
February 2024 | Initial Study

# Canoga Park Senior High School
# Major Modernization Project

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# CANOGA PARK SENIOR HIGH SCHOOL

Major Modernization Project

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**(Available at https://achieve.lausd.net/ceqa)**



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# Abbreviations and Acronyms

| | |
|---|---|
| ADA | Americans with Disabilities Act |
| AAQS | ambient air quality standards |
| AB | Assembly Bill |
| AQMP | air quality management plan |
| BERD | Built Environmental Resources Directory |
| BOE | [LAUSD] Board of Education |
| BMP | best management practices |
| C & D | Construction & Demolition |
| CALEEMOD | California Emissions Estimator Model |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CALGreen | California Green Building Code |
| Caltrans | California Department of Transportation |
| Campus | Canoga Park Senior High School |
| CARB | California Air Resources Board |
| CCR | California Code of Regulations |
| CDE | California Department of Education |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CGS | California Geological Survey |
| CHPS | Collaborative for High Performance Schools |
| CO | carbon monoxide |
| DSA | Division of the State Architect (under the California Department of General Services) |
| DTSC | Department of Toxic Substances Control |
| EIR | Environmental Impact Report |
| EPA | Environmental Protection Agency |
| FHSZs | Fire Hazard Severity Zones |
| GHG | greenhouse gases |
| HVAC | heating, ventilation and air conditioning |
| LADOT | City of Los Angeles Department of Transportation |
| LADWP | City of Los Angeles Department of Water and Power |
| LAFD | Los Angeles Fire Department |
| LAPD | City of Los Angeles Police Department |
| LAUSD | Los Angeles Unified School District |

# Abbreviations and Acronyms

| | |
|---|---|
| LOS | level of service |
| LARWQCB | Los Angeles Regional Water Quality Control Board |
| LASAN | Los Angeles Sanitation |
| LST | localized significance thresholds |
| LUST | leaking underground storage tanks |
| MBTA | Migratory Bird Treaty Act |
| MEP | maximum extent practicable |
| mgd | million gallons per day |
| MLD | most likely descendant |
| MND | Mitigated Negative Declaration |
| MPH | miles per hour |
| MPO | Metropolitan Planning Organization |
| MWD | Metropolitan Water District of Southern California |
| MWELO | Model Water Efficient Landscape Ordinance |
| NAHC | Native American Heritage Commission |
| ND | Negative Declaration |
| NMAs | Neighborhood Mobility Areas |
| NOx | Oxides of Nitrogen |
| NPDES | National Pollutant Discharge Elimination System |
| OEHS | Office of Environmental Health and Safety |
| PM-10 | Particulate Matter |
| PDF | project design features |
| PGAs | priority growth areas |
| ppm | parts per million |
| PRC | Public Resources Code |
| RCRA | Resource Conservation and Recovery Act |
| RECs | Recognized Environmental Conditions |
| RHNA | Regional Housing Needs Allocation |
| ROG | Reactive Organic Gasses |
| ROTC | Reserve Officers' Training Corps |
| RTP | Regional Transportation Plan |
| SCAG | Southern California Association of Governments |
| SRA | State Responsibility Areas |

# Abbreviations and Acronyms

| | |
|---|---|
| SC | Standard Conditions [of Approval] |
| SCAQMD | South Coast Air Quality Management District |
| SCS | sustainable communities strategy |
| SoCAB | South Coast Air Basin |
| SOx | Sulfur Oxides |
| SUP | School Upgrade Program |
| SWPPP | stormwater pollution prevention plan |
| USFWS | United States Fish and Wildlife Service |
| VHFHSZ | Very High Fire Hazard Severity Zones |
| VMT | vehicle miles traveled |
| VOC | volatile organic compounds |
| WUI | Wildland-urban interface |

# Abbreviations and Acronyms

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# 1. Introduction

## 1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a major modernization of the Canoga Park Senior High School Campus (campus), located at 6850 Topanga Canyon Boulevard, City of Los Angeles, Los Angeles County, California. The District's Major Modernization Projects are designed to address the most critical physical needs of the building and grounds at schools through building replacement, renovation, modernization, and reconfiguration. The proposed Canoga Park Senior High School Major Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

## 1.2 BACKGROUND

The District's bond program began in 1997 with the initial focus on addressing overcrowded conditions – including the use of year-round multi-track calendars and busing of students to less crowded campuses – by providing new schools with traditional calendars. This goal was met with the opening of 131 new schools for K-12 students, allowing students to attend schools in their neighborhood's operating on a two-semester, single-track calendar. Since the completion of the New School Construction Program, the District's focus has shifted from constructing new facilities to correct decades of overcrowding, to now addressing aging existing school facilities. The District's priority now is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.[1]

In 2014, the District embarked on a new bond program known as the "School Upgrade Program" (SUP). Initially in 2014, $7.85 billion was allocated for the development of projects. Over the course of the last seven years new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to $9.2 billion. To date, nearly 2,000 projects valued at approximately $1.5 billion have been funded by the SUP and completed by Facilities, and nearly 690 additional projects valued at approximately $5.4 billion are underway.

Measure RR was recently passed in 2020 to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is a $7 billion bond measure aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures amid the COVID-19 pandemic. In August 2021, the LAUSD Board of Education (BOE or Board) updated the SUP to allocate the Measure RR funds, adjusted the categories and spending targets within the program, and approved the Measure RR Implementation Plan.

[1] LAUSD Facilities Services Division, 2023, Strategic Execution Plan, Page 1.

The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP will drive the development of future projects to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning.[2]

Based on past experience and the magnitude of the proposed updates to the SUP framework, LAUSD staff determined that a Subsequent Program EIR (2023 SPEIR) should be prepared due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 SUP Program EIR. The 2023 SPEIR was prepared according to CEQA 14 CCR Section 15162(a) and certified by the LAUSD Board of Education on December 12, 2023.

On November 15, 2022, the BOE approved the project definition for the Canoga Park Senior High School Major Modernization Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the campus while providing renovations, modernizations, and reconfiguration as needed.[3]

## 1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[4] and the State CEQA Guidelines.[5] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). LAUSD is the lead agency for this proposed Project, and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

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

2 Based on LAUSD Facilities Services Division, Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities, August 24, 2021.
3 LAUSD. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.
4 California Public Resources Code, §21000 et seq (1970).
5 California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[6]

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,[7] however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[8]

## 1.4 ENVIRONMENTAL PROCESS

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

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

## 1.5 INITIAL STUDY

This Initial Study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the Project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or MND or ND; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the finding in an MND or ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this

[6] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.
[7] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.
[8] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

Initial Study have determined that an ND is the appropriate level of environmental documentation for this Project.

### 1.5.1 Negative Declaration or Mitigated Negative Declaration or Environmental Impact Report

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

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

### 1.5.2 Tiering

This type of project is one of many that were analyzed in the 2023 Subsequent Program EIR (SPEIR) that was certified by the LAUSD BOE on December 12, 2023.[9] the 2023 SPEIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The 2023 SPEIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[10] The 2023 SPEIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[11]

The 2023 SPEIR is applicable to all projects implemented under the School Upgrade Program. The 2023 SPEIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[12] Due to the extensive number of individual projects anticipated to occur under the

9 *Subsequent Program EIR for the School Upgrade Program. 2023*. http://achieve.lausd.net/ceqa.
10 *Subsequent Program EIR for the School Upgrade Program. 2023*. http://achieve.lausd.net/ceqa.
11 California Code of Regulations Title 14, § 3 Article 1-15152(a).
12 Ibid, at 4-8.

# 1. Introduction

SUP, projects were grouped into four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[13]

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus
- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

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

The proposed Project is considered a site-specific project under the SPEIR; therefore, this ND is tiered from the 2023 SPEIR. The 2023 SPEIR is available for review online at http://achieve.lausd.net/ceqa and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

## 1.5.3 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code)[14], LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[15]

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

[13] Ibid, at 1-7.
[14] California Green Building Standards Code, Title 24, Part 11.
[15] The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

# 1. Introduction

**Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects.** Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the Office of the Environmental Health & Safety (OEHS) California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

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

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

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

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

- Compensating for the impact by replacing or providing substitute resources or environments.

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[16] Federal, State, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

## 1.6 IMPACT TERMINOLOGY

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

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

## 1.7 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

**Chapter 4, *Environmental Checklist and Analysis*** presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the

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

# 1. Introduction

CHPS criteria, PDFs, Standard Conditions of Approval, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore a stand-alone bibliography section is not required.

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

**Appendices** have data supporting the analysis or contents of this CEQA Initial Study.

A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
B. Arborist Report
C. Cultural Resources Phase I Assessment
D. Construction Energy Worksheets
E. Preliminary Geotechnical Evaluation
F. Phase I Environmental Site Assessment
G. Phase II Environmental Site Assessment
H. Soil Removal Plan
I. Project Manual for Asbestos Removal
J. Noise Report
K. Transportation Assessment

# 2. Environmental Setting

## 2.1 PROJECT LOCATION

The approximately 21.38-acre school site is located at 6850 Topanga Canyon Boulevard (Assessor Parcel Number [APN] 2138-001-900) in the Canoga Park -Winnetka – Woodland Hills – West Hills community of the City of Los Angeles in Los Angeles County. Regional access to the site is from Topanga Canyon Boulevard (see **Figure 1: Regional Location**).

The Project site is bounded by Hart Street to the north, Jordan Avenue to the east, Vanowen Street to the south, and Topanga Canyon Boulevard to the west. Regionally, the Project site is approximately 5.5 miles from State Route 118 to the north, approximately 7.3 miles from Interstate 405 to the east, and approximately 1.5 miles from U.S. Route 101 to the south.

## 2.2 SURROUNDING LAND USES

Land uses surrounding the Project site are composed of single- and multifamily residential, mixed-use commercial, and other commercial uses. The neighborhood is primarily urban in nature, with commercial uses lining the major arterials and residential uses along the local streets. Directly adjacent to the school, Topanga Canyon Boulevard and Vanowen Street host commercial uses, Hart Street is lined with multifamily residential buildings, and Jordan Avenue has both multifamily and single-family residences along its length. Further out, south and southeast of the site are large commercial shopping centers, newer multifamily developments, and Warner Center, a mixed-use and commercial business district. Directly north and east of the site is a concentration of multifamily residential buildings, and multifamily residential is scattered throughout the area, but the majority of residential land, especially to the west, is occupied by single-family houses. The confluence of Bell Creek and Arroyo Calabasas, where the Los Angeles River begins, is located at the eastern edge of the property south of the center to the parcel. The concrete channels for both waterways travel through the property, with Bell Creek beginning at the northwest corner of the parcel, and Arroyo Calabasas near the center at the southern edge. Both curve through the property cutting off the northeast and southeast corners of the parcel from the rest of the campus. There are two gas stations directly across the street from the school, one at the northwest corner of the intersection of Topanga Canyon Boulevard and Vanowen Street, and one at the southeast corner (see **Figure 2: Surrounding Land Use**).

## 2.3 SENSITIVE RECEPTORS

LAUSD has defined sensitive receptors as residences, schools, long-term care facilities, dormitories, motels, hotels, transient lodgings, hospitals, libraries, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, parks, and places of worship.

In addition to students, nearby sensitive receptors in close proximity to the proposed Project include the residences on Hart Street and Jordan Avenue (see **Figure 3: Location of Sensitive Receptors** and **Table 1: Sensitive Receptors**).

**Table 1**
**Sensitive Receptors**

| No. | Name | Address | Type | Location | Distance from Project Site (ft)* |
|---|---|---|---|---|---|
| 1 | Single-family residence | 21917 Hart Street | Residential | North across Hart Street | 60 |
| 2 | Multifamily residence | 7007 Vassar Avenue | Residential | North across Hart Street | 60 |
| 3 | Multifamily residence | 7000 Vassar Avenue | Residential | North across Hart Street | 60 |
| 4 | Multifamily residence | 7005 Jordan Avenue | Residential | North across Hart Street | 60 |
| 5 | Multifamily residence | 7004 Jordan Avenue | Residential | Northeast across Hart Street | 60 |
| 6 | Multifamily residence | 21720 Hart Street | Residential | East across Jordan Street | 60 |
| 7 | Single-family residence | 6936 Jordan Avenue | Residential | East across Jordan Street | 60 |
| 8 | Single-family residence | 6930 Jordan Avenue | Residential | East across Jordan Street | 60 |
| 9 | Single-family residence | 6928 Jordan Avenue | Residential | East across Jordan Street | 60 |
| 10 | Single-family residence | 6922 Jordan Avenue | Residential | East Across Jordan Street | 60 |
| 11 | Single-family residence | 6918 Jordan Avenue | Residential | East Across Jordan Street | 60 |
| 12 | Single-family residence | 6912 Jordan Avenue | Residential | East Across Jordan Street | 60 |
| 13 | Single-family residence | 6908 Jordan Avenue | Residential | East Across Jordan Street | 60 |
| 14 | Multifamily residence | 6832 Jordan Avenue | Residential | East Across Jordan Street | 60 |

* Distance is as measured from property line to property line.

# 2.4 CAMPUS HISTORY

Canoga Park High School was first established in 1914 as Owensmouth High School on the second floor of Owensmouth Elementary School, located at the current site of Canoga Park Elementary School (7438 Topanga

Canyon Boulevard, less than a mile to the north). The school was created for the town of Owensmouth which had been established in 1912. Prior to its establishment, nearly the entirety of the San Fernando Valley below Roscoe Boulevard was owned by the San Fernando Homestead Association. In 1909 the majority of this land was purchased by the Los Angeles Suburban Homes Company in anticipation of the completion of the Los Angeles Aqueduct. Owensmouth was one of three communities, which included Van Nuys and Marion (later Reseda), that were created by the company in order to subdivide and sell the land.

In 1916 the high school moved to its current location, where a new two-story Greek-revival building and outdoor theater were constructed. In 1929 the upper floors of the building were damaged in a fire, and subsequently the building was reduced to one story and two new Greek-revival buildings were constructed for the 1931 school year. Owensmouth and other cities in the San Fernando Valley did not have access to aqueduct water and subsequently needed to join Los Angeles, which Owensmouth did in 1917. In 1931 the town changed its name to Canoga Park, prompting the high school to change its name to Canoga Park High School.

During the Great Depression, the campus auditorium was constructed with funding from the Public Works Administration. It was named G. Walter Monroe Assembly Hall (Monroe Hall) after the school's first principal and was completed in 1939. In 1940 two murals were placed on the building titled "Quests of Mankind." The murals were created by artist Helen Lundeberg working for the Works Project Administration Federal Art Project. The hall is identified as historically significant in the California Register of Historic Resources, and Lundeberg is considered an important artist in the American post-surrealist movement, with the murals noted by the Mural Conservancy of Los Angeles.

Between the 1940s and 60s several new buildings were added to the campus. In 1953 the original 1916 school building and outdoor theater were both demolished due to deterioration and were replaced by the present-day softball field. In 1971 the Sylmar earthquake damaged the two remaining Greek-revival buildings on the campus which were subsequently demolished in 1975. Replacement buildings were constructed in 1978. Since then, no major construction has taken place.

Notable visitors to the campus include Frank Sinatra and Bob Hope who performed together in the Assembly Hall in 1946. The trip was the first in a series of tours in Valley schools organized by Sinatra to promote racial and religious tolerance called the Hollywood Caravan. In 1961 Dr. Martin Luther King Jr. gave a speech titled "The Future of Integration" at the Assembly Hall, sponsored by the Woodland Hill Community Church. Later that same year Dr. King would speak to 25,000 people at the "Freedom Rally" held at the Los Angeles Memorial Sports Arena at Exposition Park.

Historic resources within LAUSD campuses have been surveyed and inventoried previously in 2001/2004 by the Getty Conservation Institute and again in 2013/2014 by Sapphos Environmental. The findings from both surveys are compiled in the LAUSD Historic Resources Survey Report, published in June 2014. The report notes that the auditorium (Monroe Hall), built in 1938 by the Public Works Administration, is listed as an individual historic resource in the California Register (CR). No other buildings on site were found eligible, and the campus itself was not found eligible as an historic district.

The auditorium is listed in the Built Environment Resources Directory (BERD) of the California Office of Historic Preservation with a status of 2S2 (assigned in the 2004 survey) which indicates the building is listed in the CR and eligible for the National Register.

## 2.5 EXISTING CONDITIONS

Canoga Park Senior High School serves grades 9 to 12 as part of the Canoga Park/Chatsworth Community of Schools. It is situated on an approximately 21.38-acre rectangular parcel oriented north-south, containing a total of 44 buildings, 35 of which contain classrooms (see **Figure 4: Existing Site Plan**). Of those 35 buildings, 16 are portable structures. The main campus buildings are clustered on the west side of the parcel toward the southern end. The main entrance to the campus is a pedestrian entrance facing Topanga Canyon Boulevard between the library and administrative buildings. Inside the campus are two outdoor quadrangles (quads), located north and south of the main entrance. At the north end of the campus is a softball field, basketball, volleyball, and tennis courts. At the "rear" of the campus (east end) is the main athletic field, and in the northeast and southeast corners that are separated from the rest of the campus by canals are the Reserve Officers' Training Corps (ROTC) and agriculture facilities. The single vehicular entrance for the interior of the campus is located on Vanowen Street, and there is a central promenade that runs north-south between the main athletic field and main campus buildings. This is used by service vehicles and contains parking for staff and students. There is a parking lot off of Vanowen Street next to Assembly Hall with its own entrance, just west of the main vehicular entrance, and another parking lot off of Topanga Canyon Boulevard south of the basketball courts. The western corner areas both have their own vehicular entrances and parking spaces. Vehicular drop off/pickup occurs on Vanowen Street and Topanga Canyon Boulevard near the entrance into the campus interior on Vanowen and near the parking lot on Topanga. Bus drop off/pickup occurs on Topanga Canyon Boulevard in front of the main campus entrance.

The high school had 1,436 students enrolled in the 2022-2023 school year with 442 students in the ninth grade, 408 in the tenth, 287 in eleventh, and 299 in the twelfth grade. The school hosts the Owensmouth Continuation High School which had 74 students enrolled in the 2022-2023 school year. The school also offers three magnet programs: Engineering, Environmental & Veterinary Science (EEVS), Communications, Arts & Media (CAM), and Visual and Performing Arts Academy (VAPA). Other academic programs available on campus include AVID (Achievement Via Individual Determination) which helps students attain entrance into college, and the Newcomer Academy, a program for students coming from outside of the U.S.

## 2.6 GENERAL PLAN AND EXISTING ZONING

The Project site is designated by the City General Plan and the Canoga Park -Winnetka – Woodland Hills – West Hills Community Plan as "**Public Facilities**."[17] Public Facilities is the designation for the use and development of publicly owned land in order to implement the City's adopted General Plan. Under the proposed Project, the use of the land falls under public elementary and secondary schools, which is allowed by the Public Facilities zoning designation.

[17] City Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/. Accessed August 4, 2023.

The California legislature has 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. On February 19, 2019, pursuant to Government Code Section 53094, the LAUSD Board of Education adopted a Resolution rendering all LAUSD school sites, including Canoga Park Senior High School, exempt from local land use regulations (Bd. of Ed Rpt No. 256-18-/19).[18]

## 2.7 NECESSARY APPROVALS

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

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

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Los Angeles, Department of Building & Safety. Approval of construction haul route.

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

State

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

Regional

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

Local

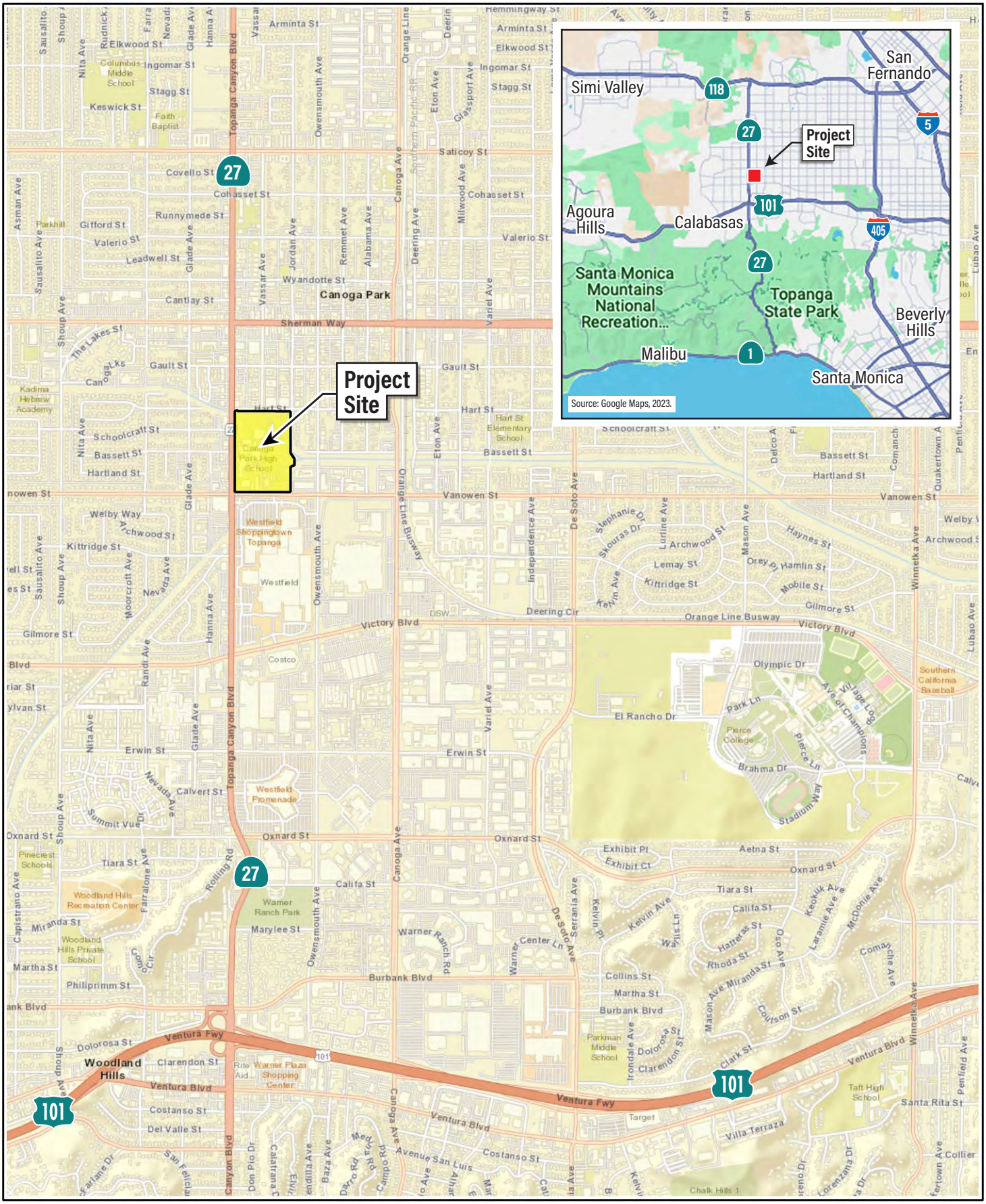
[18] LAUSD, Board of Education Report, "LAUSD Regular Meeting Stamped Order Of Business Report 256-18/19," February 19, 2019.

- City of Los Angeles Department of Planning
- City of Los Angeles Police Department
- City of Los Angeles Department of Water and Power
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Environmental Affairs

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

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

Pursuant to Assembly Bill 52 (AB 52), LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area. No Native American tribes have requested consultation with LAUSD, pursuant to Public Resources Code Section 21080.3.1. LAUSD Office of Health and Safety sent Project notification on August 25, 2023 to Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Fernandeño Tataviam Band of Mission Indians, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council (two contacts), Gabrielino/Tongva Nation, Gabrieleño Band of Mission Indians – Kizh Nation (two contacts), Gabrielino-Tongva Tribe (two contacts), Northern Chumash Tribal Council, San Fernando Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, Santa Ynez Band of Chumash Indians (four contacts), and Soboba Band of Luiseno Indians (two contacts). On August 25, 2023, letters requesting consultation were sent via email to all tribes listed above. Tribes had 30 days to request consultation regarding any or all of the Projects. The 30-day period has ended, and no requests were received.




