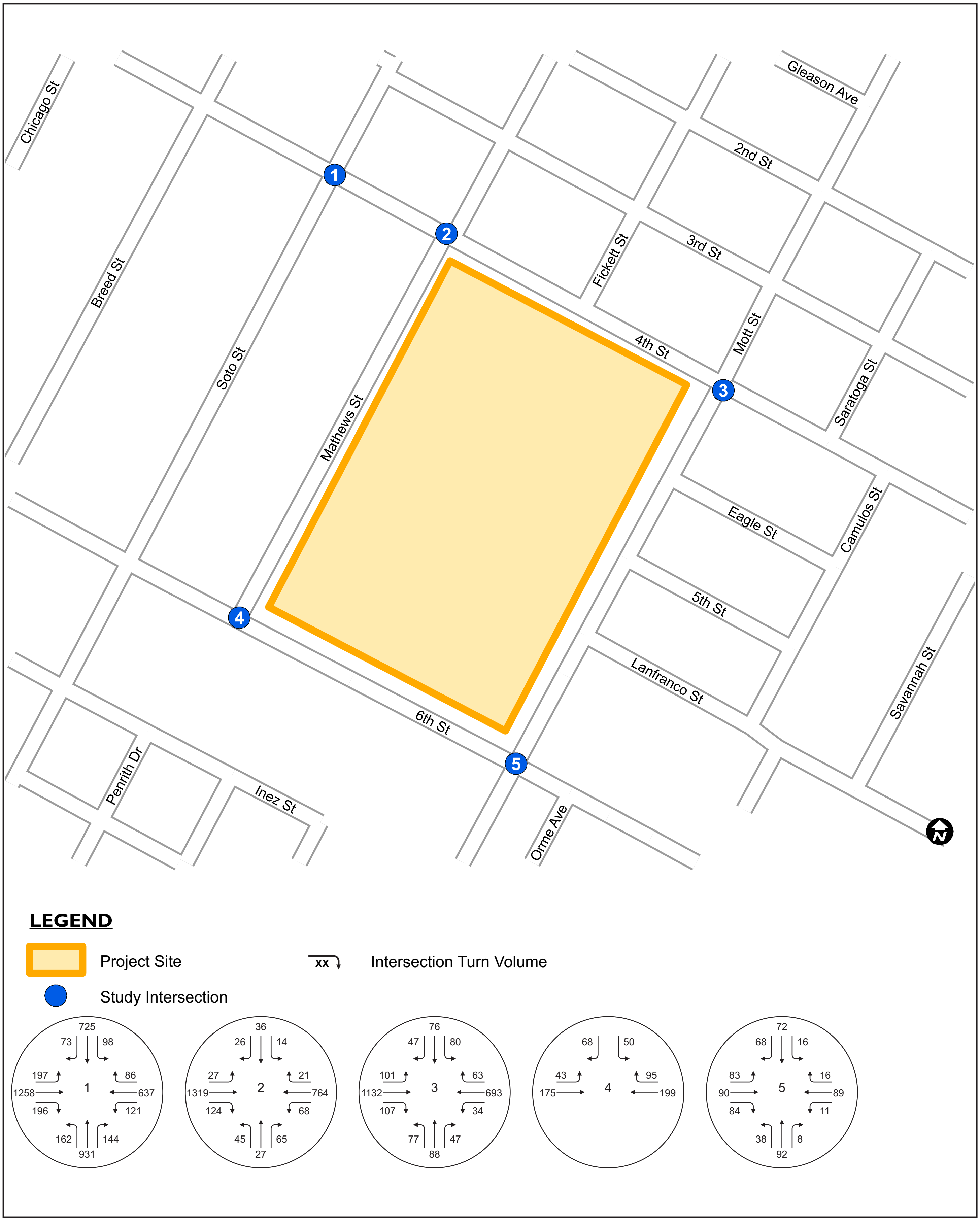
SOURCE: KOA Corporation, 2017

FIGURE **3.6-7a**

IMPACT SCIENCES

Future with Construction Period AM Peak Hour Traffic Volumes

0695.016•1/18



SOURCE: KOA Corporation, 2017

FIGURE **3.6-7b**

IMPACT SCIENCES

Future with Construction Period PM Peak Hour Traffic Volumes

0695.016•1/18

The intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant

During the construction phase, LAUSD's implementation of **SC-T-4** will require its contractors to submit a construction worksite traffic control plan to the City of Los Angeles prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. It would define measures to avoid the overlap of truck trips at construction site access points/driveways during student pedestrian travel to and from the campus on adjacent sidewalks. LAUSD should encourage its contractors to limit construction-related truck trips to avoid peak school travel times. The worksite traffic control plan would minimize impacts of all construction traffic flows and vehicle parking areas on site pick-up/drop-off activities. In addition, flag persons should be stationed at each site construction access point to control conflicts between pedestrians, vehicles in travel lanes, and pedestrians on the sidewalk. Therefore, the construction worker traffic would have a less than significant impact to traffic and transportation.

Mitigation Measures

Impacts would be less than significant, no mitigation measures are required.

Residual Impact

Impacts would be less than significant.

TRA-2	**Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.** ***Less than significant.***

The Los Angeles County Congestion Management Plan (CMP) requires analysis of traffic impacts of individual development projects that are potentially regionally significant. The CMP for Los Angeles County is a cumulative scenario that considers the impact of single projects in the context of cumulative traffic demand on CMP roadways. CMP guidelines require that freeway monitoring locations must be examined if the proposed Project would add 150 or more trips (in either direction) during either the AM or PM weekday peak hours or 50 or more trips at CMP intersections during the AM or PM weekday peak hour.

The nearest CMP arterial monitoring intersection to the Project site is located at Whittier Boulevard at Atlantic Boulevard (CMP ID#104, 3.30-miles from the Project site). The nearest CMP mainline freeway-monitoring location to the Project site is on the 101-freeway near Soto Street (to the north of the Project site). As the construction-period trip generation of the Project would be a temporary condition, and as there would be a lack of new trip generation generated at the school campus once the Project is complete, no impacts would occur at CMP intersections. Therefore, CMP impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant, no mitigation measures are required.

Residual Impact

Impacts would be less than significant.

3.6.7 CUMULATIVE ANALYSIS

Project level cumulative impacts are provided in the Future (2018) with Project scenario. This scenario includes the Project and Related Projects and represents the most intense period of traffic generation. As shown in the analysis above, the Project would not result in any project level impacts nor would the Project contribute to a cumulative impact at any of the studies intersections. Therefore, cumulative level impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant and would not be cumulatively considerable.

Residual Impact

Impacts would be less than significant.

4.0 ALTERNATIVES

4.0.1 INTRODUCTION

The *State CEQA Guidelines* require an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project," and to "evaluate the comparable merits of the alternatives."[1]The analysis of alternatives shall focus on alternatives "which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly."[2]

The selection and discussion of alternatives is intended to foster meaningful public participation and informed decision making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The *State CEQA Guidelines* also require the analysis of a no project alternative, and the identification of the environmentally superior alternative. Where the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."[3]

In addition, the *State CEQA Guidelines* require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.[4]

Accordingly, several alternatives that might avoid or substantially lessen Project impacts were considered. Some alternatives were initially considered but rejected as infeasible. These are briefly discussed below. Three alternatives, in addition to the no project alternative, were selected for further analysis, as detailed below.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a construction of reasonableness. The impacts of the alternatives may be discussed in less detail than the significant effects of the project proposed.[5] Further, courts have found that "[a]bsolute perfection" in the analysis of alternatives "is not required; what is required is the production of

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1 *State CEQA Guidelines* Section 15126.6 (a)

2 *State CEQA Guidelines* Section 15126.6 (b)

3 *State CEQA Guidelines* Section 15126.6(e)(2)

4 *State CEQA Guidelines* Section 15126.6(c)

5 *State CEQA Guidelines* section 15126.6(d)

information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." (Laurel Heights, supra, 47 Cal.3d at pp 406-407.)

4.0.2 PROJECT OBJECTIVES

The alternatives to the proposed Project ultimately selected for analysis in this EIR were developed to avoid or substantially lessen one or more of the significant environmental impacts associated with the proposed Project, while still attaining most of the basic objectives of the Project. The following are objectives for the proposed Project:

1. Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.

2. Provide upgrades throughout the campus to improve accessibility for all students (in particular those with special needs) and for the Project to comply with the requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).

3. Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

4. Honor and enhance features of the Roosevelt High School campus that reflect its history and cultural identity.

5. Establish 4th Street as the primary frontage of the Roosevelt High School campus and enhance its presence in the Boyle Heights neighborhood.

6. Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members and visitors.

7. Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

8. Incorporate opportunities into the campus site plan for future expansion of the football and baseball fields.

9. Improve the visual relationship between Roosevelt High School and Hollenbeck Middle School to encourage and inspire middle school students to matriculate to Roosevelt High School.

10. Eliminate reliance on portable classrooms.

11. Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

12. Replace buildings and infrastructure that have reached the end of their useful lives.

13. Reduce the amount of stormwater runoff drainage and improve the quality of stormwater runoff by increasing pervious surfaces on campus.

14. Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

15. Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).

16. Undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

4.0.3 SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the *State CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the project. The *State CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternative discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

Section 3.0, Environmental Impact Analysis, of this EIR concludes that implementation of the proposed Project would result in significant and unavoidable environmental impacts. These impacts include:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance as a result of Project level construction noise from haul truck trips;

- Substantial temporary or periodic increase in ambient noise levels in the Project vicinity and an increase in noise levels in combination with Related Projects (cumulative haul truck noise impact).

- The demolition of historical resources as defined in *State CEQA Guidelines*, Section 15064.5. As defined in Section 3.0 Cultural Resources, the campus is identified as an eligible historic district based on criteria A/1 due to its association with the Blowouts and B/2 due to its association with the lives of significant persons in the LAUSD civil rights movement. All buildings present on the campus in March 1968 at the time of the Blowouts are considered contributors to the proposed Roosevelt Senior High School Historic District. The contributors and the priority of significance of each are listed in **Table 4.0-1 Roosevelt Senior High School Historic District Contributors**. The buildings proposed for demolition are shown in **Figure 4.0-1 Historic District Contributors and Buildings to be Demolished – Proposed Project**.

Table 4.0-1
Roosevelt Senior High School Historic District Contributors

Bldg. No	Building Name	Year Built	Priority
1	Auditorium and Classroom	1922	Primary
7	Classroom Building	1937	Primary
6	Industrial Arts	1968	Secondary
8	Instrumental Music Building	1959	Secondary
17	Classroom	1964	Secondary
18	Classroom	1964	Secondary
19	Physical Education Building	1968	Secondary
10	Flammable Storage Building	1953	Tertiary
11	Field Sanitary Building	1958	Tertiary
12	Equipment Field Storage	1941	Tertiary
16	Field Light Controls	1949	Tertiary
20	Utility Building	1968	Tertiary
n/a	Track		Tertiary
n/a	Portions of Landscaping		Tertiary

Source: ASM Affiliates, CRTR January 2018

- In addition, Building 1 has been identified as being individually eligible as a historical resource under criteria A/1 and B/2. Therefore, the loss of Building 1 would also be a significant and unavoidable impact.

In response to these significant impacts, LAUSD has developed and considered several alternatives to the Project. These alternatives include:

Alternative 1 - No Project Alternative

The No Project Alternative assumes that the demolition of the existing structures and construction of the modernized campus site would not occur. Under this alternative, the site would remain in its existing condition with no improvements. Because much of the identified contaminated soil is located under existing buildings and no buildings would be demolished, the cleanup associated with the RAW would not be implemented under this alternative.

Alternative 2 – Rehabilitation of Building 1

Under Alternative 2, Building 1 would be rehabilitated. The renovation would consist of seismic, ADA accessibility and life/fire safety upgrades to meet current DSA requirements and LAUSD standards. The purpose of this alternative is to renovate Building 1 in a manner that the historic character/character defining features of the building would be retained and renovated following Secretary of the Interior Standards and the significant and unavoidable impact associated with loss of the individually eligible resource (Building 1) would be avoided. **Figure 4.0-2 Historic District Contributors and Buildings to be Demolished – Alternative 2** illustrates this alternative.

The following contributing resources would be removed under this alternative:

- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Utility building (Building #20)
- Gymnasium building (Building #19)
- Portions of the landscaping

Other non-contributing resources would also be removed under this alternative:

- Music building (Building #4)
- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)
- Approximately thirty-one classrooms in 17 portable buildings

Alternative 3 - Retain the Historic District

Under this alternative, a sufficient number of primary and secondary contributors would be retained to retain the historic district. Buildings 1 (Auditorium and Classroom) and 7 (Classroom) are primary contributors to the historic district and would be retained and renovated following Secretary of the Interior Standards. The following secondary contributors would also be retained and renovated: 8 (Instrumental Music), 17 (Classroom), and 18 (Classroom). All the tertiary contributors would also be retained: 10 (Flammable Storage Building), 11 (Field Sanitary Building), 12 (Equipment Field Storage), 16 (Field Light Controls), Utility building (Building #20) and the Track. Portions of the areas of historic landscaping would also be retained. Under this alternative the contributing resources identified as being retained and renovated would be renovated such that the character defining features of the buildings would be maintained. The purpose of this alternative is to maintain the historic district on the campus and to avoid the significant and unavoidable impact associated with the loss of the historic district. Figure 4.0.-3 Historic District Contributors and Buildings to be Demolished – Alternative 3 illustrates this alternative.

Alternative 4 - No Renovation of Building 1

Under this fourth alternative, Building 1 would remain in its current form. No substantial upgrades would occur and only minor improvements would be made to the building. No structural changes would occur. The Project would be redesigned to accommodate Building 1 in its current location. Similar to Alternative 2, the purpose of this alternative is to avoid the significant and unavoidable impact associated with the loss of an individually eligible resource (Building 1). Figure 4.0-4 Historic District Contributors and Buildings to be Demolished – Alternative 4 illustrates this alternative.

