

September 2021 | Mitigated Negative Declaration

# RISE KOHYANG MIDDLE SCHOOL

*Prepared for:*

**LEAD AGENCY: Los Angeles Unified School District**

Office of Environmental Health and Safety

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# Los Angeles Unified School District

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## MITIGATED NEGATIVE DECLARATION

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

**LEAD AGENCY:** Los Angeles Unified School District

**PROJECT TITLE:** Rise Kohyang Middle School

**PROJECT LOCATION:** The proposed Project site is in the city of Los Angeles (west of downtown) in the Pico-Union neighborhood. There are 11 addresses associated with the site: 1700 and 1710 West Olympic Boulevard, and 1001, 1003, 1005, 1007, 1011, 1015, 1019, 1023, 1029 South Beacon Avenue (Assessor's Parcel Number 5137-017-014).

**PROJECT DESCRIPTION:** The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District for the construction and operation of a charter school (Rise Kohyang Middle School; proposed Project). The new independent charter middle school would have a capacity of 450 students in grades 6-8 and 40 full- and part-time teachers and staff. The proposed Project consists of a 69,200-square-foot, four-story building with staff space (reception/clerical/administration/teacher offices, conference rooms), restrooms, support space (custodial, storage, electrical/telecommunications rooms), 21 classrooms, science laboratories, a multipurpose room, student and faculty dining areas, and a subterranean parking garage.

Currently, Rise Kohyang Middle School is operating in an existing classroom space in a building located at 3020 Wilshire Boulevard, approximately one mile northwest of the new site. The existing school has 16 classrooms, a multipurpose room, and several office spaces and serves approximately 287 students in grades 6-8. When the new school is completed, students would transfer to the new location.

**EXISTING CONDITIONS:** The site is currently a surface parking lot with approximately 60 spaces; only minor structures (i.e., a parking attendant booth and storage bins/sheds) are present on-site. Most of the site is paved, with some dirt patches. The main driveway is on West Olympic Boulevard, with a second driveway and pedestrian access gate on Beacon Avenue; both are typically locked. There are sidewalks on West Olympic Boulevard and Beacon Avenue along both sides of the street. The Project site is bounded by West Olympic Boulevard, a 10-story office building, commercial uses, and multifamily residences to the north; Beacon Avenue, residential, commercial, and institutional (church and school) uses to the east; an alley, 6-story office building and subterranean parking garage, and residential uses to the west; and residential uses to the south.

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*Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.  
Our Vision: To eliminate all environmental health and safety risks at schools.*

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

- Rise Kohyang Middle School, 3020 Wilshire Boulevard, Los Angeles, CA 90057
  - Rise Kohyang Middle School website: <https://brightstarschools.org/District/Department/9-Public-Documents-Information>
- Pico Union Branch Library, 1030 S Alvarado Street, Los Angeles, CA 90006
- Felipe de Neve Branch Library, 2820 West 6th Street, Los Angeles, CA 90057
- LAUSD Office of Environmental Health and Safety Website
  - CEQA IS-MND: <http://achieve.lausd.net/ceqa>
- CEQAnet Web Portal: <https://ceqanet.opr.ca.gov/>

**SUMMARY OF IMPACTS:** The attached Initial Study was prepared to identify the potential effects on the environment from the installation and operation of the new campus and to evaluate the significance of those effects. Based on the environmental analysis, the proposed Project would have no impacts or less-than-significant environmental impacts related to the following 19 topics:

- |                               |                                      |                                   |
|-------------------------------|--------------------------------------|-----------------------------------|
| • Aesthetics                  | • Agriculture and Forestry Resources | • Air Quality                     |
| • Biological Resources        | • Cultural Resources                 | • Energy                          |
| • Geology and Soils           | • Greenhouse Gas Emissions           | • Hazards and Hazardous Materials |
| • Hydrology and Water Quality | • Land Use and Planning              | • Mineral Resources               |
| • Noise                       | • Population and Housing             | • Public Services                 |
| • Recreation                  | • Tribal Cultural Resources          | • Utilities and Service Systems   |
| • Wildfire                    |                                      |                                   |

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

September 2021 | Initial Study

**RISE KOHYANG  
MIDDLE SCHOOL**



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## Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ADT	average daily trips
AQMD	air quality management district
AQMP	air quality management plan
BMP	best management practices
BOE	Board of Education (LAUSD)
BLS	Basic Life Support
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHPS	Collaborative for High Performance Schools
CSTMP	Construction Staging and Traffic Management Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2e</sub>	carbon dioxide equivalent
dB	decibel
dBA	A-Weighted Decibel
dBA L <sub>eq</sub>	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
EIR	environmental impact report
EPA	US Environmental Protection Agency
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FTA	Federal Transit Administration

## Abbreviations and Acronyms

GHG	greenhouse gases
HVAC	heating, ventilation, and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LADOT	Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
Leq	Equivalent Continuous Noise Level
LST	localized significance thresholds
LUST	leaking underground storage tank
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mph	mile per hour
MTCO <sub>2e</sub>	metric ton of CO <sub>2e</sub>
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
OEHS	Office of Environmental Health and Safety (LAUSD)
O <sub>3</sub>	ozone
PDF	project design features
PEA	Preliminary Environmental Assessment
PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill
SC	Standard Conditions of Approval
SCAG	Southern California Association of Governments
SCS	sustainable communities strategy
SO <sub>2</sub>	sulfur dioxide



## Abbreviations and Acronyms

SoCAB	South Coast Air Basin
SRA	Source Receptor Area
STC	sound transmission class
SUSMP	standard urban stormwater mitigation plan
SWPPP	stormwater pollution prevention plan
ULSD	ultra low sulfur diesel
UST	underground storage tank
VdB	vibration decibel
VOC	volatile organic compounds

## Abbreviations and Acronyms

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# 1. Introduction

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## 1.1 OVERVIEW

The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District (LAUSD or District) for the construction and operation of a charter middle school on a site at the southwest corner of West Olympic Boulevard and Beacon Avenue in the City of Los Angeles. The proposed Rise Kohyang Middle School (proposed Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

## 1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA<sup>1</sup> and the State CEQA Guidelines.<sup>2</sup> 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 the proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

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

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,<sup>4</sup> 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.<sup>5</sup>

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<sup>1</sup> California Public Resources Code, § 21000 et seq (1970).

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

<sup>3</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, § 15063.

<sup>4</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, § 15064.

<sup>5</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, § 15070.

## 1. Introduction

### 1.3 ENVIRONMENTAL PROCESS

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

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

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

#### 1.3.1 Initial Study

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

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

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<sup>6</sup> 14 CCR § 15063.

<sup>7</sup> 14 CCR § 15063.

<sup>8</sup> 14 CCR § 15064.

<sup>9</sup> 14 CCR § 15070.



## 1. Introduction

### 1.3.2 Mitigated Negative Declaration

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

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

### 1.3.3 Tiering

This type of project is one of many that were analyzed in the LAUSD School Upgrade Program (SUP) Program EIR that was certified by the LAUSD Board of Education (BOE) on November 10, 2015.<sup>10</sup> LAUSD's SUP Program EIR met the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

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

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

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

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

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

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

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

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

## 1. Introduction

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

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

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

### 1.3.4 Project Plan and Building Design

The proposed 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),<sup>15</sup> LAUSD SCs,<sup>16</sup> and the Collaborative for High-Performance Schools (CHPS) criteria.<sup>17</sup>

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

**Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects.** Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects 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 Environmental Health and Safety (OEHS) CEQA team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and

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<sup>15</sup> California Green Building Standards Code, Title 24, Part 11.

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

<sup>17</sup> 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

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

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

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

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

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

## 1. Introduction

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

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

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

### 1.4 IMPACT TERMINOLOGY

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

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

### 1.5 ORGANIZATION OF THE INITIAL STUDY

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

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

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



## 1. Introduction

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

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

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

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

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

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Geotechnical Investigation Report
- C. Geological Environmental Hazards Assessment (GEHA)
- D. Phase I Environmental Site Assessment
- E. Health Risk Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Impact Assessment

## 1. Introduction

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## 2. Environmental Setting

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### 2.1 PROJECT LOCATION

The one-acre Project site is in the City of Los Angeles (west of downtown) in the Westlake Community Plan Area and Pico-Union neighborhood, one of 114 neighborhoods in the City.<sup>19</sup> There are 11 addresses associated with the site (Assessor's Parcel Number [APN] 5137-017-014): 1700 and 1710 West Olympic Boulevard, and 1001, 1003, 1005, 1007, 1011, 1015, 1019, 1023, 1029 South Beacon Avenue (Project site).

The Project site is in the United States Geological Survey (USGS) topographic map Hollywood, California Quadrangle; Section 30 of Township 1 South, Range 13 West of the San Bernardino Base Line and Meridian (34.0494 north latitude and 118.2760 west longitude). The elevation of the Project site is approximately 250 feet above sea level.

The site is approximately 0.4 mile west of Interstate 110 (I-110 or the Harbor Freeway); 0.7 mile north of Interstate 10 (I-10 or Santa Monica Freeway); and 1.5 miles south of I-101 (Ventura Freeway) (see Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*). Access from I-110 is via ramps at Blaine Street to the east and West 8th Street northeast of the Project site. The Project site is within a Transit Priority Area and is served by several local and regional/commuter lines via stops located within walking distance. The Westlake/MacArthur Park Red Line Metro Rail Station is approximately 0.5 mile to the northwest. The Red Line extends from Union Station northwest to the community of North Hollywood.<sup>20</sup> The Project site is also approximately 0.5 mile north of Wilshire Boulevard, the primary commercial corridor extending west from downtown Los Angeles.

Rise Kohyang Middle School is currently operating in classroom space on the second floor of a building at 3020 Wilshire Boulevard, approximately a mile northwest of the Project site.