Source: ESRI World Street Map Background, 2023.



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# Regional Location Map

FEET 0 1,000 2,000

FIGURE 1

# 2. Environmental Setting

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Source: ESRI World Imagery Background, 2023. Los Angeles Department of City Planning Information and map access system (Zimas), Acessed, Nov. 15, 2023.



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# Surrounding Land Use

FEET 0 225 450

FIGURE 2

# 2. Environmental Setting

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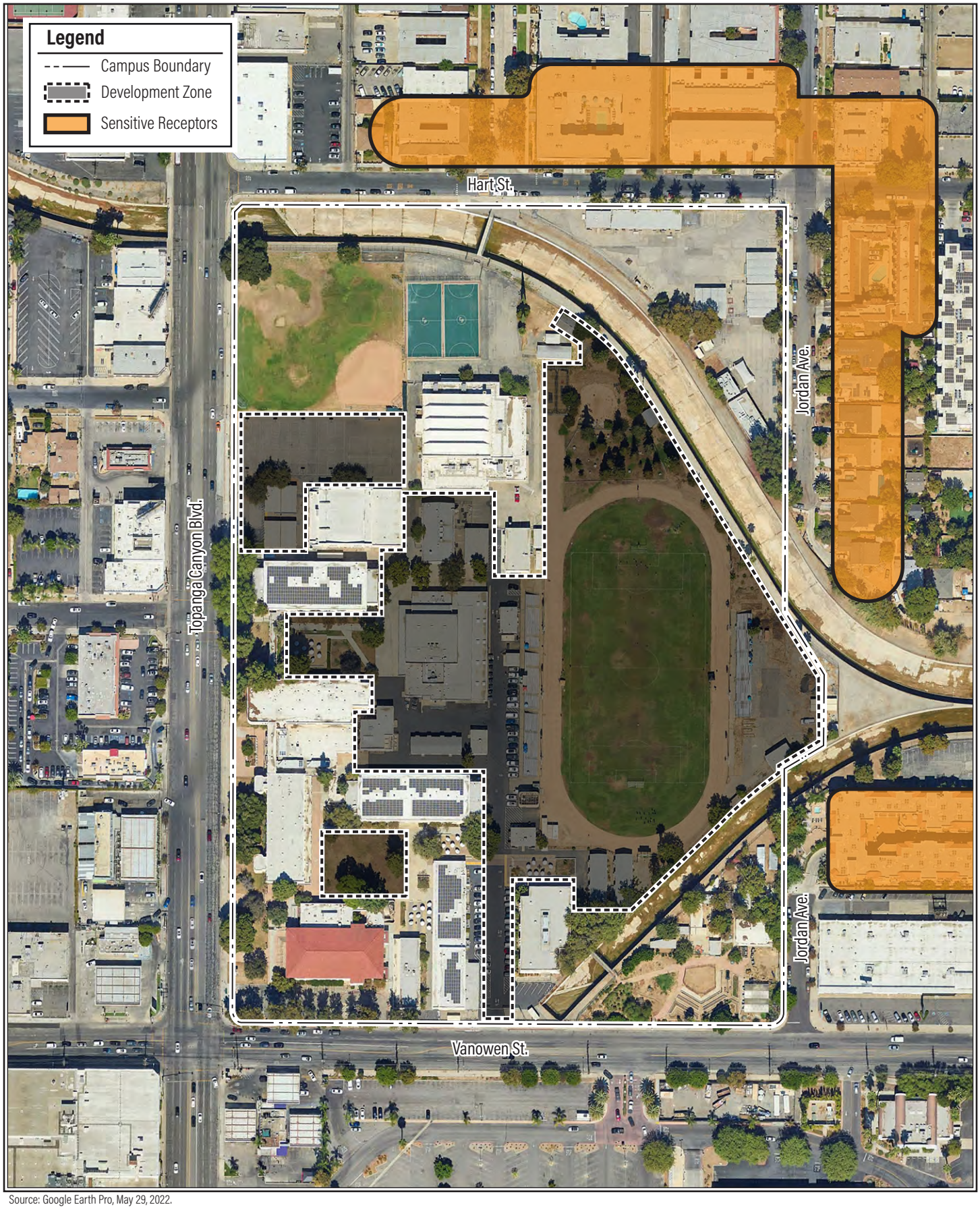


Source: Google Earth Pro, May 29, 2022.



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# Location of Sensitive Receptors

FEET 0 100 200

FIGURE 3

# 2. Environmental Setting

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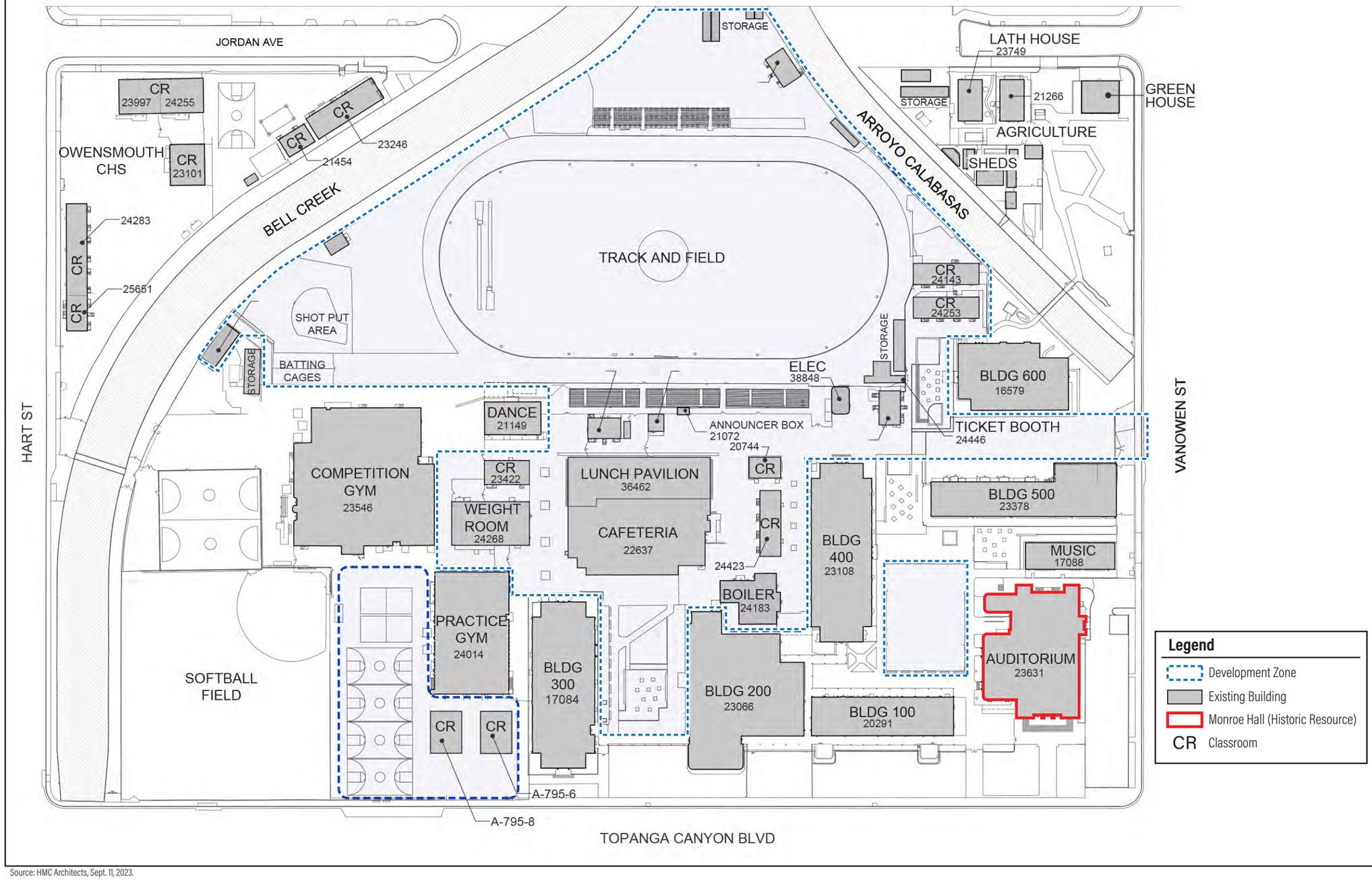



Source: HMC Architects, Sept. 11, 2023.



# Existing Site Plan

# 3. Project Description

## 3.1 BACKGROUND

**Purpose and Need for the Project.** In August 2021, the LAUSD Board of Education (BOE or Board) updated the SUP to allocate the Measure RR funds, adjusted the categories and spending targets within the program, and approved the Measure RR Implementation Plan. On December 12, 2023, the Board adopted the 2023 SPEIR, an update to the SUP (SUP Program EIR certified by the Board on November 10, 2015), to integrate both the Measure RR funding and priorities into its operational framework, and to integrate the Measure RR Implementation Plan to help guide the identification of sites and development of project proposals. The goal of the LAUSD SUP is to improve student health, safety, and education through the modernization of school facilities. The proposed Project has been developed under the LAUSD's SUP to provide Measure RR funding to give every student access to safe, secure, and updated schools. Canoga Park Senior High School was identified as one of five schools in the District most in need of an upgrade due to the physical condition of the facilities.[19]

Canoga Park Senior HS is located in the community of Canoga Park -Winnetka – Woodland Hills – West Hills in the City of Los Angeles. The school has been identified under the LAUSD Board of Education's SUP as one of the schools most in need of critical upgrades and improvements. The goal of the LAUSD SUP is to improve student health, safety, and education through the modernization of school facilities. The physical goals of this major modernization project are to provide Canoga Park High School with a reimagined campus core includes, and is not limited to:

- New construction that is thoughtfully designed to bring a collegiate ambiance to campus.
- Revitalize connections to develop new and existing outdoor spaces.
- Removal of aged relocatable classrooms
- Streamline maintenance and operations.
- Athletic upgrades to the track and field stadium with auxiliary support for sporting events.

The performance goals of this major modernization project are to advance the campus closer to LAUSD's 30 percent greening resolution and meet the standards set forth by Los Angeles Unified School District – School Design Guide 2023 Section 2.4.B.1.a, which states "All new schools and new occupied and conditioned

[19] Los Angeles Unified School District. November 15, 2022 Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

buildings on existing campuses shall, at a minimum qualify as a CHPS project as defined in the current version of CHPS 'Best Practices Manual Volume III, Criteria."[20]

# 3.2 PROPOSED PROJECT

The proposed Project involves building replacement, renovation, modernization, and reconfiguration on the campus as part of the SUP. The scope consists of the modernization of the approximately 21.38 acres of the Canoga Park Senior HS campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA educational specifications. Inadequate buildings would be demolished and replaced by new buildings that would improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades including new exterior paint, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements. A total of 12 classrooms would be demolished as part of the Project and this same number would be constructed, leaving the number of classrooms unchanged at 78.

## 3.2.1 Campus Improvements

The proposed Project would include the changes to the Campus Buildings shown in **Table 2: Proposed Project (Demolition, Remodel, and Construction)**, **Figure 5: Proposed Project Site Plan**, and **Figure 6: Site Demolition Diagram.**

*Demolition and Removal*

The proposed Project includes the demolition of fifteen buildings. These buildings include the cafeteria, the weight room, seven classroom buildings (containing a total of 12 classrooms), two storage buildings, three restroom/multipurpose buildings, and one ticket booths, totaling 43,111 square-feet of demolished structures. Four of the classroom buildings (containing 2 classrooms each) are portable and would be continued to be used during construction. Once new buildings are ready for occupancy they would be demolished. Eight portable units containing classrooms and other facilities would be brought on campus to accommodate students during Project activity. In addition to removal of the structures, the promenade pavement, and paving surrounding the cafeteria and other buildings in the main campus would be removed. The parking lot off of Topanga Canyon Boulevard and the most northern athletic area would be resurfaced, which may require pavement removal as well.

*New Construction*

The Project would result in the construction of three new buildings. The largest new structure would be the Hunter Student Union which would be placed in the center of campus approximately where the cafeteria previously stood. The building would be two stories tall and approximately 50,000 square-feet in size, containing the new cafeteria (kitchen, indoor and outdoor dining areas), 12 classrooms, a weight room, coach's office, special education support spaces, and a Wellness Center for students. The second building would be located near the southwest end of the main athletic field and contain event ticketing, home concessions, and restrooms,

[20] HMC Architects, Canoga Park Major Modernization Criteria Documents, September 2023.

along with maintenance and operations spaces, and a facility manager office. The third building would be located near the southeast end of the main athletic field and contain restrooms and visitor concessions.

*Campus Upgrades*

In addition to the new construction there would be various upgrades throughout much of the campus. All buildings on campus, including those outside of the defined development zone, would receive new exterior paint. The main athletic field would be resod, and the surrounding decomposed granite track would be replaced with a synthetic surface track. New field sports competition areas (Shot Put, Long Jump, and High Jump) would be installed north of the athletic field, and the irrigation system would be replaced. In addition, the athletic field bleachers would be updated for Americans with Disabilities Act (ADA) compliance and a new LED scoreboard would be installed. The promenade would be remade with new hardscaping and landscaping, and hardscaping and landscaping around the new Hunter Student Union would be updated, as well as areas north and south of the main athletic field. The parking lot off of Topanga Canyon Boulevard would be resurfaced as would the northernmost athletic area. Decorative screening would also be incorporated to visually separate the athletic field bleachers from the rest of the campus, and to visually obscure the boiler room located near the center of the campus.

Specifically, the proposed Project would include the changes to the Campus Buildings shown in **Table 2: Proposed Project Demolition, Remodel and New Construction**, and **Figure 5: Proposed Project Site Plan.**

**Table 2**
**Proposed Project (Demolition, Remodel, and Construction)**

| Bldg. No. | Building | Demolition | Remodel/ Modernization | New Construction | Existing to Remain |
|---|---|---|---|---|---|
| 20210 | Storage Building | 1,048 | | | |
| 20570 | Classroom | 864 | | | |
| 20284 | Bleachers No. 1 | | 1,752 | | |
| 20644 | Bleachers No. 2 | | 1,777 | | |
| 20643 | Bleachers No. 3 | | 2,013 | | |
| 20656 | Bleachers No. 4 | | 3,332 | | |
| 20744 | Parent Center | 861 | | | |
| 20756 | Storage and Restroom | 846 | | | |
| 20915 | Classroom | 884 | | | |
| 20936 | Storage | 360 | | | |
| 21455 | Storage and Restroom | 871 | | | |
| 22637 | Cafeteria | 22,361 | | | |
| 23125 | Restrooms, Office, and Storage | 954 | | | |

**Table 2**
**Proposed Project (Demolition, Remodel, and Construction)**

| Bldg. No. | Building | Demolition | Remodel/ Modernization | New Construction | Existing to Remain |
|---|---|---|---|---|---|
| 23422 | Classroom | 1,492 | | | |
| 24143 | Classrooms | 1,856 | | | |
| 24253 | Classrooms | 1,922 | | | |
| 24268 | Weight Room | 4,989 | | | |
| 24423 | Classrooms | 1,876 | | | |
| 24446 | Ticket Booth | 44 | | | |
| 25655 | Classroom | 932 | | | |
| 26321 | Classroom | 910 | | | |
| **New Building Construction** | | | | | |
| | New Classrooms | | | 15,811 | |
| | Support Facilities | | | 4,041 | |
| | Athletic Field Facilities | | | 3,869 | |
| | Cafeteria and Support Facilities | | | 31,575 | |
| | Maintenance and Operations | | | 3,087 | |
| | **Campus Total*** (does not include outdoor space) | 43,070 | 8,874 | 58,383 | 240,791 |

Note: All numbers are in square feet. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS.
* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Canoga Park High School Major Modernization Project – Space Program. October 10, 2023.
Current total square footage = Existing + Remodel + Demolition (292,732). After Project square footage = Existing + Remodel + New (308,049). Increase in campus square footage = 15,317 sq ft

## 3.2.2 Site Access, Circulation, and Parking

The single vehicular entrance for the interior of the campus is located on Vanowen Street which leads to a central promenade that runs north-south between the athletic field and the majority of the buildings. This is used for service vehicle access and parking for staff and students. There is a parking lot off of Vanowen Street next to Assembly Hall with its own entrance, just west of the main vehicular entrance, and another parking lot off of Topanga Canyon Boulevard south of the basketball courts there. The western corner areas both have their own vehicular entrances and parking spaces. Vehicular drop off/pickup occurs on Vanowen Street and Topanga Canyon Boulevard near the entrance into the campus interior on Vanowen and near the parking lot on Topanga. Bus drop off/pickup occurs on Topanga Canyon Boulevard in front of the main campus entrance. See **Figure 7: Existing Campus Circulation.**

# 3. Project Description

Campus pedestrian and vehicular entryways would remain the same and drop off/pickup points would remain unchanged. Parking would remain in the same locations though spaces would be increased along the central promenade, and potentially increased in the lot accessed from Topanga Canyon Boulevard. Internal circulation would be updated through the landscaping and hardscaping work described previously. The central promenade would be straightened, widened, and landscaped, as buildings previously within the path would be removed. Parking spaces would be increased along the promenade, but access to service vehicles would be reduced as much as possible. New hardscape treatment and landscaping is intended to orient the space toward pedestrians.

## Landscaping

The amount of landscaping within the campus would be expanded, and current (largely asphalt) hardscaping along the promenade and around the center of the campus would be removed and replaced. The intent is to reduce the use of asphalt in these areas as much as possible and utilize architectural pavers or colored concrete to define spaces and add interest.

Hardscaping and landscaping surrounding the Hunter Student Union building would be updated with the intention to remove asphalt and incorporate pavers or decorative concrete, along with outdoor furniture and landscaping to facilitate outdoor learning. The two quads would be refreshed with new landscaping, and the central quad would receive updates to create an outdoor learning space. The area north of the main athletic field would receive new landscaping, and the area south of the field would receive landscaping and hardscape for outdoor learning. See **Figure 8: Proposed Landscaping.**

Trees would be preserved in place wherever practicable and have been cataloged in the Arborist Report from Carlberg Associates, attached as **Appendix B**. Unhealthy, degraded trees within the development zone (graded C or less by the arborist) would be removed if it's determined they cannot reasonably be saved, as would trees within the proposed development footprint. A total of seven trees within grading areas would be removed, and up to six unhealthy trees would be removed. One of the unhealthy trees is a Toyon (*Heteromeles arbutifoli,* Tree #67). Per the LAUSD Tree Trimming and Removal Procedure guidelines, "protected" shrubs include Toyon, if they measure 4 inches or more in cumulative diameter at 4.5 feet above ground level at the base of the tree and were not grown as part of a tree planting program.[21] As required by the LAUSD tree trimming and removal procedure guidelines, Tree #67 may be relocated or removed subject to submittal of a Tree Removal Application and approval by the Director of OEHS and replacement equivalent to the City of LA Tree Preservation Ordinance requirements. Other removed trees would also by subject to the District's policies. Most of these trees are identified as "significant" in the Arborist Report. This designation is relevant to certain Los Angeles City community plans and often included in tree reports prepared within the City. The designation is not relevant to the Project as there are no special provisions in the Canoga Park -Winnetka – Woodland Hills – West Hills Community Plan for it, and so it has no bearing on CEQA significance. These trees and other removed trees would be replaced at a 1:1 ratio with 24" box specimens. Wood from felled trees would be used whenever practicable to create exterior furniture to be placed on campus.

[21] Los Angeles Unified School District Office of Environmental Health & Safety. Revised April 24, 2023. Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

The existing irrigation system in the central campus would be upgraded to comply with current Model Water Efficient Landscape Ordinance (MWELO) and CalGreen standards. New landscaping would be designed to integrate with the existing, retained landscaping, and plant selection would be made with maintenance, longevity, and drought tolerance as key considerations. Pedestrian areas would be planted with species that can withstand foot traffic and active uses, while perimeter planting would consist more of plants that require little maintenance.

### 3.2.3 Construction Phasing and Equipment

According to the Canoga Park Major Modernization Criteria Documents[22] ("Criteria Documents"), demolition is planned to start in the fourth quarter of 2025 and construction is estimated to be completed by the fourth quarter of 2029 (approximately 52 months). LAUSD modernization projects proceed in phases according to the procurement and planning requirements of the District. At this stage it has been determined what work would occur, what facilities would be upgraded, and what buildings would be replaced. Completion of final site, landscape, and architectural plans will not be completed until the design-build phase, which occurs after environmental review via a Request For Proposals process, and requires approval by the LAUSD Board of Education. As there is no contractor attached to the Project at this time, the precise sequencing of demolition, grading, and construction cannot be determined. Project construction was broken into two phases for analysis purposes in order to produce conservative estimates as emissions decrease as the phasing schedule time increases, due to construction activities being drawn out over a longer time period.

The estimated construction equipment list in **Table 3: Construction Schedule and Equipment,** has been created by the California Emissions Estimator Model (CalEEMod), a Statewide land use emissions computer model, developed for the California Air Pollution Officers Association, and is the same for both modeled phases except where noted. The schedules either reflect default assumptions in CalEEMod or adjusted durations to meet the overall 52-month timeline specified in the Criteria Documents. Any deviations from defaults are justified in the CalEEMod output reports (see Section 4.III).