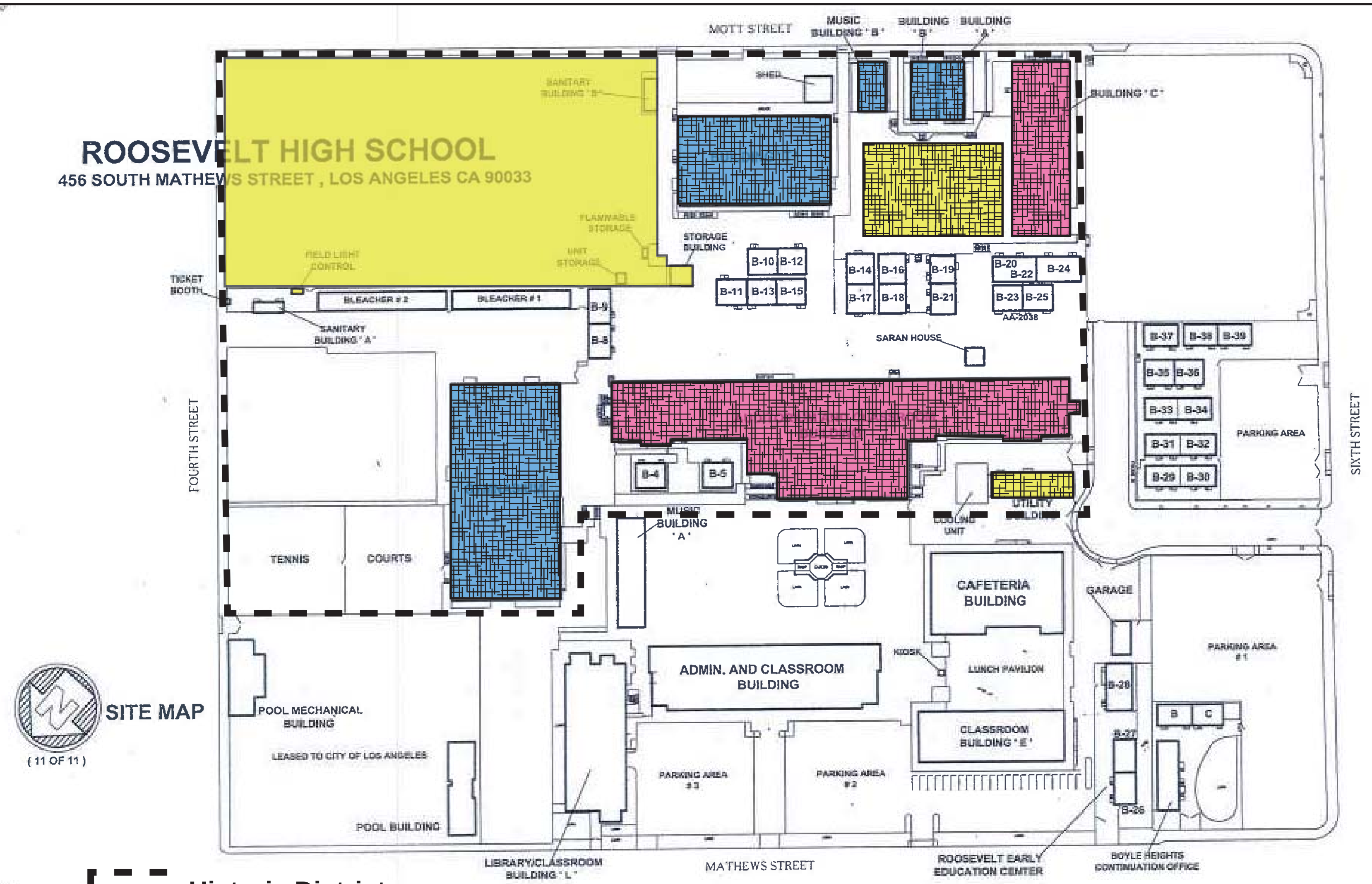
Alternatives Considered But Not Evaluated In Detail

The *State CEQA Guidelines* require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) of the *State CEQA Guidelines* states the following:

> *The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination…Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*

Alternative Location Alternative

According to Section 15126.6(f)(2) of the *State CEQA Guidelines*, alternative locations are key to analyzing "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." An alternative location would not meet the primary objectives of the Project which relate to the modernization of the existing Roosevelt High School campus. Therefore, an alternative location was eliminated from further consideration.



Contributor

- Primary
- Secondary
- Tertiary
- Historic District
- To be Demolished

SOURCE: LAUSD, 2017

FIGURE **4.0-1**

IMPACT SCIENCES

Historic District Contributors and Buildings to be Demolished – Proposed Project

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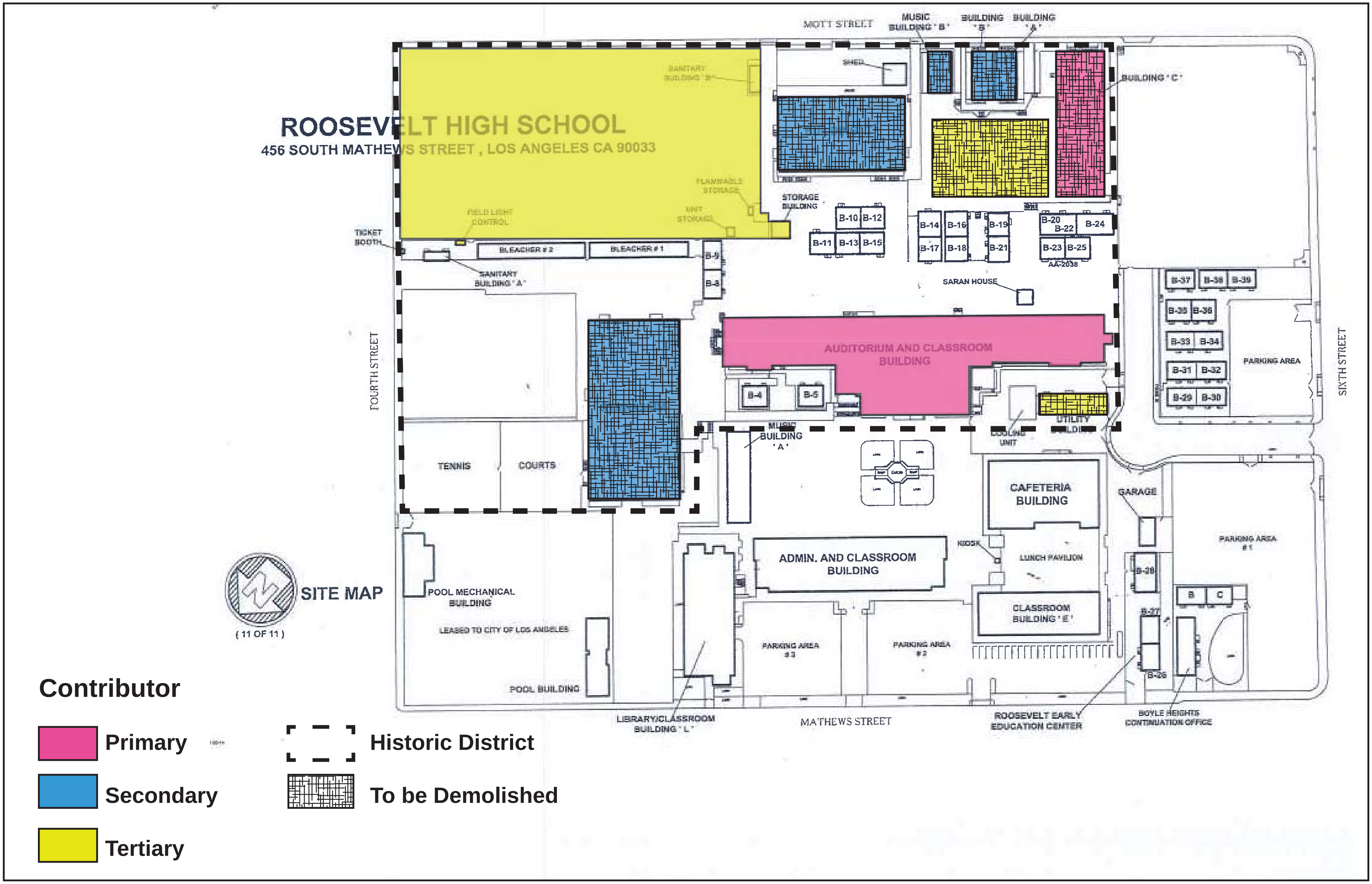
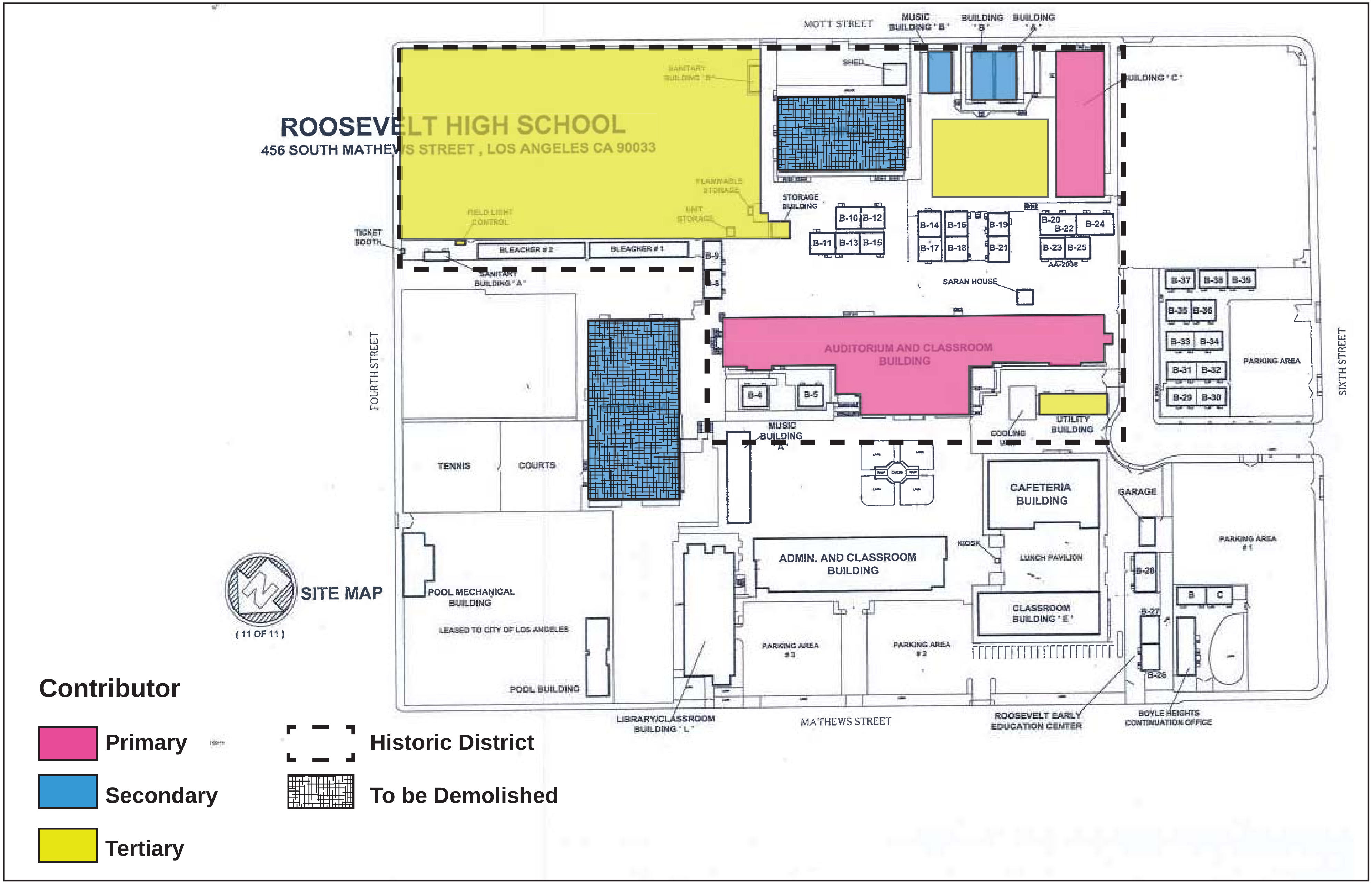


SOURCE: LAUSD, 2017

FIGURE **4.0-2**

Historic District Contributors and Buildings to be Demolished – Alternative 2

0695.016•1/18



SOURCE: LAUSD, 2017

FIGURE **4.0-3**

IMPACT SCIENCES

Historic District Contributors and Buildings to be Demolished – Alternative 3

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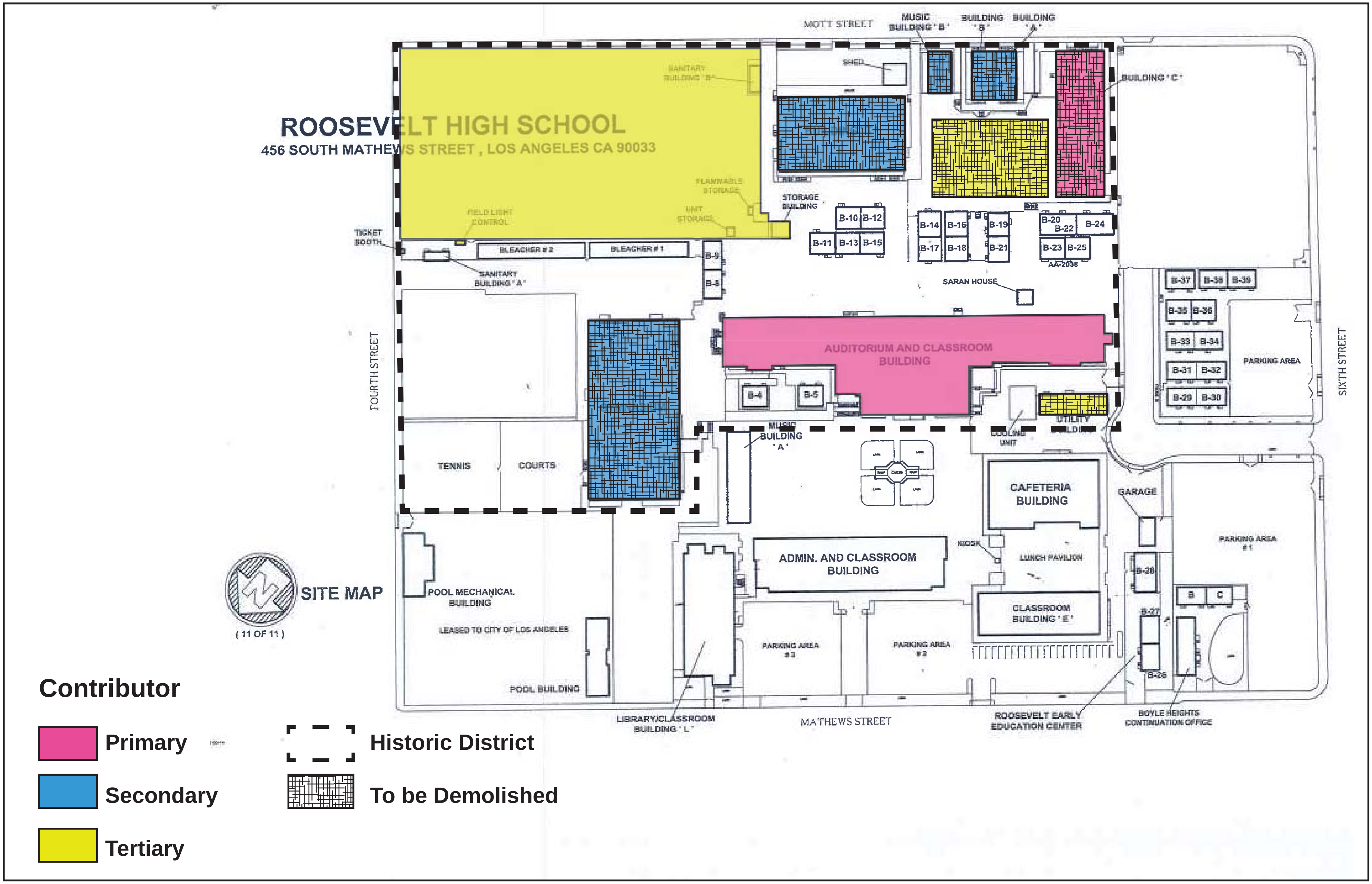

SOURCE: LAUSD, 2017

FIGURE **4.0-4**

IMPACT SCIENCES

Historic District Contributors and Buildings to be Demolished – Alternative 4

0695.016•1/18

Retention of all Contributors

The District also considered an alternative of retaining all building, structures, and landscapes identified as either primary, secondary, or tertiary contributors to the historic district. This would include all contributing resources identified in Table 4.0-1. This alternative was eliminated from further consideration as it would not meet the primary objectives of the Project which relate to the modernization of the campus. If all contributors to the historic district were retained in their current location, there would not be sufficient capacity on the campus to construct new buildings and achieve the objectives of the Project. The District did move a similar alternative forward, Alternative 3 (described above), which would retain a sufficient number of alternatives to maintain the identified historic district, although not all contributors would be maintained.

4.0.4 ANALYSIS METHODOLOGY

Consistent with *State CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in **Section 2.0, Project Description**, and above would be substantially attained by the alternative. The evaluation of each alternative follows the process described below:

- The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR;

- Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area. Where the net impact of the alternative would be less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would be more adverse or less beneficial than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar"; and

- The comparative analysis of the impacts is followed by a general discussion of whether the purpose and basic Project objectives are feasibly and substantially attained by the alternative.

Table 4.0-4 at the end of this chapter provides a summary matrix that compares the impacts of the Project with the impacts of each of the analyzed alternatives for each environmental issue addressed in this Draft EIR.

4.0.5 COMPARATIVE IMPACT ANALYSIS

A summary of the buildings proposed for demolition in each of the alternatives is provided below with additional detailed description and analysis provided later in this section (at the introduction to each alternative). **Table 4.0-2 Summary of Historic District Contributors and Alternative Scenarios,** is included to provide a comparison between the major project components.