### 2.2 SURROUNDING LAND USE

The Project site is bounded by West Olympic Boulevard, a 10-story office building, commercial uses, and multifamily residences to the north; Beacon Avenue, residential, commercial, and institutional (church and school) uses to the east; an alley, 6-story office building and subterranean parking garage, and residential uses to the west; and residential uses to the south (see Figure 3, *Aerial Photograph*).

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<sup>19</sup> Los Angeles Times. 2020, January 29. Mapping L.A. [https://s3-us-west-2.amazonaws.com/maps.latimes.com/static/img/mapping\\_la/mappingla.pdf](https://s3-us-west-2.amazonaws.com/maps.latimes.com/static/img/mapping_la/mappingla.pdf).

<sup>20</sup> Metropolitan Transportation Authority of Los Angeles County (Metro). 2020, January 29. Red & Purple Lines Schedule. <https://media.metro.net/documents/b4f1f223-c6b4-4b6e-bd18-648dbca1e7e9.pdf>.

## 2. Environmental Setting

### 2.3 SITE HISTORY

The Project site was developed in the early 1900s with a residential dwelling, shed, and horse stable. By 1950 it was occupied with 13 structures, including a shop, garages, and residential dwellings. From 1977 until approximately 2002, the Project site was vacant and undeveloped. From 2002 until 2016 it was developed with two commercial structures used as shops and churches. In 2014, the City of Los Angeles processed a CEQA document for a proposed hotel on the site. The 93,890-square-foot, four-story hotel was planned with 149 guest rooms, ground-floor commercial uses (restaurant, café, and banquet space), and subterranean parking.<sup>21</sup> The project was approved with a General Plan Amendment, Zone Change, Height District Change, and Conditional Use permits.<sup>22,23</sup> Following Project approval, the church and associated parking were removed in 2015; however, the hotel was never constructed, and the Project site has remained vacant since.

### 2.4 EXISTING CONDITIONS

The Project site is currently a surface parking lot with approximately 60 parking spaces and only minor structures (i.e., a parking attendant booth and storage bins/sheds) (see Figures 4a, 4b, 4c, *Site Photographs*). The Project site is surrounded by fencing and most of the Project site is developed with an asphalt and concrete parking lot, with some dirt patches.

The Project site frontage on West Olympic Boulevard has a concrete block wall and chain-link gate that remains open throughout the day. To the east along Beacon Avenue is a 3-foot-tall concrete block wall topped with a 5-foot-tall iron fencing and an iron roller gate; along the alley to the west is a 6-foot-tall concrete block wall; and to the south along the adjacent building is a 6-foot-tall concrete block wall. Vegetation on-site is limited to small weedy patches. There are no trees on the property but there are eight California fan palm trees and several shrubs along Beacon Avenue and three mature Ficus trees along West Olympic Boulevard, within the City right-of-way. To the west of the Ficus trees near the alley is a 24-foot-tall “DOWNTOWN” sign with a digital sign board.

Primary access to the Project site is provided via a main driveway on West Olympic Boulevard, with a secondary driveway and pedestrian access gate on Beacon Avenue that remain locked. There are public sidewalks with street trees as mentioned on West Olympic Boulevard and Beacon Avenue along both sides of the street. For the past several years there have been homeless encampments along the site frontage on Beacon Avenue and along the alley.

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<sup>21</sup> City of Los Angeles, Department of City Planning. 2014, November 13. City Planning Commission Recommendation Report. <https://planning.lacity.org/staffrpt/initialrpts/CPC-2013-3834.pdf>

<sup>22</sup> City of Los Angeles, Department of City Planning. 2014, December 4. City Planning Commission Determination Letter. Case No. CPC-2013-3834-GPA-ZC-HS-CU-CUP-SPR-ENV-2013-3835-MND; CEQA No. ENF-2013-3835-MND. <https://planning.lacity.org/pdiscaseinfo/>

<sup>23</sup> City of Los Angeles, Department of City Planning. 2015, October 5. City Planning Commission Letter of Clarification. <https://planning.lacity.org/pdiscaseinfo/>



## 2. Environmental Setting

### 2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan designation for the Project site is Community Commercial. The Project site is in the Westlake Community Plan Area, just north and outside the Pico-Union Historic Preservation Overlay District. The City of Los Angeles zoning for the Project site is C4—specifically (Q)C4-2D (Q=Qualified Conditions; C4 = Commercial; 2D = height district) (see Figure 5, *Zoning Designations*).<sup>24</sup> As stated in the Los Angeles Municipal Code, permitted uses include “School (elementary or high), educational institution, or private school.”<sup>25</sup>

The Project site is within the ZI No. 2452 Transit Priority Area (TPA), an area within one-half mile of a major transit stop that is existing or planned,<sup>26</sup> and ZI No. 2374 Enterprise Zone/Employment and Economic Incentive Program Area (EZ). EZs are specific geographic areas designated by City Council resolution, and have received approval from the California Department of Commerce under either the Enterprise Zone Act Program or Employment and Economic Incentive Act Program.<sup>27</sup>

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<sup>24</sup> City of Los Angeles. 2020, October 23. Zone Information and Map Access System (ZIMAS) Version: 3.0.2019 (d105). <http://zimas.lacity.org/>

<sup>25</sup> Los Angeles Municipal Code. [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-111049#JD\\_12.16](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-111049#JD_12.16).

<sup>26</sup> City of Los Angeles, Department of City Planning. ZI No. 2452. <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>

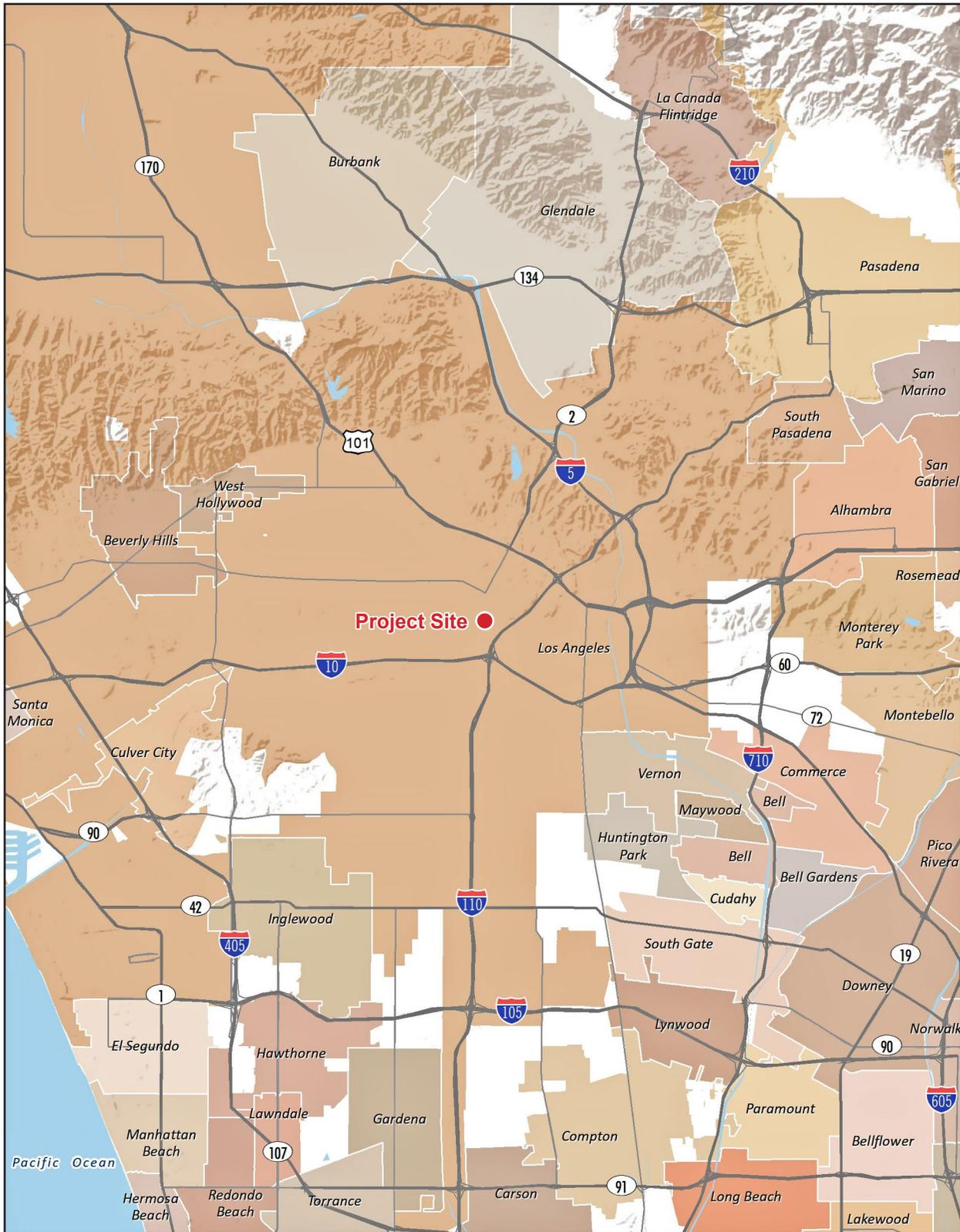
<sup>27</sup> City of Los Angeles. ZI No. 2374. <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>

## 2. Environmental Setting

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Figure 1 - Regional Location  
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