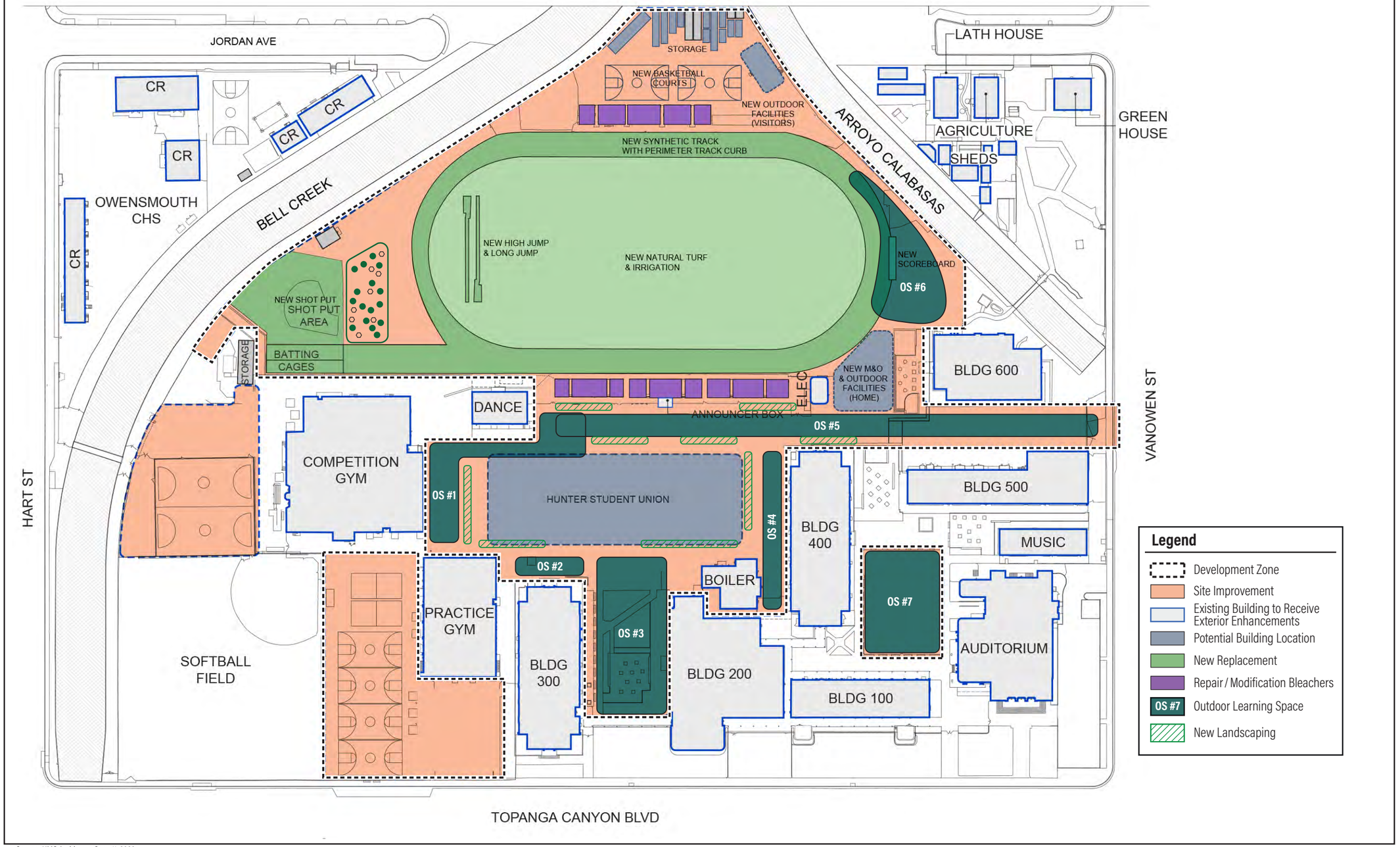
[22] HMC Architects, Canoga Park Major Modernization Criteria Documents, September 2023

# 3. Project Description

**Table 3**
**Construction Schedule and Equipment**

| Phase | Schedule | Equipment | Number |
|---|---|---|---|
| Demolition | Phase 1 12/25-2/26 Phase 2 4/27-5/27 | Concrete/Industrial Saws | 1 |
| | | Excavator | 3 |
| | | Rubber Tired Dozer | 2 |
| Grading | Phase 1 2/26-2/26 Phase 2 5/27-5/27 | Excavator | 1 |
| | | Grader | 1 |
| | | Rubber Tired Dozer | 1 |
| | | Tractors/Loaders/Backhoes | 3 |
| Building Construction | Phase 1 2/26-2/27 Phase 2 6/27-4/28 | Cranes | 1 |
| | | Forklifts | 3 |
| | | Generator Sets | 1 |
| | | Tractors/Loaders/Backhoes | 3 |
| | | Welders | 1 |
| Paving | Phase 1 7/26-12/26 (overlaps with construction) Phase 2 4/28-5/28 | Pavers | 2 |
| | | Paving Equipment | 2 |
| | | Rollers | 2 |
| | | Cement and Mortar Mixers* | 2 |
| | | Tractors/Loaders/Backhoes* | 1 |
| Painting | Phase 1 2/27-4/27 Phase 2 5/28-6/28 | Air Compressors | 1 |

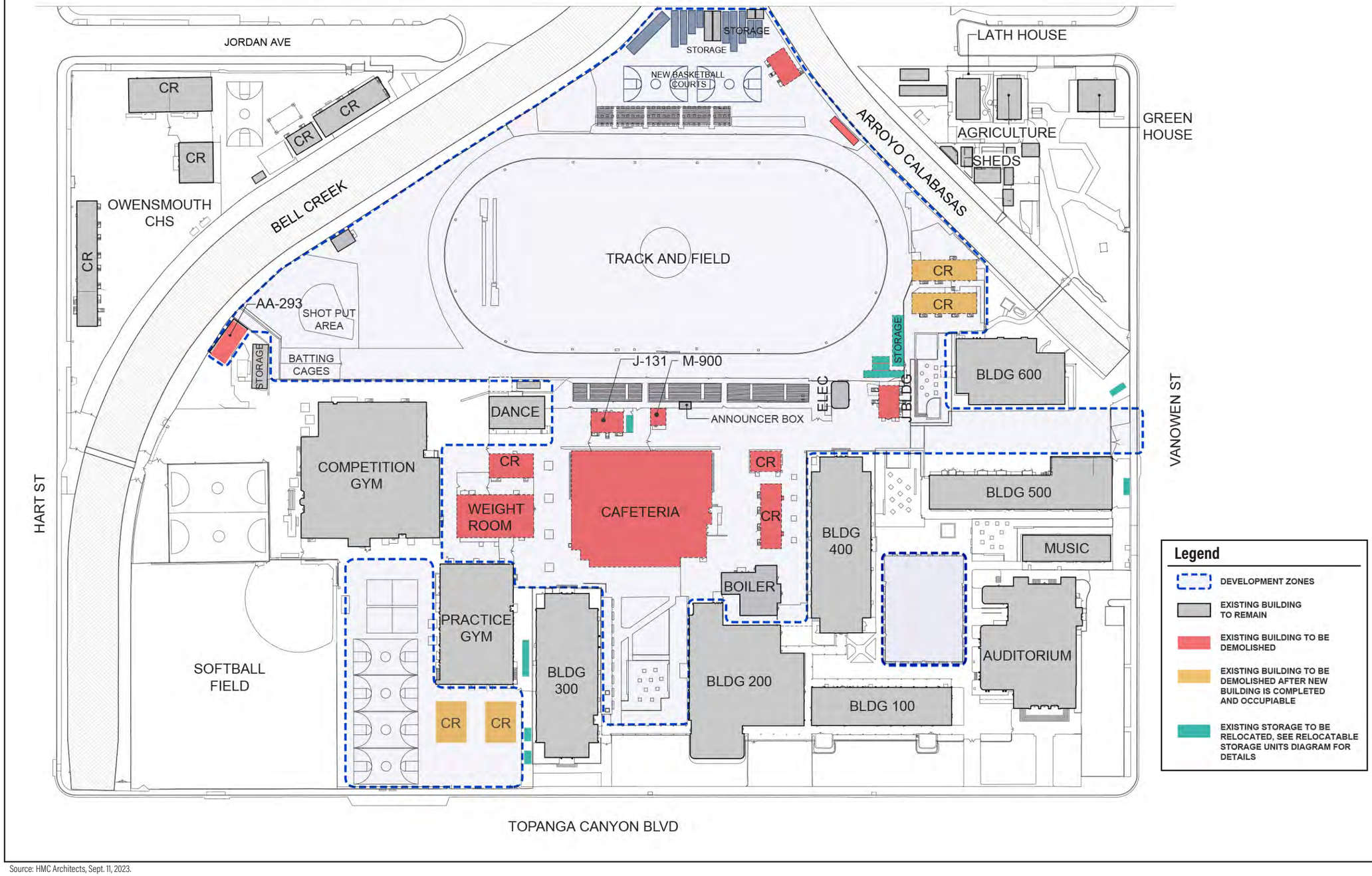
*Phase 1 only
Source: CalEEMod output report, Appendix A



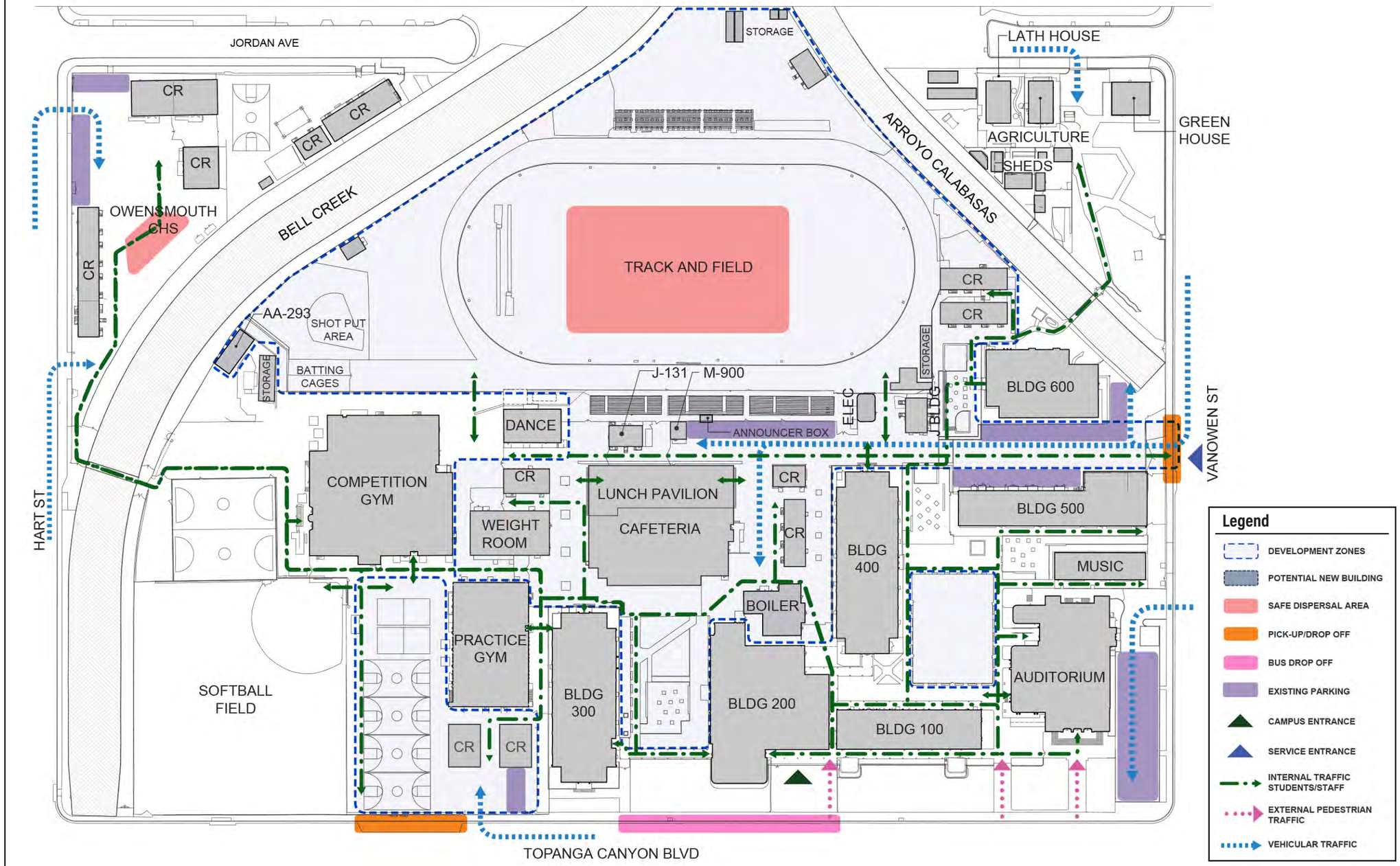

Source: HMC Architects, Sept. 11, 2023.



# Proposed Project Site Plan



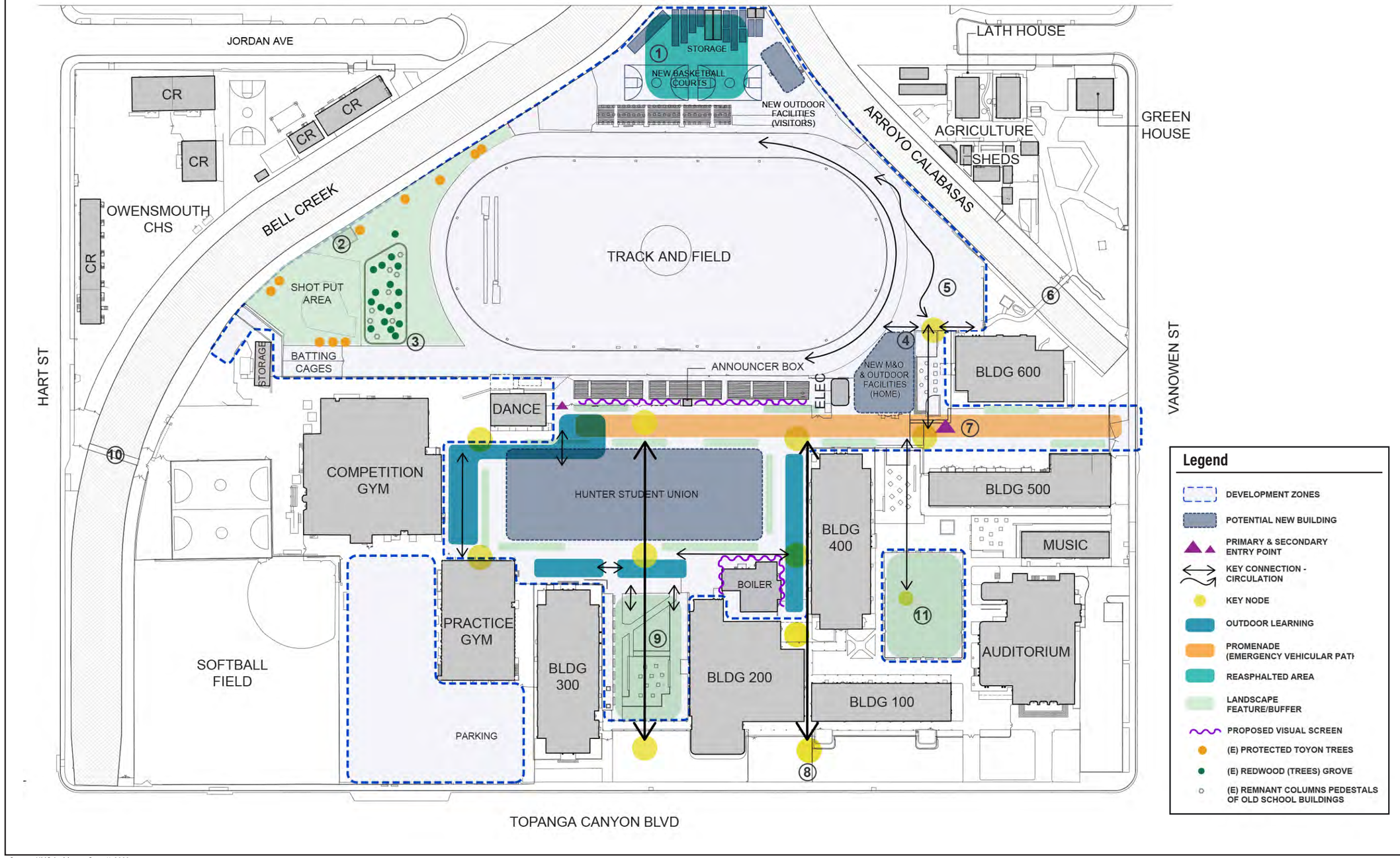

Source: HMC Architects, Sept. 11, 2023.




Source: HMC Architects, Sept. 11, 2023.



# Existing Campus Circulation




Source: HMC Architects, Sept. 11, 2023.

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# 4. Environmental Checklist and Analysis

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

## DETERMINATION

**On the basis of this initial evaluation:**

☒ I find that the proposed Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

## 4. Environmental Checklist and Analysis

Signature

02/12/24

Date

Carlos A. Torres

Printed Name

CEQA Officer for LAUSD

Title

# 4. Environmental Checklist and Analysis

## EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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# 4. Environmental Checklist and Analysis

## ENVIRONMENTAL IMPACTS

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

### Explanation:

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-AE-1 | LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design.<br><br>**School Design Guide[23]**<br>This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community. |
| SC-AE 2 | LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. |

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| | **School Design Guide**<br>This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc. |
| SC-AE 3 | LAUSD shall assess the proposed project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings. |
| SC-AE 5 | LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.<br><br>**School Design Guide**<br>This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties. |
| SC-AE 6 | The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:<br>▪ Limit the amount of light that can be used.<br>▪ Minimize glare by controlling the amount of light that tends to create glare.<br>▪ Minimize sky glow by controlling the amount of uplight.<br>▪ Minimize the amount of off-site impacts or light trespass |

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

**No Impact.** The SPEIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas.[24] This remains true for the proposed Project as the Project site and surrounding areas are flat and new construction is located within the interior of the campus, exceeding no more than two stories in height, similar to existing structures on campus. Per Table 5.1-2 of the SPEIR the nearest scenic vista to the Project site that could potentially be viewed from the campus are the Santa Monica Mountains, part of the Santa Monica Mountains National Recreational Area. The mountains are approximately four miles south of the Project site and are only nominally visible from Topanga Canyon Boulevard and would not be visible from the campus. Therefore, there is no opportunity for the Project to impact any potential views from the surrounding public right of ways and no impacts to scenic vistas would occur.

[24] *Subsequent Program EIR for the School Upgrade Program, Section 5.1. 2023*. http://achieve.lausd.net/ceqa

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

**No Impact.** The closest scenic highway to the Project is the 101 Freeway beginning at Topanga Canyon Boulevard approximately 1.6 miles south of the Project site which is considered eligible for designation. The nearest officially designated highway is a portion of State Route 27, Topanga Canyon Boulevard, approximately eight miles south of the site.[25] The Project is not close enough to either location to have any impact on scenic resources considered part of it and therefore there would be no impacts.

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

**No Impact.** The Project site is within an urbanized area and the new construction is occurring within the interior of the campus. The new Hunter Student Union building would be the most substantial change to the site and would only be minimally visible from surrounding public right of ways, if at all. Existing buildings would be given new exterior paint in shades matching or similar to existing shades, and the promenade would be given new hardscape and landscape treatments. These would be the most visible changes to the campus from public streets and there are no applicable zoning or other regulations concerned with scenic quality these changes would conflict with. In addition, SC-AE-1 through SC-AE-3 require the design of new campus features to consider aesthetic compatibility with existing campus buildings and the character of the surround community. This should ensure the aesthetic impression of the Project as viewed from public streets would be a visual refresh of the campus which would be beneficial to overall scenic quality, and there would be no impacts.

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

**Less Than Significant Impact.** Lighting on campus would remain similar to existing lighting. Apart from lighting on new buildings and some lighting for outdoor learning areas, the lighting scheme for the campus would remain largely unchanged. Lighting for new construction and site work would be located in the interior of the campus, any additional lighting changes would amount to the replacement of existing lighting. All lighting is subject to SC-AE-5 and SC-AE-6 which are designed to ensure that lighting does not result in substantial light or glare, therefore, impacts would remain less than significant.

[25] CalTrans California State Scenic Highway System Map, Accessed October 17, 2023 at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

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

## Explanation:

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

**No Impact.** The Project is a modernization of Canoga Park High School which is located in Urban and Built-Up Land.[26] There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the campus. As such, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

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

**No Impact.** The Project site is zoned PF-1XL-RIO and is designated as Public Facilities land use. The Project site is not designated for agricultural production and as stated above, has no farmland on site. Additionally, the

[26] California Department of Conservation, California Important Farmland Finder, accessed on August 16, 2023 at: https://maps.conservation.ca.gov/dlrp/ciff/

# 4. Environmental Checklist and Analysis

Project site is not designated in a Williamson Act contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract; as such, there is no impact.

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

**No Impact.** The Project site is zoned PF, public facilities, and is designated as a Public Facilities land use. The Project site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. No impacts would occur.

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

**No Impact.** As stated above, the Project site is not zoned as forest land, so no impacts to forestland would occur.

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

**No Impact.** The existing land uses surrounding the Project site include single- and multi-family residences and commercial land uses. There are no land uses within the vicinity that are utilized for agricultural or forest uses. As such, there would be no impact to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use**.**

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

**III. AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

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

Would the project:

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

### Explanation:

The following air analysis draws on information contained in the Air Quality and Greenhouse Gas Emissions Background and Modeling Data (emissions appendix), attached as **Appendix A.** Emissions estimates are produced by Envicom Corporation using the California Emissions Estimator Model (CalEEMod). The emissions appendix includes all air quality regulatory setting and existing conditions information relevant to this section, as well as the output reports from CalEEMod.

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

| **LAUSD Standard Conditions of Approval** | |
|---|---|
| SC-AQ 2 | Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment. |
| SC-AQ 3 | ▪ Construction Contractor shall:<br>▪ Maintain speeds of 15 miles per hour (mph) or less with all vehicles.<br>▪ Load impacted soil directly into transportation trucks to minimize soil handling.<br>▪ Water/mist soil as it is being excavated and loaded onto the transportation trucks.<br>▪ Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.<br>▪ Minimize soil drop height into haul trucks or stockpiles during dumping.<br>▪ During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. |

# 4. Environmental Checklist and Analysis

| | |
|---|---|
| | ▪ Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.<br>▪ Place stockpiled soil on polyethylene sheeting and cover with similar material.<br>▪ Place stockpiled soil in areas shielded from prevailing winds. |
| SC-AQ-4 | LAUSD shall analyze air quality impacts:<br>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.<br>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.<br><u>Exhaust Emissions</u><br>▪ Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).<br>▪ Consolidate truck deliveries and limit the number of haul trips per day.<br>▪ Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.<br>▪ Employ high pressure fuel injection systems or engine timing retardation.<br>▪ Use ultra-low sulfur diesel fuel, containing 15 parts per million (ppm) sulfur or less (ULSD) in all diesel construction equipment.<br>▪ Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower.<br>▪ Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.<br>▪ Use electrical power rather than internal combustion engine power generators.<br>▪ Use electric or alternatively fueled equipment, as feasible.<br>▪ Use construction equipment with the minimum practical engine size.<br>▪ Use low-emission on-road construction fleet vehicles.<br>▪ Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.<br><u>Fugitive Dust</u><br>▪ Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).<br>▪ Replace ground cover in disturbed areas as quickly as possible.<br>▪ 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).<br>▪ 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.<br>▪ Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.<br>▪ Pave all unimproved construction access roads for at least 100 feet from the main road to the project site.<br>▪ Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.<br>▪ Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). |

| | |
|---|---|
| | ▪ Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.<br>▪ Limit traffic speeds on unpaved roads to 15 mph or less.<br>▪ Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.<br>▪ Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.<br>▪ Limit the amount of daily soil and/or demolition debris loaded and hauled per day.<br>▪ General Construction<br>▪ Use ultra-low volatile organic compounds (VOC) or zero-VOC surface coatings.<br>▪ Phase construction activities to minimize maximum daily emissions.<br>▪ Configure construction parking to minimize traffic interference.<br>▪ Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).<br>▪ Prepare and implement a trip reduction plan for construction employees.<br>▪ Implement a shuttle service to and from retail services and food establishments during lunch hours.<br>▪ Increase distance between emission sources to reduce near-field emission impacts. |

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

**Less Than Significant Impact.** The South Coast Air Quality Management District's (SCAQMD) 2022 Air Quality Management Plan (AQMP) is the area's applicable air quality plan. The AQMP demonstrates attainment of national Ambient Air Quality Standards (AAQS) and provides control strategies for pollutants in nonattainment in order to reduce air pollution year over year until attainment is reached, as applicable. The Project could conflict with the AQMP if it significantly deviated from the projected growth estimates and land use assumptions that underline the pollution control measures developed in the AQMP. As the Project does not increase enrollment capacity, there would be no deviation from the growth estimates or land use assumptions that underlie the pollution control measures of the plan, and there would be no conflict in that regard.

However, a project's consistency with the AQMP is primarily based upon its consistency with SCAQMD's project impact evaluation thresholds. The SCAQMD significance thresholds were established to assess impacts of project-related criteria pollutant emissions. Non-exceedance of these thresholds demonstrates consistency with the AQMP and a less than significant CEQA impact; exceedance would represent a conflict with the AQMP.

As the amount of a secondary pollutant that may result from a project cannot be quantified by direct measurement of its emissions from a source, the SCAQMD has designated significant emissions levels of precursor components as surrogates for evaluating whether a project's emissions could result in significant regional air quality impacts associated with secondary pollutants. Projects with daily emissions that exceed any of the emission thresholds shown in **Table III-1, SCAQMD CEQA Daily Emissions Thresholds**, are recommended by the SCAQMD to be considered significant under CEQA.