Table 4.0-2
Summary of Historic District Contributors and Alternative Scenarios

Contributor	Description	Priority	Alt 1 - Proposed Project	Alt 2 Rehab of Building 1	Alt 3 – Retain Historic District	Alt 4 – Retain Building 1 As-Is
Building 1	Auditorium/ Classroom	Primary	X	Rehabilitation	Rehabilitation	Remains in current condition
Building 6	Industrial Arts	Secondary	X	X	X	X
Building 7	Classroom	Primary	X	X	Rehabilitation	X
Building 8	Instrumental Music	Secondary	X	X	Rehabilitation	X
Building 10	Flammable Storage	Tertiary	Retained	Retained	Retained	Retained
Building 11	Field Sanitary	Tertiary	Retained	Retained	Retained	Retained
Building 12	Equipment Field Storage	Tertiary	Retained	Retained	Retained	Retained
Building 16	Field Light Controls	Tertiary	Retained	Retained	Retained	Retained
Building 17	Classroom	Secondary	X	X	Rehabilitation	X
Building 18	Classroom	Secondary	X	X	Rehabilitation	X
Building 19	Gymnasium	Secondary	X	X	X	X
Track		Tertiary	Retained	Retained	Retained	Retained
Building 20	Utility Building	Tertiary	X	X	Retained	X
Landscaping		Tertiary	X	X	Partially retained	X

"X" denotes a building proposed for demolition
"Rehabilitation" means seismic, ADA accessibility, and/or life/fire safety upgrades to meet current DSA and LAUSD standards.

Alternative 1 – No Project

Section 15126(2)(4) of the *State CEQA Guidelines* requires evaluation of the No Project Alternative. As described in the *State CEQA Guidelines*, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed project. Therefore, as required by the *State CEQA Guidelines*, the analysis must examine the impacts that might reasonably be expected to occur in the foreseeable future if the proposed Project was not approved. Under the No Project Alternative, all buildings would remain in the current condition and no improvements would be made to the campus.

This No Project analysis discusses the existing conditions at the time the Notice of Preparation was prepared, as well as what would be reasonably expected to occur in the foreseeable future if the Project was not approved. Under the No Project Alternative, the potential Project-related impacts associated with redevelopment of the Project site and described in **Section 3.0, Environmental Impact Analysis** would not occur. In addition, because much of the contaminated soils identified on site were used as fill and are located under the existing buildings, the clean-up activities proposed to be implemented as part of the Project would not occur.[6]

Air Quality

Alternative 1 would not alter the Project site's existing uses or result in new construction and, therefore, would not generate additional air pollutant emissions. Although no significant impacts were identified under Alternative 1, construction emissions associated with the proposed Project would not occur. Alternative 1 would not result in construction activities associated with either building construction or RAW activities and, therefore, there would be no additional emissions from haul truck traffic. Potential impacts associated with construction air quality emissions would not occur and would be than those of the Project. Under this alternative the school would continue to operation in energy inefficient buildings, therefore operational air quality emissions would be less than significant and similar to the proposed Project.

Cultural Resources

Under Alternative 1, no buildings on the Project site would be rehabilitated, altered, removed or demolished. None of the primary, secondary, or tertiary contributors to the identified historic district would be rehabilitated, altered, removed or demolished. Building 1, which was determined to be individually eligible as a historical resource, would also not be rehabilitated, altered, or demolished. As none of the existing buildings would be altered in any way, none of the significant and unavoidable impacts associated with the loss of an identified historical resource would occur. Potential impacts would be less than those of the proposed Project.

Hazards & Hazardous Materials

Under Alternative 1, the activities associated with the RAW and cleanup would not occur. Because none of the buildings would be removed from the site, there would be no opportunity for removal of contaminated soil that exists beneath the buildings. Under Alternative 1, construction of new permanent buildings and associated grading activities would not occur. Thus, Alternative 1 would not result in

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6 Contaminated fill in other locations (such as under the track) would not need to be removed

potential construction-related impacts associated with hazardous materials use, uncovering of unknown subsurface soil contamination, or development in proximity to a high pressure pipeline. No impacts would occur, and the less than significant impacts that would occur under the Project would be avoided.

Operation of Alternative 1 would result in the school remaining in operation on the Project site, no changes to the existing use would occur. Therefore, operational impacts associated with the proposed Project would be the same as Alternative 1 and would be less than significant with mitigation due to proximity a high pressure pipeline.

Noise

Under Alternative 1, construction of new school buildings would not occur. Thus, no noise impacts associated with construction haul truck traffic would occur. The significant and unavoidable noise impacts associated with construction activities would be avoided. Because this alternative would not generate any construction haul truck traffic, the alternative would not contribute to a cumulative increase in construction noise levels in the Project area. Impacts would be less than significant and less than the proposed Project.

During operation, similar to the proposed Project, no increase in traffic would occur, and no new noise sources would be introduced. The school would continue to operate as under existing conditions. As such, noise levels would remain at existing levels and no new or increased sources of noise within the Project vicinity would occur as a result of the No Project alternative. Therefore, Alternative 1 would result in similar operational noise impacts compared to the Project. Finally, Alternative 1 would not result in any vibration impacts during either construction or operation. Therefore, vibration impacts would be less than the Project's less than significant impacts.

Pedestrian Safety

Under Alternative 1, there would be no construction activities that could introduce haul trucks or other construction trucks onto the Project site. Thus, impacts under Alternative 1 would be less than the Project's identified less than significant impact. During operation, Alternative 1 would continue to provide seats for the approximately 2,600 students currently on the campus. As described in Section 3.5 Pedestrian Safety, conditions around the site are adequate and no impact would occur. Impacts under Alternative 1 would be the same as with the proposed Project.

Transportation & Traffic

Under Alternative 1, none of the construction trips associated with building construction or RAW cleanup would occur. Therefore, this impact would be less than the Project's less than significant impact.

Relationship of the Alternative to the Project Objectives

Alternative 1 would not meet the Project's purpose to ensure that the buildings that have been identified as requiring seismic upgrades are addressed. The buildings on the site would remain in their current condition and no upgrades would occur. The buildings in their current condition are considered safe for school use, although they do not meet DSA's current requirements related to seismic safety as well as CDE standards for school buildings. The existing site does partially honor the history of the site and its cultural identity by maintaining the existing buildings, but none of the features of the interpretive plan would be incorporated into the Project site, thereby enhancing the history of the site. Therefore, this alternative would not meet any of the Project objectives.

Alternative 2 - Rehabilitation of Building 1

The State of California enacted Assembly Bill (AB) 300 in 1999, which required the Department of General Services to survey the State's public school buildings (Kindergarten through grade 12) for earthquake safety and to submit a report of its findings to the Legislature. AB 300 identified 269 of the LAUSD's nearly 13,000 buildings for seismic evaluation. In 2006, after further analysis by District staff, including site visits and field investigations, additional buildings were identified for seismic evaluation based upon AB 300 criteria and the District's higher standards. Building 1 at Roosevelt High School was identified as one of the buildings which required seismic evaluations due to its seismic vulnerability. Under Alternative 2, Building 1 would be retained and renovated. The renovation would consist of seismic, ADA accessibility and life/fire safety upgrades to meet current DSA requirements and LAUSD standards. It is assumed that these upgrades could be accomplished while maintaining the historic character of Building 1 and would be completed in accordance with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (SOI Standards).

To accommodate Building 1 in its location in the middle of the Project site, the proposed site plan would be reorganized. As part of this reorganization, parking and the athletic components of the site (i.e., tennis courts, basketball courts) would be located in the future expansion area for the football or baseball fields. The new gym would also be located near 6th Street, resulting in an undesirably long distance between the gym and the athletic fields.

Under Alternative 2, Building 1 would be maintained and substantially upgraded to meet seismic, ADA and fire/life safety requirements; upgrades would also occur elsewhere on the site. In particular, the following historic district contributing resources are proposed for demolition/removal under Alternative 2:

- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Gymnasium building (Building #19)
- Utility Building (Building #20)
- Portions of the landscaping

Other non-contributing resources proposed for demolition/removal:

- Music building (Building #4)
- Utility building (Building #20)
- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)
- Approximately 31 classrooms in 17 portable buildings

Air Quality

Alternative 2 would be consistent with the assumptions in the AQMP, similar to the proposed Project. Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. Alternative 2 would not increase the number of students attending Roosevelt High School. Under Alternative 2, the same number of students would be accommodated on the site. Impacts would be the same as the proposed Project and would be less than significant.

Construction of Alternative 2 would result in emissions of air pollutants. In addition to standard construction activities, there are approximately 7,019 cubic yards of contaminated soil that will need to be exported from the Project site. According to the RAW prepared for the Project, the following SCAQMD rules are applicable to the Project, and will be applied to all work related to the movement of contaminated soils:

> **Rule 401**. This rule prohibits discharge of air contaminants based on "darkness in shade" measured by the Ringleman chart. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 402**. This rule prohibits discharge of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause or may cause injury or damage to business or property. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 403**. The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air as a result of manmade fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust sources. It requires the use of best available control measures to minimize fugitive dust emissions. This is applicable to soil excavation and handling operations during the removal action, as well as exhaust from construction equipment.
>
> **Rule 1466**. This rule imposes requirements to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions associated with earth-moving activities, including soil excavation, handling, stockpiling, loading, etc. This is applicable to soil excavation and handling operations during the removal action.

Total emissions associated with Alternative 2 would be expected to be similar to the proposed Project, but the emissions would be incrementally reduced due to the fact that Building 1 would not be demolished, thereby slightly reducing the overall amount of construction debris associated with this alternative. **Table 3.1-5 Estimated Project Construction Emissions** demonstrates that emissions of the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction. Therefore, impacts would be less than significant

Operation of Alternative 2 would not generate any new operational traffic or result in a net increase in student population or facility square footage and there would be no change in school student capacity or pick-up and drop-off routes. Further, it is assumed that Building 1 would be upgraded to Title 24 energy standards as part of the renovation and would therefore be more energy efficient than the existing building. The other newer buildings would also be expected to be more energy efficient than the existing buildings. In addition, the proposed Project would be required to comply with the LAUSD Standard

Conditions of Approval, which include area, energy, and mobile source reduction strategies that would further reduce air quality effects as compared to existing conditions. **Table 3.1-6 Estimated Project Operational Emissions** shows the emissions that would be expected with the proposed Project, Alternative 2 emissions would be expected to be similar or incrementally reduced and would also be less than significant.

The SCAQMD CEQA Guidelines state that SCAQMD emissions thresholds were developed such that emissions from an individual project that exceed the threshold would be cumulatively considerable. As emissions from this alternative would be below the threshold for all pollutants during both construction and operation, Alternative 2 would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is nonattainment under an applicable federal or state ambient air quality. Impacts would be less than significant and would be similar to the proposed Project.

Cultural Resources

As described in **Section 3.3 Cultural Resources**, the Roosevelt HS campus meets all of the eligibility criteria listed in the LAUSD Historic Context Statement under the theme of *LAUSD and the Civil Rights Movement, 1954–1980.* Specifically, the recommended historic district and its contributors were constructed or extant during the period of significance; the campus was the site of significant integration initiatives, challenges, or activities related to the Chicano Civil Rights Movement and school integration; the campus directly reflects the movement for equal access to schools in LAUSD schools; the campus has a well-established, long-term association with Sal Castro, who was significant in the Chicano Civil Rights Movement and school integration (eligibility under B/2); and it is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement (from the SurveyLA Latino context). The campus retains most of the associative and character-defining features from the period of significance. Following the LAUSD guidelines, the multiple buildings extant during the period of significance are evaluated as comprising a potential historic district. ASM recommends all buildings present on the campus in March 1968 at the time of the Blowouts be considered contributors to the proposed Roosevelt Senior High School Historic District.

Under Alternative 2, Building 1 would be renovated and maintained in its current position on the campus. The renovation would be designed to maintain the character defining features of the building to the extent feasible. As described in Table 4.0-2 above, several of the remaining contributors to the historic district would be demolished. Specifically: Industrial Arts building (Building #6), two-story classroom building (Building #7); instrumental music building (Building #8); classroom building (Building #17); classroom building (Building #18); gymnasium building (Building #19); Utility Building (Building #20) and portions of the landscaping. The loss of the contributors would result in a significant and unavoidable impact to a historical resource (historic district) even with the application of the interpretive plan as mitigation. However, the renovation of Building 1 would eliminate the significant unavoidable impact associated with the loss of an individually eligible resource (Building 1). As such, impacts under Alternative 2 would be less than those with the proposed Project.

Alternative 2 would also require implementation of **MM-CUL-2** due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through the Project area. With application of **MM-CUL-2**, impacts related to archeological resources would be less than significant and similar to the proposed Project.

Hazards & Hazardous Materials

Under Alternative 2, the activities associated with the RAW and cleanup would occur as under the proposed Project. Approximately 7,019 cubic yards of soil containing contaminants of concern (COCs); specifically, arsenic, lead, and petroleum hydrocarbons, at levels that exceed the LAUSD's cleanup goals would be removed from areas located throughout the Project site.[7] As detailed in **Section 3.3 Hazards and Hazardous Materials**, excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials to, or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the Project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

Implementation of the RAW will be closely monitored and will occur in accordance with local, state and federal requirements. Therefore, similar to the proposed Project, Alternative 2 would not subject people to substantial hazards from lead, arsenic, or petroleum hydrocarbons. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Alternative 2 is for an educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also

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7 TRC Solutions. June 27, 2017. Roosevelt High School: Revised Summary of Proposed Excavation Areas.

be stored on-site. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant and would be similar to the proposed Project.

Noise

Under Alternative 2, construction, demolition (or removal of existing classroom building and other structures), ground clearing, grading, structural, and other noise-generating activities would occur between 7:00 AM and 9:00 PM in accordance with the LAMC. Construction activities would vary over several phases of development and would include off-road larger equipment such as tractors, loaders, and smaller equipment such as saws, hammers, and pneumatic tools. Construction of the Project is estimated to take place over approximately three years beginning in the summer of 2018 and continuing through the fall of 2022. Construction of the alternative would be generally similar but may vary slightly depending on the renovation of Building 1 and any specialized aspects of the construction which could add to the construction timeline.

In general, it is not expected that construction noise under Alternative 2 would vary significantly from the construction scenarios evaluated for the Project. **Table 3.4-8** summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential and school uses. Construction noise would generally peak during site preparation and soil remediation, where up to seven pieces of noise generating construction equipment could produce a cumulative 87.6 dB(A) at 50 feet of distance. This would not increase ambient noise levels above 75 dB(A) (the City of Los Angeles threshold) at adjacent off-site sensitive receptors; however, it would represent increases of more than 5 dB(A) at three off-site receptors. In the absence of mitigating sound attenuation measures, construction activities would generate maximum off-site noise levels of up to 72.4 dB(A) at the residences along South Mott Street, an increase of up to 11.9 dB(A).

Because construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dB(A) Leq) at one or more of the adjacent sensitive receptors, as well as exceed the City's threshold of resulting in an increase of more than 5 dB(A). Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce construction noise level increases primarily by requiring the use of sound attenuation walls between construction activities and sensitive receptors. Alternative 2 would result in a potentially significant construction noise impact related to on-site construction equipment noise. Similar to the proposed Project, construction noise would be mitigated to less than significant. Impacts would be similar to the proposed Project.

Construction haul trucks would generate noise off-site during demolition, site preparation, and building construction. This would include removal of materials from the Project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished structures. According to the traffic study prepared for the Project, this could produce up to 100 haul trips per day during the peak phase of construction, incrementally adding traffic volumes to local roads.[8] Although these trips are not enough to increase ambient traffic noise due to regular truck travel, there could be instantaneous noise level increases (an empty truck hitting a pothole, or the application of air brakes near residences, etc.) from haul trucks that could reach levels of up to 88 dBA at 50 feet.[9] Mitigation Measures **MM-NOI-11** and **MM-NOI-12** would reduce noise level increases primarily by designing a haul route that would avoid sensitive receptors to the highest extent feasible. However, due to the residential location of the Project site, it would not be possible to have a haul route that would completely avoid passing by any of the nearby sensitive receptors. Therefore, even though it is temporary, haul trip noise associated with construction would be significant and unavoidable and would be similar to the proposed Project.