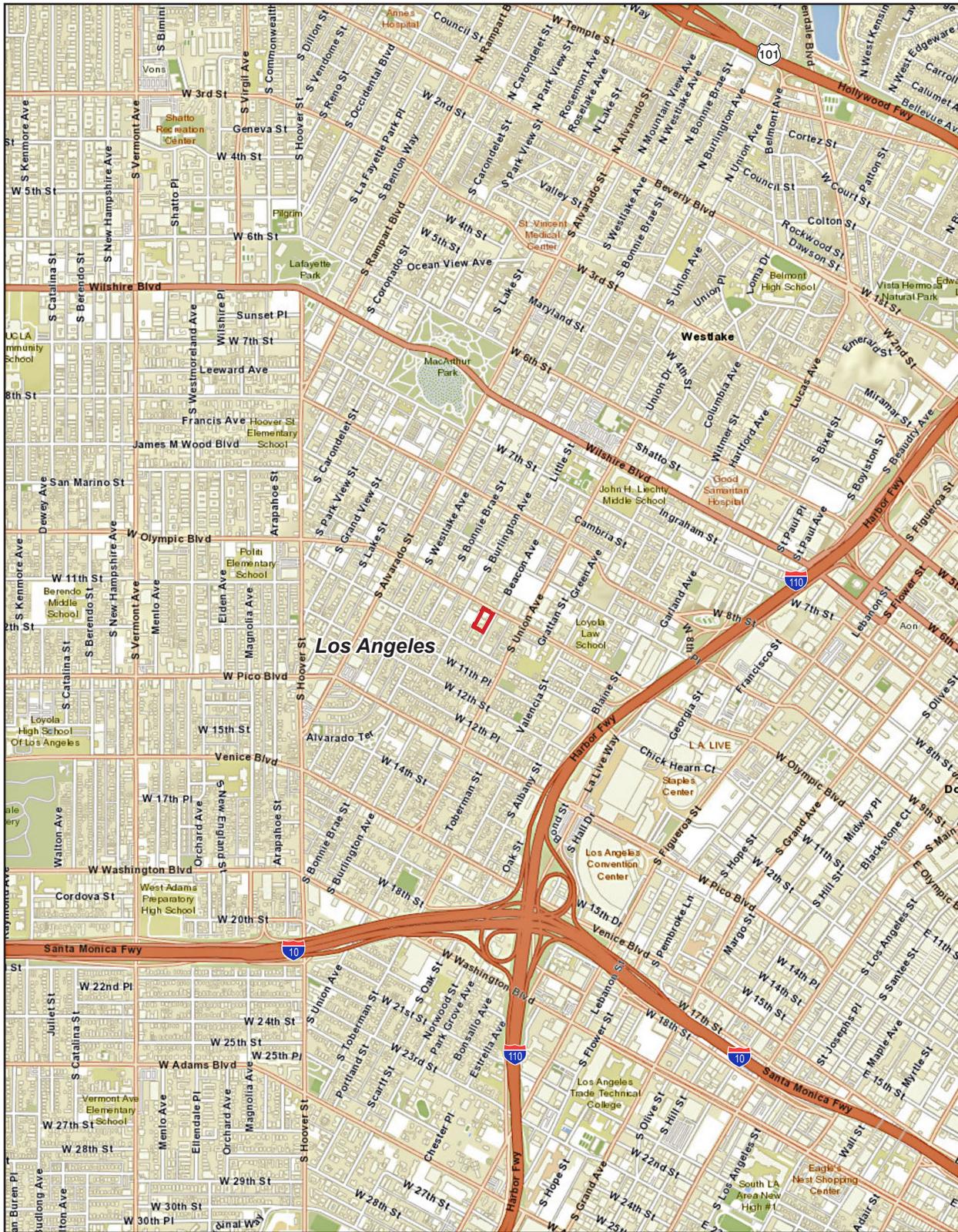
Source: ESRI, 2020

## 2. Environmental Setting

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Figure 2 - Local Vicinity  
2. Environmental Setting



Project Boundary



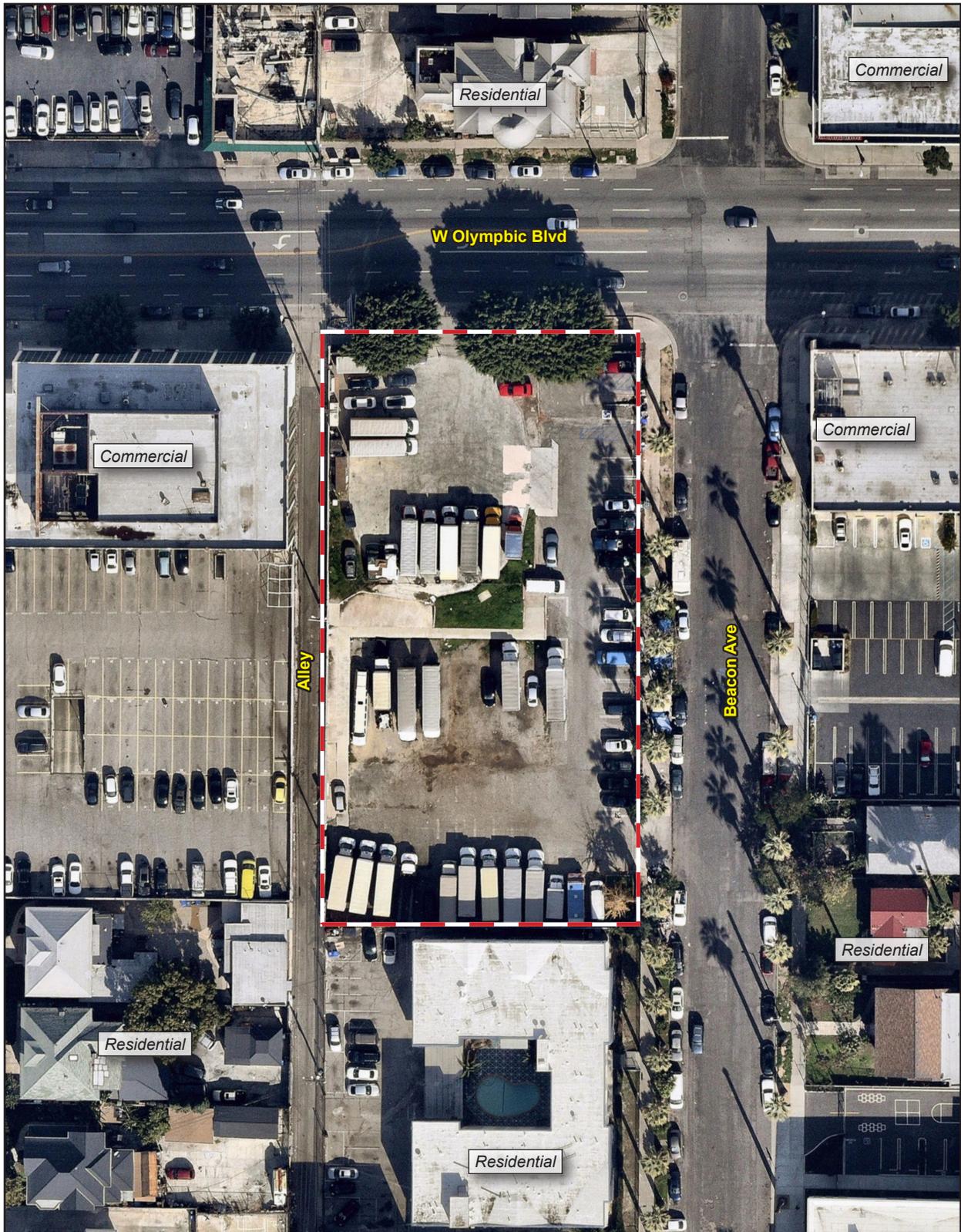
Source: ESRI, 2020

## 2. Environmental Setting

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Figure 3 - Aerial Photograph  
2. Environmental Setting



— Project Boundary

0 75  
Scale (Feet)



Source: Nearmap, 2020

## 2. Environmental Setting

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Figure 4a - Site Photographs  
2. Environmental Setting



Photo 1: View looking north toward project site from West Olympic Boulevard.



Photo 2 View looking west along Olympic Boulevard from Beacon Avenue Intersection (project site on left side).

## 2. Environmental Setting

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Figure 4b - Site Photographs  
2. Environmental Setting



Photo 3: View looking south along the alley from West Olympic Boulevard (project site on left side).



Photo 4: View looking northwest toward project site from Beacon Avenue.

## 2. Environmental Setting

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Figure 4c - Site Photographs  
2. Environmental Setting



Photo 5: View looking south across project site toward alley and 6-story office building.



Photo 6: View looking north toward homeless encampments along Beacon Avenue (project site on left side).

## 2. Environmental Setting

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## 2. Environmental Setting

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## 3. Project Description

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### 3.1 PROPOSED PROJECT

The Project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District (LAUSD or District) for the construction and operation of a charter school (Rise Kohyang Middle School; proposed Project) on a site at the southwest corner of West Olympic Boulevard and Beacon Avenue in the City of Los Angeles. The 11 addresses associated with the Project site (APN 5137-017-014) are: 1700 and 1710 West Olympic Boulevard, and 1001, 1003, 1005, 1007, 1011, 1015, 1019, 1023, 1029 South Beacon Avenue.

Bright Star Schools has obtained an LAUSD Augmentation Grant for this proposed Project which would fund a portion of the proposed Project costs. If the proposed Project is approved, agreements between the District, Bright Star Schools, and the State would be executed to provide for the ownership of the property to be transferred to the District.

#### 3.1.1 Facilities

The new charter middle school would have a capacity of 450 students in grades 6-8 and would consist of a four-story, 60-foot tall, approximately 69,200-square-foot building with an approximately 21,000-square-foot underground parking lot. See Figure 6a, *Conceptual Site Plan (Parking Garage)*, Figure 6b, *Conceptual Site Plan (Level 1)*, Figure 6c, *Conceptual Site Plan (Level 2)*, Figure 6d, *Conceptual Site Plan (Level 3)*, Figure 6e, *Conceptual Site Plan (Level 4)*, and Figures 7a and 7b, *Building Elevations*. The building would include the following:

- Administration (reception/clerical/offices, meeting rooms)
- Restrooms
- Support space (custodial, storage, mechanical rooms)
- 21 classrooms
- Collaborative space
- Multipurpose room and servery (kitchen space without food preparation)

#### 3.1.2 Play Space and Landscaping

The campus would also have an approximately 2,400-square-foot synthetic turf area and a full 4,200-square-foot basketball court at the ground level, an approximately 2,900-square-foot outdoor deck on the 2nd floor, an approximately 2,900-square-foot outdoor deck on the 3rd floor, and an approximately 3,100-square-foot outdoor deck on the 4th floor for student activities (physical education and outdoor learning). An emergency assembly area for staff and students would be on the turf area.