# 4. Environmental Checklist and Analysis

**Table III-1**
**SCAQMD CEQA Daily Emissions Thresholds**

| Pollutant | Construction | Operations |
|---|---|---|
| Reactive Organic Gasses (ROG) | 75 | 55 |
| Oxides of Nitrogen ($NO_X$) | 100 | 55 |
| Carbon Monoxide (CO) | 550 | 550 |
| Particulate Matter (PM-10) | 150 | 150 |
| Particulate Matter (PM-2.5) | 55 | 55 |
| Sulfur Oxides ($SO_X$) | 150 | 150 |
| Source: SCAQMD CEQA Air Quality Significance Thresholds. Revision March 2023. | | |

## CONSTRUCTION ACTIVITY IMPACTS

The proposed project's estimated construction emissions were modeled using CalEEMod Version 2022.1.1.20 to identify maximum daily emissions for each pollutant during project construction. The California Emissions Estimator Model (CalEEMod) is a Statewide land use emissions computer model, developed for the California Air Pollution Officers Association, designed to provide a uniform platform to quantify criteria pollutant and carbon emissions associated with construction and operations from a variety of land use projects. Construction emissions for a project are modeled based upon inputs of lot acreage, the proposed building's square footage by use, number of parking spaces, the amount of soil to be imported or exported, and other variables. Maximum daily pollutant emissions from construction activities include emissions from worker trips, hauling trips, construction vehicle emissions and fugitive dust from site preparation, grading, paving, building construction, and architectural coating phases. The output reports from CalEEMod are included in Appendix A.

LAUSD modernization projects proceed in phases according to the procurement and planning requirements of the District. At this stage it has been determined what work would occur, what facilities would be upgraded, and what buildings would be replaced. Completion of final site, landscape, and architectural plans will not be completed until the design-build phase, which occurs after environmental review via a Request For Proposals process, and requires approval by the LAUSD Board of Education. Demolition is planned to start in the fourth quarter of 2025 and construction is estimated to be completed by the fourth quarter of 2029 (approximately 52 months). As there is no contractor attached to the Project at this time, the precise sequencing of demolition, grading, and construction cannot be determined. Project construction was broken into two phases for analysis purposes in order to produce conservative estimates as emissions decrease as the phasing schedule time increases, due to construction activities being drawn out over a longer time period.

These two phases were developed as follows:

- Phase 1 includes:
    - Demolition of all structures except for the four portable buildings that would continue to be used and the restroom building on the eastern boundary of the site; and demolition of the promenade and all asphalt west of the promenade, with the exception of the areas that would stage portables adjacent to the competition and practice gyms.

- Construction of the new Student Union building, the promenade, and all flat work and landscaping in both quads and those surrounding areas (not including the staging area for portables.)

- Phase 2 includes:
  - Demolition of the portable buildings and the easternmost restroom; demolition of the existing track surface, and demolition of all remaining asphalt surfaces scheduled for such.
  - Construction of the new athletic field buildings, the new track surface, remaining asphalt and flatwork, and new landscaping, including resodding of the athletic field.

These phases are not meant to predict actual construction phasing but rather to create a more conservative emissions profile for the Project in a good-faith effort to disclose any potential air quality impacts. By dividing the Project into two phases the timelines for each stage (demolition, grading, construction, paving, painting) are compressed. This would result in more conservative emissions estimates than using just one model with a total project timeline of 52 months. The estimated construction equipment list is presented in Section 3, Table 3: Construction Schedule and Equipment.

The amount of soil exported from the site during grading is estimated at 400 cubic yards for each phase (800 cubic yards total). This is a conservative estimate that may be more than twice the amount eventually removed and imported to the site. The geotechnical evaluation of the site (see Section VII) found primarily native soils in test borings and very little fill, and determined the native soils would not need to be supplemented by engineered fill. The Phase II ESA (see Section IX) determined an estimated 273 cubic yards of soil on site is contaminated and must be removed. As that soil must be replaced it is certain that 273 cubic yards of soil must be exported and another 273 cubic yards of soil imported. Although it appears fill replacement should result in minimal additional soil import/export, a conservative total figure of 400 cubic yards per phase was chosen for the emissions model. In this way a worst-case scenario of all import/export activities occurring at once is accounted for in both phases.

The project's estimated maximum daily construction emissions, as calculated by CalEEMod, are listed in **Tables III-2, Maximum Daily Construction Emissions-Phase I and Table III-3, Maximum Daily Construction Emissions-Phase 2**. All construction grading projects in the South Coast Air Basin (SoCAB) must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Best Available Control Measures for all fugitive dust sources. SC-AQ2, SC-AQ-3, and SC-AQ-4 enforce this condition and also require more preventative measures than required by law, such as requiring Tier-4 construction equipment which reduces emissions, particularly particulate emissions, scheduling construction traffic to avoid peak hours, and limiting speeds of 15 mph or less in all instances.

As seen in the tables below, peak daily construction activity emissions of criteria air pollutants are estimated to be far below the SCAQMD thresholds of significance. Therefore, as Project construction would not violate SCAQMD thresholds, construction of the Project does not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

**Table III-2**
**Maximum Daily Construction Emissions- Phase 1**

| | ROG | $NO_X$ | CO | $SO_2$ | PM-10 | PM-2.5 |
|---|---|---|---|---|---|---|
| | (pounds per day) | | | | | |
| **Maximum Daily Construction Emissions** | 17.4 | 7.6 | 29.9 | <0.1 | 3.2 | 1.5 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? Yes/No | No | No | No | No | No | No |
| Source: CalEEMod Version 2022.1.1.20 output, October 26, 2023. Maximum for Summer or Winter, whichever is greater. Estimates include compliance with SCAQMD Rule 403 – Fugitive Dust, and Tier 4 construction equipment per SC-AQ-4 | | | | | | |

**Table III-3**
**Maximum Daily Construction Emissions- Phase 2**

| | ROG | $NO_X$ | CO | $SO_2$ | PM-10 | PM-2.5 |
|---|---|---|---|---|---|---|
| | (pounds per day) | | | | | |
| **Maximum Daily Construction Emissions** | 5.6 | 5.6 | 19.5 | <0.1 | 3.1 | 1.5 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? Yes/No | No | No | No | No | No | No |
| Source: CalEEMod Version 2022.1.1.20 output, October 26, 2023. Maximum for Summer or Winter, whichever is greater. Estimates include compliance with SCAQMD Rule 403 – Fugitive Dust, and Tier 4 construction equipment per SC-AQ-4. | | | | | | |

### OPERATIONAL IMPACTS

Operational emissions were not calculated as the Project is a continuing use with no net change in activities or in student enrollment. Operational emissions that would be subject to CEQA review would only include post-Project emissions above existing emissions. That is, existing emissions would be subtracted from post-Project emissions, and only the remaining operational emissions would be considered for potential impacts according to the thresholds listed in Table III-1.

As there is no change in the land use of the Project, no increase in enrollment, and no new additional stationary sources of emissions being added, there would be no significant change in project operational emissions. In fact, because several older buildings are being replaced with fewer new and more efficient buildings, operational emissions may be reduced from existing levels. According to the Phase I ESA (Appendix F, see Section IX), the cafeteria and nearby buildings scheduled for demolition were built between 1954 and 1968. These buildings, as well as four portable classrooms, would be replaced by the Hunter Student Union building. Prior to the Warren-Alquist Act of 1976, building energy efficiency standards were not uniform, or necessarily present, across California. The first uniform, consolidated standards were not in place until 1976.[27] The buildings being replaced by the Hunter Student Union building were built to lesser standards for insulation and glazing and overall energy and water efficiency than the new buildings would be. Each of these buildings required its own heating and cooling systems, and the combined envelope of all of the exterior walls and fenestration of each would create significant inefficiencies for climate control compared to a single, modern building. The Hunter

[27] California Energy Commission, 2022 Building Energy Efficiency Standards for Residential And Nonresidential Buildings, Abstract.

Student Union building would be subject to the standards in place at the time of its permitting, including the energy-efficient provisions of the current California Building Standards Code (Title 24), CHPS criteria, and applicable CALGreen (CCR Title 24, Part 11) mandatory measures.[80]. Generally, each promulgation of the Title 24 requirements focuses on reducing energy consumption per square foot of floor space, and SC-GHG-5 (See Section 4-VIII) requires new construction to arrive at an energy budget at least 10 percent (20 percent if possible) less than a design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards. Additionally, the new buildings would be designed with CHPS and LAUSD sustainability guidelines, such as utilizing all-electric Heating, Ventilation, and Air Conditioning (HVAC) and water heating systems, and new kitchen appliances will be all-electric according to the Criteria Documents. This would eliminate the onsite combustion of fossil fuels (natural gas) from older buildings which will decrease NOx, CO, and VOC emissions on campus. In addition, the Hunter Student Union building would be required by Title 24 to install a solar photovoltaic array, decreasing offsite energy consumption. These changes, therefore, would result in a decrease in onsite emissions associated with building use.

Other changes would also contribute to an overall reduction of emissions related to operation of the campus. For example, wherever asphalt is removed and replaced with concrete and/or landscaping it would contribute to decreasing the "heat island" effect, lowering ambient temperatures near buildings. And new irrigation systems would comply with MWELO requirements which would save water compared to the previous systems which likely were not subject to the MWELO. Reducing water use reduces offsite emissions because the delivery of water requires power. Mobile emissions would not substantially change because there would be no increase in enrollment capacity, and subsequently no changes that would induce an increase in trips associated with the school. With no substantial change in vehicle trips, no expansion of enrollment, and an increase in energy efficiency via the consolidation of older structures into fewer, more energy-efficient structures, it would not be possible for post-Project emissions, less existing emissions, to result in pollutant emissions above SCAQMD operational thresholds. Therefore, there is no conflict with the AQMP, and impacts would be less than significant.

This comports with the analysis in the SEIR which finds that modernization and upgrade projects would not result in significant impacts as: "no new vehicle trips would be generated and there would be no increase in mobile source emissions for these types of school project. Furthermore, building improvements could also result in increased energy efficiency thereby reducing emissions from energy usage (i.e., natural gas)."[28]

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

**Less Than Significant Impact.** As discussed above in III(a), the SCAQMD has designated significant emissions levels of precursor components as surrogates for evaluating whether a project's emissions could result in significant regional air quality impacts associated with secondary pollutants. Projects with daily emissions that exceed the emission thresholds in Table III-1 would be considered to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. As explained above, the Project would not violate any of the SCAQMD emissions thresholds, therefore, there would be no

[28] *Subsequent Program EIR for the School Upgrade Program, Impact 5.3-3. 2023*. http://achieve.lausd.net/ceqa

cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and impacts would be less than significant.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.**

### Construction Localized Significance Thresholds

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs are only applicable to the following criteria pollutants: $NO_X$, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

SCAQMD's LST screening tables provide thresholds for 25, 50, 100, 200 and 500-meter (m) source-receptor distances. For the purposes of CEQA LST analysis, the SCAQMD considers a sensitive receptor to be a receptor such as residence, hospital, convalescent facility where it is possible that an individual could remain for 24 hours.[29] Therefore, sensitive receptors would include the residences near the Project site, shown in Table 1. LST pollutant screening level concentration data is currently published for 1, 2, and 5-acre sites. The Project site is over 21 acres; however, the area of land disturbed in one day can be used to determine the acreage size for LST screening.[30]

The area of land disturbed in one day is a function of the type of equipment operating during a day and the maximum number of acres that equipment can disturb in one day. This is shown in Table G-14 of Appendix G of the 2022 CalEEMod User Guide, reproduced here:

| Equipment Type | Acres/8-Hour Day |
|---|---|
| Crawler Tractor | 0.5 |
| Grader | 0.5 |
| Rubber Tired Dozer | 0.5 |
| Scraper | 1.0 |
| Source: SCAQMD Construction Survey | |

CalEEMod assigns the same number and type of construction equipment to both Phase 1 and Phase 2 of the Project for demolition and grading. This equipment includes 1 Grader (0.5 ac), 1 Rubber Tired Dozer (0.5 ac), and 3 Tractors (0.5 ac x 3). Therefore, 2.5 acres is the maximum amount of disturbance within one day and as such the Project will be screened as a 2-acre site.

Allowed emissions in the LST screening tables increases as the size of the project site and source-receptor distance increases. Conversely, as the project site size and source-receptor distance decreases, allowable emissions are reduced, and the thresholds become more stringent. Phase 1 of Project construction would not

[29] SCAQMD, Final Localized Significance Threshold Methodology, Revised July 2008.
[30] SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds,

disturb any areas outside of the core of the campus which is far from any residential receptors. Phase 2 would disturb areas east of the athletic field and at the northern edge of the site, closer to receptors. Therefore, there is no need to perform an LST screening for Phase 1 as Phase 2 activity would be subject to stricter thresholds. The nearest sensitive receptor to areas that would be disturbed is the apartment building located at 6832 Jordan Avenue. Measured parcel-to-parcel all sensitive receptors are 60 feet from the campus, however, work would only be performed within the development zone as indicated on Figures 4 and 5. The apartment building is the sensitive receptor physically closest to the development zone, located approximately 85 feet from the zone as measured from the building itself. This distance is used for the LST screening as all other sensitive receptors are located further away and would be impacted less. This evaluation is based on estimated maximum daily onsite emissions for the construction phase representing the highest daily emissions.

**Table III-4, Local Significance Thresholds and Peak Daily Onsite Emissions** shows the relevant thresholds and the estimated peak daily onsite emissions during the construction phases that would generate the highest level of onsite emissions for each pollutant evaluated for LST impacts.[31] As previously described, the project would be required to implement adequate watering of exposed surfaces during grading to reduce dust emissions to comply with SCAQMD Rule 403, Fugitive Dust.

**Table III-4**
**Local Significance Thresholds and Peak Daily Onsite Emissions**

| Construction Year (Phase 2) | Maximum Daily Emissions (pounds/day)[a] | | | |
|---|---|---|---|---|
| | NOx | CO | $PM_{10}$ | $PM_{2.5}$ |
| 2027 | 4.5 | 18.2 | 2.8 | 1.4 |
| 2028 | 2.0 | 14.3 | <0.1 | <0.1 |
| **Construction LST** | **147** | **644** | **6** | **2** |
| **Exceeds LST Screening Level?** | **No** | **No** | **No** | **No** |

Source: CalEEMod Report October 26, 2023, Appendix A.
SCAQMD LST parameters: West San Fernando Valley, 2.0 acre site, 25 meter receptor distance.
Maximum emissions for on-site emissions only, reported for any construction phase in summer or winter season, whichever is greater.

As shown above, Project construction emissions would not exceed LST screening levels. The table illustrates maximum potential localized emissions, actual emissions are likely to be less given that construction equipment would only be active within 25 meters of the receptor for a short period of time. Potential localized impacts would therefore be less than significant.

An operational LST screening is unnecessary as the Project is a continuing use and, as explained previously, the Project would have various building code, CHPS and LAUSD sustainability measures, resulting (among other things), in a decrease in the amount of natural gas used onsite for heating and cooking, which would reduce the amounts of NOx, CO, and VOCs produced onsite.

### Carbon Monoxide Hotspots

Carbon Monoxide hotspots are potential localized CO concentrations from traffic at busy or congested intersections. In the 2003 AQMP, the SCAQMD provided an analysis of CO attainment within the Basin. CO

[31] Offsite construction emissions, such as export hauling, are not considered in local significance evaluations.

modeling was conducted for the four worst-case intersections within the Basin: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The SCAQMD's peak modeled 1-hour CO concentration at this intersection was 4.6 ppm, far below the 1-hour CO standard of 20.0 ppm. The SCAQMD determined the 1-hour standard would likely not be exceeded unless traffic at the intersection was above 400,000 vehicles per day. This demonstrated that despite the high amounts of traffic in the air basin, there were no "hot spots" anywhere in Southern California. Subsequently, there is no potential for a hot spot near the school. Regardless, the Project is a continuing use and is not adding any enrollment capacity, and therefore would not be expected to result in an increase of traffic at the nearby intersection. Therefore, the Project's contribution to any potential CO hotspot would be less than significant.

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

**Less Than Significant Impact.** Objectionable odors are typically associated with manufacturing, industrial, or sewage treatment processes, and typically are not associated with school sites. Nevertheless, the SCAQMD's rules for odor compliance are mandated under the California Health and Safety Code, Section 41700, and also addressed in SCAQMD Rule 402. This rule on Public Nuisance states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals."

During construction and operation of the project, trash receptacles would be covered and properly maintained in order to control odors, as required by law. There is a potential for some odors from the curing of asphalt or concrete, or from the application of paints, etc., to be present during construction, but these odors would be short-lived and temporary in nature and would dissipate away from the source. The implementation of SC-AQ-3 and SC-AQ-4, during construction activities would lower exhaust emissions and fugitive dust levels. The incorporation of SC-AQ-2 would mandate contractors to keep equipment properly tuned and thereby reduce harmful emissions and odors. Odors from landscaping equipment, such as lawnmowers and leaf blowers, would result from operation and maintenance activities of the proposed Project site, but would not change in comparison to the existing setting. Therefore, odor impacts of the project during construction and operation would be less than significant.

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

### Explanation:

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-BIO 1 | An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:<br>▪ United States Fish and Wildlife Service (USFWS)<br>▪ National Marine Fisheries Services (NMFS)<br>▪ California Department of Fish and Wildlife (CDFW)<br>▪ California Native Plant Society (CNPS) |

- County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.
- California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory
- Local Audubon Society
- Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
- California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites.

Biological Resources Report

If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.

| | |
|---|---|
| | ▪ Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.<br>▪ Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:<br>o Location of the mitigation site.<br>o Plant species to be used, container sizes, and seeding rates.<br>o Schematic depicting the mitigation area.<br>o Planting schedule.<br>o Irrigation method.<br>o Measures to control exotic vegetation.<br>o Specific success criteria.<br>o Detailed monitoring program.<br>o Contingency measures should the success criteria not be met.<br>o Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.<br><br>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats. |
| SC-BIO 2 | LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6. |
| SC-BIO 3 | LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates[32]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[33]<br><br>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat<br>▪ For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).<br>▪ If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being |

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

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

conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.

If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.

If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.

If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.

A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

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

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.
- The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager.
- If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.
- The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.
- No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.

Bat Surveys

- Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.
- Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of

| | |
|---|---|
| | structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.<br>▪ If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.<br>▪ Mitigation measures shall be determined on a project-specific basis and may include:<br>o Avoidance<br>o Humane exclusion prior to demolition<br>▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality<br>▪ Bats should be flushed from trees prior to felling or trimming.<br>Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife. |
| SC-BIO 4 | LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:<br><br>**New Construction in Native Habitat**<br>LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:<br>▪ **Translocation of rare plants is prohibited in most instances.** CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.<br>▪ **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.<br>▪ **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.<br>▪ **Creation of woodlands**. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.<br>o All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.<br>o Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period.<br>o Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. |

| | |
|---|---|
| | LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.<br><br>**Removal of Protected Trees on Existing Campuses**<br>LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances |
| SC-BIO-5 | LAUSD shall comply with CDFW recommendations:<br>▪ Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage.<br>▪ All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.<br>▪ A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition.<br>▪ Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors |

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

**Less Than Significant Impact.** The Project site and its surroundings have been developed with urban uses for many decades and there is no intact native habitat on site or in the immediate vicinity. Sensitive and special status wildlife species have specific habitat needs normally requiring intact native habitat. Vegetation that is present on site and in the immediate vicinity would not provide suitable habitat for federal, state, or locally protected special-status wildlife species. Without intact, native habitat on site there would also be no opportunity for special status plant species to be present.

However, trees protected by the LAUSD Tree Trimming and Removal Procedure guidelines are present on site, corresponding to trees protected by the Los Angeles Tree Preservation Ordinance (see Arborist Report, **Appendix B**). One protected tree within the development area would be removed, a toyon (*Heteromeles arbutifolia*) that has been determined to require removal due to poor health. SC-BIO-4 requires adherence to the LAUSD OEHS Tree Trimming and Removal Policy which will require submittal of a Tree Removal Application to remove this and other non-protected trees. The application requires approval by the Director of OEHS and would result in replacement (assuming relocation is not an option) equivalent to the City of LA Tree Preservation Ordinance requirements. As a protected species replacement would occur at a 4:1 ratio with minimum 15-gallon specimens, as per LAUSD guidelines which comport with the Los Angeles Tree Preservation Ordinance. With adherence to SC-BIO-4 and replacement conforming to the City Ordinance impacts remain less than significant to protected plant species.

Sensitive or special-status wildlife would normally not be expected to be present on site, however, the Project site is located at the confluence of the channelized Bell Creek and Arroyo Calabasas, which can be used by birds for foraging and travel, including potentially sensitive or special-status bird species, or species protected by the Federal Migratory Bird Treaty Act (MBTA). As sensitive or protected bird species may utilize the canals,

there is a possibility roosting or nesting could occur in trees located on site. SC-BIO-3 stipulates that if any disturbance of trees occurs during nesting or breeding season a qualified biologist with survey experience would conduct nesting bird surveys no more than three days before disturbance activities to determine if active nests are within or adjacent to the work area. If an active nest or protected species is observed the biologist shall establish an appropriate buffer zone around the area where no disturbance would be allowed, and conduct regular surveys until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Implementation of SC-BIO-3 would ensure no significant impacts to sensitive or special-status bird species, or species protected by the Federal MBTA, would occur, and impacts would be less than significant.

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

**No Impact.** Bell Creek is considered riverine habitat by the US Fish and Wildlife Service classified as R4SBCr, which is an intermittent, channelized wetlands habitat with an artificial substrate (concrete channel). Arroyo Calabasas is not considered riverine habitat where it travels adjacent to the Project site. Although the creek is classified as a wetland, there is no riparian habitat within the channel near the Project site as it is a concrete channel with squared sides designed to move floodwaters and there are no opportunities for habitat of any sort to establish or persist. The nearby Los Angeles River channel is also considered riverine habitat, but similarly it is a concrete channel designed to move floodwaters and there are no areas where riparian habitat to establish or persist. Occasionally soil and rock deposits may settle on the channel bottom and host opportunistic species, however, portions of the river that are completely channelized, as near the project site, are continually scoured by seasonal flooding and as such cannot host riparian habitat. Regardless, there is no work to be conducted as part of the Project that would disturb any of the channeled waterways.

The Project site is fully developed and landscaped and does not contain any sensitive natural plant communities. As mentioned above there are trees protected by the LAUSD Tree Trimming and Removal Procedure guidelines located on the Project site which are native species, including valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*) and toyon, however, these trees are individual specimens that are part of the landscaping and do not exist in a natural state that would constitute a sensitive natural community, such as oak an oak woodland. As such, there would be no impacts to riparian habitat or other sensitive natural communities.

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

**Less Than Significant Impact.** As described above, Bell Creek and the nearby Los Angeles River are considered riverine habitat, though both are contained within concrete channels in the vicinity of the Project site. There would be no direct removal, fill, or other disturbances to the channels, and no work would be conducted within the Bell Creek right of way. During construction the Project would be required to control stormwater runoff so that erosion is avoided and soil is not deposited into the channels (see Section X), and control of dust during ground-moving operations is required pursuant to SCAQMD Rule 403, and operations

of the school does not include activities that might result in the deposit of substantial amounts of soil or debris

into the channels. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** As described in part IV(a) above Bell Creek and Arroyo Calabasas may be used as a wildlife corridor for migratory birds, and in certain low-water conditions could be used for foraging by bird species, and as such there is the potential for trees on site to be used for nesting. Implementation of SC-BIO-3 would ensure no significant impacts to local native bird species or those protected by the Federal MBTA, would occur, and impacts would be less than significant.

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

**Less Than Significant Impact.** As discussed in part IV(a) the LAUSD Tree Trimming and Removal Procedure guidelines protect certain native tree species, including toyon (*Heteromeles arbutifolia*), one of which would likely be removed due to poor health. The guidelines requires replacement of the toyon at a 4:1 ratio which the Project will comply with. The guidelines comport with the Los Angeles Tree Preservation Ordinance, and there are no other local policies or ordinances protecting biological resources that would apply to the Project. Therefore, impacts would be less than significant.