Alternative 2 would not increase the student population or generate an increase in vehicle trips, and therefore it is not anticipated that there would be an increase in the amount of noise generated by motor vehicle operations. Similarly, there is not anticipated to be a significant increase in HVAC system noise, as the existing buildings on the Project site have similar systems with similar noise levels. Therefore, operational impacts with Alternative 2 would be less than significant and similar to the proposed Project.

Due to the similarities between the construction phases between the Project and Alternative 2, the vibration velocities predicted to occur at the nearest off-site sensitive receptors would be 0.033 in/sec PPV at the closest receptors on South Mott Street. This vibration level does not exceed the FTA 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be 0.046 in/sec. This vibration level does not exceed the FTA 0.3 inch per second threshold. With implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI 12**, impacts would be less than significant.

Any construction noise from any future site, were it to occur concurrently with the alternative, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from this site to the nearby receptors. Additionally, any such projects would be subject to the City's noise ordinance, which limits the hours of allowable construction activities and the extent to which direct noise impacts can affect adjacent land uses. With conformance with the City's noise ordinance and

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8 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization*. December 2017.

9 FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

incorporation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, the alternative's cumulative construction noise impact would be greatly reduced. However, because construction haul truck noise would be considered significant and unavoidable, noise increases on local roadways resulting from off-site haul truck noise that occurs on the same streets as the haul route for the alternative would result in a significant and unavoidable impact. Similar to the proposed Project, the alternative's contribution to a cumulative impact would be considerable.

Pedestrian Safety

Under Alternative 2, construction vehicles would need to access the Project site during construction. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete. The limited number of construction vehicles accessing the site would therefore not result in a substantial increase in pedestrian safety hazards due to incompatible uses. Construction traffic would be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety in accordance with **SC-T-4** from the LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. Construction loading areas would not overlap with the Roosevelt High School bus/vehicle loading areas. Areas of active construction would remain fenced and construction staging (i.e., storage of equipment and materials) would be contained on the Project site.

Any potential interference with pedestrian safety would be mitigated with the compliance of **SC-T-4** from LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. To further ensure pedestrian safety during construction, **MM-PED-1** would be implemented to prohibit construction vehicles from accessing the site during the peak AM and PM hours. With the implementation of **MM-PED-1,** construction impacts associated with the creation of unsafe routes to schools, at the proposed school, or any other nearby schools including Hollenbeck Middle School, would be less than significant. Impact would be similar to the proposed Project.

Alternative 2 will continue to provide seats for approximately 2,600 students. The current and future student population is estimated to generate 1,014 weekday a.m. peak-hour vehicle trips (544 inbound and 468 outboard) and 338 weekday p.m. peak-hour trips (159 inbound and 179 outbound).[10] Pick-up/drop-off operations occur informally along the perimeter of the campus, and the proposed campus improvements under Alternative 2 will not change this.

As required by **SC-T-3**, all local pedestrian routes will have adequate sidewalk facilities, per LADOT standards. As described in the existing conditions, there are yellow striped crosswalks at all four

10 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California*, October 21, 2017.

intersections surrounding the Project site including one across East 6th Street between Roosevelt HS and Hollenbeck Middle School across the street and across East 4th Street adjacent to South Fickett Street as well as across South Mott Street adjacent to East 5th Street. As the Project site is currently in operation as a school site, no new pedestrian safety improvements are necessary and impacts related to pedestrian safety during operation would be less than significant. Impacts would be similar to the proposed Project.

Transportation & Traffic

The traffic analysis provided in **Section 3.6 Traffic and Transportation** states that future traffic conditions in the study area with ambient growth and Related Projects, and the proposed Project construction is anticipated to have peak intensity during the year 2018. Alternative 2 would generally be expected to have the same traffic impacts as the proposed Project as the construction would generally be the same. It is possible that due to the specialized nature of the renovations for Building 1 and the extent of renovation that would be required, the construction schedule could be extended as compared to the proposed Project. **Table 3.6 Future Year (2018) Peak-Hour Level of Service Summary with the Project** provides a comparison of existing conditions scenario to future year-2018 conditions with Project construction. LOS values of E or F are shown below in bold text. The intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant. As described above, construction of Alternative 2 would generally require the same number of construction truck trips, but could extend the timeline of construction due to the specialized nature of the renovation of Building 1. This minor change in the construction timeline, could incrementally increase the number of truck trips during a given phase, but would not be expected to result in a significant impact. As a result, traffic impacts would be greater than the proposed Project but would continue to be less than significant.

Relationship to the Project Objectives

Alternative 2 does not meet several of the basic Project objectives, which are set forth in this EIR in **Section 2.0, Project Description** and **Section 4.2** above. Project objectives not met or impeded by Alternative 2 are listed below.

Objective #3: Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

By retaining and renovating Building 1, classroom sizes in the building would not meet current LAUSD standard classroom size and dimensions. A maximum of 21 classrooms within the building would be usable for instruction. The Building's existing structural layout would restrict classroom proportions to an elongated and narrow shape. These restricted proportions do not support effective instruction when compared to classrooms that meet District design standards. These elongated classrooms would limit teaching wall visibility and result in reduced acoustical effectiveness due to the increased distance from the instructor to the student and limit flexible seating arrangements. The seismic retrofit work would result in an inefficient utilization of space by only yielding 21 classrooms that meet California Department of Education (CDE) standards from the existing 48 under-sized classrooms. The remaining spaces and rooms would not meet the CDE standard for classrooms and would have to be used as specialized spaces or smaller support spaces. There would be more support spaces than the program and Project requires. In addition, the required new concrete shear walls for the seismic retrofit could block existing windows and compromise the amount of natural daylighting into the classroom. The remaining classrooms within the building would not be equivalent to other LAUSD campuses which provide modern, state of the art technology and efficient classroom space.

Objective #7: Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

By incorporating Building 1 into the site plan, the area designated as "classroom zone" at the interior of the campus would be used primarily by Building 1. As Building 1 only accommodates 21 classrooms, the remaining class rooms would need to be accommodated elsewhere on the site and hinder the improvement of the overall functionality of the campus.

Objective #8: Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.

Due to the need to accommodate additional classrooms on the site to make up for the lack of classrooms within Building 1, parking would need to be accommodated in the future expansion area for the baseball or football fields resulting in students of Roosevelt High School having inferior athletic facilities to other LAUSD campuses.

Objective #11 Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

Alternative 2 would not maximize the use of limited bond funds for several reasons, including: 1) the cost of the renovation of Building 1 would exceed the cost of constructing a new modern building;[11] 2) the renovation of Building 1 would still result in a building with inefficient and unusable classrooms, and would still result in the need for additional classrooms to be constructed elsewhere on the campus; and 3)

11 DLR Group, Building 1 Seismic Analysis Project, October 2017

the need for additional classrooms elsewhere on the campus will impact the availability of parking, and in order to meet the parking needs, expansion of the athletic fields and track will not be able to be constructed.

Objective #12 Replace buildings and infrastructure that have reached the end of their useful lives.

This objective would not be achieved as the District has determined, based on review of available information and reports prepared by its experts and additional sources within this EIR, that Building 1 has reached the end of its useful life.

Objective #14 Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

This objective would not be achieved due to the inefficient layout of the campus. As mentioned above, the athletic zone would be bisected and would not improve access or circulation. Potential campus layouts with the retention of Building 1 would generally obscure student observation and would not improve campus safety.

Objective #16 Undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

This objective would not be achieved as the renovation and construction activities would take longer to complete for a renovation compared to new construction. Based on LAUSD's experience constructing schools, the specialized nature of the renovation and the need for DSA approval and SOI standards would substantially increase the timeline associated with the project.

Alternative 3 - Retain Historic District

Under this alternative, a sufficient number of primary and secondary contributors would be retained to retain the historic district. Buildings 1 (Auditorium and Classroom) and 7 (Classroom) are primary contributors to the historic district and would be retained and renovated. The following secondary contributors would also be retained and renovated: 8 (Instrumental Music), 17 (Classroom), and 18 (Classroom). All the tertiary contributors would also be retained: 10 (Flammable Storage Building), 11 (Field Sanitary Building), 12 (Equipment Field Storage), 16 (Field Light Controls) 20 (Utility Building), and the Track. Portions of the areas of historic landscaping would also be retained.

Air Quality

Alternative 3 would be consistent with the assumptions in the AQMP, similar to the proposed Project. Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. Alternative 3 would not increase the number of students attending Roosevelt High School. Under Alternative 3, the same number of students would be accommodated on the site. Impacts would be the same as the proposed Project and would be less than significant.

Construction of Alternative 3 would result in emissions of air pollutants. In addition to standard construction activities, there are approximately 7,019 cubic yards of contaminated soil that will need to be exported from the Project site. According to the RAW prepared for the Project, the following SCAQMD rules are applicable to the Project site, and will be applied to all work related to the movement of contaminated soils: Rule 401, Rule 402, Rule 403 and Rule 1466.

Total emissions associated with Alternative 3 would be expected to be similar to the proposed Project, but would be incrementally reduced due to the fact that several buildings would not be demolished, thereby slightly reducing the overall amount of construction debris associated with this alternative. **Table 3.1-5 Estimated Project Construction Emissions** demonstrates that emissions of the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction, impacts would be less than significant

Operation of Alternative 3 would not generate any new operational traffic or result in a net increase in student population or facility square footage and there would be no change in school student capacity or pick-up and drop-off routes. Further, it is assumed that the renovated buildings would be upgraded to Title 24 energy standards as part of the renovation and would therefore result in improved energy efficiency. The other newer buildings would also be expected to be more energy efficient than the existing buildings. In addition, the proposed Project would be required to comply with the LAUSD Standard Conditions of Approval, which include area, energy, and mobile source reduction strategies that would further reduce air quality effects as compared to existing conditions. **Table 3.1-6 Estimated Project Operational Emissions** shows the emissions that would be expected with the proposed Project, Alternative 2 emissions would be expected to be similar or incrementally reduced and would also be less than significant.

The SCAQMD CEQA Guidelines state that SCAQMD emissions thresholds were developed such that emissions from an individual project that exceed the threshold would be cumulatively considerable. As emissions from this alternative would be below the threshold for all pollutants during both construction and operation, Alternative 3 would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is nonattainment under an applicable federal or state ambient air quality. Impacts would be less than significant and would be similar to the proposed Project.

Cultural Resources

As described in **Section 3.3 Cultural Resources**, the Roosevelt HS campus meets all of the eligibility criteria listed in the LAUSD HCS under the theme of *LAUSD and the Civil Rights Movement, 1954–1980.* Specifically, the recommended historic district and its contributors were constructed or extant during the period of significance; the campus was the site of significant integration initiatives, challenges, or activities related to the Chicano Civil Rights Movement and school integration; the campus directly reflects the movement for equal access to schools in LAUSD schools; the campus has a well-established, long-term association with Sal Castro, who was significant in the Chicano Civil Rights Movement and school integration (eligibility under B/2); and it is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement (from the SurveyLA Latino context). The campus retains most of the associative and character-defining features from the period of significance. Following the LAUSD guidelines, the multiple buildings extant during the period of significance are evaluated in this report as comprising a potential historic district. ASM recommends all buildings present on the campus in March 1968 at the time of the Blowouts be considered contributors to the proposed Roosevelt Senior High School Historic District.

Under Alternative 3, Building 1 would be renovated and maintained in its current position on the campus. As described above, Building 7, the other primary contributor to the historic district would also be maintained, as would the following secondary contributors: 8 (Instrumental Music), 17 (Classroom), and 18 (Classroom). All the tertiary contributors would also be retained: 10 (Flammable Storage Building), 11 (Field Sanitary Building), 12 (Equipment Field Storage), 16 (Field Light Controls), and the Track. Portions of the areas of historic landscaping would also be retained. Under this Alternative, a sufficient number of primary and secondary contributors to the historic district would be maintained. As such, the significant unavoidable impact associated with loss of a historical resource would be eliminated. Impacts under Alternative 3 would be less than those with the proposed Project and would be less than significant.

Alternative 3 would also require implementation of **MM-CUL-2** due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through the Project area. With application of **MM-CUL-2**, impacts related to archeological resources would be less than significant and similar to the proposed Project.

Hazards & Hazardous Materials

Under Alternative 3, the same activities associated with the RAW and cleanup would occur as under the proposed Project. Approximately 7,019 cubic yards of soil containing contaminants of concern (COCs);

specifically, arsenic, lead, and petroleum hydrocarbons, at levels that exceed the LAUSD's cleanup goals would be removed from areas located throughout the Project site.[12] As detailed in **Section 3.3 Hazards and Hazardous Materials**, excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation to an appropriate facility for disposal. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

Implementation of the proposed RAW will be closely monitored and will occur in accordance with local, state and federal requirements. Therefore, similar to the proposed Project, Alternative 3 would not subject people to substantial hazards from lead, arsenic, or petroleum hydrocarbons. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

The proposed Project is an educational facility and under Alternative 3, would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant and would be similar to the proposed Project.

Noise

Under Alternative 3, construction, demolition (or removal of existing classroom building and other structures), ground clearing, grading, structural, and other noise-generating activities would occur between 7:00 AM and 9:00 PM in accordance with the LAMC. Construction activities would vary over several phases of development and would include off-road larger equipment such as tractors, loaders,

12 TRC Solutions. June 27, 2017. Roosevelt High School: Revised Summary of Proposed Excavation Areas.

and smaller equipment such as saws, hammers, and pneumatic tools. Construction of the Project is estimated to take place over approximately three years beginning in the summer of 2018 and continuing through the fall of 2022. Construction of the alternative would be generally similar but may vary slightly depending on the renovation of the buildings and any specialized aspects of the construction.

In general, it is not expected that construction noise under Alternative 3 would vary significantly from the construction scenarios evaluated for the Project. **Table 3.4-8** summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential and school uses. Construction noise would generally peak during site preparation and soil remediation, where up to seven pieces of noise generating construction equipment could produce a cumulative 87.6 dB(A) at 50 feet of distance. This would not increase ambient noise levels above 75 dB(A) (the City of Los Angeles threshold) at adjacent off-site sensitive receptors; however, it would represent increases of more than 5 dB(A) at three off-site receptors. In the absence of mitigating sound attenuation measures, construction activities would generate maximum off-site noise levels of up to 72.4 dB(A) at the residences along South Mott Street, an increase of up to 11.9 dB(A).

Because construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dB(A) Leq) at one or more of the adjacent sensitive receptors, as well as exceed the City's threshold of resulting in an increase of more than 5 dB(A). Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce construction noise level increases primarily by requiring the use of sound attenuation walls between construction activities and sensitive receptors. Alternative 3 would result in a potentially significant construction noise impact related to on-site construction equipment noise. Similar to the proposed Project, construction noise would be mitigated to less than significant. Impacts would be similar to the proposed Project.

Construction haul trucks would generate noise off-site during demolition, site preparation, and building construction. This would include removal of materials from the Project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished structures. According to the traffic study prepared for the Project, this could produce up to 100 haul trips per day during the peak phase of construction, incrementally adding traffic volumes to local roads.[13] Although these trips are not enough to increase ambient traffic noise due to regular truck travel, there could be instantaneous noise level increases (an empty truck hitting a pothole, or the application of air brakes near residences, etc.) from haul trucks that could reach levels of up to 88 dBA at 50 feet.[14] Mitigation Measures **MM-NOI-11** and **MM-NOI-12** would reduce noise level increases primarily by designing a haul route that would avoid

13 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization*. December 2017.

14 FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

sensitive receptors to the highest extent feasible. However, due to the residential location of the Project site, it would not be possible to have a haul route that would completely avoid passing by any of the nearby sensitive receptors. Therefore, haul trip noise associated with construction would be significant and unavoidable and would be similar to the proposed Project.