The existing concrete block wall (along Olympic Boulevard, Beacon Avenue, and alley) would either be raised or reconstructed to 6 feet high. Outdoor play spaces would have exterior lighting for school use during winter

### 3. Project Description

when the sun sets early; however, play space lights would not be used after school hours. Exterior safety and security lighting would be provided on exterior walls of buildings, building entrances, and where required to illuminate exterior areas and campus access points.

Project landscaping would consist of drought-tolerant trees and plants and a water-efficient irrigation system. Stormwater drainage would consist of a system to collect and clean runoff water in underground settling chambers. The chambers would contain sediment and debris such as floating trash, paper, pavement oil, etc., and the system would release filtered stormwater into the street storm drains or infiltrate it at approximately 10 feet below the ground surface.<sup>28</sup>

#### 3.1.3 Site Access and Circulation

Cars dropping off students would enter the Project site from Beacon Avenue (enter only) and then exit through the alley to the west and onto Olympic Boulevard. The student drop-off/pick-up area would accommodate approximately 16 vehicles at a time. The Olympic Boulevard driveway would provide for right-in-only access to the employee-only parking garage and right-out-only for parking garage and surface drop-off and pick-up. Unloading and loading would be directly from the passenger side; a passing lane would be to the left so traffic circulation would not be obstructed.

School warning signs and safety devices would be installed on the surrounding streets in compliance with State standards.<sup>29</sup> School staff attendants would provide parking management and traffic management during drop-off and pick-up times to ensure efficiency and safety as students get in and out of cars.

Pedestrian access would be via two gates on Beacon Avenue—one adjacent to the entry driveway and one midblock. Another gate would be along Olympic Boulevard. Visitors would enter the school building on Olympic Boulevard and be required to complete a check-in procedure at the administrative office before entering the school campus.

The Project would provide bicycle parking on-site in compliance with the Los Angeles Municipal Code (LAMC). The Project is required to provide 84 short-term and 2 long-term bicycle parking spaces for a total of 86 bicycle parking spaces. This would be provided via 42 U-shaped bicycle racks, which provide short-term parking for 84 bicycles. Additionally, the Project would provide two bicycle lockers for long-term bicycle storage.

Because this is a charter school, there are no defined attendance boundaries, and students would come from a broad area. It is assumed that the 287 students would transfer from the existing Rise Kohyang Middle School, a mile to the northwest. The charter school would not provide student busing, but buses may be used periodically for field trips, as they are now.

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<sup>28</sup> Example of storm drainage system. [http://www.torrentresources.com/wp-content/uploads/2014/06/MaxWell-Plus-Insert-8-2012\\_200.pdf](http://www.torrentresources.com/wp-content/uploads/2014/06/MaxWell-Plus-Insert-8-2012_200.pdf)

<sup>29</sup> California Manual on Uniform Traffic Control Devices (CA MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of California Vehicle Code (CVC) Section 21400. Part 7 of the CA MUTCD has standards for traffic control, warning signs and markings for school areas. Part 7: Traffic Control for School Area. <http://mutcd.fhwa.dot.gov/pdfs/2009/part7.pdf>.



## 3. Project Description

Existing sidewalks along the site frontage are over 14 feet wide. Construction of the proposed Project would require removal of one mature Ficus tree along Olympic Boulevard. Additionally, to accommodate the driveway on Beacon Avenue on the south edge of the Project site, one California fan palm tree would be removed.

### 3.1.4 Parking

The proposed Project would provide parking spaces for staff in a secure-access underground parking garage. Ingress and egress for the parking garage would be from a gated driveway on Olympic Boulevard. Staff would gain access to the parking garage by using a keycard system. The garage would have a sensor-based vehicle exit system that automatically opens when triggered from the inside.

Based on LAUSD standards for parking ratios, the new school will provide 2.25 parking spaces for every classroom, for a total of 48. The approximately 6,500-square-foot parking garage would provide 48 parking spaces, including 2 spaces compliant with the Americans with Disabilities Act and 24 tandem spaces. Additionally, the parking garage would include 2 electric vehicle (EV) charging stalls, and 3 stalls designated for clean air, vanpool, and electric vehicles. No school-time guest parking would be provided on campus; guests would park curbside.

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

### 3.1.5 Operation

**Student Transfers.** Rise Kohyang Middle School is currently operating in classroom spaces at a building at 3020 Wilshire Boulevard, approximately one mile northwest of the new site. The existing school has 16 classrooms, a multipurpose room, and several office spaces and serves approximately 287 students in grades 6-8. When the new school is completed, students would transfer to the new location and vacate the space at 3020 Wilshire Boulevard, which would be closed. The proposed new school campus would have a maximum capacity of 450 students and up to 40 staff members.

**Traditional School.** The school would operate on a traditional two-semester academic calendar, with students in session from August through June. School hours would be 8:10 am to 2:45 pm, and some teachers and students may be on campus after school hours. The new middle school operation hours would avoid the start and end times at the two other schools within a quarter-mile radius: Tenth Street Elementary School and Equitas Academy #3 Elementary Charter School.

**School-Related Events.** The school may provide after-school programs for the students, such as special-interest clubs, and extracurricular activities that may end later than 2:45 pm. There may also be occasional nighttime and weekend events during the school year. If the main play yard is used during the evening, temporary portable lights may be provided for the event. Some of these events would be campus wide, such as school plays and open houses, and others would be grade specific, such as commencement.

### 3. Project Description

**Community Use.** In compliance with the Civic Center Act,<sup>30</sup> the campus would be available for community use at selected times when not in use by Bright Star Schools or LAUSD.

#### 3.1.6 Construction

Project construction is planned to start in Quarter 3 (Summer) 2023 and be completed by Quarter 2 (Spring) 2025, in approximately 21 months. The start of classes is planned for Summer 2025. Construction activities would include minor vegetation removal, asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping.

- **Demolition.** The existing concrete, asphalt, and small landscaped grass areas would be demolished and cleared. One California fan palm tree and one Ficus would be removed as a part of the proposed Project.
- **Excavation and Site Grading.** Excavation would occur to a depth of approximately 16 feet 2 inches. Total excavation would be approximately 12,600 cubic yards of soil. Any soil that is exported or imported must be chemically tested in accordance with specific written procedures, as outlined in LAUSD Specifications Section 01 4524, “Environmental Import/Export Materials Testing.”<sup>31</sup> This section specifies the requirements for the sampling, testing, transportation, and certification of imported or exported fill materials to or from school sites. On-site concrete and asphalt crushing would occur throughout the Project site. Debris and soil would be exported to landfill facilities in either Arcadia or Irwindale.
- **Utility Trenching.** Utility trenches would be excavated, and utility pipes, cables, and storm drainage system would be laid in trenches and connected.
- **Construction.** Building and parking garage construction.
- **Architectural Coating.** Painting the new building.
- **Asphalt.** Paving and off-site street work.
- **Finishing and Landscaping.** Finishing and new drought-tolerant landscaping. Approximately 85 percent of the one-acre site would be impervious surfaces that would drain stormwater into underground filtering chambers. <sup>32</sup> Approximately 5,400 square feet would be pervious (landscape, planters, and pervious surfaces).

Construction laydown/material staging would be on the Project site as far from nearby residences as possible. A Construction Worksite Traffic Control Plan would be prepared and implemented by the construction contractor. Off-street parking for construction worker vehicles would be provided on-site; workers would not

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<sup>30</sup> CA Education Code Sections 38130–38139.

<sup>31</sup> LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing. October 1, 2011.

<sup>32</sup> Artificial turf is classified as impervious surface because a typical system has an impermeable liner at the bottom and the water is drained via perforated pipes to the stormwater drainage system.



### 3. Project Description

park on residential streets. The Construction Worksite Traffic Control Plan would identify haul routes, hours of construction, protective devices, warning signs, and access. Construction noticing would be provided to the residential neighbors. Following Project construction, the Project site would have less impermeable surfaces (buildings, driveway, and walkways) compared to the existing conditions.