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

**No Impact.** There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that would apply to the Project. There would be no impacts.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **V. CULTURAL RESOURCES:** Would the project: | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? | ☐ | ☐ | ☒ | ☐ |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? | ☐ | ☐ | ☒ | ☐ |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☒ | ☐ |

### Explanation:

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

| **LAUSD Standard Conditions of Approval** | |
|---|---|
| SC-CUL-2 | LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.<br><br>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.<br><br>General guidelines include:<br>▪ Retain and preserve the character of historic resources.<br>▪ Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.<br>▪ Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.<br>▪ Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.<br>Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments. |
| SC-CUL-3 | Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:<br>▪ Notation of the historic resource on construction plans. |

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|---|---|
| | ▪ Pre-construction survey to document the existing physical condition of the historic resource.<br>▪ Procedures and timing for the placement and removal of temporary protection features, around the historic resource.<br>▪ Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.<br>▪ Post-construction survey to document the condition of the historic resource after Project completion.<br>▪ Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan. |
| SC-CUL-5 | LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features. |
| SC-CUL-6 | LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.<br><br>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7. |
| SC-CUL-7 | The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.<br>▪ LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.<br>▪ The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.<br>▪ The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.<br>▪ If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.<br>▪ Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource.<br>▪ Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.<br>▪ The Archaeological Monitoring Plan shall include:<br>o Extent and duration of the monitoring based on the grading plans<br>o At what soil depths monitoring of earthmoving activities shall be required<br>o Location of areas to be monitored<br>o Types of artifacts anticipated<br>o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources<br>o Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources |

| | |
|---|---|
| | ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed.<br>○ Accommodation and procedures for Native American monitors, if required.<br>○ Procedures for discovery of Native American cultural resources.<br>▪ The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan. |
| SC-CUL-8 | Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed. |
| SC-CUL-9 | LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the Office of Historic Preservation. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program. |
| SC-CUL-10 | All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources. |

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

**Less Than Significant Impact.** Historic resources within LAUSD campuses have been surveyed and inventoried previously in 2001/2004 by the Getty Conservation Institute and again in 2013/2014 by Sapphos Environmental. The findings from both surveys are compiled in the LAUSD Historic Resources Survey Report, published in June 2014. The report notes that the auditorium (G. Walter Monroe Assembly Hall), built in 1938 by the Public Works Administration, is listed as an individual historic resource in the California Register (CR). No other buildings on site were found eligible, and the campus itself was not found eligible as an historic district.

The auditorium is listed in the Built Environment Resources Directory (BERD) of the California Office of Historic Preservation with a status of 2S2 (assigned in the 2004 survey) which indicates the building is listed in the CR and eligible for the National Register. No changes would be made to the auditorium save for new paint which would either be in the same colors and shade as the existing paint which would not amount to a change to the resource. If any repairs are needed or a different paint used, SC-CUL-5 would require a historic treatment plan that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards) to be approved by the LAUSD prior to any work performed. New paint on the auditorium therefore would not result in any substantial adverse change.

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The quad adjacent to the auditorium is receiving landscaping and hardscaping updates, and existing adjacent buildings would receive new paint which would either be the same color and shade or similar. These changes would not result in a substantial adverse change to the significance of the auditorium because the campus has changed dramatically over the life of the building and these changes have not affected the building's status. In 1978, the adjacent administrative building was constructed, as well as an addition to the north side of the auditorium, and neither change impacted the eligibility of the auditorium for listing in the CR. Regardless, SC-s CUL-2 and CUL-3 require that when work is performed adjacent to a historic resource, the Standards would be followed and a plan developed for protection of the resource. With implementation of the Standard Conditions there would be no substantial adverse change to the auditorium's significance and impacts would be less than significant.

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

**Less Than Significant Impact.** A Cultural Resources Phase I Assessment of the Project site was prepared by Envicom Corporation and is attached as **Appendix C.** The assessment requested a record search by the South Central Coastal Information Center (SCCIC) and the California Native American Heritage Commission (NAHC). Both searches examined the Project site plus 0.25-mile study area around the Project. The record search results from the SCCIC were received on August 20, 2023 and resulted in no previously identified cultural resources located within the Project property. Seven cultural resources were located within the 0.25-mile study area, but review of these reports did not identify any specific cultural resources of concern for the Project. Results from the 2023 NAHS record search were received on August 13, 2023 with negative findings. Examination of the State of California SCCIC database of previously identified cultural resources and the NAHC Sacred Lands database were both negative for cultural resources within the Project development site. Examination of historic maps and archival aerial photographs illustrated the built history of the site and as such the site would be considered sensitive for older historical cultural resources that could be encountered during Project grading and excavation.

The assessment concluded no further assessment of cultural resources was necessary but set forth recommendations for monitoring for potential archeological resources during project construction. SC-CUL-6 through SC-CUL-10 require the project to retain a qualified archeologist to produce an Archaeological Monitoring Program and follow standard procedures if a potential resource is unearthed. With the implementation of SC-CUL-6 through SC-CUL-10 the project would have a less than significant impact regarding the potential discovery archaeological resources.

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

**Less Than Significant Impact.** While there are no known human remains or formal cemeteries on site, the potential for inadvertent discovery of human remains is always a possibility, however unlikely. Compliance with California law would ensure impacts remain less than significant if remains are encountered. California Health and Safety Code Section 7050.5 requires construction to stop if human remains are found and for the County Coroner to be contacted for examination of the remains. The coroner has two days to examine the remains to determine if they are subject to their authority. If so the coroner determines what laws concerning examination and treatment the remains are subject to. If the coroner determines the remains are prehistoric they would contact the NAHC within 24 hours. Remains of prehistoric origin are subject to Public Resources Code, Section

5097–5097.6 wherein, within 48 hours, the NAHC makes a determination of Most Likely Descendant (MLD) and contacts a representative who would have 48 hours to inspect the site and make recommendations to the owner as to the treatment of the remains. Any disagreement between the MLD and the owner of the land is mediated by the NAHC. Compliance with these existing regulations would ensure that impacts to human remains would be less than Significant.

# 4. Environmental Checklist and Analysis

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **VI. Energy:** Would the project: | | | | |
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with or obstruct a state or local plan for renewable energy efficiency? | ☐ | ☐ | ☐ | ☒ |

## Explanation:

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

**Less Than Significant Impact.**

### Construction

During construction, the Project would use heavy-duty equipment associated with demolition, site preparation, grading, construction, paving, and architectural coating. Construction equipment used on the site would include excavators, graders, dozers, forklifts, tractors and the like, generally powered by diesel fuel, and diesel-powered trucks would largely be used for material and supplies deliveries. Worker vehicles would primarily be powered by gasoline, and electrical power would be used for certain types of construction equipment where applicable. SC-AQ-4 (see Section III) requires non-essential diesel engine idle time to be limited to no more than five minutes, and for the use electrical power rather than internal combustion engine power generators. However, energy calculations are made according to the CalEEMod models developed for the Project which favor the use of diesel powered equipment, which may result in conservative fuel use estimates.

According to carbon dioxide ($CO_2$) emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of $CO_2$ and burning one gallon of petroleum-based gasoline produces approximately 19.6 pounds of $CO_2$.[34] Based on the Project's construction-related $CO_2$ emissions, Project consumption of diesel and gasoline fuel during construction was calculated and is shown in **Table VI-1, Total Fuel Consumption During Project Construction**. The calculations are shown in the Construction Energy Worksheets provided in **Appendix D**.

[34] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

**Table VI-1**
**Total Fuel Consumption During Project Construction**

| Phase | Fuel Type | Total Gallons Consumed |
|---|---|---|
| 1 | Diesel | 53,911 |
| | Gasoline | 6,020 |
| 2 | Diesel | 33,782 |
| | Gasoline | 1,138 |
| | **Total Diesel** | **87,693** |
| | **Total Gasoline** | **7,158** |

Source: Construction Energy Worksheets, Appendix D

As shown above it is estimated that the Project's construction activities would consume a total of approximately 87,693 gallons of diesel fuel and approximately 7,158 gallons of gasoline. In 2015 two billion gallons of diesel, including off-road diesel, were sold in California,[35] and in 2021, 13.8 billion gallons of gasoline were sold.[36] As such, the use of fuels necessary for Project construction would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Electricity consumption associated with construction was also calculated for the Project. Although it's possible some construction equipment may be electric, CalEEMod calculations assume only diesel-powered equipment. Therefore, electricity consumption associated with the use of water for suppression of dust, and the potential use of a mobile construction office were estimated. The Air Pollution Engineering Manual from the Air & Waste Management Association (1992) calculates that each acre of graded land requires a total of 3,020 gallons of water to be applied for proper dust suppression. Per the CalEEMod Reports in Appendix A, Phase 1 of the Project would grade a total of nine acres, and Phase 2 a total of 15 acres. This would amount to 24 acres in total, requiring 72,480 gallons of water for dust suppression. As water would also be used to suppress dust from demolition activities, another two acres were added to the calculations to represent this water use, for a total of 78,520 gallons of water. According to CalEEMod each gallon of water distributed in Southern California is associated with 0.005306 kWh (kilowatt hours) of energy use. Water use for dust suppression would therefore amount to approximately 417 kWh of energy use.[37]

Energy use for a mobile construction office is estimated by using the CalEEMod land use of "mobile home park," which represents mobile home living units. One such unit at 1,300 square-feet is estimated to use 3,590 kWh a year. This is likely substantially more energy use than an actual construction office would use as construction offices are often smaller and not used outside of working hours. Regardless, for purposes of this estimate, if the model construction office were used for the entire four year extent of construction, energy use would amount to 14,360 kWh. Combined with the energy use associated with dust suppression, Project construction would consume 14,777 kWh, or 14.9 MWh (megawatt hours) of electricity. The Los Angeles

[35] California Energy Commission, Diesel Fuel Data, Facts, and Statistics, Accessed July 22, 2022 at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics#:~:text=Diesel%20fuel%20is%20the%20second,including%20offroad%20diesel%2C%20was%20sold.
[36] California Energy Commission, California Gasoline Data, Facts, and Statistics, Accessed July 22, 2022 at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics.
[37] See Construction Energy Worksheets, Appendix D

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Department of Water and Power (LADWP) supplies more than 24 million MWh/year of electricity to the City's residential and business customers.[38] Construction electricity demand would represent approximately 0.0006 percent of the yearly electricity demand, which is negligible in relation to the entire City's electricity demand.

Due to the temporary nature of construction and the necessity of fuel consumption inherent in construction projects, fuel and electricity consumption would not be excessive or substantial with respect to existing supply and demand. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient, or unnecessary consumption of energy. Therefore, the Project's potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operational energy use was not calculated as, explained in Section III, the Project is a continuing use with no increase in enrollment and older, less efficient buildings are being replaced by new, energy efficient buildings, as well as other changes that contribute to energy efficiency. Therefore, there would be no significant change in Project energy use, with the potential for energy use to be decreased, and the potential for impacts would be less than significant.

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

**No Impact.** The proposed Project is subject to the energy-efficient provisions of the current California Building Standards Code (CCR Title 24), CHPS criteria, and applicable CALGreen (CCR Title 24, Part 11) mandatory measures.[39] The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The proposed Project is designed to meet CHPS criteria for energy performance and LAUSD sustainability guidelines, with implementation of an energy management system. LAUSD is a current member of the CHPS (since 2001) and consistently applies sustainable construction principles as part of its development criteria. CHPS criteria were established for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are planned to be healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. Construction and operation of the proposed Project would remove existing permanent and temporary buildings, to provide CHPS-designed facilities. The LAUSD Board of Education has enacted several major policies regarding energy efficiency throughout the District. The October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS criteria to the extent possible. In 2007, the Board passed the GreenLAUSD resolution calling for development of sustainability protocols including quantification of energy and water usage and committing the District to becoming the "most sustainable large urban school district in the nation." As a result, the Sustainability Initiatives Unit (SIU) was established in 2009 to oversee the implementation of GreenLAUSD. In 2015, the Board enacted the Energy and Resource Conservation Policy, which set the goal to reduce energy and water consumption by 20 percent by 2024 from a 2014 baseline. The

[38] LADWP, Power Today, Accessed on July 22, 2022, at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afrLoop=1595016012439636.
[39] California Building Standards Commission. Effective January 1, 2023. 2023 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: http://www.bsc.ca.gov/Home/CALGreen.aspx

HEROES for Zero Program (Health and wellness, Education, Recognize partnerships, Optimize performance, Efficiency, and Sharing best practices), among other programs, was created to serve as the framework for policy implementation. Most recently in 2020 the Transitioning Los Angeles Unified School District to 100% Clean, Renewable Energy Resulting in Healthier Students and More Sustainable, Equitable Communities resolution was passed committing the pursue 100 percent clean, renewable energy in its electricity sector by 2030 and in all energy sectors, including heating, ventilation, air conditioning (HVAC), cooking, and transportation, by 2040, including goals to reduce waste production District-wide. The Project will contribute to the realization of these goals by removing older, less efficient buildings as described, which will lower energy costs for the campus in general, help to lower ambient temperatures in the core of the campus through the replacement of asphalt with lower-albedo materials and expanded landscaping, while reducing water consumption for landscaped areas with new, upgraded irrigation systems.

In addition, SC-GHG-5 (See Section VIII) requires new construction to arrive at an energy budget at least 10 percent (20 percent if possible) less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards. As the Project would meet or exceed all energy efficiency requirements in place at the time of permitting, it would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and there would be no impacts.

# 4. Environmental Checklist and Analysis

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

## Explanation:

The following geology and soils analysis is based on the Preliminary Geotechnical Evaluation (Geotechnical Evaluation, evaluation), prepared by Gorian & Associates, Inc. dated May 16, 2022, which is attached as **Appendix E**.

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-GEO-1 | LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition. |

**a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**

**Less than Significant Impact.** According to the Geotechnical Evaluation the Project site is not located within an Alquist-Priolo Fault Zone as defined by the State Geologist. The closest known historically-active surface faults are the San Fernando Fault which is approximately nine miles northeast of the site, and the Holocene-active Simi-Santa Rosa Fault zone located approximately nine miles northwest of the site. The closest active faults are the Hollywood fault, located approximately 13.5 miles southeast of the site, and the Verdugo fault, approximately 15 miles east of the site. Since there are no historic or active faults located within the immediate vicinity of the Project site the potential for ground rupture on-site due to faulting is considered remote and impacts would be less than significant.

**ii. Strong seismic ground shaking?**

**Less than Significant Impact.** The Project site is located in a seismically active region as is virtually all of southern California. Four large earthquakes have occurred within 40 miles of the Project site within the last 80 years, in 1933, 1971, 1987, and 1994. The 1994 Northridge earthquake epicenter was located approximately four miles northeast of the site. The site would likely be subject to another large earthquake within the lifetime of the Project and experience strong ground shaking as a result. The evaluation determined the site is suitable for development provided recommendations concerning site preparation, grading and foundations are followed. The evaluation classifies the site as within Seismic Design Category Class D. Seismic Design Categories range from A to F, and the requirements for foundation and structural design in the California Building Code (CBC) change according to the class in order to compensate for less or more anticipated ground-shaking. The evaluation specific recommendations include removing soil under paving to a minimum of three feet and recompacting to code specifications, to two feet for paving, and to two feet below any deep foundations (piles). The new structures are more likely to be built without piling. The majority of the site appears to be built upon native soil as fill soils were encountered in only four of ten test borings and where encountered the fill was shallow. The native soil is suitable for building provided it is removed and recompacted according to the recommendations of the geotechnical report. If soil fill is encountered it may or may not be determined to be suitable for recompacting. It is not anticipated that significant amounts of fill soil would need to be removed from the site, or engineered fill to be imported. Conventional footings or mat foundations were both found to be acceptable for construction on the site provided the recommendations in the evaluation are followed. As the site has been determined suitable for construction with standard techniques according to the CBC requirements for Class D structures which are designed to safeguard against major structural failures and loss of life, and according to the recommendations of the evaluation, potential substantial adverse impacts related to seismic ground shaking would be less than significant.

**iii. Seismic-related ground failure, including liquefaction?**

**Less than Significant Impact.** Liquefaction is a process by which sediments below the water table temporarily lose strength and behave as a viscous liquid rather than a solid.. The Geotechnical Evaluation states the Project site is within an area zoned by the State as being susceptible to liquefaction. A seismic

settlement analysis was performed which estimated seismic induced settlement between 0 to 1.75 inches. Differential seismic settlement, wherein only part of a structure might be subject to ground failure thereby creating greater stresses than uniform settlement, is estimated at 0.5 to 0.75 inch across 30 feet. This amount of potential ground failure is taken into consideration as part of the Geotechnical Evaluation's recommendations. As explained above, the evaluation determined the site is suitable for construction according to the requirements of Class D structures and the recommendations of the evaluation. Therefore, potential substantial adverse impacts related to liquefaction would be less than significant.

**iv. Landslides?**

**No Impact.** The Geotechnical Evaluation states no landslide are present within the Project site nor located in the site vicinity based on regional geological maps. Since the Project is not located near any landslides, there would be no potential adverse impacts relating to landslides.

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

**Less Than Significant Impact.** Although the Project site is flat, development of the Project has the potential to result in the erosion of exposed soils during site preparation and construction activities. All grading activities would require grading permits which must conform to provisions of the CBC addressing control of erosion during construction. The Project would be required to produce a Stormwater Pollution Prevention Plan (SWPPP) prior to permitting for any ground disturbing activities that demonstrates implementation of Best Management Practices (BMPs) sufficient to minimize erosion and discharge of soil during construction activities. SC- HWQ-2, described below in Section X, Hydrology and Water, reiterates these requirements. Compliance with construction stormwater control requirements would ensure that the project would not result in substantial soil erosion or the loss of topsoil during construction and impacts would be less than significant

After construction of the proposed Project, the Campus ground cover would be similar to current conditions, covered primarily by structures and impermeable surfaces, which generally precludes it from being susceptible to erosion. SC-HWQ-1, described in Section X, requires the Project to meet or exceed the current and applicable post-construction stormwater guidelines of the County's MS4 permit requirements (Order No. R4-2012-0175), issued by the Los Angeles RWCQB in accordance with the County's National Pollutant Discharge Elimination System (NPDES) permit, CAS004001, implemented via provisions of the Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements. With adherence to permit requirements, and a minor increase in greenspace, planting areas, and landscaped features, which would be operated and maintained by LAUSD, the Project would not result in soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** As discussed above, the Project is located in a flat area that is not susceptible to potential landslides and is not near an active or historic fault. Also, the Geotechnical Evaluation has determined the site is suitable for development. Lateral spreading is a term referring to landslides that form on gentle slopes. Lateral spreading could be a factor on site due to the presence of the stormwater channels on the

north and south sides. The potential lateral spread on the site was analyzed by the evaluation and determined to be no more than 0.25 to 0.5 inches toward the channels, which is not a significant amount. The site is not located within an area of known ground subsidence, and the evaluation indicates settlement is not expected to exceed one inch. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity and as such there is little or no potential for ground subsidence due to withdrawal of fluids or gases at the site. Liquefaction has been previously discussed, determined by the evaluation to have minimal potential for seismic-induced settlement and adequately surmounted by standard construction techniques. The evaluation also investigated possible hydro-collapse and determined the onsite soils are not susceptible to potential collapse. The Project site has been determined to be suitable for development and onsite soils suitable for building provided soil preparation and foundation recommendations in the evaluation are followed, and structures are built according to the requirements for Class D buildings. Impacts would be less than significant.

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

**Less Than Significant Impact.** Expansive soils contain clay particles that change in volume (shrink or swell) due to a change in the soil moisture content. The amount of volume change depends upon the soil swell potential (amount of expansive clay in the soil), availability of water to the soul, and the soul confining pressure. Swelling occurs when soils containing clay become wet due to excessive water from poor surface drainage, over-irrigation of lawns and planters, and sprinkler or plumbing leaks. Swelling clay souls can cause distress to structures, walks, drains, and patio slabs. The Geotechnical Evaluation investigated expansion potential and determined underlying soils have a low to medium to high expansion potential. The evaluation provided the following recommendations to reduce the potential for expansive soils.

a) Positive drainage should be continuously maintained away from structures and slopes. Ponding or trapping of water in localized areas near the foundations can cause differential moisture levels in subsurface soils. Plumbing leaks should be immediately repaired so that the subgrade soils underlying the structure do not become saturated.

b) Trees and large shrubbery should not be planted where roots can grow under foundations and flatwork when they mature.

c) Landscape watering should be held to a minimum; however, landscaped areas should be maintained uniformly moist condition and not allowed to dry-out. During extreme hot and dry periods, adequate watering should be provided to keep soul from separating or pulling back from the foundation.

Provided the recommendations from the evaluation are followed the Project would have a less than significant impact regarding expansive soils.

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

**No Impact.** The Project would not use septic tanks or alternative wastewater disposal systems, and there would be no impact.

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

**Less Than Significant Impact.** The Cultural Resources Phase I Assessment (Appendix C) investigated the potential for paleontological resources and determined there is little possibility for construction activities to encounter any resources. The entire property is located above Holocene (modern) alluvial deposits. Modern alluvial material generally would not contain fossils as the soil is composed of the recent sediment deposits of rivers or streams. Excavations on the site would be shallow, generally no more than three feet plus over-excavation scarring and as such would only encounter recent alluvial material and not any bedrock formations or other rock units that might contain fossils. No paleontological monitoring was recommended, and impacts would be less than significant.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **VIII. GREENHOUSE GAS EMISSIONS.** Would the project: | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

## Explanation:

The following greenhouse gas GHG emissions analysis is based on emissions estimates produced by Envicom Corporation using the California Emissions Estimator Model (CalEEMod), which are attached to the Air Quality and Greenhouse Gas Emissions Background and Modeling Data, Appendix A. This appendix includes all greenhouse gas regulatory setting and existing conditions information relevant to this section, as well as the output reports from CalEEMod.

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-GHG-1 | During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss. |
| SC-GHG-2 | LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation. |
| SC-GHG-3 | LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season. |
| SC-GHG-4 | LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources. |
| SC-GHG-5 | LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect. |
| SC-USS-1 | Implementation of SC-USS-1. |

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

**Less Than Significant Impact.** Because individual projects do not generate sufficient GHG emissions that would substantially affect climate change; the issue of climate change typically involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. As defined by the California Environmental Quality Act (CEQA Guidelines) Section 15355, "Cumulatively considerable" means that the

# 4. Environmental Checklist and Analysis

incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

The CEQA Guidelines Section 15064.4(a) states that a lead agency shall have discretion to determine, in the context of a particular project, whether to:

1) Quantify greenhouse gas emissions resulting from a project; and/or

2) Rely on a qualitative analysis or performance based standards.

Additionally, the Section 15064.4(b) states that "In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change," and that the following factors should be considered:

1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG emissions. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts (see CEQA Guidelines Section 15064.7(c)). Pursuant to CEQA Guidelines Section 15064.7(b), "Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence." To date, no thresholds for evaluating the significance of GHG emissions that could be applied to the Project have been developed by the SCAQMD, or the City of Los Angeles. As such the potential significance of the project's GHG emissions will primarily be qualitatively evaluated based on the "extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions" (CEQA Guidelines Section 15064.4(b)).

Pursuant to CEQA Guidelines Section 15064.4(a), which states that "A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project," the project's estimated construction GHG emissions were calculated using CalEEMod 2022.1.1.20, which are presented for discussion purposes. Project-specific details and design features used in CalEEMod to calculate GHG emissions are the same as those used in the analysis of air quality criteria pollutants discussed in Section III.

### Construction GHG Emissions Methodology and Analysis

During construction, the project would generate GHG emissions primarily from the use of internal combustion engines to power onsite equipment as well as offsite transportation of workers and materials. As estimated using CalEEMod 2022.1.1.20, Phase 1 of the project's construction activities would generate a total of approximately 601.3 MT $CO_2e$ emissions, Phase 2 would generate 353.4 MT $CO_2e$ emission, for a grand total of 954.6 MT $CO_2e$. As construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. A project lifetime of 30 years is recommended by SCAQMD for amortizing construction-related GHG emissions.[40] The proposed project's amortized construction-related emissions would therefore be 31.8 MT $CO_2e$. There have been no proposed impact thresholds for construction emissions as construction emissions represent just a small portion of a project's lifetime emissions.