Alternative 3 would not increase the student population or generate an increase in vehicle trips. Therefore it is not anticipated that there would be an increase in the amount of noise generated by motor vehicle operations. Similarly, there is not anticipated to be a significant increase in HVAC system noise, as the existing buildings on the Project site have similar systems with similar noise levels. Therefore, operational impacts with Alternative 3 would be less than significant and similar to the proposed Project.

Due to the similarities between the construction phases between the Project and Alternative 3, the vibration velocities predicted to occur at the nearest off-site sensitive receptors would be 0.033 in/sec PPV at the closest receptors on South Mott Street. This vibration level does not exceed the FTA 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be 0.046 in/sec. This vibration level does not exceed the FTA 0.3 inch per second threshold. With implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI 12**, impacts would be less than significant.

Any construction noise from any future site, were it to occur concurrently with the alternative, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from this site to the nearby receptors. Additionally, any such projects would be subject to the City's noise ordinance, which limits the hours of allowable construction activities and the extent to which direct noise impacts can affect adjacent land uses. With conformance with the City's noise ordinance and incorporation of Mitigation Measures **MM-NOI-1** through **MM-NOI-12**, the alternative's cumulative construction noise impact would be greatly reduced. However, because construction haul truck noise would be considered significant and unavoidable, noise increases on local roadways resulting from off-site haul truck noise that occurs on the same streets as the haul route for the alternative would result in a significant and unavoidable impact. Similar to the proposed Project, the alternative's contribution to a cumulative impact would be considerable.

Pedestrian Safety

Under Alternative 3, construction vehicles would need to access the Project site during construction. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete. The limited number of construction vehicles accessing the site would therefore not result in substantially increased pedestrian safety hazards due to incompatible uses. Construction traffic would be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety in accordance with **SC-T-4** from LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. Construction loading areas would not overlap with the Roosevelt High School bus/vehicle loading areas. Areas of active construction would remain fenced and construction staging (i.e., storage of equipment and materials) would be contained on the Project site.

To further ensure pedestrian safety during construction, **MM-PED-1** would be implemented to prohibit construction vehicles from accessing the site during the peak AM and PM hours. With the implementation of **MM-PED-1,** construction impacts associated with the creation of unsafe routes to schools, at the proposed school, or any other nearby schools including Hollenbeck Middle School, would be less than significant. Impact would be similar to the proposed Project.

Alternative 3 will continue to provide seats for approximately 2,600 students. The current and future student population is estimated to generate 1,014 weekday a.m. peak-hour vehicle trips (544 inbound and 468 outboard) and 338 weekday p.m. peak-hour trips (159 inbound and 179 outbound).[15] Pick-up/drop-off operations occur informally along the perimeter of the campus, and the proposed campus improvements under Alternative 3 will not change this.

As required by **SC-T-3**, all local pedestrian routes will have adequate sidewalk facilities, per LADOT standards. As described in the existing conditions, there are yellow striped crosswalks at all four intersections surrounding the Project site, including one across East 6th Street between Roosevelt HS and Hollenbeck Middle School across the street and across East 4th Street adjacent to South Fickett Street as well as across South Mott Street adjacent to East 5th Street. As the Project site is currently in operation as a school site, no new pedestrian safety improvements are necessary and impacts related to pedestrian safety during operation would be less than significant. Impacts would be similar to the proposed Project.

Traffic & Transportation

The traffic analysis provided in **Section 3.6 Traffic and Transportation** states that future traffic conditions in the study area with ambient growth and Related Projects, and the proposed Project construction is anticipated to have peak intensity during the year 2018. Alternative 3 would generally be expected to have the same traffic impacts as the proposed Project, as the construction would generally be the same. It is possible that due to the specialized nature of the renovations for the buildings proposed for renovation, and the extent of renovation that would be required, the construction schedule could be

15 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California*, October 21, 2017.

extended compared to the proposed Project. **Table 3.6 Future Year (2018) Peak-Hour Level of Service Summary with the Project** provides a comparison of existing conditions scenario to future year-2018 conditions with Project construction. LOS values of E or F are shown below in bold text. The intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant. As described above, construction of Alternative 3 would generally require the same number of construction truck trips, but could extend the timeline of construction due to the specialized nature of the renovation of Building 1 and the other buildings being renovated. This minor change in the construction timeline, could incrementally increase the number of truck trips during a given phase, but would not be expected to result in a significant impact. As a result, traffic impacts would be greater than the proposed Project but would continue to be less than significant.

Relationship to the Project Objectives

Alternative 3 does not meet several of the basic Project objectives, which are set forth in this EIR in **Section 2.0, Project Description** and above. Project objectives not met or impeded by Alternative 3 are listed below.

Objective #3 Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

By keeping Building 1 and Building 7 (as well as other contributing resources), the campus would keep several inefficient buildings that are not equivalent to other LAUSD campuses. As discussed in Alternative 1 above, Building 1 classroom sizes would not meet current LAUSD standard classroom size. A maximum of 21 classrooms within the building would be usable for instruction. The Building's existing structural layout would restrict classroom proportions to an elongated and narrow shape. These restricted proportions do not support effective instruction when compared to classrooms that meet District design standards. These elongated classrooms would limit teaching wall visibility and result in reduced acoustical effectiveness due to the increased distance from the instructor to the student and limit flexible seating arrangements. The seismic retrofit work would result in an inefficient utilization of space by only yielding 21 classrooms that meet California Department of Education (CDE) standards from the existing 48 under-sized classrooms. The remaining spaces and rooms would not meet the CDE standard for classrooms and would have to be used as specialized spaces or smaller support spaces. There would be more support spaces than the program and Project requires. In addition, the required new concrete shear walls for the seismic retrofit could block existing windows and compromise the amount of natural daylighting into the classroom. The remaining classrooms within the building would not be equivalent to other LAUSD campuses which provide modern, state of the art technology and efficient classroom space.

Objective #7 Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

By incorporating Building 1 into the site plan, the area designated as "classroom zone" at the interior of the campus would be used primarily by Building 1. As Building 1 only accommodates 21 classrooms, the remaining class rooms would need to be accommodated elsewhere on the site and prevent the improvement of the overall functionality of the campus. Further, Building 7 would be located in the athletic zone and the future field expansion area, thereby eliminating the opportunity to create zones.

Objective #8 Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.

Under Alternative 3, Building 7 and several other small buildings would remain in their current location near the athletic fields, eliminating the ability to expend either the football or baseball fields.

Objective #11 Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

This alternative would not maximize the use of limited bond funds for several reasons, including: 1) the cost of the renovation of Building 1 would exceed the cost of constructing a new modern building;[16] 2) the renovation of Building 1 would still result in a building with inefficient and unusable classrooms, and would still result in the need for additional classrooms to be constructed elsewhere on the campus; and 3) the need for additional classrooms elsewhere on the campus will impact the availability of parking, and Building 7 would be located in the baseball field expansion area, limiting future athletic opportunities on the site.

Objective #12 Replace buildings and infrastructure that have reached the end of their useful lives.

The District has identified several of the buildings that would be preserved as part of this alternative as having reached the end of their respective useful life.

16 DLR Group, Building 1 Seismic Analysis Project, October 2017

Objective #14 Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

This objective would not be achieved due to the inefficient layout of the campus. As mentioned above, the athletic zone would be bisected and would not improve access or circulation. The additional smaller buildings would generally obscure student observation and would not improve campus safety.

Objective #15 Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).

While new buildings would also be constructed, many older inefficient buildings would remain. Although the buildings would be upgraded they would not be as efficient as new modern buildings.

Objective #16 Undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

This objective would not be achieved as the renovation and construction activities would take longer to complete for a renovation compared to new construction. Based on LAUSD's experience constructing schools, the specialized nature of the renovation and the need for DSA approval and SOI standards would substantially increase the timeline associated with the project.

Alternative 4 - No Renovation of Building 1

Under this alternative, Building 1 would remain in its current form. No substantial upgrades would occur and only minor improvements would be made to the building. No structural changes would occur. Similar to Alternative 2, the purpose of this alternative is to avoid the significant unavoidable impact associated with the loss of an individually eligible resource (Building 1).

Air Quality

Alternative 4 would be consistent with the assumptions in the AQMP, similar to the proposed Project. Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. Alternative 4 would not increase the number of students attending Roosevelt High School. Under Alternative 4, the same number of students would be accommodated on the site. Impacts would be the same as the proposed Project and would be less than significant.

Construction of Alternative 4 would result in emissions of air pollutants. In addition to standard construction activities, there are approximately 7,019 cubic yards of contaminated soil that will need to be exported from the Project site. According to the RAW prepared for the Project, the following SCAQMD rules are applicable to the Project site, and will be applied to all work related to the movement of contaminated soils: Rule 401, Rule 402, Rule 403 and Rule 1466.

Total emissions associated with Alternative 4 would be expected to be similar to the proposed Project, but would be incrementally reduced due to the fact that Building 1 would not be demolished or renovated, thereby slightly reducing the overall amount of construction debris associated with this alternative. **Table 3.1-5 Estimated Project Construction Emissions** demonstrates that emissions of the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction, impacts would be less than significant.

Operation of Alternative 4 would not generate any new operational traffic or result in a net increase in student population or facility square footage and there would be no change in school student capacity or pick-up and drop-off routes. However, as Building 1 would not be upgraded, it would continue to be energy inefficient. The other newer buildings would be expected to be more energy efficient than the existing buildings. In addition, the proposed Project would be required to comply with the LAUSD Standard Conditions of Approval, which include area, energy, and mobile source reduction strategies that would further reduce air quality effects as compared to existing conditions. **Table 3.1-6 Estimated Project Operational Emissions** shows the emissions that would be expected with the proposed Project, Alternative 4 emissions would be expected to be similar or incrementally greater (due to the inefficiency of Building 1) and would also be less than significant.

The SCAQMD CEQA Guidelines state that SCAQMD emissions thresholds were developed such that emissions from an individual project that exceed the threshold would be cumulatively considerable. As emissions from this alternative would be below the threshold for all pollutants during both construction and operation, Alternative 4 would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is nonattainment under an applicable federal or state ambient air quality. Impacts would be less than significant and would be similar to the proposed Project.

Cultural Resources

As described in **Section 3.3 Cultural Resources**, the Roosevelt HS campus meets all of the eligibility criteria listed in the LAUSD HCS under the theme of *LAUSD and the Civil Rights Movement, 1954–1980.* Specifically, the recommended historic district and its contributors were constructed or extant during the period of significance; the campus was the site of significant integration initiatives, challenges, or activities related to the Chicano Civil Rights Movement and school integration; the campus directly reflects the movement for equal access to schools in LAUSD schools; the campus has a well-established, long-term association with Sal Castro, who was significant in the Chicano Civil Rights Movement and school integration (eligibility under B/2); and it is directly associated with events and institutions that were pivotal in the history of the Latino civil rights movement (from the SurveyLA Latino context). The campus retains most of the associative and character-defining features from the period of significance. Following the LAUSD guidelines, the multiple buildings extant during the period of significance are evaluated in this report as comprising a potential historic district. ASM recommends all buildings present on the campus in March 1968 at the time of the Blowouts be considered contributors to the proposed Roosevelt Senior High School Historic District.

Under Alternative 4, Building 1 would remain in its current state with no upgrades or renovation. As described in Table 4.0-2 above, several of the remaining contributors to the historic district would be demolished. Specifically: Industrial Arts building (Building #6), two-story classroom building (Building #7); instrumental music building (Building #8); classroom building (Building #17); classroom building (Building #18); gymnasium building (Building #19); portions of the landscaping. The loss of the contributors would result in a significant and unavoidable impact to a historical resource (historic district) even with the application of the interpretive plan as mitigation. However, the renovation of Building 1 would eliminate the significant unavoidable impact associated with the loss of an individually eligible resource (Building 1). As such, impacts under Alternative 4 would be less than those with the proposed Project but would still be significant and unavoidable.

Alternative 4 would also require implementation of MM CUL-2 due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through the Project area. With application of MM CUL-2, impacts related to archeological resources would be less than significant and similar to the proposed Project.

Hazards & Hazardous Materials

Under Alternative 4, the same, the activities associated with the RAW and cleanup would occur as under the proposed Project. Approximately 7,019 cubic yards of soil containing contaminants of concern (COCs); specifically, arsenic, lead, and petroleum hydrocarbons, at levels that exceed the LAUSD's cleanup goals would be removed from areas located throughout the Project site.[17] As detailed in **Section 3.3 Hazards and Hazardous Materials**, excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Any soil that is imported or exported must be chemically tested in accordance with specific written

17 TRC Solutions. June 27, 2017. Roosevelt High School: Revised Summary of Proposed Excavation Areas.

procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

Implementation of the proposed RAW will be closely monitored and will occur in accordance with local, state and federal requirements. Therefore, similar to the proposed Project, Alternative 4 would not subject people to substantial hazards from lead, arsenic, or petroleum hydrocarbons. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Alternative 4 is an educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant and would be similar to the proposed Project.

Noise

Under Alternative 4, construction, demolition (or removal of existing classroom building and other structures), ground clearing, grading, structural, and other noise-generating activities would occur between 7:00 AM and 9:00 PM in accordance with the LAMC. Construction activities would vary over several phases of development and would include off-road larger equipment such as tractors, loaders, and smaller equipment such as saws, hammers, and pneumatic tools. Construction of the Project is estimated to take place over approximately three years beginning in the summer of 2018 and continuing through the fall of 2022. Construction of the alternative would be generally similar but may be slightly reduced because Building 1 would not require renovation or upgrade. This could slightly reduce the overall construction timeline.

In general, it is not expected that construction noise under Alternative 4 would vary significantly from the construction scenarios evaluated for the Project. **Table 3.4-8** summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential and school uses. Construction noise would generally peak during site preparation and soil remediation, where up to seven pieces of noise generating construction equipment could produce a cumulative 87.6 dB(A) at 50 feet of distance. This would not increase ambient noise levels above 75 dB(A) (the City of Los Angeles threshold) at adjacent off-site sensitive receptors; however, it would represent increases of more than 5 dB(A) at three off-site receptors. In the absence of mitigating sound attenuation measures, construction activities would generate maximum off-site noise levels of up to 72.4 dB(A) at the residences along South Mott Street, an increase of up to 11.9 dB(A).

Because construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dB(A) Leq) at one or more of the adjacent sensitive receptors, as well as exceed the City's threshold of resulting in an increase of more than 5 dB(A). Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce construction noise level increases primarily by requiring the use of sound attenuation walls between construction activities and sensitive receptors. Alternative 4 would result in a potentially significant construction noise impact related to on-site construction equipment noise. Similar to the proposed Project, construction noise would be mitigated to less than significant. Impacts would be similar to the proposed Project.

Construction haul trucks would generate noise off-site during demolition, site preparation, and building construction. This would include removal of materials from the Project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished structures. According to the traffic study prepared for the Project, this could produce up to 100 haul trips per day during the peak phase of construction, incrementally adding traffic volumes to local roads.[18] As mentioned above, the number of haul trucks may be slightly reduced under this alternative as no improvements would be made to Building 1. Although these trips are not enough to increase ambient traffic noise due to regular truck travel, there could be instantaneous noise level increases (an empty truck hitting a pothole, or the application of air brakes near residences, etc.) from haul trucks that could reach levels of up to 88 dBA at 50 feet.[19] Mitigation Measures **MM-NOI-11** and **MM-NOI-12** would reduce noise level increases primarily by designing a haul route that would avoid sensitive receptors to the highest extent feasible. However, due to the residential location of the Project site, it would not be possible to have a haul route that would completely avoid passing by any of the nearby sensitive receptors. Therefore, haul trip noise, even with a reduced number of truck trips, associated with construction would be significant and unavoidable and would be similar to the proposed Project.

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18 KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization*. December 2017.

19 FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

Alternative 4 would not increase the student population or generate an increase in vehicle trips, and therefore it is not anticipated that there would be an increase in the amount of noise generate by motor vehicle operations. Similarly, there is not anticipated to be a significant increase in HVAC system noise, as the existing buildings on the Project site have similar systems with similar noise levels. Therefore, operational impacts with Alternative 4 would be less than significant and similar to the proposed Project.