## 3.2 AGENCY REVIEWS AND APPROVALS

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

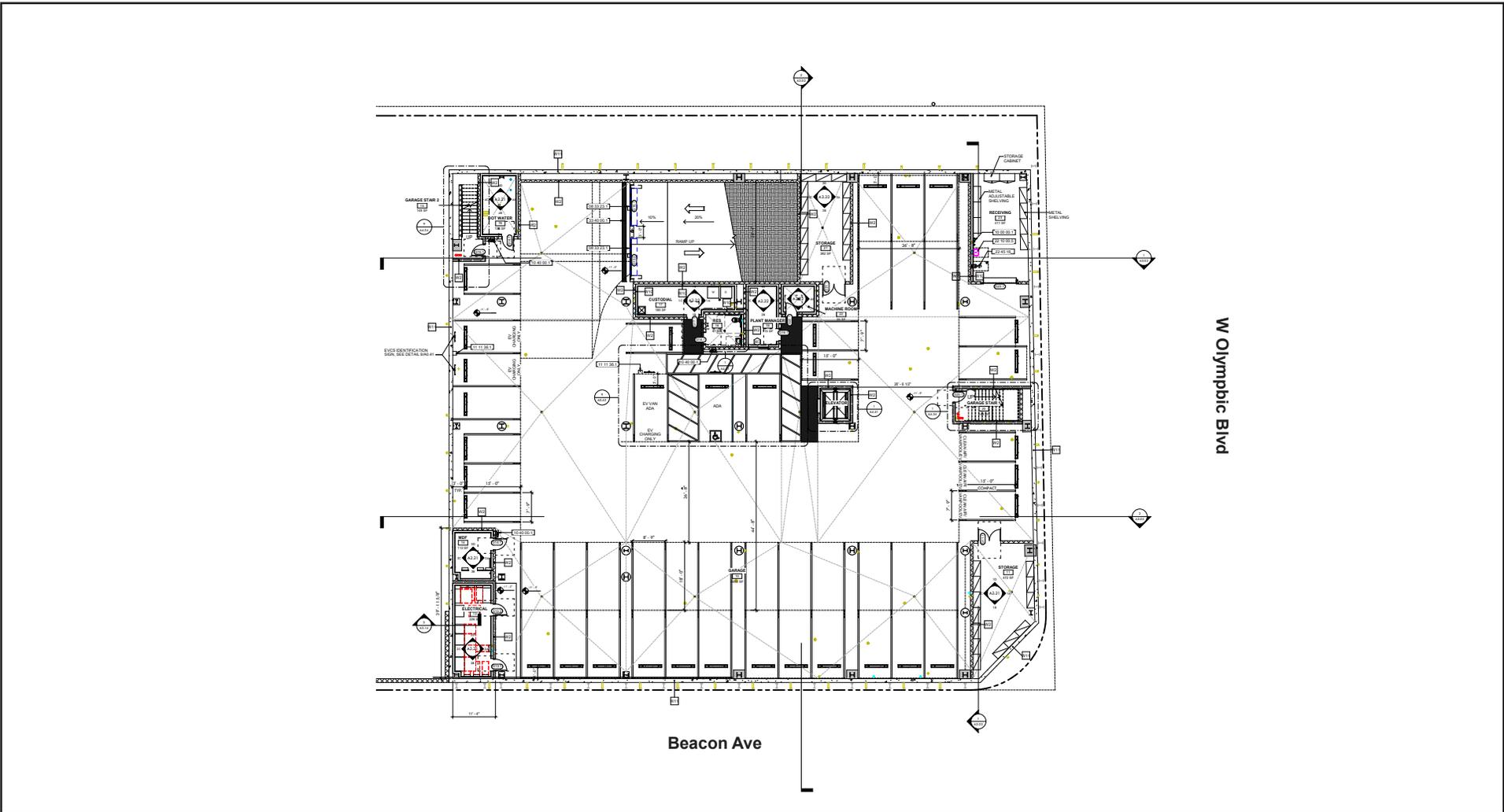
- **City of Los Angeles, Public Works Department.** Permit for curb, gutter, and other off-site improvements.
- **City of Los Angeles, Fire Department.** Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a project requires local fire authority review of elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
- **City of Los Angeles, Department of Transportation.** Approval of construction-related haul route.
- **California Department of General Services, Division of State Architect.** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division.** Because Bright Star Schools is requesting new construction funds from the State Allocation Board, the plans must be reviewed and approved by the CDE (Education Code Section 17070.50) before Bright Star Schools can submit a funding request.
- **California Department of Transportation.** Transportation permit for oversized vehicles on State highways.
- **State Water Resources Control Board.** Review of notice of intent to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan.
- **Los Angeles Regional Water Quality Control Board.** Issue National Pollution Discharge Elimination System permit; Clean Water Act Section 401 Water Quality Certification.
- **South Coast Air Quality Management District.** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Rule 201, Permit to Construct; Rule 1166; and site monitoring.
- **City of Los Angeles, Planning Commission, Area Planning Commission, and Zoning Administrator.** Approval of a conditional use permit (CUP) for construction of a new school within an area with a land use designation of Community Commercial.

### 3. Project Description

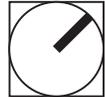
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Figure 6a - Conceptual Site Plan (Parking Garage)  
3. Project Description



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Scale (Feet)



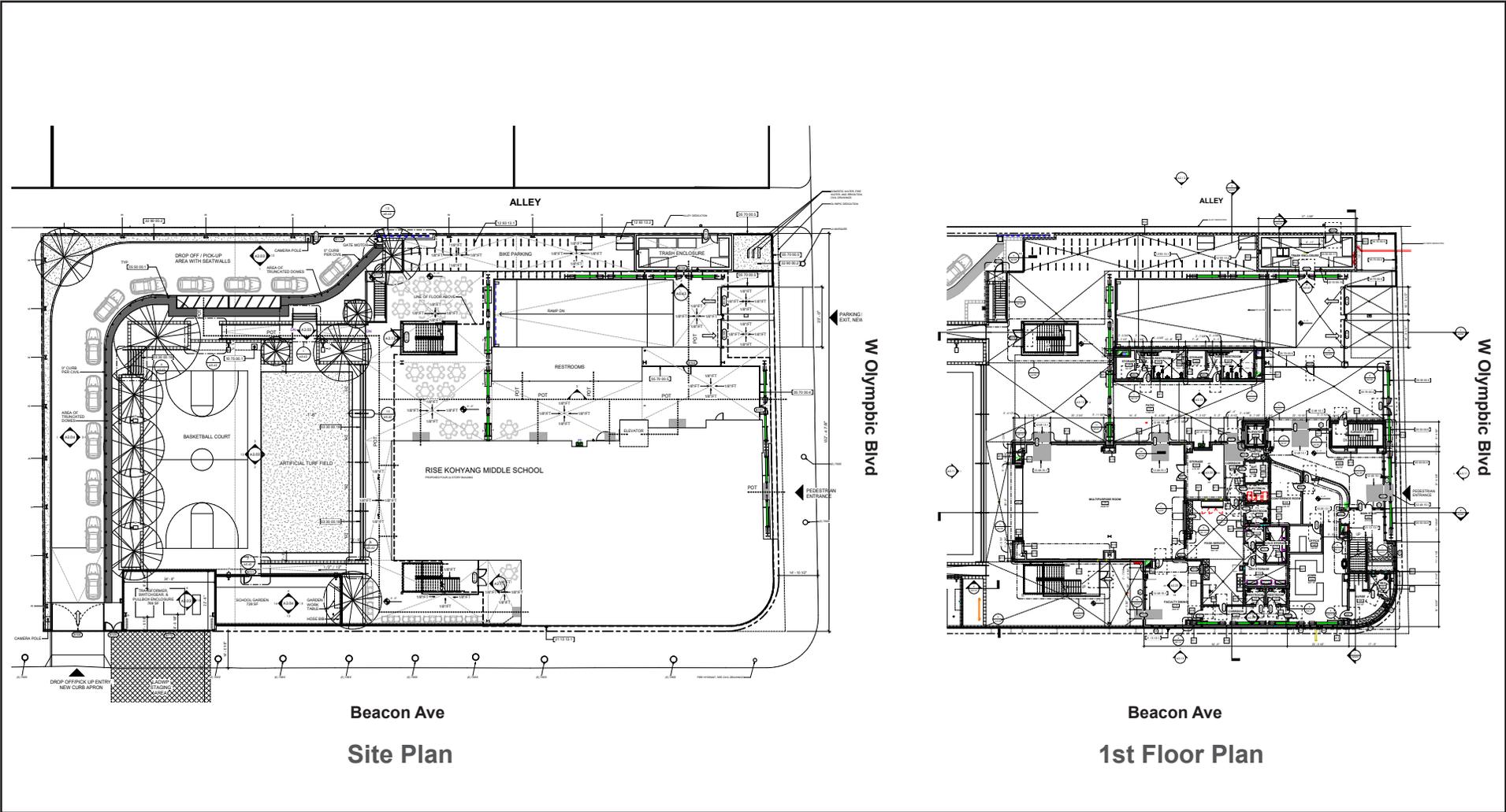
Source: Berliner Architects, 2021

### 3. Project Description

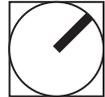
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Figure 6b - Conceptual Site Plan (Level 1)  
3. Project Description



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Scale (Feet)