### Operational GHG Emissions

Operational GHG emissions are not calculated for the Project as the Project is a continuing use and there is no increase in enrollment capacity associated with the Project. With no increase in enrollment capacity there would be no change in vehicle use or vehicle miles traveled (VMT) associated with the Project, and therefore no substantial change in mobile GHG emissions which account for the majority of emissions from virtually all categories of land use save power generation, oil refining, and some agricultural and heavy industrial uses. The replacement of older buildings with new, more efficient, all-electric buildings would reduce stationary emissions as new buildings would not use fossil fuels (natural gas) onsite, and all energy used in the buildings would be derived from offsite power generation, as well as required solar power for the Hunter Student Union building. As power generation in the state reduces its reliance on fossil fuels, over time electrical energy use would result in fewer GHG emissions. This comports with the Program EIR conclusion that modernization projects would result in increased energy efficiency, thereby reducing emissions from energy usage, even for Projects which expand enrollment. As the Project is not expanding enrollment, it can be determined that GHG emissions from the Project would not result in a significant impact.

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

**Less Than Significant Impact.** There are two primary plans adopted for the for the purpose of reducing the emissions of greenhouse gases applicable to the Project, the California Air Resources Board (CARB) Scoping Plan and the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Scoping Plan was developed in 2008 to implement the requirements of AB 32, The Global Warming Solutions Act of 2006. The Scoping Plan outlined the state's strategy to achieve 1990 level emissions by year 2020, which was achieved in 2016. The Scoping Plan has been updated every five years since 2008, and the 2022 Scoping Plan is focused on obtaining carbon neutrality by 2045 or earlier.

The Scoping Plan is not directly applicable to most development projects. Rather, project-level conformance to the goals of the Scoping Plan is achieved through conformance with the applicable sustainable communities

[40] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

strategy (SCS) as promulgated by the regional metropolitan planning organization (MPO). This was developed in accordance with Senate Bill 375, the Sustainable Communities and Climate Protection Act, passed in 2008, which required CARB to develop and set regional targets for GHG emission reductions from passenger vehicles. MPOs must prepare a SCS that will reduce GHG emissions to achieve these regional targets, if feasible to do so. The SCS is a component to the Regional Transportation Plan (RTP), which regulates transportation financing in each region. The RTP and SCS must complement each other and accommodate the Regional Housing Needs Allocation (RHNA). The bill modified the RHNA requirements to align with production of the RTP/SCS. The purpose of this coordination is for each MPO to arrive at a mix of transportation and land use strategies that will direct the region's growth in such a way that emissions from car trips meet the GHG reduction targets.

The SCAG is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS aka Connect SoCal) is the most recent RTP/SCS adopted by SCAG. The 2020-2045 RTP/SCS is a long-range visioning plan that examines existing land use and transportation conditions throughout the SCAG region and forecasts how the plan will meet the region's transportation needs between 2020 and 2045, as well as achieve CARB's GHG emissions reduction targets. On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels.

As the 2020-2045 RTP/SCS is determined to meet CARB emissions targets, conformance with the RTP/SCS demonstrates a project's lack of conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Stationary GHG emissions are addressed in a different manner, through the application of state-mandated fuel efficiency standards, power generation standards, and building standards (Title 24). All construction projects must meet the requirements of Title 24 through the building plan check process, and as such there is no opportunity to conflict with such requirements.

The 2020-2045 RTP/SCS meets state climate goals by identifying the land use patterns that would result in a reduction of VMT and a subsequent reduction in GHG emissions. The RTP/SCS identifies areas within the SCAG region where the strategies of the plan are best realized; these are Priority Growth Areas (PGAs). PGAs include areas suitable for particular strategies and areas identified to already have crucial components for smart growth. These are Job Centers, TPAs (Transit Priority Areas), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. PGAs account for just 4 percent of the SCAG region's total land area but are intended to accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. Implementation of the SCS, which is determined to achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels, consists of effecting the Priority Growth Area land use strategies.

A project would comply with the 2020-2045 RTP/SCS if it fulfilled the land use strategies of the plan. For example, if land zoned for single-family residential use was identified as a PGA, fulfilling the strategies of the plan would necessitate increasing residential density. In the case of Canoga Park High School, and all public schools in the SCAG area, the RTP/SCS does not require any changes to the land use to implement the RTP/SCS strategies. The school fulfills the land use strategies of the plan by remaining a public school. As

noted in the Program EIR, continuing use of schools, or increasing enrollment, or the construction of new schools as demographics require, would be anticipated to reduce VMT and thereby GHG emissions. As a continuing with no increase to enrollment according to demographic trends in the service area, there is no conflict with either the Scoping Plan, or the 2020-2045 RTP/SCS which implements the land use strategies of the Scoping Plan, and impacts would be less than significant.

# 4. Environmental Checklist and Analysis

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

## Explanation:

The following analysis was completed using information from the Phase I Environment Site Assessment Report (Phase I ESA) prepared by Eco & Associates, Inc. dated February 18, 2019, attached as **Appendix F**, the Preliminary Environmental Assessment – Equivalent Report prepared by Parsons (Phase II ESA), dated August 18, 2023, attached as **Appendix G,** the Soil Removal Plan prepared by Parsons dated September 20, 2023, attached as **Appendix H,** and the Project Manual for Asbestos Removal (Asbestos Report), prepared by Vista Environmental Consulting, Inc. dated March 1, 2023, attached as **Appendix I.**

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

| **LAUSD Standard Conditions of Approval** | |
|---|---|
| SC-HAZ-4 | ▪ The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):<br>▪ District Specification Section 01 4524, Environmental Import / Export Materials Testing.<br>▪ Removal Action Workplan or Remedial Activities Workplan.<br>▪ California Air Resources Board Rule 1466. |

| | |
|---|---|
| | ▪ Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials – particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.<br>▪ Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s). |
| SC-AQ-1 | Implementation of SC-AQ-1. |

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

**Less than Significant Impact.** Normal construction activity would involve the use of minimal amounts of hazardous materials such as diesel fuel, paints, and solvents. Use of hazardous materials in this regard would be in insignificant amounts and would be transported, used, and disposed of in accordance with applicable federal, state, and local regulations. The proper use of these materials for their intended purpose would not pose a significant risk to the public or environment.

The Project would require special handling and removal of impacted soil and materials during demolition, however. Although the Phase I ESA did not find any Recognized Environmental Conditions (RECs) within the development zone, it did note there were several potential RECs on site. These are issues that would have a low probability of producing a significant impact but should be considered in project planning and risk management. These include two issues which would not be a factor in completing the Project: An underground hydraulic lift that is within the southern portion of Building 500, and 22017 Vanowen Street west of the campus which once held dry cleaners. The building containing the hydraulic lift (Building 500) is not being demolished and the hydraulic lift is not being removed or changed. Flatwork will occur adjacent to the building but is not an area where impacted soils will need to be removed. The ESA states that the lift is out of service and would contain a small amount of hydraulic fluid, but due to the heavy nature of the fluid if there is a leak it would be limited to soils below the lift. As the project will not disturb soils to such a depth this potential REC is not a factor for the Project's construction and would not require transport or disposal of hazardous materials. The former dry cleaners at 22017 Vanowen Street is currently being investigated by the Los Angeles Regional Water Quality Control Board (LARWQCB) for releases of dry-cleaning chemicals into the soil. Potential vapor intrusion risks from the site are below accepted thresholds and the completion of remediation activities were confirmed in 2016, and in 2017 the Office of Environmental Health Hazard Assessment (OEHHA) conducted vapor intrusion risk assessment and concluded that the risk estimates at the subject site are less than one in one million and hazard indices are less than one, which are below commonly accepted thresholds for schools and daycare. However, because the case has not been closed the site would still be considered a potential REC. This potential REC is not a factor for the Project regarding the transport or disposal of hazardous materials because the only potential hazard from the REC would be contaminated groundwater. Depth to groundwater at the site is historically between 15 and 20 feet, and excavation activities would likely not need to go further than five feet below the surface, therefor there is little chance groundwater would be encountered during construction requiring dewatering.

The potential RECs that are a factor are based upon historic policies and conditions that may affect completion of the Project. These include the fact that asbestos-containing materials are common in older buildings, and historic LAUSD practices such as the use of arsenic-based herbicide and organochlorine pesticide may have

resulted in contaminated soil. In addition, older transformers often used polychlorinated biphenyls in lubricants and coolant, and as such may have contaminated soil in the past through leakage. In response to these findings two Phase II studies were initiated; the Phase II ESA sampled soil for contaminants and the Asbestos Report specifically investigated asbestos on site.

The Phase II ESA took soil samples from 52 initial locations, then followed up with an additional 68 locations near the initial sample sites. The results found that 12 areas within the development zone are impacted by arsenic and/or lead at concentrations above Environmental Protection Agency (EPA) or Department of Toxic Substances Control (DTSC) preliminary screening levels. The impacted soils are estimated to amount to 273 cubic yards. The testing did not identify any soil that would be defined as hazardous by the federal Resource Conservation and Recovery Act (RCRA). Approximately 180 cubic yards of soil can be managed as non-hazardous waste (above the preliminary screening levels, but non-hazardous) and approximately 100 cubic yards of soil must be managed as non-RCRA [hazardous in California] hazardous waste, meaning the soil is not hazardous according to federal standards, but is defined as hazardous according to California standards.[41] Subsequent to the screening a Soil Removal Plan was created. Ten of the impacted areas are adjacent to structures scheduled for demolition, one area is on the west side of the athletic field, and one other to the east of the athletic field near the eastern property line. All of the identified areas are located where excavation or flatwork is scheduled to occur.

The Asbestos Report investigated buildings slated for demolition and areas that would be excavated and determined four of the permanent buildings to be demolished (cafeteria, weight room, and two classrooms) have materials containing asbestos present. These consist primarily of floor tiles, fire doors, and materials like mastics and joint compounds. The portable classrooms that would be demolished also contain similar materials. The report also identified six areas where asphalt contains asbestos. Four of those areas overlap with locations impacted by arsenic and lead, all of the locations are in areas where excavation or flatwork is scheduled to occur.

Removal of contaminated soil, contaminated asphalt, and contaminated building materials would be done according to the procedures outlined in the Soil Removal Plan and Asbestos Report which reiterate the provisions required of SC-HAZ-4, which implements the various governing federal, state and local requirements including the California Hazardous Waste Control Law (Title 22, Division 4.5) concerning removal, handling, and disposal of contaminated waste, and SCAQMD permitting for Rule 1466 compliance (dust control). State law, reiterated in SC-HAZ-4 requires all soil excavation and disposal activities to be completed by a properly licensed Remediation Contractor under the oversight of an Environmental Consultant selected by OEHS. OEHS is the District authority which oversees proper handling of hazardous materials. OEHS has developed a suite of environmental guidance manuals and procedures for safe handling of hazardous materials which are followed for all construction and renovation activities on LAUSD campuses. These procedures are standardized protocols which implement the legal requirements appropriate to the task and nature of hazardous material.

During operations the school would generate chemical waste from science laboratories, shop classes, and maintenance activities, and electronic wastes would be generated as well when outdated computers, televisions, cathode ray tubes, or other electronic components are retired. Handling and proper disposal of these materials are governed by OEHS protocols as well. In summary, all activities performed on LAUSD campuses that

[41] Defined in the Cal. Code Regs. Tit. 22, Section 66261.3.

involve hazardous materials are subject to requirements set forth by OEHS, overseen by OEHS staff, which implement the various federal, state, and local legal requirements in a standardized fashion. Requirements for staff training to handle materials is part of SC-HWQ-3, described in Section X. With these regulatory mechanisms in place, impacts would be less than significant.

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

**Less Than Significant Impact.** As discussed above, it has been determined demolition activities would involve the removal of materials containing asbestos and the removal of soil contaminated with arsenic and lead. In addition, as noted in the Asbestos Report, all coated surfaces would be assumed to contain lead, and all building materials that have not already been tested would be assumed to contain asbestos. Although there is no intent to disturb other materials or building coatings, should construction or renovation activities require disturbance, such as the removal of flaking paint or replacement of some other material all work would proceed according to the guidance in the Report. This guidance reiterates the requirements of the LAUSD OEHS, which is applied in SC-HAZ-4, which implements federal, state, and local handling requirements such as the US EPA Renovator, Repair, and Painting Rule, and Cal/OSHA Lead in Construction Standard (SB 460), among others. As all construction and renovation work would be conducted under the auspices of legal hazardous materials handling requirements, impacts concerning the potential release of hazardous materials into the environment would be less than significant.

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

**Less Than Significant Impact.** As explained above, the Project would proceed according to the requirements of SC-HAZ-4 which implement all applicable and potentially-applicable federal, state, and local requirements for the handling of hazardous materials. The Project is a school, and as impacts are reduced to less than significant in IX(a) and (b) above, impacts would remain less than significant.

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

**Less than Significant Impact.** A database search was conducted for the campus in the Phase I ESA for Project. The Project site is not included in the "Cortese List" (sites compiled pursuant to Government Code Section 65962.5), though there are 18 properties within one-quarter miles of the site on the list. Four adjacent properties once had leaking underground storage tanks (LUST), two former service stations and two existing service stations. Each of these sites were remediated and the cases closed by the LAWQCB. these properties were adjacent to the subject property, however, the ESA determined that there is a relatively low potential that contaminants from upgradient properties have impacted the soil or groundwater underlying the site. In addition, depth to groundwater at the site is historically between 15 and 20 feet, and excavation activities would likely not need to go further than five feet below the surface, as such there is little to no potential for groundwater to be encountered. With very little potential for nearby Cortese List sites to affect the Project in any manner, impacts would be less than significant.

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

**No Impact.** The Project site is not located within two miles of a public airport and would not result in a safety hazard for people residing or working in the Project area. The closest airport to the campus is the Van Nuys Airport, which is over 6 miles away to the east.[42] Therefore, the Project would have no impact with respect to posing a safety hazard or excessive noise from an airport for people residing or working in the Project area.

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

**No Impact.** According to Los Angeles County Department of Public Works, the Project site is not located along a disaster route, but is it on a connecting street to a disaster route.[43] As enrollment would not be increased with the Project, significant new traffic generation would not occur. Additionally, points of ingress and egress into the campus would be unchanged, and there would be no changes to public infrastructure as part of the project that could physically interfere with an adopted emergency response plan or emergency evacuation plan.

Additionally, public schools are considered critical community facilities and are often used as evacuation centers during disasters. State design and construction standards for critical facilities such as schools and hospitals are more rigorous than those for many other types of structures; thus, public schools are more likely than some other types of structures to be safely used and occupied after a disaster such as a strong earthquake. New construction, modernization, and repair work conducted would have a favorable impact on emergency response by making improvements to schools that would comply with current, stringent seismic standards and that could be used as evacuation centers in the event of a disaster. There would be no impacts.

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

**No Impact.** The Project site is in a densely developed urban area and is not within a fire hazard area.[44] Therefore, the Project would have no impact with respect to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires**.**

[42] Los Angeles County, General Plan 2035, Figure 7.4: Airports / Airfields Map, July 2014.
[43] Los Angeles County Department of Public Works, Disaster Routes with Road Districts South Los Angeles County, Accessed on August 1, 2023 at: https://pw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf
[44] Los Angeles County, General Plan 2035, Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

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

## Explanation:

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

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

| | |
|---|---|
| SC-HWQ-2 | LAUSD shall implement the applicable stormwater requirements during construction activities.<br><br>**Compliance Checklist for Storm Water Requirements at Construction Sites**<br>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 ; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits. |
| SC-HWQ-3 | LAUSD shall implement the following programs and procedures, as applicable:<br>▪ Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project.<br>▪ Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste).<br>▪ Medical Waste Management Program.<br>▪ Environmental Compliance Inspections.<br>▪ Safe School Inspection Program.<br>▪ Integrated Pest Management Program.<br>▪ Fats Oil and Grease Management Program.<br>▪ Solid Waste Management Program.<br>▪ Other related programs overseen by OEHS. |

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

**Less Than Significant Impact.**

### Construction Phase

Construction of the project would involve grading which would create the potential for discharge into the Arroyo Calabasas or Bell Creek that are located adjacent to the Project site. SC-HWQ-2 ensures compliance with Los Angeles County MS4 permit requirements (Order No. R4-2012-0175), issued by the Los Angeles RWCQB in accordance with the County's NPDES permit, CAS004001, via a General Construction Activity Permit. This requires preparation of a SWPPP prior to issuance of a grading permit that demonstrates which BMPs or series of BMPs would be used during construction to prevent construction-related discharges from entering storm drains and minimize sediment transport and erosion. Implementation and compliance with stormwater requirements would reduce impacts from construction to water quality. Therefore, impacts would be less than significant with respect to violating water quality standards or waste discharge requirements during construction.

### Operation Phase

SC-HWQ-1 requires the Project to meet or exceed the current and applicable post-construction stormwater guidelines of the County's MS4 permit requirements implemented via provisions of the Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements. Compliance requires that the project must be designed to retain stormwater runoff generated on site during a 0.75 inch 24-hour storm event, or an 85th percentile 24-hour storm event, whichever is greater. Stormwater is retained through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use. The Project would reduce the amount of impervious surfaces on the site, and as the previous development on

the site the Project is replacing was not subject to MS4 permitting requirements, the Project would generate less stormwater runoff than it currently does, and stormwater that eventually leaves the site would be cleaner than runoff that is currently generated. In addition, HWQ-3 reiterates compliance with regulatory measures that regard the handling of trash, waste oils, and pesticides to keep such pollutants out of stormwater systems. Therefore, compliance with HWQ-1 and HWQ-3 would reduce potential impacts related to the violation of water quality standards or waste discharge requirements or the degradation of surface or ground water quality to less than significant levels.

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

**No Impact.** The Project does not involve the extraction of groundwater and new development would result in less impervious surface on site than currently. Therefore, the Project would have no impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge.

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

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

**Less than Significant Impact.** The Project would not alter the course of any streams or rivers, and post-construction drainage on site would be improved from current conditions as the Project would reduce the amount of impervious surfaces on the site and, as described above, would be subject to MS4 permitting requirements, whereas the existing development was not. Therefore, the Project would have a less than significant impact regarding the potential for substantial on- or offsite erosion or siltation.

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

**Less than Significant Impact.** The Project would not alter the course of any streams or rivers, and as explained above drainage on the site would be improved compared to existing conditions. SUSMP compliance requires the project must retain stormwater runoff generated on site during a 0.75 inch 24-hour storm event, or an 85th percentile 24-hour storm event, whichever is greater. The Project would install detention tank to slow down discharge into the Calabasas Creek Flood Control Channel compared to existing conditions. Therefore, the Project would have a less than significant impact regarding substantially increased rate or amount of surface runoff that would result in flooding.

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

**Less than Significant Impact.** The new storm drain and LID biofiltration facilities would connect to the existing storm drain piping within the development. Stormwater would be filtered prior to discharge, and a detention tank would slow down the discharge rate into the Calabasas Creek Flood Control Channel. Therefore, the Project would have a less than significant impact regarding runoff

water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

**iv) Impede or redirect flood flows?**

**No Impact.** The Project is not located within a flood hazard zone and as such would not impede or redirect flood flows.[45] Therefore, the Project would have a less than significant impact regarding to impeding or redirecting flood flows.

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

**No Impact.** The Project site is not within a flood hazard, tsunami, or seiche zone.[46,47] Therefore, the Project would have no impact with respect to the risk of releasing pollutants due to Project inundation.

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

**Less than Significant Impact.** As described previously, the Project would also be subject to SC-HWQ-1 and SC-HWQ-3 which ensure compliance with all state and local measures related to water quality. With SUSMP requirements in place and proper handling of potential pollutants such as trash and waste oils, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

45 Federal Emergency Management Agency, Flood Insurance Rate Map Panel 1280 of 2350, September 26, 2008.
46 Los Angeles County, General Plan 2035, Figure 12.2a: FEMA Flood Hazard Zones Policy Map, June 2021.
47 Los Angeles County, General Plan 2035, Figure 12.3: Tsunami Hazard Areas, February 2022.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XI. LAND USE AND PLANNING**. Would the project: | | | | |
| a. Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |

## Explanation:

**a) Physically divide an established community?**

**No Impact.** The Project site is currently developed as a school campus within an established community. The Project would involve modernization of the existing school and would not expand development outside the current campus boundary. Therefore, the Project would have no impact and would not physically divide an established community.

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

**Less than Significant Impact.** The Project site is zoned in the Los Angeles Municipal Code as PF-1, which is the Public Facilities Zone, and designated as Public Facilities in the General Plan. Per Government Code Section 53094 a school district does not have to comply with local zoning requirements provided the governing board of the district votes with a two-thirds majority to exempt district school facilities. On February 19, 2019, pursuant to Government Code Section 53094, the LAUSD Board of Education adopted a Resolution rendering all LAUSD school sites, including Canoga Park Senior High School, exempt from local land use regulations (Bd. of Ed Rpt No. 256-18-/19).[48] The Project is considered a site-specific project under the 2023 SPEIR, and this ND is tiered from the 2023 SP EIR. The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location, and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the 2023 SPEIR. Additionally, the Project would not result in an increase of population or employment so it would not exceed planned growth projections in SCAG 2020-2045 RTP/SCS. Therefore, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

[48] LAUSD, Board of Education Report, "LAUSD Regular Meeting Stamped Order Of Business Report 256-18/19," February 19, 2019.

# 4. Environmental Checklist and Analysis

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XII. MINERAL RESOURCES**. Would the project: | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | ☐ | ☐ | ☐ | ☒ |

## Explanation:

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

**No Impact.** According to the City of Los Angeles General Plan Conservation Element, which reflects known state mineral resources, there are no such resources located within the Project site.[49] The Project is also an existing school site and any potential mineral resources would have already been rendered unavailable by the use. As such the Project would not cause a loss of availability of known mineral resources valuable to the region and the State, and no impacts would occur.

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

**No Impact.** As explained above the Project is not delineated as a locally important mineral resource recovery sites as oil drilling districts, state designated oil fields, and surface mining districts. Therefore, the modernization Project would not result in the loss of availability of locally important mineral resources recovery sites.

[49] City of Los Angeles General Plan, Conservation Element, Exhibit A: Mineral Resources.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XIII. NOISE.** Would the project result in: | | | | |
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards? | ☐ | ☐ | ☒ | ☐ |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

## Explanation:

The following analysis is based in part on the Noise Report prepared by Veneklasen Associates dated November 21, 2023, which is attached as **Appendix J.**

Noise is unwanted sound. Sound is mechanical energy that is transmitted by pressure waves through a compressible medium such as air. The sound pressure level, expressed in decibels (dB), has become the most common descriptor used to characterize the loudness of an ambient sound level. A dB is a logarithmic unit of the ratio of sound pressure to a reference sound pressure level, standardized as 20 micropascals, the threshold of human hearing. Sound or noise can vary in intensity by over one million times within the range of human hearing, so a logarithmic loudness scale similar to the Richter Scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum, so noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called A-weighting written as dB(A) or dBA. Subsequent references to decibels written as dB should be understood as A weighted dB(A).

Because decibels are logarithmic, the noise level of several sounds at once do not add together arithmetically to produce a louder noise. When two sounds of equal pressure come together, the result is a 3.0 dB increase in the noise level. For example, if traffic is producing 60 dB of noise and a lawnmower produces another 60 dB of noise, the resulting noise level would be 63 dB, not 120 dB. Humans generally cannot perceive an increase in noise less than 3.0 dB outside of a controlled laboratory environment. If an ambient background noise of 60 dB increases to 62 dB, there would be no perceptible increase in loudness. A 1.0 dB increase is perceptible in a controlled environment. A 5 dB increase is considered readily perceptible, and an increase of 10 dB is perceived as the noise becoming twice as loud. Time variations in noise exposure are typically expressed in Leq, a steady-state energy level equal to the energy content of the time varying period. Leq provides a statistical description of the sound level that is exceeded over some fraction of a given observation period.