Due to the similarities between the construction phases between the Project and Alternative 4, the vibration velocities predicted to occur at the nearest off-site sensitive receptors would be 0.033 in/sec PPV at the closest receptors on South Mott Street. This vibration level does not exceed the FTA 0.2 inch per second threshold. Vibration velocities predicted to occur at the nearest on-site sensitive receptors would be 0.046 in/sec. This vibration level does not exceed the FTA 0.3 inch per second threshold. With implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI 12**, impacts would be less than significant.

Any construction noise from any future site, were it to occur concurrently with the alternative, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from this site to the nearby receptors. Additionally, any such projects would be subject to the City's noise ordinance, which limits the hours of allowable construction activities and the extent to which direct noise impacts can affect adjacent land uses. With conformance with the City's noise ordinance and incorporation of **Mitigation Measures MM-NOI-1** through **MM-NOI-12**, the alternative's cumulative construction noise impact would be greatly reduced. However, because construction haul truck noise would be considered significant and unavoidable, noise increases on local roadways resulting from off-site haul truck noise that occurs on the same streets as the haul route for the alternative would result in a significant and unavoidable impact. Similar to the proposed Project, the alternative's contribution to a cumulative impact would be considerable.

Pedestrian Safety

Under Alternative 4, construction vehicles would need to access the Project site during construction. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete. The limited number of construction vehicles accessing the site would therefore not result in substantially increase pedestrian safety hazards due to incompatible uses. Construction traffic would be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety in accordance with **SC-T-4** from LAUSD's SUP Program EIR, which requires contractors to submit a construction worksite traffic control plan prior to construction. Construction loading areas would not overlap with the Roosevelt High

School bus/vehicle loading areas. Areas of active construction would remain fenced and construction staging (i.e., storage of equipment and materials) would be contained on the Project site.

To further ensure pedestrian safety during construction, **MM-PED-1** would be implemented to prohibit construction vehicles from accessing the site during the peak AM and PM hours. With the implementation of **MM-PED-1,** construction impacts associated with the creation of unsafe routes to schools, at the proposed school, or any other nearby schools including Hollenbeck Middle School, would be less than significant. Impact would be similar to the proposed Project.

Alternative 4 will continue to provide seats for approximately 2,600 students. The current and future student population is estimated to generate 1,014 weekday a.m. peak-hour vehicle trips (544 inbound and 468 outboard) and 338 weekday p.m. peak-hour trips (159 inbound and 179 outbound).[20] Pick-up/drop-off operations occur informally along the perimeter of the campus, and the proposed campus improvements under Alternative 4 will not change this.

As required by **SC-T-3**, all local pedestrian routes will have adequate sidewalk facilities, per LADOT standards. As described in the existing conditions, there are yellow striped crosswalks at all four intersections surrounding the Project site including one across East 6th Street between Roosevelt HS and Hollenbeck Middle School across the street and across East 4th Street adjacent to South Fickett Street as well as across South Mott Street adjacent to East 5th Street. As the Project site is currently in operation as a school, no new pedestrian safety improvements are necessary and impacts related to pedestrian safety during operation would be less than significant. Impacts would be similar to the proposed Project.

Traffic & Transportation

The traffic analysis provided in **Section 3.6 Traffic and Transportation** states that future traffic conditions in the study area with ambient growth and Related Projects, and the proposed Project construction is anticipated to have peak intensity during the year 2018. Alternative 4 would generally be expected to have the same traffic impacts as the proposed Project as the construction would generally be the same. **Table 3.6 Future Year (2018) Peak-Hour Level of Service Summary with the Project** provides a comparison of existing conditions scenario to future year-2018 conditions with Project construction. LOS values of E or F are shown below in bold text. The intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the

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[20] KOA Corporation, *Traffic Study for LAUSD Roosevelt High School Comprehensive Modernization Los Angeles, California*, October 21, 2017.

study intersections. Impacts would be less than significant. As described above, construction of Alternative 4 would generally require the same number of construction truck trips as the proposed Project, but could be slightly reduced as there would be no need to renovate Building 1. This minor change in the construction timeline could incrementally decrease the number of truck trips during a given phase. As a result, traffic impacts would be less than the proposed Project and would continue to be less than significant.

Relationship to the Project Objectives

Alternative 4 does not meet several of the basic Project objectives, which are set forth in this EIR in **Section 2.0, Project Description** and **Section 4.2**. Project objectives not met or impeded by Alternative 4 are listed below.

Objective #3 Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

By not renovating or upgrading Building 1, classroom sizes in the building would not meet current LAUSD standard size. The current classrooms are oddly sized and are of limited use for classroom instruction.

Objective # 2: Provide upgrades throughout the campus to improve accessibility for all students (in particular those with special needs) and for the Project to comply with the requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).

Building 1 does not comply with ADA regulations, if the building was not upgraded, it would remain out of compliance and inaccessible for students with disabilities.

Objective #7: Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.

By incorporating Building 1 into the site plan, the area designated as "classroom zone" at the interior of the campus would be used primarily by Building 1. As Building 1 only accommodates a limited number of classrooms, the remaining classrooms would need to be accommodated elsewhere on the site.

Objective #8: Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.

Due to the need to accommodate additional classrooms on the site to make up for the lack of classrooms within Building 1, parking would need to be accommodated in the expansion area for the baseball track, or football fields.

Objective #11: Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

Alternative 4 would not maximize the use of limited bond funds as modern classroom facilities would not be provided on the site.

Objective #12: Replace buildings and infrastructure that have reached the end of their useful lives.

This objective would not be achieved as the District has determined, based on review of available information and reports provided by experts and sources within this EIR, that Building 1 has reached the end of its useful life.

Objective # 14: Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

This objective would not be achieved due to the inefficient layout of the campus. As mentioned above, the athletic zone would be bisected and would not improve access or circulation. Potential campus layouts with Building 1 would generally obscure student observation and would not improve campus safety.

Objective #15: Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).

While new buildings would also be constructed, Building 1, which is currently energy inefficient, would remain.

Summary of Alternatives

Table 4.0-3 Summary of Alternatives Ability to Attain Project Objectives, provides a comparison to alternatives and the identified project objectives.

Table 4.0-3
Summary of Alternatives Ability to Attain Project Objectives

Objective	Alternative 1 No Project	Alternative 2 Renovate Building 1	Alternative 3 Retain Historic District	Alternative 4 No Renovation of Building 1
#1 Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.	No	Yes	Yes	No
#2 Provide upgrades throughout the campus to improve accessibility for all students (in particular those with special needs) and for the Project to comply with the requirements of the Americans with Disabilities Act (ADA) Title II	No	Partial	Partial	Partial

Objective	Alternative 1 No Project	Alternative 2 Renovate Building 1	Alternative 3 Retain Historic District	Alternative 4 No Renovation of Building 1
Regulations, and the provisions of the Modified Consent Decree (MCD).				
#3 Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.	No	Partial	No	No
#4 Honor and enhance features of the Roosevelt High School campus that reflect its history and cultural identity.	Partial	Yes	Yes	Yes
#5 Establish 4th Street as the primary frontage of the Roosevelt High School campus and enhance its presence in the Boyle Heights neighborhood.	No	Yes	Yes	Yes
#6 Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members and visitors.	No	Yes	Yes	Yes
#7 Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different "zones" that separate academic uses from physical education uses.	No	No	No	No
#8 Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.	No	No	No	No
#9 Improve the visual relationship between Roosevelt High School and Hollenbeck Middle School to encourage and inspire middle school students to matriculate to Roosevelt High School.	No	Partial	No	Partial
#10 Eliminate reliance on portable classrooms.	No	Yes	Yes	Yes
#11 Maximize the use of limited bond funds to provide modern and permanent classroom facilities.	No	No	No	No
#12 Replace buildings and infrastructure that have reached the end of their useful lives.	No	Partial	No	No
#13Reduce the amount of stormwater runoff drainage and improve the quality of stormwater runoff by increasing pervious surfaces on campus.	No	Partial	Partial	Partial
#14 Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.	No	No	No	No
#15 Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).	No	No	No	No
#16 Undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.	No	No	No	Yes

Alternatives Impact Comparison Matrix

A summary comparison of impacts associated with the Project alternatives is provided in **Table 4.0-4, Alternatives Impact Comparison Matrix**. The table lists each of the Project alternatives, each of the environmental impact categories, and notes whether the respective alternative's impacts are greater than, similar to, or less than those of the Project.

Table 4.0-4
Alternatives Impact Comparison Matrix

Environmental Topic	Proposed Project	Alternative 1 No Project	Alternative 2 Renovate Bldg. 1	Alternative 3 Maintain Historic District	Alternative 4 No Renovation of Building 1
Air Quality - Construction	LTS	LTS-L	LTS-G	LTS-S	LTS-L
Air Quality - Operational	LTS	S	S	S	S
Cultural Resources	S/U	L	S/U-L	LTS	S/U-L
Hazards and Hazardous Materials	LTS	L	LTS-G	L	S
Noise - Construction	S/U	LTS-L	S/U-G	S/U-S	S/U - L
Noise - Operational	LTS	L	S	S	S
Pedestrian Safety	LTS	L	S	S	S
Transportation/Traffic	LTS	L	LTS-G	LTS-G	LTS-L

LTS = Less than Significant
S/U = Significant and Unavoidable
L = Less than the Project
S = Similar to the Project
G = Greater than the Project

4.0.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under Section 15126.6(e)(2) of the *State CEQA Guidelines*, an analysis of project alternatives must identify an environmentally superior alternative among the alternatives evaluated in an EIR. This section also states that if the No Project alternative is determined to be the environmentally superior alternative, the EIR shall also identify another environmentally superior alternative among the remaining alternatives.

Table 4.0-4 provides a comparative summary of the anticipated environmental impacts under each alternative in relation to the Project's environmental impacts. Pursuant to the *State CEQA Guidelines* Section 15126.6(c), the discussion below addresses the ability of the alternatives to avoid or substantially reduce one or more significant effects of the Project.

Of the alternatives evaluated in this Draft EIR, Alternative 1, No Project is considered the environmentally superior alternative as it would avoid all the significant and unavoidable impacts under the Project. However, as discussed above, the No Project Alternative would not meet the objectives established for the Project.

With respect to the *State CEQA Guidelines* requirement to identify an environmentally superior alternative other than the No Project, Alternative 3 would preserve the historic district and thus eliminate the significant unavoidable impact associated with the loss of the historic district. It would also retain Building 1 which is an identified eligible resource, eliminating the significant unavoidable impact associated with loss of Building 1. As such, this alternative would be environmentally superior to the other alternatives and the proposed Project. However, this alternative would not meet several basic Project objectives, including providing educational facilities equivalent to other LAUSD campuses, improving the overall functionality and utility of the campus, incorporating opportunities for future expansion of football, track, and baseball fields, maximizing the use of limited bond funds to provide modern and permanent classroom facilities, and replacing buildings and infrastructure that have reached the end of their useful lives.

Alternative 3 would achieve (and partially achieve) some of the Project objectives, but would not use the existing campus to its full potential. Although Alternative 3 would avoid the significant unavoidable cultural resources impacts by maintaining the historic district and Building 1, the reduction in useable space would not maximize the potential of the site or fully enhance the campus. In addition, Alternative 3 would not result in a cohesive site design and would eliminate the potential to create zones on the campus. Further, this alternative would not improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel. The existing layout of the campus is inefficient with limited sight lines which impedes safety objectives. Because much of the layout would be retained (due to the number of buildings to be retained on site, campus safety and access would not be improved. This alternative also would not meet the objective of completing the campus renovation in a timely manner. Due to the specialized nature of the construction and the need to meet both DSA requirements and SOI standards, the timeline would be substantially increased. This would result in a substantial disruption to the learning environment as the renovations would necessarily overlap with school operations. There would be opportunities to create a primary entrance on 4th Street and to provide a primary point of entry, but due to the size of Building 1 and the location of the remaining buildings, any major changes to the flow of the campus would be impeded. Therefore, this alternative would meet some of the project objectives but not to the same degree as the proposed Project.

5.0 OTHER CEQA CONSIDERATIONS

Section 15126.2 of the *State CEQA Guidelines* requires that the EIR include a discussion of significant environmental effects of the proposed Project; significant environmental effects which cannot be avoided if the proposed Project is implemented; significant irreversible changes which would be involved in the proposed Project should it be implemented; and growth-inducing impacts of the proposed Project. Sections 15126.4 and 15126.6 of the *State CEQA Guidelines* require that mitigation measures be proposed to minimize significant effects and alternatives to the proposed Project are considered and discussed. Cumulative impacts are discussed under each environmental issue area in **Section 3.0** pursuant to Section 15130 of the *State CEQA Guidelines*. Alternatives are analyzed in **Section 4.0** of this document.

Significant, Irreversible Environmental Changes

The EIR must examine irreversible changes to the environment. More specifically, *State CEQA Guidelines* require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely" (*State CEQA Guidelines* section 15126.2(c)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc.

Nonrenewable resources used during the construction of the proposed Project include construction materials and fossil fuels to power construction equipment. During operation of the Project, water and energy resources in the form of natural gas and electricity would be required. Impacts would also result from the incremental increase in vehicular traffic, and the associated air pollution. However, as discussed in the analysis within this EIR, impacts associated with increased resource use and consumption would not be significant. Nonetheless, the resources utilized for the proposed Project would be permanently committed to the Project and therefore considered irreversible.

5.0.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Cultural Resources

CUL-1: Implementation of the Theodore Roosevelt Senior High School Comprehensive Modernization Project would require the demolition of a number of existing buildings on the campus that have been identified as either primary or secondary contributors to an eligible historic district, which will therefore cause a significant and unavoidable impact to a historical resource by substantially altering the district. Further, the proposed Project includes demolition of Building 1 which is also identified as an eligible historical resource individually. Mitigation Measure MM-CUL-1 requires the implementation of a Historic American Building Survey (HABS) Level II documentation or closely followed format. Mitigation Measure MM-CUL-3 requires the implementation of an Interpretive Plan to commemorate the events, people, and places involved in the 1968 walkouts at Roosevelt HS. However, even with implementation of the Mitigation MeasureMM-CUL-1, MM-CUL-3, and applicable LAUSD Standard Conditions of Approval (SC-CUL-4, SC-CUL-6, SC-CUL-7, SC-CUL-8, SC-CUL-9, SC-CUL-10, SC-CUL-11, and SC-CUL-13), the demolition of the majority of the historic district buildings, the residual impacts from the proposed Project would be significant and unavoidable.

Noise

NOI-1: During the construction phase, haul trucks would pass through residential areas. Mitigation Measures MM-NOI-1through MM-NOI-12 are intended to minimize off-site noise from haul trucks that could increase noise levels in adjacent residential neighborhoods during construction. However, it would not be possible to have a haul route that would completely avoid passing by any of the nearby sensitive receptors. It is also not feasible to restrict the use of air brakes or to have trucks completely avoid driving activities that could cause significant noise increases (pulling in and out of driveways, hitting potholes, etc.). Although implementation of Mitigation Measures MM-NOI-1through MM-NOI-12 and applicable LAUSD Standard Conditions of Approval (SC-AQ-2, SC-NOI-1, and SC-NOI-9) would reduce noise impacts from haul truck activities, these impacts would likely remain significant and unavoidable. Therefore, the proposed Project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

NOI-4: During construction, haul truck noise would pass through residential areas. Mitigation Measures MM-NOI-1 through MM-NOI-12 are intended to are intended to minimize off-site noise from haul trucks that could increase noise levels in adjacent residential neighborhoods during construction. With conformance with the City's noise ordinance, incorporation of Mitigation Measures MM-NOI-1 through MM-NOI-12, and applicable LAUSD Standard Conditions of Approval ( ) would be greatly reduced. However, because construction haul truck noise would be considered significant and unavoidable, noise increases on local roadways resulting from off-site haul truck noise that occurs on the same streets as the haul route for the Proposed Project would result in a significant and unavoidable impact.