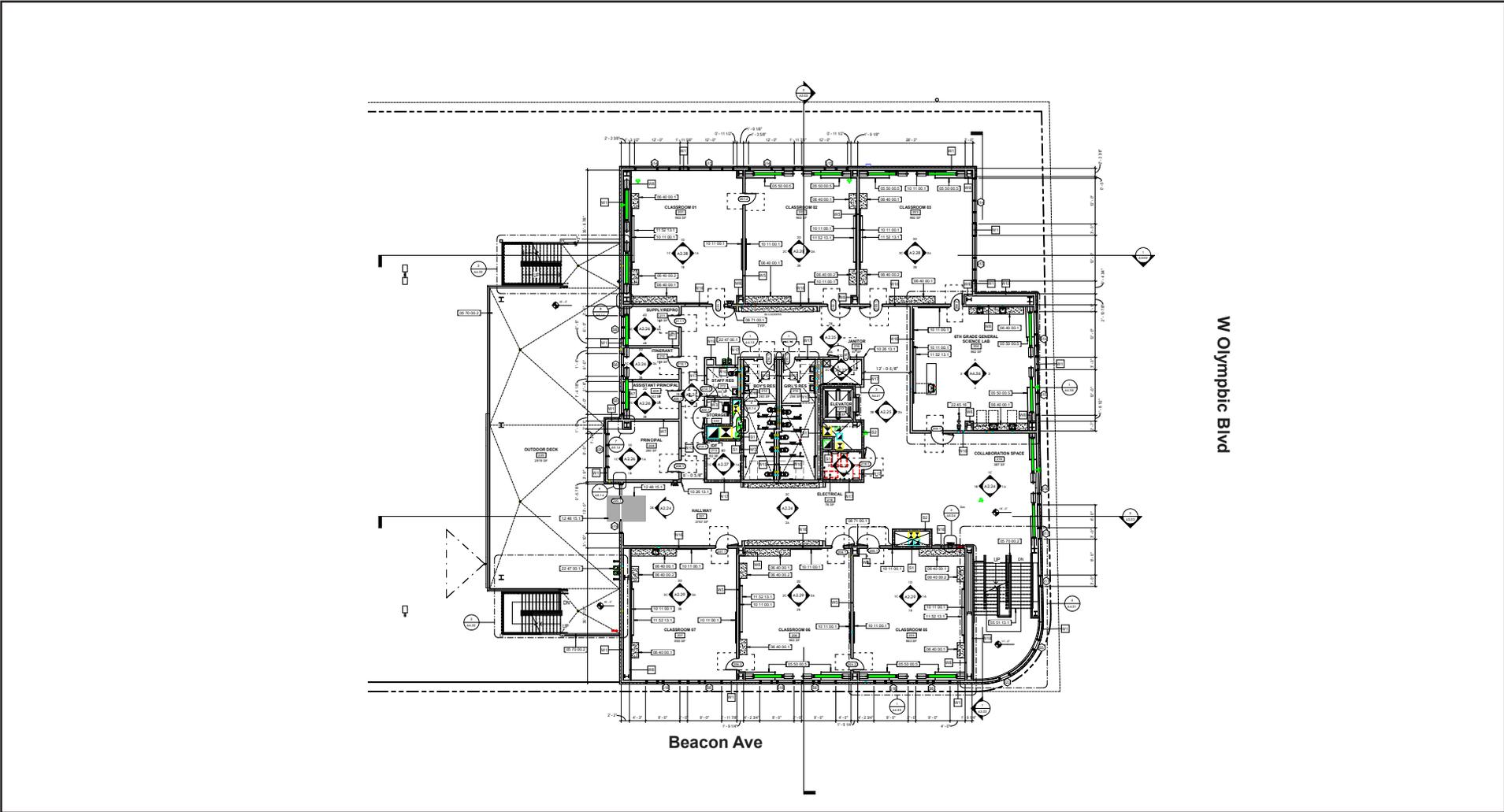
Source: Berliner Architects, 2021

### 3. Project Description

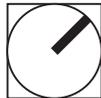
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Figure 6c - Conceptual Site Plan (Level 2)  
3. Project Description



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Scale (Feet)



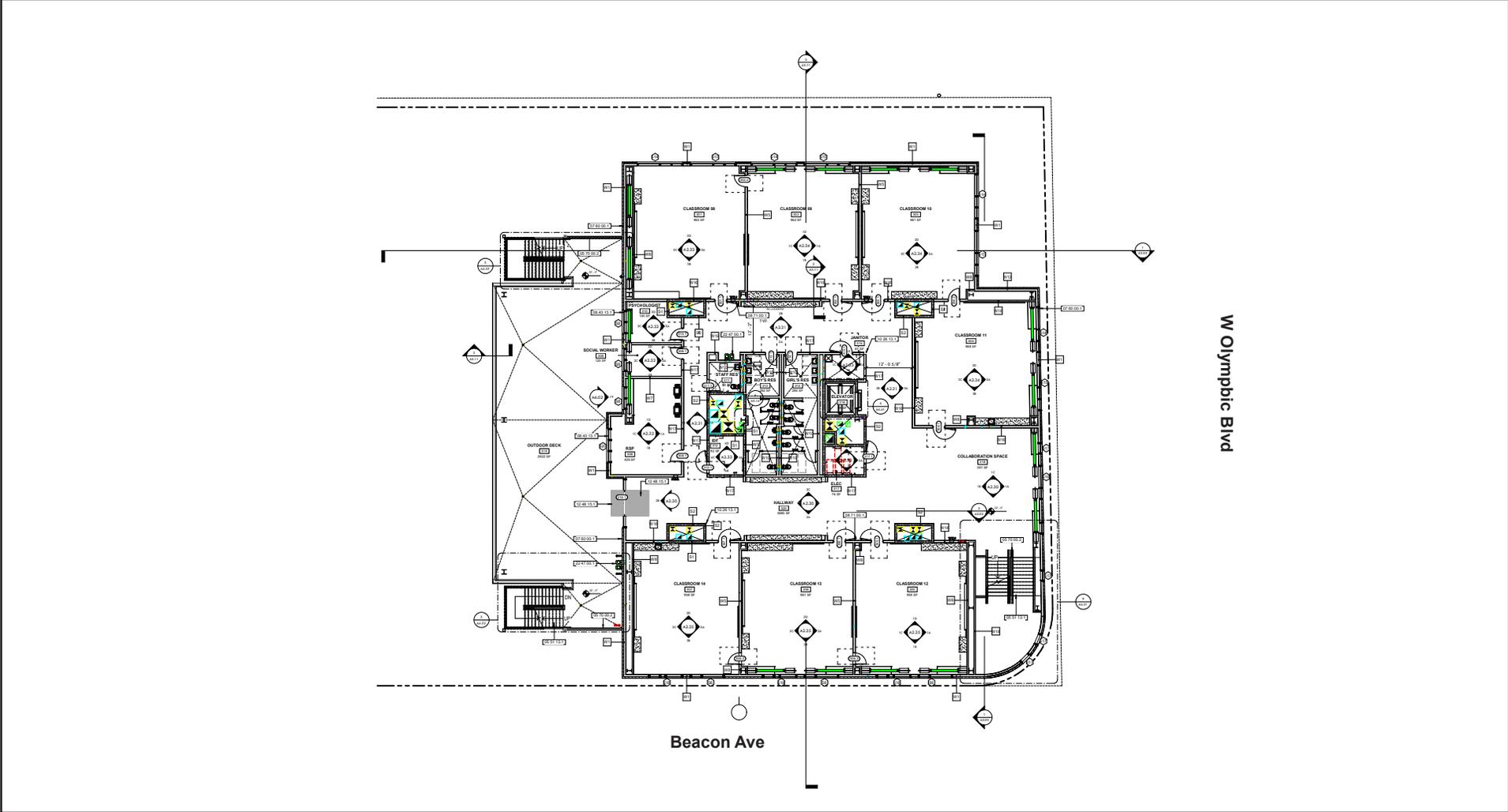
Source: Berliner Architects, 2021

### 3. Project Description

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Figure 6d - Conceptual Site Plan (Level 3)  
3. Project Description



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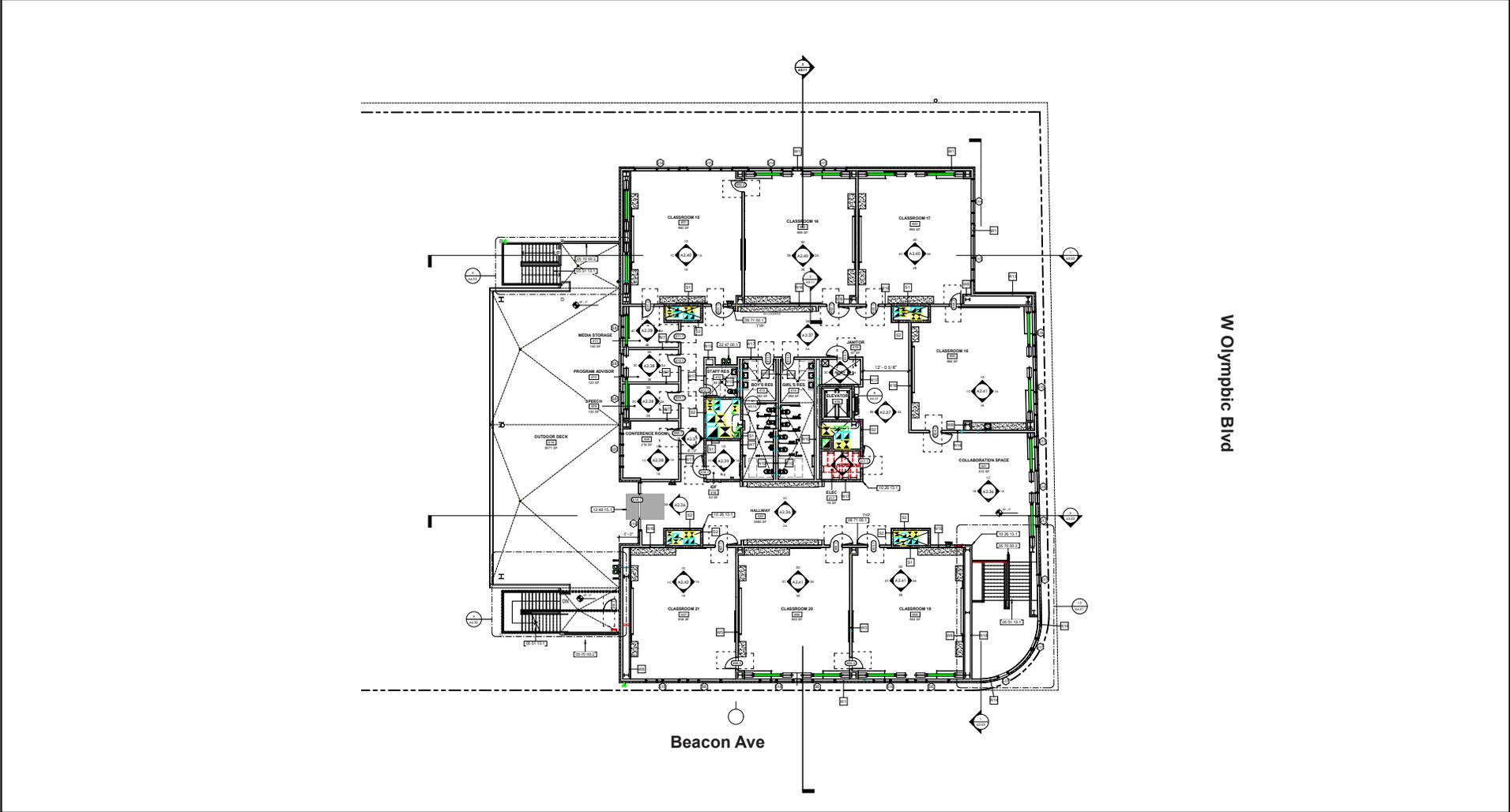
Source: Berliner Architects, 2021