# 4. Environmental Checklist and Analysis

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-N-1 | LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA $L_{eq}$.[50] |
| SC-N-2 | LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA $L_{eq}$ with a target of 40 dBA $L_{eq}$ (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.<br>▪ New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA $L_{eq}$.<br>▪ New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA $L_{eq}$<br>▪ Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system.<br>▪ The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.<br>▪ Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified |
| SC-N-3 | LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.<br><br>Operational noise attenuation measures include, but are not limited to:<br>▪ Buffer zones;<br>▪ Berms;<br>▪ Sound barriers;<br>▪ Buildings;<br>▪ Masonry walls;<br>▪ Enclosed bleacher foot wells; and/or Other site-specific project design features |
| SC-N-4 | LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions. |
| SC-N-5 | LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible |
| SC-N-6 | For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts |

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

| | |
|---|---|
| | related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage. |
| SC-N-7 | LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.<br>▪ Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building.<br>▪ The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques.<br>▪ The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building.<br>▪ During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction.<br><br>During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented. |
| SC-N-8 | Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.<br><br>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:<br><br><u>Source Controls</u><br>▪ Time Constraints – prohibiting work during sensitive nighttime hours.<br>▪ Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM).<br>▪ Equipment Restrictions – restricting the type of equipment used.<br>▪ Substitute Methods – using quieter methods and/or equipment.<br>▪ Exhaust Mufflers – ensuring equipment has quality mufflers installed.<br>▪ Lubrication & Maintenance – well maintained equipment is quieter.<br>▪ Reduced Power Operation – use only necessary size and power.<br>▪ Limit Equipment On-Site – only have necessary equipment on-site.<br>▪ Noise Compliance Monitoring – technician on site to ensure compliance.<br>▪ Quieter Backup Alarms – manually-adjustable or ambient sensitive types.<br><br><u>Path Controls</u><br>▪ Noise Barriers – semi-permanent or portable wooden or concrete barriers.<br>▪ Noise Curtains – flexible intervening curtain systems hung from supports.<br>▪ Enclosures – encasing localized and stationary noise sources.<br>▪ Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment.<br><br><u>Receptor Controls</u><br>▪ Window Treatments – reinforcing the building's noise reduction ability.<br>▪ Community Participation – open dialog to involve affected residents. |

| | |
|---|---|
| | ▪ Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive. |
| SC-N-9 | Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.[51] Noise control measures may include, but are not limited to:<br><br><u>Path Controls</u><br>▪ Noise Attenuation Barriers[52] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers.<br><br><u>Source Controls</u><br>▪ Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM).<br>▪ Substitute Methods – using quieter methods and/or equipment.<br>▪ Exhaust Mufflers – ensuring equipment has quality mufflers installed.<br>▪ Lubrication & Maintenance – well maintained equipment is quieter.<br>▪ Reduced Power Operation – use only necessary size and power.<br>▪ Limit Equipment On-Site – only have necessary equipment on-site.<br>▪ Quieter Backup Alarms – manually-adjustable or ambient sensitive types.<br><br>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:<br><br><u>Receptor Controls</u><br>▪ Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability.<br><br>Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity. |

**a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?**

**Less Than Significant Impact.** The City's noise standards for non-transportation sources are articulated in Chapter XI, Noise Regulation, of the Los Angeles Municipal Code (LAMC), which contains the City's Noise

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

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

Ordinances. This Chapter of the LAMC restricts the level of noise that one type of land use or activity may broadcast across the property line of an adjacent land use. Noise ordinance standards are stated with respect to ambient levels found without the contribution of an identified noise source, such as a piece of construction equipment.

Section 111.03, Minimum Ambient Noise Level, of the LAMC establishes presumed ambient noise levels as a function of zoning and times of day to be used as an evaluation baseline. Where the actual ambient noise level is measured and is found to be higher than the presumed ambient levels, however, the LAMC states that the actual ambient level shall be used as a baseline. In this case, the District's consultants measured ambient noise around the project site in 10-minute averages on November 2, 2023 at eight different locations. The noise levels recorded ranged from 49.3 dB to 73.8 dB. See **Figure 9: Noise Monitoring and Receptor Locations** depicting the noise measurement locations and receptors used for analysis. The presumed daytime ambient noise level for adjacent commercially zoned property would be 60 dB, and for adjacent residentially zoned property the presumed level would be 50 dB. Therefore, the baseline ambient noise levels for evaluation purposes is as shown below in **Table XIII-1, Project Site Ambient Noise Levels.**

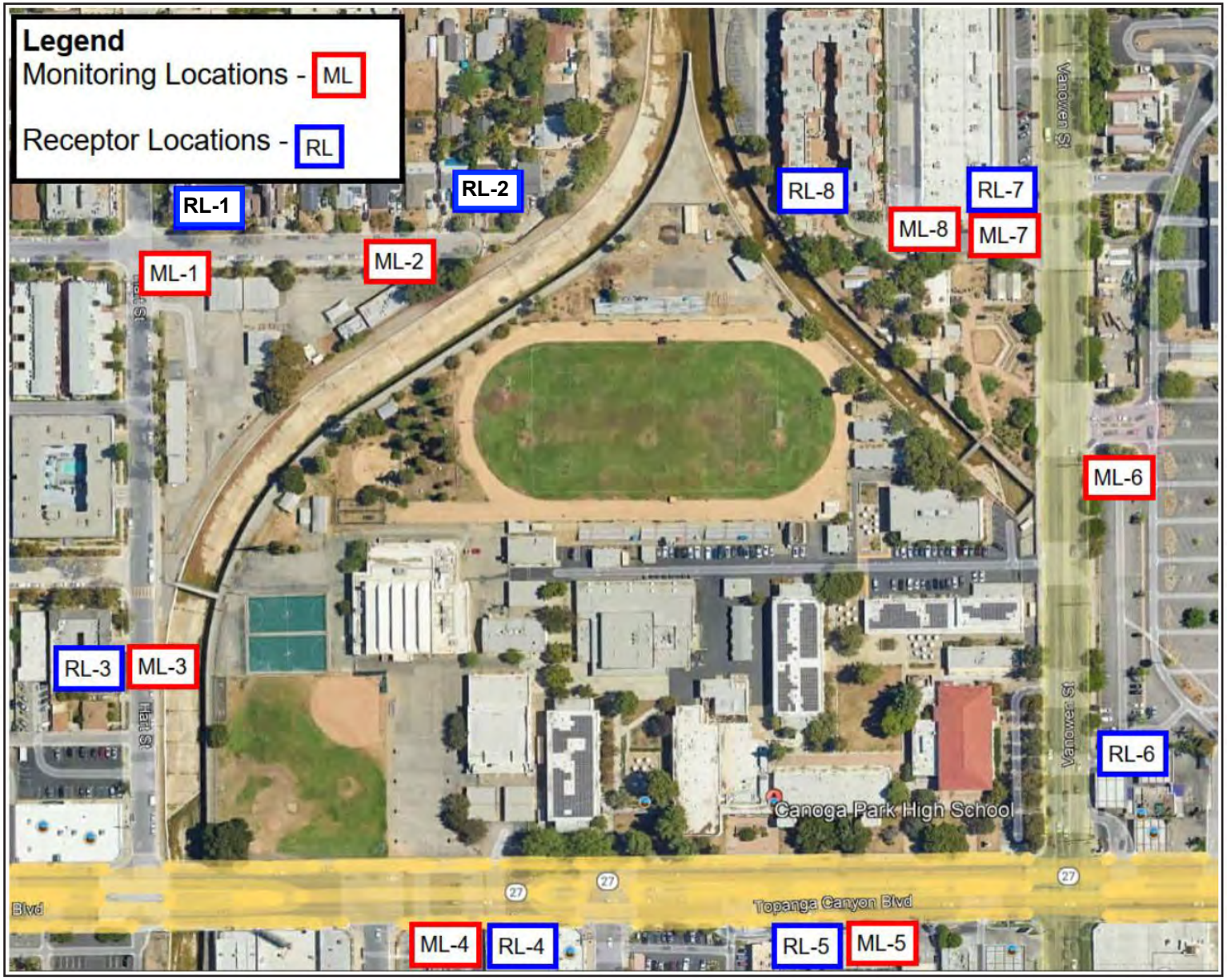
**Table XIII-1**
**Project Site Ambient Noise Levels**

| Monitoring Location | ML-1 | ML-2 | ML-3 | ML-4[a] | ML-5[a] | ML-6[a] | ML-7[b] | ML-8[c] |
|---|---|---|---|---|---|---|---|---|
| Measured dBA Leq | 55.1 | 49.3 | 57.8 | 71.3 | 71.4 | 73.8 | 61.3 | 52.9 |
| **Baseline dBA** | **55.1** | **50** | **57.8** | **71.0** | **71.4** | **73.8** | **61.3** | **52.9** |

Source: Noise Report, Appendix J
a) Commercial zoning
b) Warner center, Commercial
c) Warner Center, Residential

During the daytime, some deviation from these standards is allowed for short-term (less than 15 minute) noise generation. The Noise Ordinance numerical standards apply to "stationary" sources of noise generation (mechanical equipment such as air conditioning, refrigeration, heating, or pumping). If such activities are not specifically prohibited by the Noise Ordinance, the noise constraint for general stationary sources is that they may not increase the ambient level by more than 5 dB above ambient (measured or presumed minimum) levels associated with the zoning.[53]

[53] City of Los Angeles Municipal Code Section 111.02.




Source: Veneklasen Associates, November 27, 2023.



Noise Monitoring and Receptor Locations

FIGURE 9

### Construction Noise Impacts

Construction noise is governed by Noise Ordinance limitations on allowable times of equipment operations. Chapter XI of the LAMC limits construction activities to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on any Saturday. Construction is not permitted on any national holiday or on any Sunday.

In addition, LAMC Section 112.05 prohibits the use of any powered equipment or powered hand tool for construction within a residential zone or within 500 ft thereof that produces a maximum noise level exceeding 75 dB at a distance of 50 feet from the source. However, this noise limitation does not apply where compliance is technically infeasible despite the use of mufflers, shields, sound barriers or any other noise reduction device or techniques. Although the City standard concerns the noise level measured at 50 feet from equipment, the Noise Report calculates noise level at the receptor since work is not occurring at an even distance along the property line of the campus, and the intent of the City requirement can be interpreted to keep construction noise at or below 75 dB for adjacent residential receptors.

The Construction Noise Handbook prepared by the Federal Highway Administration (FHA) includes a national database of construction equipment reference noise emissions levels. The FHA uses these reference noise emission levels in their Roadway Construction Noise Model. The FHA handbook also provides an acoustical usage factor to estimate the fraction of time each piece of equipment is operating at full power during construction. The acoustical usage factor, abbreviated (U.F.), is a key input used to calculate sound levels averaged over time expressed as Leq. The sound level prediction equation is expressed as follows for the hourly average sound level (Leq) at distance (D) between the source and receiver.

$$Leq = Lmax\ @\ 50' - 20 \bullet \log (D/50') + 10 \bullet \log (U.F./100) - I.L.$$

Where:

*Lmax @ 50' is the published reference noise level at 50 feet*

*U.F. is the acoustical usage factor for full power operation per hour*

*I.L. is the insertion loss for intervening barriers*

The construction equipment types and quantities anticipated to be used during construction are as shown in Section 3, Table 3. The three loudest pieces of equipment and the max noise level they produce at 50 feet and the hourly Leq according to the usage factor is shown below in **Table XIII-2, Example Equipment Noise Levels.**

The loudest equipment are shown for example as sound does not add arithmetically as described in this section's introduction, and these loudest pieces of equipment, or combinations thereof, will be the largest noise sources in this evaluation.

# 4. Environmental Checklist and Analysis

**Table XIII-2**
**Example Equipment Noise Levels**

| Equipment | Lmax @ 50 ft. (dB) [2] | Usage Factor | Hourly Leq (dB) |
|---|---|---|---|
| Concrete Saw | 90 | 20% | 83 |
| Grader and Excavator | 85 | 40% | 81 |
| Tractor/Loader/Backhoe | 84 | 40% | 80 |

Source: Federal Highway Administration, Construction Noise Handbook, Chapter 9, Construction Equipment Noise Levels and Ranges
Usage Factor (U.F.) is the portion of time equipment is operating at full power during construction. The Leq is reduced by the U.F. according to the formula 10 • log (x/100) where x is the U.F. % as a whole number.

Per the 2023 SPEIR schools, residences, hospital facilities, religious facilities, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community are considered sensitive receptors to noise. Commercial and industrial uses are not considered noise- and vibration-sensitive uses. The Noise Report identifies eight receptor locations near the monitoring locations for assessment purposes. Four of the monitoring locations are near residential uses, which are the only nearby uses that would be considered sensitive receptors. The sensitive receptors closest to where construction will take place are identified as Sensitive Receptors 2 and 8 (SR-2, -8). Equipment will be operating at the very eastern end of the project site where hardscape will be replaced and new visitor concession facilities constructed, which is approximately 85 feet from SR-8. SR-2 will be closer to work occurring in and around the athletic track, which is approximately 126 feet away. Each residence on Jordan Avenue north of SR-2 is progressively further away from construction activity than the residence below it. The furthest residence, SR-1, is approximately 300 feet from the nearest location of construction activity. Noise levels diminish with distance so further receptors would not experience the same noise levels as closer receptors. The Noise Report assesses noise level at all eight of the receptor locations, finding that SR-2 and SR-8 would experience noise above 75 dB during demolition, grading, and construction phases. In order to reduce noise levels below 75 dB some manner of noise attenuation device or devices must be used. The Noise Report modeled the inclusion of an eight-foot tall noise barrier along the east side of the work area and determined it could provide the necessary noise attenuation. **Table XIII-3, Construction Noise Levels** provides the details found in Table 6 of the Noise Report.

**Table XIII-3**
**Construction Noise Levels**

| Scenario | Daytime Noise Levels at Sensitive Receptors (dB) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | SR-1 | SR-2 | RL-3 | RL-4 | RL-5 | RL-6 | RL-7 | SR-8 |
| Existing Ambient Noise Level | 55 | 50* | 58 | 71 | 71 | 74 | 61 | 53 |
| Demolition | 73 | **80** | 73 | 72 | 72 | 71 | 72 | **83** |
| *Demolition with barrier* | | *69* | | | | | | *71* |
| Grading | 73 | **80** | 72 | 71 | 71 | 71 | 72 | **83** |
| *Grading with barrier* | | *68* | | | | | | *71* |
| Construction | 71 | **78** | 71 | 69 | 69 | 69 | 70 | **81** |
| *Construction with barrier* | | *66* | | | | | | *69* |
| Paving | 65 | 72 | 64 | 63 | 63 | 63 | 64 | 75 |
| *Paving with barrier* | | *60* | | | | | | *63* |

Source: Noise Report, Appendix J

Per SC-N-8 the District's general contractor would be required to attenuate construction noise to the 75 dB threshold. A barrier as modeled by the Noise Report and depicted in **Figure 10: Proposed Noise Barrier Locations**, would reduce construction noise to below 75 dB for the nearest sensitive receptors. This method was used for modeling purposes and is not the only noise reduction method available. Noise levels need to be attenuated by at least 8 dB to reduce maximum noise from 83 dB to 75 dB. This is a level of noise reduction that can be achieved through multiple available methods.

Construction noise occurring in the center of campus where most construction would take place would not require nose barriers for sensitive receptors as the distance would render all noise levels below 75 dB Leq. Noise in classrooms would exceed 75 dB, though as this would be an impact to the Project itself, not to the environment (i.e. offsite receptors), the 75 dB threshold does not apply. The District OEHS would assess impacts to student learning according to their standards and, per SC-N-9, would require barriers, temporary window treatments or other measures, or potentially relocating students during construction, to meet District requirements to protect students and staff.

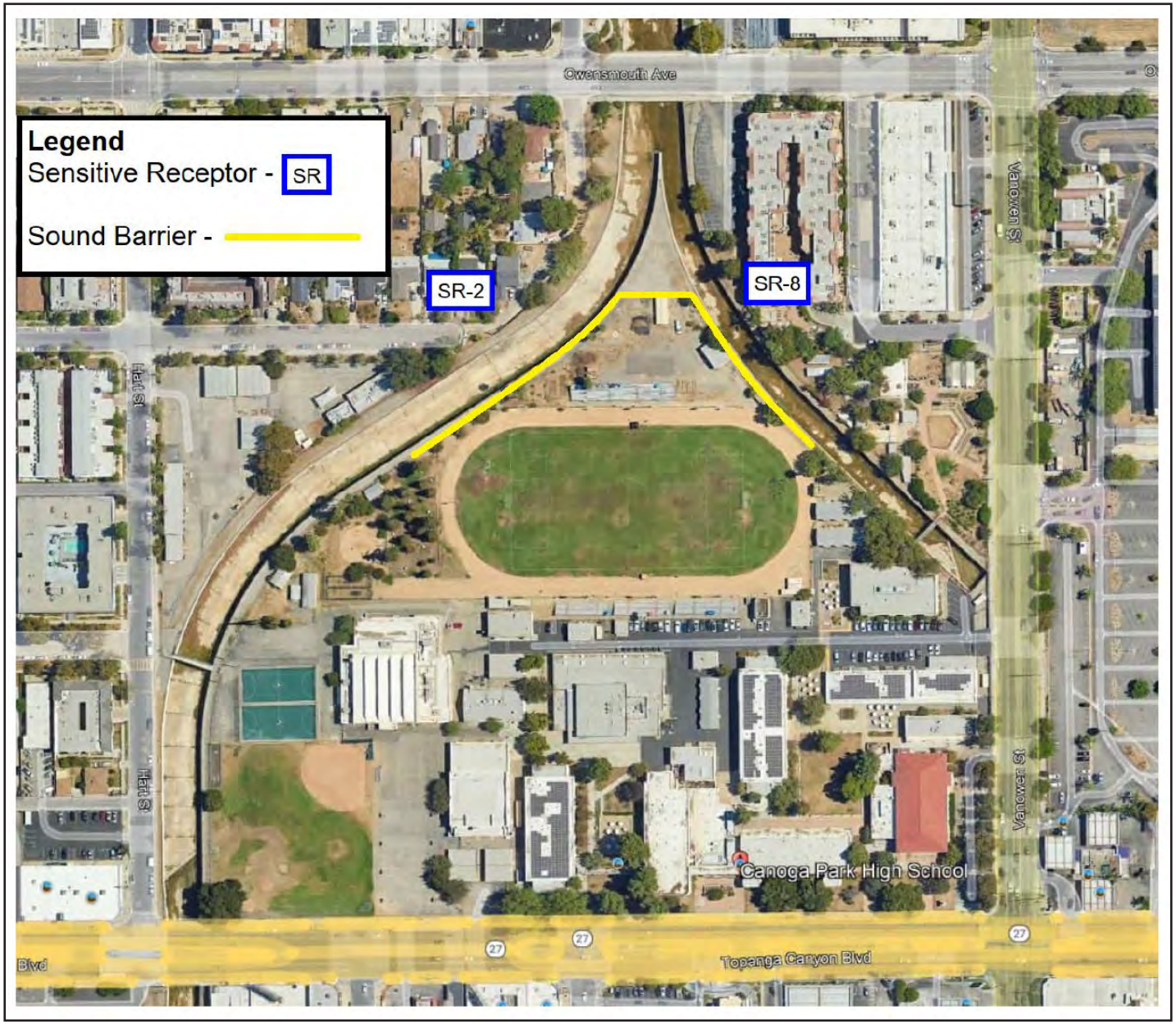
Since there is no change in the enrollment capacity of the school, and no new noise sources as part of the Project, save for HVAC equipment which would not be close enough nor substantial enough to produce significant noise, there would be no operational noise impacts that would significantly exceed existing noise levels produced by the campus. As such, there would be no new impacts on sensitive receptors for operational noise.

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

**Less Than Significant Impact.** Construction activities generate ground-borne vibration when heavy equipment travels over unpaved surfaces or is engaged in soil movement. The effects of ground-borne vibration may include discernable movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Ground vibration is quickly damped out within the softer sedimentary surfaces of much of Southern California. Because vibration is typically not an issue, very few jurisdictions have adopted vibration significance thresholds. Vibration thresholds have been adopted for major public works construction projects, but these relate mostly to structural protection (cracking foundations or stucco) rather than to human annoyance.

A vibration descriptor commonly used to determine structural damage is the peak particle velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second (in/sec). The California Department of Transportation (Caltrans) damage criterion of 0.3 PPV in/sec is appropriate for intermittent vibration in older residential structures.

There are no sensitive receptors that are directly adjacent to construction areas as the Arroyo Calabasas and Bell Creek canals create significant barriers to the transmission of vibration through the ground. Whereas sound travels out from a noise source in a direct line between source and receiver, vibration is transferred through the ground and the gap created by the canals creates a significant barrier to the transmission of vibration. The canals are 40 and 60 feet in width, and more than 10 feet deep. The nearest receptor to an area of construction is SR-8, as mentioned above. Including the distance created by the Arroyo Calabasas the receptor is calculated as 140 feet away for the purposes of analysis. At this distance PPV is calculated at a maximum of 0.016 for operation of the grader, which is far below the Caltrans damage criterion of 0.3 PPV in/sec, and the Lv, or




Source: Veneklasen Associates, November 27, 2023.



# Proposed Noise Barrier Location

FIGURE 10

vibration decibels, Vdb, used by the Federal Transit Administration (FTA) to calculate human annoyance, at 71.6, which is below the FTA threshold of 72 VdB, levels above which would cause human annoyance. Therefore, vibration impacts from construction activities would be less than significant.

Hauling of materials to and from the site is another potential source of vibration damage or annoyance, and the nearest receptor to hauling activities would be 30 feet from a truck traveling on either Topanga Canyon Boulevard or Vanowen Street. Here the PPV would be 0.058 and the VdB 83.6. The VdB is above the FTA 72 VdB threshold, however, this level of vibration would only potentially occur for a brief moment as a truck passes, and the FTA manual states in Section 7 that it is "unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Therefore, vibration impacts from hauling activities would be less than significant.

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

**No Impact.** The Project is neither located within an airport land use plan nor within two miles of a public use airport nor a private airstrip that would expose people residing or working in the Project area to excessive noise levels. The airport closest to the Project site is the Van Nuys Airport located approximately 6.5 miles to the east. The Project would have no impact with regard to this issue.

# 4. Environmental Checklist and Analysis

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

## Explanation:

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-PED2 | LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.<br><br>**OEHS Traffic and Pedestrian Safety Program**<br>LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. |
| SC-PED3 | LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:<br>▪ Clearly designate passenger loading areas with the use of signage, painted curbs, etc.<br>▪ Install new walkway and/or sidewalk segments where none exist.<br>▪ Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.<br>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades. |
| SC-PED4 | LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.<br><br>**School Traffic Safety Reference Guide REF 4492.1.**<br>This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide |

| | |
|---|---|
| | also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff. |
| SC-PED-5 | LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.<br><br>**School Design Guide.**<br>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 | Implementation of SC-T-4. |

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

**Less than Significant Impact.** The school is located in a developed urban area characterized by commercial, residential, and institutional land uses. The school has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways. Campus pedestrian and vehicular entryways would remain the same and drop off/pickup points would remain unchanged, therefore, there would be no new variables introduced to the interface between the campus and public streets. Changes to interior circulation would follow SC- PED-5, primarily applicable to the central promenade. The promenade would be straightened, widened, and landscaped, with hardscape and landscaping changes made with the intent of orienting the space toward pedestrians as much as possible. Currently the promenade is undifferentiated asphalt with only one area clearly designated for pedestrian crossing. The redesigned promenade would continue to be used as an access road and provide parking but would be designed with visual and physical cues to increase pedestrian safety and ease and comfort of use. As such, there would be no increase in vehicular and/or pedestrian safety hazards due to a design feature or incompatible use, and impacts would be less than significant created.

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

**Less than Significant Impact.** Construction activities may temporarily create unsafe routes for students as they would require the use of haul trucks, equipment, worker vehicles, and construction activities on the Campus while students are in school. The construction and demolition activities would result in a temporary increase in truck activity on the roadway network.