Cumulative Impact: The list of related projects as discussed in Section 3.0, Environmental Impact Analysis, would result in a significant impact when occurring concurrently with haul truck activities for the proposed Project. Mitigation Measures MM-NOI-1 through MM-NOI-12 would be required to reduce construction noise impacts as well as the applicable LAUSD Standard Conditions of Approval (SC-AQ-2, SC-NOI-1, and SC-NOI-9). However, the mitigation designed to reduced noise from haul truck activities would not reduce noise level increases to a less than significant level. Therefore, this cumulatively considerable impact would remain significant and unavoidable.

Growth Inducing Impacts

Section 15126(d) of *State CEQA Guidelines* requires that this section discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the following criteria:

- The project removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area)
- The project results in the urbanization of land in a remote location (i.e., leapfrog development)
- Economic expansion or growth occurs in an area in response to a project (e.g., changes in revenue base, employment expansion, etc.)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)

Should a project meet any of these criteria, it can be considered growth inducing under CEQA. An evaluation of this Project compared against these growth-inducing criteria is provided below.

Removal of an Impediment to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.

The Project area contains established land uses and supporting infrastructure. The proposed Project would require replacing and/or modifying existing buildings and infrastructure that have reached the end of their useful lives. Such modifications and improvements to infrastructure are discussed in further detail below. The Project site is currently in use as a high school, and is surrounded by existing residential and commercial uses. Given the developed nature of the vicinity, and the existence of established infrastructure, no growth-inducing impacts would result from Project implementation.

An established transportation network exists in the surrounding area that offers local and regional access to the Project site. Access would continue to be via all four surrounding streets: S. Mathews Street, E. 4th Street, S. Mott Street, and E. 6th Street.

The water and energy (electricity and natural gas) infrastructure required to support the proposed Project is available from surrounding streets. No new water lines other than those required to connect the proposed new buildings to the existing water conveyance network would be constructed. As such, the development of on-site water infrastructure to serve the Project would not induce growth within the area.

Electricity and natural gas transmission infrastructure presently exists in the vicinity of the Project site. Development of the Project would necessitate the construction of an on-site connection system to convey this energy to new buildings on the site. This system would be designed to accommodate proposed uses, and would not extend beyond the requirements or boundary of the Project. The on-site service lines would be sized to meet the demands of the proposed Project. No growth-inducing impacts, due to the extension of electrical or natural gas service lines, would occur with the development of the Project.

In summary, the design and construction of roadway, water, and energy infrastructure needed to accommodate the Project would not induce growth within undeveloped areas surrounding the Project area.

Urbanization of Land in Remote Locations (Leapfrog Development)

Under this criterion, the Project would be considered growth inducing if it would result in the urbanization of land in a remote location. This means that the development would not be contiguous to existing urban development and would "leap" over large areas of undeveloped land. The Project site is located in a fully developed area of the City adjacent to other institutional, residential and commercial uses and is currently in use as a high school. Because the Project is contiguous to existing development and is currently developed, it is not growth inducing under this criterion.

Economic Growth

Under this criterion, the Project would be considered growth inducing if it would cause economic expansion or economic growth to occur in the Project area. Examples of economic expansion or growth would include changes in revenue base and employment expansion.

Buildout of the Project could result in temporary increases in construction-related job opportunities. Potential employees would likely be drawn from the existing labor force in the Los Angeles Metropolitan area.

Long-term growth is typically in the form of an economic response for the operation of the site. In this case, the Project site is in use as a high school and would continue to be in use as a high school. As such new employees (i.e. teachers, maintenance, administration) associated with proposed Project would not occur. Further, given the small size of the Project in relation to City population, the economic contribution of this Project alone would not be considered growth inducing.

Precedent-setting Action

Changes from a project that could be precedent setting include (among others) approval of zone change that could have implications for other properties, or that could make it easier for other properties to develop.

The Project site is currently designated as "Public Facilities" on the City of Los Angeles General Plan Land Use map and zoned as public facilities. The Project site has been in operation as a high school since 1923. This Project would not involve a zone change, and thus is not considered to be growth inducing under this criterion.

Conclusion

It must be emphasized that the *State CEQA Guidelines* require an EIR to "discuss the ways" a project could be growth inducing and "discuss the characteristics of some projects that may encourage…activities that could significantly affect the environment." However, the *State CEQA Guidelines* do not require an EIR to predict or speculate where such growth would occur, in what form it would occur, or when it would occur. Attempting to determine the environmental impacts created by growth that might be induced by the proposed Project is speculative because the size, type, and location of specific future projects that may be induced by this Project are unknown at the present time. Therefore, such impacts are too speculative to evaluate (see *State CEQA Guidelines* Section 15145). To the extent that specific projects are known (as discussed in **Section 3.0, Environmental Impact Analysis,** of this EIR), those projects have already been or would be subjected to their own environmental analysis. Additionally, due to the variables that must be considered when examining the mechanics of urban growth (e.g., market forces, demographic trends, etc.), it would be speculative to state conclusively that implementation of the Project alone would induce growth in the surrounding area. Further analysis of impacts associated with growth in the City, and corresponding cumulative impact assessment methodology, can be found in the cumulative analyses for each individual topic addressed in **Section 3.0**.

6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

In accordance with Section 15128 of the *State CEQA Guidelines*, an EIR must contain a statement briefly indicating the reasons that various potential significant effects of a project were determined not to be significant. Based on the Initial Study prepared for the proposed Project, and included in **Appendix 1.0**, the District has determined that the proposed Project would not have the potential to cause significant adverse effects associated with the issues identified below. These topics have not, therefore, been addressed in detail in this EIR.

6.0.1 AESTHETICS

The proposed Project would not substantially impact aesthetics and views in the Project vicinity. The Project site is located in the Boyle Heights Community Plan Area in the City of Los Angeles, in a primarily residential area dominated by both single-family and multi-family dwellings. There are no scenic highways or scenic vistas proximate to the Project site. The Project site is located in an area of relatively flat topography and dense developments; however, intermittent views of the distant San Gabriel Mountains are available from Soto Street. Although the proposed Project would change existing views by adding new structures and demolishing old ones, existing views within the right of way would not be affected. In addition, regarding viewshed obstruction, the proposed Project would be subject to LAUSD Standard Condition of Approval (SC) SC-AE-3.

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 new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction 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.

The proposed Project consists of new buildings that would be one to two stories in height (approximately 45 feet to the top of the highest roof and approximately 50 feet to the top of the mechanical screens on the classroom buildings). As views are intermittent and no expansive vistas are available, construction of the proposed Project would not have a substantial effect on a scenic vista nor a scenic highway. Thus, impacts related to scenic views/vistas would be less than significant and no further analysis is required in the EIR.

6.0.2 AGRICULTURAL RESOURCES

The Project site is located within a mix of residential and commercial land uses within the Boyle Heights neighborhood of the City and Los Angeles and contains no agricultural lands, forestlands, or timberland. Therefore, no impact is identified for this issue.

6.0.3 AIR QUALITY

The proposed Project would not include any odor-producing uses; odors associated with Project operation will be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the on-site food service operations. Furthermore, all trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by the City of Los Angeles and Los Angeles County Health Department regulations, and will be emptied on a regular basis. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project site. Development of the proposed Project would utilize typical construction techniques, and the odors will be typical of most construction sites. Additionally, the odors would be temporary, and construction activity will be required to comply with **SC-AQ-2** through **SC-AQ-4**, and SCAQMD Rules 402 and 1113.[1] A less than significant impact relative to an odor nuisance would occur during construction associated with the proposed Project.

6.0.4 BIOLOGICAL RESOURCES

The Project site is located in a residential area of Boyle Heights. No threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats, or wildlife corridors exist on this Project site.

The Project site does not contain any watercourse or greenbelt for wildlife movement. However, there are mature trees with potential for bird nesting. In accordance with the Migratory Bird Treaty Act of 1918, **SC-BIO-3** would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. Therefore, impacts would be less than significant.

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1 SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The purpose of SCAQMD Rule 1113 is to limit the VOC content of architectural coatings used in the SCAQMD.

Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

A total of nine California sycamores (*Platanus racemosa*), a protected tree under City of Los Angeles ordinance 177,404 were identified in a tree survey conducted in November 2016. Construction of the proposed Project may require the removal of street trees and trees on-site. The Project includes a landscape plan to offset the loss of trees on site. Replacement trees will be planted in accordance with the City of Los Angeles Tree Ordinance (as applicable) at the appropriate ratio, size at maturity for the space, and will be selected from the LAUSD Approved Plant List. Therefore, less than significant impacts would occur related to protected trees and no further analysis is required in the EIR.

6.0.5 CULTURAL RESOURCES

The Project site has been subject to past subsurface disturbance associated with grading and foundations. Further, the geotechnical investigations identified fill materials in several locations on the site. It is unlikely that undisturbed unique archaeological resources exist on the Project site. No known tribal cultural resources are located on the Project site. Although the unanticipated discovery of unique archeological resources is possible during soil excavation activities (e.g., during installation of utilities), based on the lack of previous resources on the site, and the level of disturbance, the probability that archeological resources will be discovered is low. In addition, compliance with Program EIR **SC-CUL-13, SC-CUL-17,** and **SC-CUL-18** would require that upon discovery of an archeological resource (1) construction activities in the immediate area of the find shall cease and LAUSD shall retain a qualified archaeologist to determine the significance of the find, (2) LAUSD shall determine if a Phase III Data Recovery/Mitigation Program is necessary, and (3) if the archaeological resource is a Native American resource work shall stop within a 30-foot radius of the discovery.

It is also unlikely that undisturbed paleontological resources exist on the Project site. Compliance with Program EIR **SC-CUL-19** and **SC-CUL-20** would require the District to contract with a paleontological monitor for on-call purposes when developing sites sensitive to paleontological resources, and if a site is deemed to be highly sensitive for paleontological resources, an approved paleontological monitor shall be on the site during ground-disturbing activities.

Lastly, no formal cemetery exists on the Project site or in the vicinity of the proposed Project. In the event that human remains are uncovered during ground-disturbing activities, construction will cease until a coroner has conducted an investigation into the circumstances, manner, and cause of any death. Thus, impacts related to cultural resources would be less than significant.

6.0.6 GEOLOGY AND SOILS

The proposed Project is the renovation of an existing school site and does not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people or structures to the risk of loss, injury, or death due to rupture of a known earthquake fault. As the proposed Project would not exacerbate any of these existing conditions, no impact would occur.

The Project will be constructed in accordance with California Building Code (CBC) and Division of State Architect (DSA) standards. As a public school, Roosevelt HS will have to comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. As described above, the Project does not include any activities that would exacerbate an existing geologic condition. No impact would occur.

Regulatory maps indicate that the Project site is not in an area potentially affected by liquefaction. Further, the proposed renovation activities would not exacerbate existing liquefaction potential. No impact would occur. The Project does not include any activities that would result in the exacerbation of any existing landslide potential. No impact would occur. Soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant. This soil is more resistant to liquefaction and as a result, the Project site is not in a liquefaction area. With proper design and construction in accordance with current engineering practices, the impacts would be less than significant and no further analysis is necessary. The existing school is connected to the existing sewer. No septic tank use is proposed as part of the Project. No impact regarding the ability of the soil to support septic tanks would occur.

6.0.7 GREENHOUSE GASES

The proposed Project would not generate direct GHG emissions from new vehicle trips and onsite area sources as trips currently exist and no change in the number of seats is proposed. Additionally, no indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would be generated. Further, because the square footage of the proposed Project is less than the square footage of the existing campus, combined with the fact that new facilities as part of the proposed Project would be required to comply with the LAUSD Standard Conditions of Approval (SC-USS-1, SC-GHG-1, SC-GHG-2, SC-GHG-3, SC-GHG-1, and SC-GHG-539), there would be a slight net decrease in operational GHG emissions related to energy, waste, and water. Therefore, the cumulative contribution to GHG emissions from the Project would be less than significant.

The Project site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed Project would be well below the SCAQMD thresholds, based on the analysis in the Program EIR, the proposed Project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed Project would not conflict with the state's ability to meet its GHG goals under AB 32 and SB 375. Impacts related to greenhouse gas emissions would be less than significant.

6.0.8 HAZARDS AND HAZARDOUS MATERIALS

The design and operation of the proposed Project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances, installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant. No further analysis is required.

The operation of the proposed Project would not create a hazard through upset or accident conditions involving hazardous materials. All health and safety requirements would be stipulated by LAUSD OEHS. Compliance would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public. Therefore potential operation impacts would be less than significant.

The proposed Project is not located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List. Therefore, the potential impacts would be less than significant.

The proposed Project would not result in safety hazards regarding airports and airplanes. The Project site is not located within an airport safety zone. Therefore, there would be no impact.

The Project is not anticipated to interfere with an emergency response plan or evacuation plan. Based on LAUSD's standard plans and procedures related to emergency response, impacts to existing emergency response plans and/or evacuation plans/routes would be less than significant.

The proposed Project would not expose people or structures to a substantial risk of wildland fires. The Project site is located in a developed, residential area of the City of Los Angeles and is not within a Very High Fire Hazard Severity Zone. The State Department of Health Services has not identified the Project site as a hazardous substance release site, nor does the site contain one or more pipelines which transport hazardous waste. The Project is not expected to create any new significant safety hazards or exacerbate any existing safety hazards to students from high voltage powerlines or electromagnetic fields within 350 feet of the site. The Project site is not located within 1,500 feet of a railroad track easement. Although the site is located near major highways and arterial roadways, the proximity of such roads would not pose an immediate safety hazard to students and staff accessing the Project site. No known infrastructure, including water storage tanks, reservoirs, and/or high pressure water lines are located near the Project site. Therefore, no impact would occur.

6.0.9 HYDROLOGY AND WATER QUALITY

In California, the State Water Resources Control Board (SWRCB) administers the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. The SWRCB works in coordination with the Regional Water Quality Control Board (RWQCB) to preserve, protect, enhance, and restore water quality. Regulations in compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) would reduce potential water quality impacts. The proposed Project would also be subject to the Program EIR **SC-HWQ-1 Stormwater Technical Manual** and **SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site**. Thus, construction related ground disturbance activities as well as operation activities would not result in significant impacts to water quality. Therefore, water quality impacts would be less than significant.

A significant impact would occur if the proposed Project substantially depleted groundwater or interfered with groundwater recharge. The Project site is already the location of Roosevelt HS and entails the demolition and replacement of existing buildings. Build out of the proposed Project would not create substantially more impermeable surfaces such that groundwater recharge would be affected. In fact, the proposed Project would include new landscaped areas, which could allow more percolation of rainwater to groundwater, as well as opportunities for newer technologies such a permeable pavement, bioswales and similar uses. Furthermore, groundwater levels in the City are maintained through the City and specific recharge basins. The Project site is not identified as an opportunity for groundwater recharge activities. Additionally, no groundwater production wells are located in the vicinity of the Project site, nor is the proposed Project growth inducing. Therefore, impacts related to groundwater recharge would be less than significant and no further evaluation is required.

A significant impact would occur if the proposed Project substantially alters the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. No stream or river is present on the Project site. The topography of the Project site is relatively level with minor changes in elevation from north to south. Very little change would occur to the drainage pattern on the Project site with development of the proposed Project, as the site is already established.

A significant impact would occur if the proposed Project substantially altered the drainage pattern of an existing stream or river so that flooding would result. No streams or rivers exist on the Project site.

A significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems serving the Project site. A Project-related significant impact would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system. Compliance with existing regulations would reduce the potential for the proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. Impacts would be less than significant.

A significant impact would occur if the proposed Project would substantially degrade water quality. Other than the sources discussed above, the Project does not include other potential sources of contaminants which could potentially degrade water quality. Therefore, Project impacts related to operational water quality would be less than significant and no further analysis is required.

In accordance with the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) for Special Flood Hazard Areas (SFHAs), the Project would not exacerbate an existing flood hazard as it would include the renovation of an existing school. Therefore, impacts would be less than significant.