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Figure 6e - Conceptual Site Plan (Level 4)  
3. Project Description



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Scale (Feet)



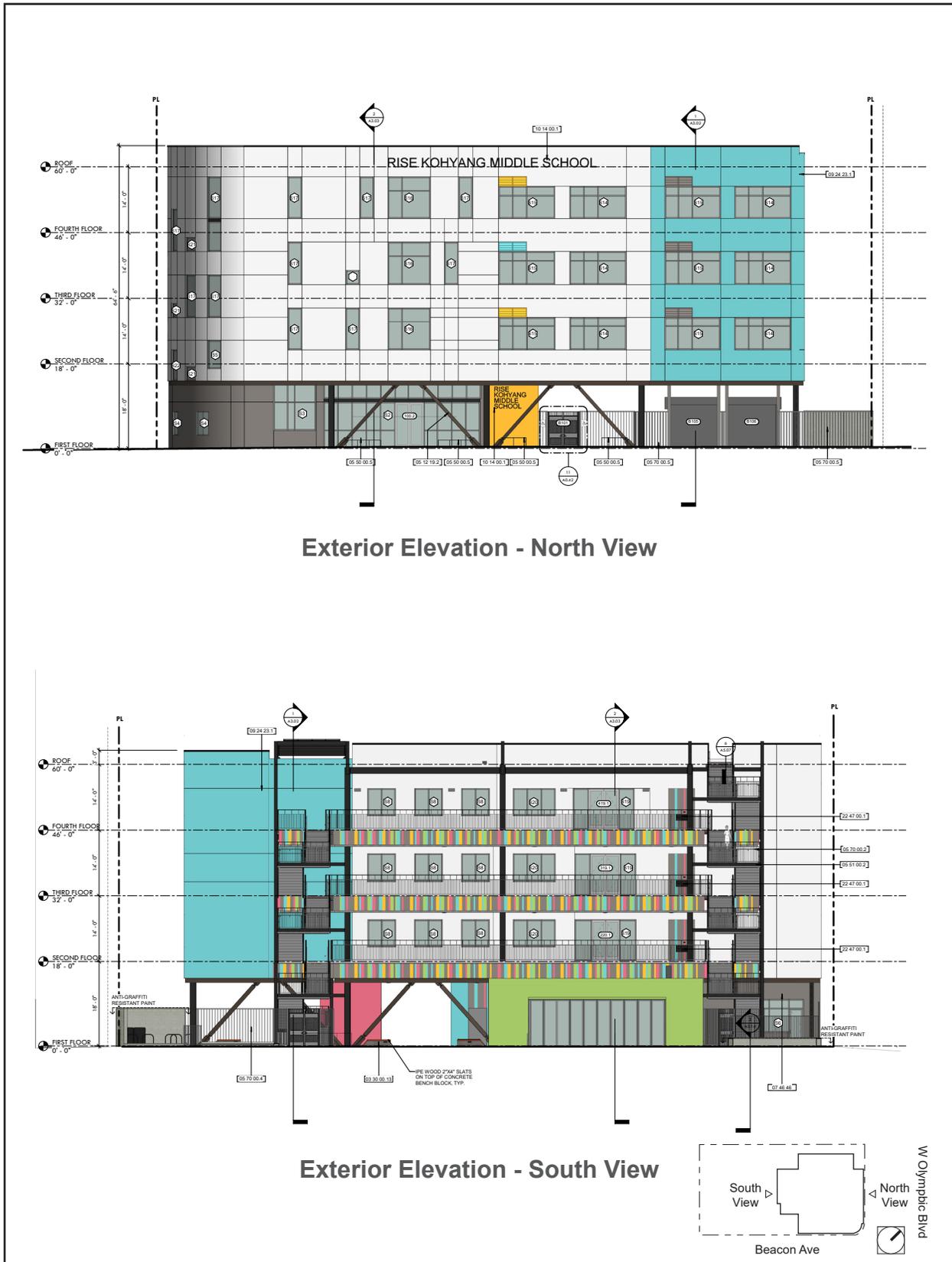
Source: Berliner Architects, 2021

### 3. Project Description

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Figure 7a - Building Elevations - North and South  
3. Project Description



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Scale (Feet)

### 3. Project Description

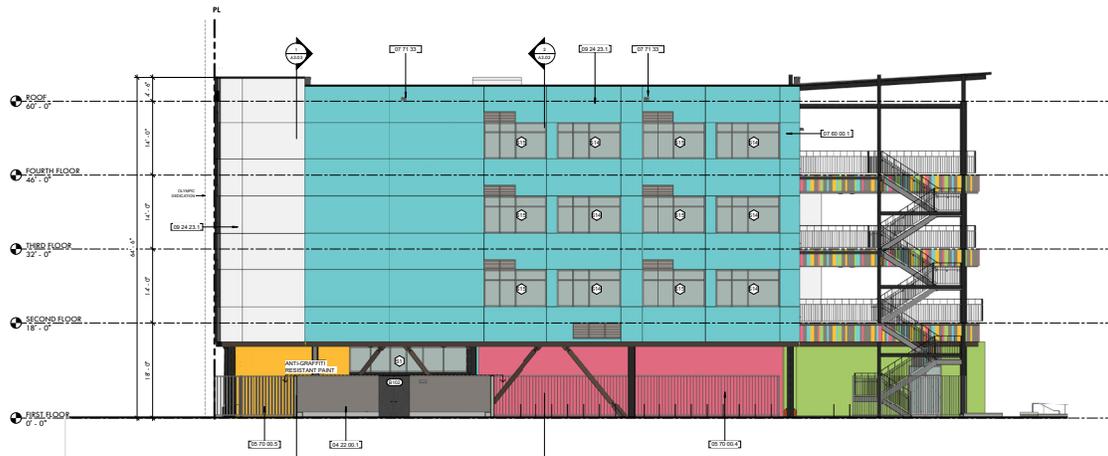
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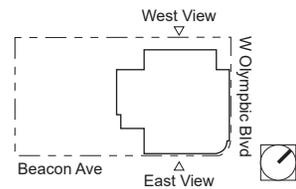
Figure 7b - Building Elevations - East and West  
3. Project Description



Exterior Elevation - East View



Exterior Elevation - West View



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Scale (Feet)

### 3. Project Description

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# 4. Environmental Checklist and Analysis

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## 4.1 PROJECT INFORMATION

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

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

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

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

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

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4. **Project Location:**

The Project site is in the City of Los Angeles (west of downtown) in the Pico-Union neighborhood; 1700 and 1710 West Olympic Boulevard, and 1001, 1003, 1005, 1007, 1011, 1015, 1019, 1023, 1029 South Beacon Avenue (APN 5137-017-014).

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

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

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6. **General Plan Designation:** Community Commercial

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7. **Zoning:** C4 (Commercial)

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8. **Description of Project:**

The proposed Project is a new charter middle school with a capacity for 450 students in grades 6-8, and 40 full- and part-time teachers and staff. The campus would include an approximately 69,200 square foot, four-story building with staff space (reception/clerical/administration/teacher offices, meeting rooms), restrooms, support space (custodial, storage, electrical/telecommunications rooms), 21 classrooms, multipurpose room and servery, and subterranean parking garage.

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

The Project site is bounded by West Olympic Boulevard, commercial uses, and multifamily residences to the north; Beacon Avenue, commercial, and institutional uses to the east; an alley, commercial, and residential uses to the west; and residential uses to the south.

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## 4. Environmental Checklist and Analysis

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

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

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

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

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 to Fernandeño Tataviam Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe (2 separate contacts). As of the time of publication of this Initial Study, no response has been received and no tribes have requested consultation on this proposed Project; the 30-day time period for requesting consultation has expired as of July 11, 2021. However, as a result of the consultations with Native American tribal representatives on other LAUSD projects, new SCs (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with tribal cultural resources were adopted by the LAUSD Board of Education.



## 4. Environmental Checklist and Analysis

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

### DETERMINATION

On the basis of this initial evaluation:

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



Digitally signed by Carlos A. Torres  
Date: 2021.09.23 17:33:07 -07'00'

Signature

Date

**Carlos A. Torres**

Print Name

**CEQA Officer for LAUSD**

Title

September 2021

## 4. Environmental Checklist and Analysis

### 4.2 EVALUATION OF ENVIRONMENTAL IMPACTS

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



## 4. Environmental Checklist and Analysis

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

## 4. Environmental Checklist and Analysis

### ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b>				
Except as provided in Public Resources Code Section 21099 <sup>33</sup> would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-AE-4	<p>LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.</p> <p><b>Marquee Signs Bulletin BUL 5004.1</b> This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.</p>

<sup>33</sup> PRC 21099(d) (1) Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.  
(2) (A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies.  
(2)(B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.



## 4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-AE-6	<p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Upplight Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> <li>• Limit the amount of light that can be used.</li> <li>• Minimize glare by controlling the amount of light that tends to create glare.</li> <li>• Minimize sky glow by controlling the amount of uplight.</li> <li>• Minimize the amount of off-site impacts or light trespass.</li> </ul>

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

**No Impact.** Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.<sup>34</sup>

The Project site and surrounding area lack significant topography and are developed with urban land uses. The Project site is developed with a paved surface parking lot surrounded by walls and fences. Although the proposed Project would redevelop the property with a new four-story building, the overall height would be similar to existing buildings in the neighborhood (three stories to the south, two to four stories to the east, six stories to the west, and between one and ten stories to the north). There are no protected or designated scenic vistas or views in the Project vicinity, and the proposed Project would not obscure any scenic vistas. Therefore, no impact would occur.