To avoid conflicts between construction activities and students, the District would implement SC-T-4, which requires the construction contractor to prepare a construction worksite traffic control plan prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic on the Campus and in the neighborhood. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Construction contractors would work closely with the school administration during all construction to coordinate activities and ensure students are safe.

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Pursuant to the requirements of SC-PED-3, LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide by coordinating with City of Los Angeles Department of Transportation (LADOT) to implement any required infrastructure improvements affecting pedestrian safety. The District would implement SC-PED-2 though SC-PED-4, to implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program and design the proposed Project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. Therefore, impacts to existing routes to school would be less than significant and no further analysis is required.

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

**No Impact.** The Project is a continuing use and has been located adjacent to Topanga Canyon Boulevard and Vanowen Street, both arterial roadways, for many decades. There is no change to this context, and therefore there would be no new impacts.

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

## Explanation:

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

**No Impact.** The proposed Project is a modernization of Canoga Park High School. The Project does not expand enrollment capacity of the school and does not expand infrastructure outside of the school that would allow for new development, and therefore would not induce growth within the local community. The Project also does not include the extension of roads or other infrastructure to indirectly induce growth.

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

**No Impact.** The Project does not involve any activity outside of existing school grounds, and therefore would not displace housing or people resulting in the need of replacement housing elsewhere. Therefore, impacts would occur.

# 4. Environmental Checklist and Analysis

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XVI. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: | | | | |
| a. Fire protection? | ☐ | ☐ | ☒ | ☐ |
| b. Police protection? | ☐ | ☐ | ☒ | ☐ |
| c. Schools? | ☐ | ☐ | ☐ | ☒ |
| d. Parks? | ☐ | ☐ | ☐ | ☒ |
| e. Other public facilities? | ☐ | ☐ | ☐ | ☒ |

## Explanation:

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

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

### a) Fire protection?

**Less than Significant Impact.** The Project does not increase enrollment capacity of the school or propose any new buildings outside of the existing campus, and therefore can be served by existing fire protection facilities. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the Project site. The nearest LAFD fire station to the site is Fire Station 72, located at 6811 De Soto Avenue, approximately 0.8 mile east of the Project site. The components of the proposed site plan are similar to the existing campus, but would be subject to current fire and safety codes. Pursuant to SC-PS-1, the Project would be designed to accommodate fire equipment access during construction and specifications for the new emergency access driveways and fire protection systems must be approved by the State Fire Marshall. Therefore, impacts would be less than significant and no further analysis is required.

### b) Police protection?

**Less than Significant Impact.** The LAUSD operates their own police department, the Los Angeles School Police Department (LASPD), which provides security for the schools and centers within its jurisdiction. Canoga

Park High School is located with the North Division of the LASPD.[54] The Project is also located in the Los Angeles Police Department (LAPD) jurisdiction and would be a secondary provider of police protection to the school campus. The nearest LAPD station is the Topanga Community Police Station located at 21501 Schoenborn Street approximately 1.75 miles north of the campus. Police services are primarily mobile, however, so proximity to a station does not necessary effect service.

Since the Project is not increasing enrollment capacity or constructing new facilities outside of the existing campus existing police services would remain adequate for servicing the Project. Any police demand associated with construction of the Project due to vandalism, trespassing, and/or left would be a temporary and not demand the construction of new or expanded police facilities. The Project would continue to be consistent with LAUSD standards regarding emergency response procedures and school safety, as required. Therefore, the Project would not require an expansion of police facilities and impacts would be less than significant impact.

**c) Schools?**

**No Impact.** The Project is the modernization of an existing school with no increase in enrollment capacity. The proposed Project addresses the most critical physical conditions and essential safety issues at the campus as defined by the Board of Education. Thus, the Project would not require the expansion of school facilities and there would be no impacts.

**d) Parks?**

**No Impact.** The Project does not expand enrollment capacity of the school and does not construct any new facilities outside of the existing campus. Therefore, the project would not induce any new local expansion of population that might require the development of any new park facilities or refurbishment of any existing park facilities. Therefore, the Project would not create increased demands for parks and no impacts would occur.

**e) Other public facilities?**

**No Impact.** The demands for other public services and facilities such as libraries are generated by an increase in population that exceeds facility service ratios. Since the Project does not increase enrollment capacity it would not induce a population increase that may require expansion of public facilities, and there would be no impacts.

[54] Los Angeles Unified School District, LA Unified Region North, accessed on August 16, 2023 at: https://www.lausd.org/site/handlers/filedownload.ashx?moduleinstanceid=76966&dataid=127908&FileName=North_2022-2023_Poster.pdf

# 4. Environmental Checklist and Analysis

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XVII. RECREATION.** Would the project: | | | | |
| a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☐ | ☒ |
| b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? | ☐ | ☐ | ☒ | ☐ |

## Explanation:

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

**No Impact.** The Project would not increase enrollment capacity of the school and thereby would not induce population growth which could result in an increase of nearby parks. Also, Canoga Park High School has recreational facilities and playfields and, 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. Therefore, the Project would not lead to an increase in use of recreational facilities, and there would be no associated impacts regarding deterioration of such facilities.

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

**Less Than Significant Impact.** The Project is the modernization of a public high school, and public schools by their nature include recreational facilities. There is no expansion of recreational facilities off-campus and any renovated facilities on campus, such as the athletic field and surrounding running track, are included in the analysis of the Project's potential impacts. Potential impacts from the renovation of existing recreational facilities on campus would be less than significant as discussed throughout this document.

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

### Explanation:

The following analysis is based in part on the Pedestrian Safety and Vehicle Miles Traveled Analysis (Transportation Analysis), prepared by Associated Transportation Engineers dated November 16, 2023, which is attached as Appendix K.

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

| **LAUSD Standard Conditions of Approval** | |
|---|---|
| SC-T-1 | LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.<br><br>**Traffic and Pedestrian Safety Requirements for New Schools**<br>Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:<br>▪ Site Selection<br>▪ Bus and Passenger Loading Areas<br>▪ Vehicle Access<br>▪ Pedestrian Routes to School<br>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. |
| SC-T-2 | LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.<br><br>**School Design Guide**<br>Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:<br>▪ Parking Space Requirements<br>▪ General Parking Guidelines |

# 4. Environmental Checklist and Analysis

| | |
|---|---|
| | ▪ Vehicular Access and Pedestrian Safety<br>▪ Parking Structure Security |
| SC-T-3 | LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:<br>▪ Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.<br>▪ 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.<br>▪ Implementation of SR2S, traffic control and pedestrian safety devices.<br>▪ Fair share contribution and/or other mitigation measures for potential traffic impacts.<br>▪ Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.<br>▪ Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.<br>▪ 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 Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods. |

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

**No Impact.** The primary transportation planning document for the City of Los Angeles is the Mobility Plan 2035, which is the transportation element of the General Plan. The Plan is structured around five goals: Safety First; Access for All Angelenos; World Class Infrastructure; Collaboration, Communication, and Informed Choices; Clean Environments & Healthy Communities. The Plan identifies policies for each of these goals which are primarily concerned with the design and use of public rights of way, with an emphasis on pedestrian experience and the provision of more multi-modal transportation opportunities throughout the City.

The Project would not conflict with the objectives of the Mobility Plan 2035. The Project would enhance circulation and parking within the campus, and offsite infrastructure would not be modified. With no increase in enrollment capacity the Project would continue to operate much as it has over the last 40 years since its last modernization activities. If campus drop off/pickup points are modified SC- T-3 would be employed to ensure the areas are suitable and meet the requirements of the LADOT. As a continuing use the Project would not introduce any new variables into the circulation network that would have the potential to conflict with programs, plans, ordinance or policy that concern transit, roadway, bicycle, or pedestrian facilities, and for this reason there would be no impacts.

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

**No Impact.** According to the CEQA Guidelines Section 15064.3(b), generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. The section establishes that a land use project's effect on automobile delay shall not constitute a significant environmental impact.

Construction of the proposed Project would involve construction equipment and additional vehicles for construction workers to access the Project site. Construction equipment would primarily remain on site for the duration of the construction except for haul trucks. LAUSD encourages carpooling for construction contractors getting to and from the Project site and will work with the contractor to minimize vehicle trips to the extent feasible. Construction equipment and contractor travels to the Project site would be temporary in nature, ceasing at the completion of the proposed Project.

Post construction the Project would have no change in use with no increase in enrollment capacity, and therefore should not result in any changes to VMT. The Transportation Analysis calculated the school to generate 1,335 average daily trips (ADT), a figure that would remain the same both pre- and post-construction. VMT was calculated utilizing the City of Los Angeles VMT Calculator at 13,990 daily VMT, with no increase in VMT post-construction. A VMT analysis would be required only if the Project resulted in a VMT increase of 250 or more trips. As there is no increase in VMT, a further VMT analysis is not required. Therefore, no VMT related impacts would occur and no further analysis is required.

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

**No Impact.** As explained in Section XIV internal circulation would be enhanced with changes to the promenade made with the intent of orienting the space toward pedestrians as much as possible. Currently the promenade is undifferentiated asphalt with only one area clearly designated for pedestrian crossing. The redesigned promenade would continue to be used as an access road and provide parking but would be designed with visual and physical cues to increase pedestrian safety and ease and comfort of use. Campus pedestrian and vehicular entryways would likely remain the same and drop off/pickup points should remain unchanged, therefore, there would be no new variables introduced to the interface between the campus and public streets. If campus drop off/pickup points are modified SC-T-3 would be employed to ensure the areas are suitable and meet the requirements of the LADOT. The Project would employ standard engineering practices in regard to the interface between school entry points and the public right-of-way, such as standard driveway width and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards. As such, there would be no increase in hazards due to a geometric design feature and there would be no impacts.

**d) Result in inadequate emergency access?**

**Less Than Significant Impact.** Pedestrian and vehicle access to and from campus during construction would be minimally altered and any temporary changes would be completed as outlined in a worksite traffic control plan per SC-T-4. These measures address potential congestion from construction activities that would help

# 4. Environmental Checklist and Analysis

keep roadways accessible to emergency vehicles. SC-PS-1 (see Section XVI) would provide construction plans for review to the LAFD to ensure proper access is maintained. The primary staging area during construction would likely be the basketball courts to the north of the campus per the Criteria Documents. This would prevent staging activities interfering with campus access. The promenade would continue to provide primary emergency access during construction and would only experience temporary, partial closure during reconstruction with a clear fire access path maintained at all times. Post-construction the promenade would provide primary emergency access, with other access points available at the parking lot/play courts access from Topanga Boulevard, and the northeast corner of campus off of Hart Street. The athletic field would serve as an area of refuge during emergencies clearing staff and students from structures within the campus (see Figure 1.3 in the Criteria Documents). Emergency access would be enhanced post-construction with enhancement and widening of the promenade, therefore, Project construction would have a less than significant impact on emergency access, and operational emergency access would not be impacted.

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

**XIX. TRIBAL CULTURAL RESOURCES.**

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

☐ Yes ☒ No

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

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

### Explanation:

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-TCR-1 | All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District. |
| SC-TCR-2 | In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications:<br>▪ At least one year of experience providing Native American monitoring support during similar construction activities.<br>▪ Be designated by the Tribe as capable of providing Native American monitoring support.<br>▪ Have a combination of education and experience with Tribal cultural resources.<br><br>Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable). |

| | |
|---|---|
| | Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.<br><br>The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified. |

As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the lead agency's AB 52 notice. LAUSD contacted the NAHC regarding seven Major Modernization Projects, including Canoga Park High School, to obtain a list of tribes affiliated with the areas of work. Subsequently, LAUSD as lead agency submitted letters requesting consultation to all tribes provided by the NAHC on August 25, 2023 in conformance with the consultation requirements of AB 52. At the conclusion of the 30 days noticing period none of the contacted tribes had requested consultation.

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

**Less Than Significant Impact.** As discussed above in Section V, Cultural Resources, the Cultural Resource Phase I Assessment of the project site found no record of cultural resources within the site and no relevant resources within the surrounding buffer area. The assessment also requested NAHC review of the Sacred Lands File which returned a negative result. This does not preclude the possibility that unknown resources may exist on the Project site and be uncovered during ground-disturbing activities, however, SC-CUL-6 through SC-CUL-10, and SC-TCR-1 and SC-TCR-2 would ensure any potential impacts to tribal cultural resources eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), would be less than significant.

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

**Less Than Significant Impact.** As discussed above, there are no known tribal resources on the site, and little evidence the site should be considered likely to contain a tribal resource. However, as mentioned above, there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities, though this is considered unlikely. SC-CUL-6 through SC-CUL-10, and SC-TCR-1 and SC-TCR-2 would ensure that excavation is monitored and if any tribal cultural resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 was uncounted, impacts would be less than significant.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XX. UTILITIES AND SERVICE SYSTEMS.** Would the project: | | | | |
| a. Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☐ | ☒ |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | ☐ | ☐ | ☒ | ☐ |
| c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments? | ☐ | ☐ | ☒ | ☐ |
| d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | ☐ | ☐ | ☒ | ☐ |
| e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

### Explanation:

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

| LAUSD Standard Conditions of Approval | |
|---|---|
| SC-USS-1 | Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:<br><br>**School Design Guide.**<br>Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.<br><br>**Construction & Demolition Waste Management.**<br>This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight. |

| | |
|---|---|
| SC-USS-2 | LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service. |
| SC-USS-3 | LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms. |
| SC-GHG-1 | Implementation of SC-GHG-1. |
| SC-GHG-2 | Implementation of SC-GHG-2. |
| SC-GHG-3 | Implementation of SC-GHG-3. |

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

**No Impact.** The Project would include replacement and renovation of buildings and grounds on campus. There is no increase in enrollment capacity and as such there is no need to replace or upgrade offsite drainage, sewer, or water pipes, or the like. There is also no need to relocate or construct new utility facilities as the Project site is already adequately served by all necessary utilities. As no relocation or construction of new utilities is necessary, there would be no impacts.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less than Significant Impact.** LADWP provides water service for domestic and protection uses. The LADWP receives their water supply from several sources such as the Los Angeles Aqueduct, local groundwater, recycled water, and the Metropolitan Water District of Southern California.[55] According to the 2020 Urban Water Management Plan (UWMP), the LADWP has sufficient water supplies available for average weather years through the Year 2045 with existing passive conservation, as well as for single dry years and multiple dry years.[56] As the Project would not increase student enrollment, water fixtures in new buildings would meet the most recent efficiency requirements, and new landscaping and irrigation would be required to meet the water-saving requirements of the Model Water Efficient Landscape Ordinance (MWELO), water use on campus would not be expected to increase and could potentially decrease by a measurable amount. Therefore, the Project's impact on available water supplies would be less than significant.

[55] Los Angeles Department of Water and Power, L.A. Water Sources in 2022, accessed on August 29, 2023 at: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-dwqr-laws?_adf.ctrl-state=ogxq80rpw_4&_afrLoop=318525705789160&_afrWindowMode=0&_afrWindowId=z4wc9gpmq_39#%40%3F_afrWindowId%3Dz4wc9gpmq_39%26_afrLoop%3D318525705789160%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dz4wc9gpmq_88

[56] LADWP Urban Water Management Plan: 2020, approved May 25, 2021.

**c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?**

**Less than Significant Impact.** The Los Angeles Bureau of Sanitation (LA Sanitation) provides wastewater conveyance infrastructure and treatment service for the City, including the Project site. Wastewater from the Project area is treated by the Donald C. Tillman Water Reclamation Plant. The plant has a treatment capacity of 80 million gallons per day (mgd) and is currently processing approximately 55 mgd.[57] As enrollment capacity would not be increased by the Project sewer generation is not expected to substantially change. Therefore, the Project would have a less than significant impact on wastewater treatment capacity of the provider.

**d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less than Significant Impact**. Los Angeles Sanitation (LASAN) is responsible for the collection and removal of all solid waste products within the City of Los Angeles. As enrollment would not be increased by the Project there would be no substantial increase in solid waste during operations of the school, and SC-USS-3 implements solid waste diversion requirements from the state, including the California Integrated Waste Management Act (AB 939) and follow-up assembly bills AB 341, AB 1826, and AB 876. During construction waste would be generated from demolition, excavation, and construction activities. SC-USS-1 implements construction waste diversion requirements which would reduce the amount of waste sent to landfills. Pursuant to LAMC, Section 99.04.408.1, the Project would be required to divert at least 50 percent of construction and demolition (C&D) waste as a condition of permitting. Section 66.32 of the LAMC requires that C&D waste from the City be taken to a City certified C&D waste processor to ensure diversion of recyclables. All haulers and contractors who collect, haul, or transport C&D waste must have a Private Waste Hauler Permit from the Los Angeles Sanitation and Environment. Accordingly, the Project would be required to hire a C&D private waste hauler certified to properly divert recyclable waste. Waste would ultimately likely be taken to the Sunshine Canyon landfill in Sylmar which has the capacity to accept 12,100 tons of waste a day but currently only receives 7,420 tons, and is projected to remain operational for 17 more years.[58] Contaminated waste would be handled according to the Soil Removal Plan (Appendix H) and Asbestos Report (Appendix I).

With implementation of SC-USS-1, and no proposed increase in students, construction waste would not overwhelm local infrastructure and operations would not generate solid waste in excess of the capacity of local infrastructure or impair solid waste reduction goals during construction, and impacts would be less than significant.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less than Significant Impact.** As detailed in Section IX, removal of contaminated soil, contaminated asphalt, and contaminated building materials would be done according to the procedures outlined in the Soil Removal Plan and Asbestos Report which reiterate the provisions required of SC-HAZ-4, which implements the various

[57] LA Sanitation, Donald C. Tillman Water Reclamation Plant informational brochure, Accessed on October 26, 2023 at: https://www.lacitysan.org/san/sandocview?docname=cnt067745

[58] Los Angeles County Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021.

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governing federal, state and local requirements including the California Hazardous Waste Control Law (Title 22, Division 4.5) concerning removal, handling, and disposal of contaminated waste, and SCAQMD permitting for Rule 1466 compliance (dust control). State law, reiterated in SC-HAZ-4 requires all soil excavation and disposal activities to be completed by a properly licensed Remediation Contractor under the oversight of an Environmental Consultant selected by LAUSD's Office of Environmental Health and Safety (OEHS). The OEHS is the District authority which oversees proper handling of hazardous materials. During operations the chemical waste from science laboratories, shop classes, and maintenance activities, and electronic wastes, would be handled according to OEHS protocols as well, ensuring all legal disposal requirements are followed.

All inert construction waste would be handled according to SC-USS-2 and the LASAN requirements, and all operational waste handled according to state law, implemented by LASAN as detailed above in XX(d). Impacts would be less than significant.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XXI. WILDFIRE.** | | | | |
| Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones? | | | | |
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | ☐ Yes | | | ☒ No |
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☒ |
| c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☐ | ☒ |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☒ |

## Explanation:

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The Project site is an urban high school campus located in a highly urbanized area that has been developed for many decades. The purpose of Section XXI is to analyze "the wildfire risks of development projects in the wildland-urban interface and other fire prone areas."[59] Wildfire prone areas are those areas classified by the California Department of Forestry and Fire Protection (CAL FIRE) as high or very high fire hazard severity zones (VHFHSZ). State Responsibility Areas (SRA) are high fire hazard zones where the State has responsibility for firefighting operations.[60] Section XX is present in order to require lead agencies to consider the wildfire impacts of projects within SRAs, Fire Hazard Severity Zones (FHSZs) and VHFHSZs, and in areas of wildland-urban interface (WUI). Projects outside of these zones in an urban setting are not at risk of wildfire and the questions of Section XXI are not applicable.

Wildfires are defined in Chapter 7A of the CBC, Section 702A as "any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources as defined in Public Resources Code

[59] California Office of the Attorney General, Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act, October 10, 2022.
[60] Ibid.

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Sections 4103 and 4104." PRC Sections 4103 subsequently define "Forest Fire" and use of the term "uncontrolled fire" within Division 4 of the PRC. A fire in an urban setting, typically called a "structure fire," is not a wildfire. Urban buildings surrounded by an urban landscape may be subject to the risk of a structure fire, but by definition cannot be subject to the risk of wildfire, unless located within an SRA, FHSZ, VHFHSZ, or WUI area.

The Project Site is not located within or near an existing or proposed SRA[61] or land classified as FHSZ or VHFHSZ,[62] and is not within a WUI area.[63] The nearest such areas are approximately three miles to the west in the Simi Hills. There are no wilderness areas or otherwise heavily vegetated areas that may be subject to wildfire between the Project site and this VHFHSZ area, but rather unbroken, fully developed urban spaces, all of which are within the service area of various LAFD stations.

Therefore, the Project Site cannot reasonably be considered to be "located in or near state responsibility areas or land classified as very high fire hazard severity zones" nor within or near a WUI area and thus Section XXI is not applicable to the Project, and there would be no Project impacts in relation to wildfire.

**b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact.** As explained in XXI(a) above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

**c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No Impact.** As explained in XXI(a) above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** As explained in XXI(a) above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

[61] Board of Forestry and Fire Protection, State Responsibility Area Viewer, Accessed on Jul 11, 2022 at: https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/.
[62] CalFire, FRAP, FHSZ Viewer, Accessed on July 11, 2022 at: https://egis.fire.ca.gov/FHSZ/.
[63] CalFire, FRAP, Wildland Urban Interface (WUI) map, December 2019, available at: https://frap.fire.ca.gov/media/10300/wui_19_ada.pdf

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XXII. MANDATORY FINDINGS OF SIGNIFICANCE.** | | | | |
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☐ | ☒ | ☐ |
| b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). | ☐ | ☐ | ☒ | ☐ |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ☒ | ☐ |

## Explanation:

**a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Less Than Significant Impact.** As discussed above in Section IV, Biological Resources, the Project site is located within an urbanized area of the City, surrounded by urban uses, including a major arterial street and adjacent residential and commercial uses, and it would have unlikely potential to degrade the quality of the environment, based on the analyses. The Project includes construction within an existing campus which does not represent substantial habitat for fish or wildlife. The Project would not eliminate a plant or animal community or restrict the range of any plant or animal. As discussed in Section V. Cultural Resources, the Project development would not eliminate any known important examples of the major periods of California history or prehistory, and it would not eliminate any unknown important examples of California prehistory through compliance with applicable Standard Conditions. Impacts would be less than significant.

**b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

**Less Than Significant Impact.** The Project involves demolition and construction within an urbanized area of the City on an existing campus. There is no expansion of enrollment capacity and, once constructed, As

concluded in this analysis, the Project's incremental contribution to each evaluated issue would be less than significant, mitigated to less than significant, or would have no impact. As such, the Project's contribution to cumulative impacts would be less than significant and no additional mitigation measures are required.

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

**Less Than Significant Impact.** As discussed in the preceding environmental analysis, the Project would not have significant environmental effects with implementation of the Standard Conditions identified within this document. As such, the Project would not have substantial adverse effects on human beings. Therefore, this potential impact would be less than significant and no additional mitigation measures are required.

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# 5. List of Preparers

## 5.1 LEAD AGENCY

### Los Angeles Unified School District, Office of Environmental Health & Safety

Julian Capata, CEQA Manager - Contract Professional

Ed Paek, AICP, Senior CEQA Project Manager

Gwenn Godek, CEQA Advisor

Christian Taylor, Historic Preservation Specialist

Anthony Espinoza, Environmental Health Manager/Environmental Program

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## 5.2 CEQA CONSULTANT

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Attn: Mr. Scott A. Schell

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# Appendix

Appendices are on USB Drive

A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data

B. Arborist Report

C. Cultural Resources Phase I Assessment

D. Construction Energy Worksheets

E. Preliminary Geotechnical Evaluation

F. Phase I Environmental Site Assessment

G. Phase II Environmental Site Assessment

H. Soil Removal Plan

I. Project Manual for Asbestos Removal

J. Noise Report

K. Transportation Assessment

# Appendix

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