The Project site would not expose people or structures to significant risk including injury or death as a result of flooding. Therefore, no impact would occur.

A significant impact would occur if the proposed Project exacerbated an existing hazard such as inundation by seiche, tsunami, or mudflow. The Project would not exacerbate any existing hazard condition. Therefore, no impact related to inundation by seiche, tsunami, or mudflow would occur.

6.0.10 LAND USE AND PLANNING

The proposed Project is located in a fully developed area of the City. The proposed Project would involve the demolition of buildings and the construction of their replacements. Improvements will be limited to the Project site and there would be no physical effect on the surrounding neighborhood. As such, a community will not be divided and no further inquiry is necessary.

The City of Los Angeles General Plan land use designation for the Project site is "Public Facilities." The proposed Project would be consistent with the existing zoning for the site. The Project does not require a General Plan Amendment or other change in land use designation. As such, the proposed Project would not conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the Project. Furthermore, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094.

6.0.11 MINERAL RESOURCES

The Project site is located in a residential area of the Boyle Heights neighborhood in the City of Los Angeles. There are no identified mineral resources within the Project site and the Boyle Heights area as designated by the City General Plan. Therefore, no impact associated with mineral resources would occur.

6.0.12 NOISE

The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest public airport is the Los Angeles International Airport, located approximately 20 miles to the southwest. The San Gabriel Valley Airport in the City of El Monte, a general aviation airport, is located approximately 10 miles northeast of the Project site. No impacts would occur related to airport noise.

6.0.13 PEDESTRIAN SAFETY

While the site is adjacent to 4th Street, a major arterial roadway, the Project site has been in use as a school since 1923. Per the current existing conditions, the primary pedestrian access to the Project site would remain along 4th Street, and access to staff parking would remain on Mathews Street. Minor changes to improve safety would be made to the existing pedestrian circulation patterns. Enhancements to pedestrian crossings on 4th Street, near the school front entrance, would be made at the existing signalized intersections of Mathews Street/4th Street (at the northwest corner of the school site), Fickett Street/4th Street (at the north side of the school site), and Mott Street/4th Street (at the northeast corner of the school site). These intersections all have existing striped yellow school crosswalks.

There are no identified impacts for pedestrian access or general safety issues for the proposed school access configuration, based on the review of the conceptual site plan. Impacts would be less than significant.

6.0.14 POPULATION AND HOUSING

The proposed Project would not directly induce substantial growth to the area as it would accommodate the existing student population. The proposed new facilities on campus would be for Roosevelt HS current students, faculty, and staff. The proposed Project is a modernization plan, no increase in students or staff is proposed. In addition, the proposed Project does not include any features such as new homes or businesses that may induce growth. The proposed Project also would not indirectly induce growth through the extension of roads or other infrastructure as no new infrastructure or roads are proposed. As such, there will be no impact and no further analysis is needed.

The Project site is the campus for Roosevelt HS and is not in use for housing. Therefore, the proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. No impacts would occur from the proposed Project.

6.0.15 PUBLIC SERVICES

Police, Fire, Schools, Parks, and Other Facilities

The proposed Project is currently served by Los Angeles Fire Department Fire Station No. 25, approximately 2,500 feet southeast of the Project site. LAUSD's Program EIR Standard Conditions **SC-PS-1** and **SC-PS-2** require LAUSD to consult with local fire and police departments prior to construction regarding site plans and emergency preparedness. Therefore, this impact is considered less than significant.

Roosevelt High School is under the jurisdiction of the Los Angeles School Police Department (LASPD). The LASPD provides general law enforcement services for all LAUSD campuses, however the everyday campus activities would be under the supervision of the principal, vice principal, teachers, and other staff members. The Los Angeles Police Department (LAPD) would provide additional police protection services to the project site if needed. The nearest LAPD station is located at the Hollenbeck Community Police Station, approximately 2,800 feet northwest of the site. The proposed Project would not increase the population or size of the site, therefore current police protection services would continue to be sufficient to serve the campus. Similarly, LAUSD **SC-PS-1** and **SC-PS-2** will be implemented to ensure consultation and preparation with public services. Thus, the proposed Project would have a less than significant impact.

The proposed Project would not include any residential component and would not directly and/or indirectly result in population growth. Development of the proposed Project would improve Roosevelt HS for its current students and not warrant additional schools in the area. No impact to schools would occur from the proposed Project. The City of Los Angeles Parks and Recreation Department manages park facilities and provides recreation programs. Hollenbeck Park, Boyle Heights Sports Center, and Evergreen Recreation Center are all within a 2,000-foot radius of the Project site. The proposed Project would not include any residential uses that would result in a permanent population increase, resulting in a need for new or expanded park facilities. The proposed Project design includes active and passive areas located throughout the site, including play fields, a courtyard, and several other landscaped areas. 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. Impacts to parks and recreational facilities would be less than significant.

The closest library to the proposed Project site is the Benjamin Franklin Library, located at 2200 E. 1st Street, approximately 1,700 feet from Roosevelt HS. There are no residential units included as part of the proposed Project that would result in a permanent increase in population resulting in a need for new or expanded library facilities. In addition, Roosevelt HS has a library facility on campus. Therefore, any increase in use of public libraries would be less than significant.

6.0.16 RECREATION

The proposed Project does not involve residential uses and as such, there will not be a permanent population increase. The proposed Project design includes active and passive areas located throughout the Project site, including play fields, a courtyard, and several other landscaped areas. Similar to the discussion on park impacts, the Civic Center Act allows school facilities to 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 recreation facilities onsite, the Project is anticipated to result in beneficial effects for the community. Therefore, impacts related to requiring construction or expansion of recreational facilities is less than significant.

6.0.17 TRANSPORTATION AND TRAFFIC

The proposed Project would not impact air traffic. The Project site is not located within an airport safety zone nor does the Project propose any structure that would conflict with air traffic patterns. The nearest airports are the San Gabriel Valley Airport in the City of El Monte, a general aviation airport, located approximately 10 miles northeast of the Project site and Los Angeles International Airport located approximately 20 miles to the southwest. No impact would occur and no further analysis is needed in the EIR

The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site. The proposed Project would not create new hazards due to design features or incompatible uses. Impacts would be less than significant and no additional analysis would be required.

The Project is not anticipated to interfere with an emergency response plan or evacuation plan. Construction activities would not result in temporary partial obstruction of adjacent roadways and the District would comply with applicable regulations relating to access. Further, the proposed Project would be developed in consultation with the City of Los Angeles Fire Department, LAPD, and City of Los Angeles Department of Public Works, Bureau of Engineering. Therefore, the impact would be less than significant and no further study is required.

County of Los Angeles Metropolitan Transit Authority (Metro) bus lines run along Soto Street and 4th Street. Construction and operation of the proposed Project would not alter the location of existing bus stops. LAUSD works with Metro to implement the Metro Transit Education Program which provides transit education to the public and schools along the Metro Rail Lines (the Soto Street Gold Line station is located three blocks north of the campus). It offers students the opportunity to ride the train and receive specific safety information, site specific presentations in the schools and a mobile theatre. The goal of the Transit Education Program is to increase public awareness and teach residents of the Los Angeles County how to live safely around trains and buses.[2] Implementation of the proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). Impacts related to alternative transportation would be less than significant, and no further analysis is necessary.

2 LAUSD OEHS Traffic and Pedestrian Safety Program, https://achieve.lausd.net/Page/4238

6.0.18 TRIBAL CULTURAL RESOURCES

Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in Public Resources Code Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible, or listed, in the California Register of Historical Resources, or the local register of historical resources.

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD as the Lead Agency to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the Project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either: 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource; or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. To date the District has not received any requests to be notified about projects in the District. A sacred lands file search was conducted through the Native American Heritage Commission (NAHC) with negative results, although the area is determined to be sensitive for tribal resources.[3] The letter from NAHC is provided in **Appendix 6.0**. Additionally, although the school is eligible for listing on the National Register of Historic Places and the California State Register of Historical Resources, no specific tribal resources have been identified. In the event that construction-related ground disturbance results in the discovery of potential resources, **SC-CUL-18** would be implemented in order to avoid potential impacts to tribal resources. No impacts to tribal cultural resources would occur.

6.0.19 UTILITIES AND SERVICE SYSTEMS

Wastewater, Water, Solid Waste

Regulations of the RWQCB require specific permits when relating to wastewater. The proposed Project would need to obtain National Pollutant Discharge Elimination System (NPDES) permits when carrying out construction with requirements for wastewater discharge, Best Management Plans (BMPs), and stormwater pollution prevention plan (SWPPP), as required by **SC-HWQ-1** and **SC-HWQ-2**. Additionally, LAUSD would need to comply with the effluent quality criteria specified within the NPDES so the proposed Project would not exceed wastewater treatment requirements of the applicable RWQCB. The Project site is currently served by an 8″ sewer line along Mathews Street, a 6″ sewer line

[3] Email correspondence, Native American Heritage Commission, July 27, 2017

along Mott Street, an 8″ sewer line along E. Fourth Street, and an 8″ sewer line along E. Sixth Street. There are multiple existing sewer laterals around the site, especially along Mathews Street. Wastewater generated on the Project site would be transported to Los Angeles County Sanitation District facilities via the City's sewer lines. The proposed Project would not lead to the increase of new student enrollment. As such, the proposed Project would not increase generated wastewater, which would continue to be contained and directed through the current system to a wastewater treatment plant in the City. Therefore, this impact would be less than significant.

A significant impact would occur if the volume of stormwater water runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

Currently, stormwater from the site curb drains out onto the streets. The water then flows onto existing catch basins located at the southeast and southwest corners of the site's public right of way. The proposed Project would not result in a significant increase in site runoff, or significant changes in the local drainage patterns. Therefore, this impact would be less than significant.

California law such as Senate Bill (SB) 221 and SB 610 regulate land use planning and water supply availability by requiring an Urban Water Management Plan (UWMP). Also under SB 610 it is the responsibility of the water service provider to prepare a Water Supply Assessment (WSA). The proposed Project would not meet any of the criteria resulting in the need for a WSA; therefore; a WSA is not necessary.

During construction water may be used on site for dust suppression or similar activities. The small amount of water necessary during construction of the proposed Project would not result in the need for new or expanded water entitlements. Construction of the proposed Project would not result in a significant impact to the City's existing water supply.

Implementation of the proposed Project would not result in an increase in the on-site school population (i.e., students, faculty, and staff). As such, buildout of the proposed Project would generate a demand on the City's water supplies similar to that of the current demand. Water supply to the Project site is provided by the LADWP. As the proposed Project would not increase the total number of students enrolled, the proposed Project would not increase demand on the City's water supplies. Further, implementation of LAUSD's **SC-USS-2**, impacts would be less than significant.

During construction and operation of the proposed Project, the District would comply with all applicable City, County, and state solid waste diversion, reduction, and recycling mandates, including compliance with the 2016 CAL Green Construction Waste Reduction Requirements. Compliance with these regulations and mandates would assist in reducing the amount of waste deposited in local landfills. Construction of the proposed Project would generate construction debris. Waste materials generated during construction are expected to be typical construction debris as well as green wastes. Waste generated during demolition and construction that is not recycled would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities generally within Los Angeles County. However construction would only be temporary and debris would cease once the construction phase is completed. The proposed Project would be subject to the **SC-USS-1**, which requires compliance with the School Design Guide & Specification 01340, Construction and Demolition Waste Management. Operation of the proposed Project would not result in an increase in solid waste generation as the proposed Project would not expand the District's total student capacity or increase student enrollment. The District contracts with private waste haulers to dispose of solid waste generated on school campuses. The proposed Project would comply with the recycling requirements, and would adhere to **SC-USS-3** for accessible collections of recycling material. Thus, impacts related to utilities and service systems would be less than significant.

6.0.20 ENERGY CONSUMPTION

Construction

Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use.

The estimated amounts of energy resources would be consumed over a period of four years (48 months) and would represent a small percentage of the total energy used in the state. More importantly, for reasons presented below, this consumption would not represent a wasteful and inefficient use of energy resources.

There is growing recognition among developers and retailers that sustainable construction is not any more expensive than "business as usual" construction methods, and further, that there are long-term significant cost-savings potential in utilizing green building practices and materials. In addition, the proposed Project would feature a sustainable design to comply with CALGreen and CHPS, which would result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Construction materials would include recycled materials and products originating from nearby sources to the extent feasible in order to comply with CALGreen and to reduce costs of transportation.

Construction of the proposed Project estimated to consume a total of approximately 2,547,746 gallons of diesel fuel, and 19,541,600 gallons of gasoline over the Project's construction horizon, or approximately 1,273,873 gallons of diesel fuel, and 9,770,800 gallons of gasoline annually. Worker trips are expected to vary by phase; however, trips would be temporary and would occur over the three-year timeframe of construction activity. As these trips would be temporary, they would not be wasteful or an inefficient use of energy. CARB has adopted Title 13 Section 2485, an Airborne Toxic Control Measure (ATCM), to limit diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. All diesel-fueled commercial heavy and medium-duty vehicles are required to comply with these measures.

The ATCM requires that construction idling times shall be minimized either by shutting equipment off when not in use, or limiting the maximum idling time to five minutes. It also requires that all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications, and that all equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. **SC-AQ-2,** and **SC-AQ-3** require that construction equipment be selected to minimize emissions, and that all diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days continuously shall, at a minimum, meet US EPA particulate matter emissions standards for Tier 4 engines or equivalent.

Idling restrictions and the use of newer engines and properly maintained equipment would result in less fuel combustion and energy consumption. Furthermore, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and the construction-phase impact related to energy consumption would be less than significant.

Operation

Title 24 represents the state policy on building energy efficiency. The goals of the Title 24 standards are to improve energy efficiency of residential and non-residential buildings, minimize impacts during peak energy-usage periods, and reduce impacts on state energy needs. The proposed Project is required to comply with Title 24, and therefore would be energy efficient. Furthermore, the proposed Project would include features to minimize energy consumption, many of which are mandated by the CALGreen and

CHPS, which would further reduce the amount of electricity and natural gas consumed by the proposed Project.

It is anticipated that SCE and SoCalGas would be able to provide electricity and natural gas to the Project site using existing infrastructure. Only minor modifications to the distribution system would be required to connect the new buildings to be constructed under the proposed Project to the existing off-site electrical and natural gas systems. Further, the Project's demand for electricity by itself would not require the construction of new power generation facilities.

The proposed Project does not include a residential component, and would not induce population growth. The students who would attend the renovated school are existing students that currently attend other schools. As such, no new students would be generated through this Project. Many of the proposed students are currently housed in less efficient portable classrooms; therefore, the construction of the new energy efficient school would be an environmental benefit.

Further, the electrical loads and natural gas demand that would be required by the proposed Project are within the parameters of projected load growth in the City, and SCE and SoCalGas would be able to meet the demand in this area. Therefore, the proposed Project would not result in the consumption of energy resources that could not be accommodated within the long-term electricity and natural gas supply.

It is anticipated that SCE and SoCalGas would be able to provide electricity and natural gas to the Project site using existing infrastructure. Only minor modifications to the distribution system would be required to connect the new buildings to be constructed under the proposed Project to the existing off-site electrical and natural gas systems. Further, the Project's demand for electricity by itself would not require the construction of new power generation facilities.

The proposed Project would result in the consumption of petroleum-fuel related to vehicular travel (quantified as VMT) to and from the Project site. Based on the CalEEMod results for the proposed Project, approximately 64,612 gallons of diesel and 438,060 gallons of gasoline would be consumed per year, or a total of 502,672 gallons of petroleum-based fuels per year based on an annual estimate of 9,769,680 VMT

This is a conservative estimate, given that it assumes no electric, hybrid, or other alternate fuel use vehicles in the fleet mix. Furthermore, this level of annual consumption is based on fuel efficiency rates (miles per gallon). Federal and State laws and regulations will continue to require further improvements in fuel efficiency in motor vehicles produced and/or sold in the US, and total annual consumption of petroleum-based fuel is expected to decrease over time.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation and the operation-phase energy impact would be less than significant.

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