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

**No Impact.** There are two officially designated State scenic highways in Los Angeles County: State Route 2 (SR-2, the Angeles Crest Highway, part of the Angeles Crest Scenic Byway) from near La Canada-Flintridge north to the San Bernardino County line, approximately 10 miles north, and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 18 miles west of the Project site. Additionally, the Arroyo Seco Historic Parkway is approximately 2 miles northeast. The new school would not be visible from SR-2 or the Arroyo Seco Parkway.

<sup>34</sup> City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.  
<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

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The Project site is not visible from any Eligible State Scenic Highways, County Scenic Highways,<sup>35</sup> or City-designated Scenic Highways.<sup>36</sup> Project development would not result in impacts to scenic resources within a designated State scenic highway. Therefore, no impact would occur.

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

**Less Than Significant Impact.** The Project site contains a surface paved parking lot and is absent other permanent structures. It is surrounded by adjacent residential, commercial, and institutional uses and qualifies as an “urbanized area.”<sup>37</sup> The Project site is in an area zoned C4 (Commercial)—specifically, (Q)C4-2D (Q=Qualified Conditions; C4=Commercial; 2=height district; D=Limited floor area ratio permitted from 6:1 to 3:1). Construction in Height District No. 2 would permit a building to be erected three times the floor area ratio (FAR). Thus, the proposed building on the one-acre Project site could be up to approximately 130,700 square feet, which is significantly greater than the Proposed building of 69,200 square feet. However, there is no maximum height limit or maximum stories allowed for a site zoned C4 in Height District No. 2.

The proposed Project includes demolition of the parking lot, construction of a four-story building, and other site improvements. The proposed Project would not conflict with Commercial zoning or regulations governing scenic quality. The proposed Project would require the removal of one California fan palm tree along Beacon Avenue and one Ficus along Olympic Boulevard. However, the nearby remaining trees would still be visually prominent and would not change the urbanized views of the area. Therefore, impacts to the scenic quality would be less than significant.

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

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

The proposed Project would not significantly increase nighttime lighting in the neighborhood. The new campus would have nighttime lights for the safety of people and the security of property. The building would not

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<sup>35</sup> California Department of Transportation (Caltrans). 2019. List of Eligible and Officially Designated State Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

<sup>36</sup> City of Los Angeles. 1998. General Plan Transportation Element, Scenic Highways Map. [http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E\\_Scnc.gif](http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif)

<sup>37</sup> PRC § 21071/CEQA Guidelines § 15191(m)(1) for an incorporated city “Urbanized area” means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Los Angeles has a population of about 3,999,759 [U.S. Census Bureau. QuickFacts. July 1, 2017 estimates. <https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,losangelescountycalifornia,ca/PST045218>



## 4. Environmental Checklist and Analysis

include any high-intensity lighting such as lighting used for athletic fields or nighttime sports activity. Security and path lights would be directional and would not spill light to nearby residential properties to the south and east. The parking lot would be partially underground, and its lights would be concealed.

Additionally, the exterior of the new building would be constructed of nonreflective building materials. Compliance would be required with SC-AE-4 for the design of marquee signs and SC-AE-6 to control unwanted light. The proposed Project would not introduce lights at substantially greater intensities than existing lights near the site, and the proposed Project would have no impact on nighttime views. Therefore, light and glare 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
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

There are no agriculture and forestry resources LAUSD SCs.

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

**No Impact.** There is no agricultural or farm use on or in the vicinity of the Project site; therefore, the proposed Project would not convert farmland to nonagricultural uses. The Project site is not mapped as important farmland on the California Important Farmland Finder.<sup>38,39</sup> Therefore, no impact would occur.

<sup>38</sup> Division of Land Resource Protection (DLRP). California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>.

<sup>39</sup> Most of urbanized Los Angeles County, including the Project site, is not mapped on the California Important Farmland Finder due to a lack of farmland.



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

**No Impact.** The proposed Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the Project site is C4 (Commercial).<sup>40</sup> The site is not zoned for agricultural use, and Project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect on-site.<sup>41</sup> Therefore, no impact would occur.

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

**No Impact.** Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”<sup>42</sup> Timberland is defined as “land... which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”<sup>43</sup> The Project site is zoned for commercial uses and is not zoned for forest land or timberland use.<sup>44</sup> Therefore, no impact would occur.

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

**No Impact.** Construction of the proposed Project would not result in the loss or conversion of forest land. No vegetation on-site is cultivated for forest resources. There is no vegetation on the existing Project site though there are some ornamental trees and shrubs located along Beacon Avenue and Olympic Boulevard. No forest land would be affected by the proposed Project; therefore, no impact 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.** There is no mapped important farmland or forest land on or near the Project site, and Project development would not indirectly cause conversion of such land to nonagricultural or nonforest use. No impact would occur.

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<sup>40</sup> City of Los Angeles. Zoning Map. <http://zimas.lacity.org/>.

<sup>41</sup> California Department of Conservation, Division of Land Resources Protection. 2016. Los Angeles County Williamson Act FY 2015/2016. <https://maps.conservation.ca.gov/agriculture/>

<sup>42</sup> California PRC Section 12220(g).

<sup>43</sup> California PRC Section 4526.

<sup>44</sup> City of Los Angeles. Zoning Map. <http://zimas.lacity.org/>.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?		<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous material, substances, or waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

### Explanation:

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



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<b>LAUSD Standard Conditions of Approval</b>	
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	<p>Construction Contractor shall:</p> <ul style="list-style-type: none"> <li>• Maintain speeds of 15 miles per hour (mph) or less with all vehicles.</li> <li>• Load impacted soil directly into transportation trucks to minimize soil handling.</li> <li>• Water/mist soil as it is being excavated and loaded onto the transportation trucks.</li> <li>• Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.</li> <li>• Minimize soil drop height into haul trucks or stockpiles during dumping.</li> <li>• During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.</li> <li>• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.</li> <li>• Place stockpiled soil on polyethylene sheeting and cover with similar material.</li> <li>• Place stockpiled soil in areas shielded from prevailing winds. Place stockpiled soil on polyethylene sheeting and cover with similar material.</li> <li>• Place stockpiled soil in areas shielded from prevailing winds.</li> </ul>
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> <li>• Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).</li> <li>• Consolidate truck deliveries and limit the number of haul trips per day.</li> <li>• Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.</li> <li>• Employ high pressure fuel injection systems or engine timing retardation.</li> <li>• Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.</li> <li>• Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.</li> <li>• Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.</li> <li>• Use electrical power rather than internal combustion engine power generators.</li> <li>• Use electric or alternatively fueled equipment, as feasible.</li> <li>• Use construction equipment with the minimum practical engine size.</li> <li>• Use low-emission on-road construction fleet vehicles.</li> <li>• Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.</li> </ul> <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> <li>• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).</li> <li>• Replace ground cover in disturbed areas as quickly as possible.</li> <li>• 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).</li> <li>• 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.</li> <li>• 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.</li> <li>• Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site.</li> </ul>

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).</li> <li>• Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.</li> <li>• Limit traffic speeds on unpaved roads to 15 mph or less.</li> <li>• Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.</li> <li>• Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> <li>• Limit the amount of daily soil and/or demolition debris loaded and hauled per day.</li> </ul> <p><u>General Construction</u></p> <ul style="list-style-type: none"> <li>• Use ultra-low VOC or zero-VOC surface coatings.</li> <li>• Phase construction activities to minimize maximum daily emissions.</li> <li>• Configure construction parking to minimize traffic interference.</li> <li>• Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).</li> <li>• Prepare and implement a trip reduction plan for construction employees.</li> <li>• Implement a shuttle service to and from retail services and food establishments during lunch hours.</li> <li>• Increase distance between emission sources to reduce near-field emission impacts.</li> </ul>

This air quality section addresses the impacts of the proposed Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O<sub>3</sub>), carbon monoxide (CO), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for PM<sub>2.5</sub> under the California and National AAQS, nonattainment for O<sub>3</sub> under the California AAQS and extreme nonattainment under the National AAQS, nonattainment for PM<sub>10</sub> under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.<sup>45</sup>

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing

<sup>45</sup> California Air Resources Board (CARB). 2017, October 18. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/desig.htm>.



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or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations.

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

**Less Than Significant Impact.** The South Coast AQMD adopted the 2016 Air Quality Management Plan on March 3, 2017. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of general plans, specific plans, and significant projects.

The proposed Project would involve the construction and operation of a middle school. Based on the scope and nature of the proposed Project—including that the student population would be transferred from other schools in the District and the existing Rise Kohyang Middle School is located one mile from the Project site—it is not considered a project of statewide, regional, or areawide significance that would require intergovernmental review under Section 15206(b) of the CEQA Guidelines. Therefore, the proposed Project would not have the potential to substantially affect SCAG’s demographic projections. Additionally, as demonstrated below in Table 2, the regional emissions that would be generated by operation of the proposed Project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant.

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

**Less Than Significant Impact.** The following describes Project-related impacts from regional short-term construction activities and regional long-term operation of the proposed Project.

#### Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of VOCs from paints and asphalt.

Construction activities to develop the middle school are anticipated to disturb about one acre of the Project site. The proposed Project would involve demolition and demolition debris haul, site preparation, grading and grading soil haul, building construction, architectural painting, and paving. The proposed Project is anticipated to start in Quarter 3 (summer) 2023 and finish in Quarter 2 (spring) 2025, with operation (school starting) in Summer 2025. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2.25, and are based on the proposed Project’s preliminary construction duration and CalEEMod default phasing and equipment mix. Construction emissions modeling are shown in Table 1, which shows maximum daily emissions for VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction-related

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activities would be less than their respective South Coast AQMD regional significance threshold values. Short-term air quality impacts from Project-related construction activities would be less than significant.

**Table 1 Maximum Daily Regional Construction Emissions**

Construction Phase	Criteria Air Pollutants (lbs. /day) <sup>a,b,c,d</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 2023</b>						
Demolition and Demolition Haul	1	6	8	<1	1	<1
Site Preparation	1	6	4	<1	1	<1
Grading and Grading Soil Haul	2	39	19	<1	4	1
Building Construction 2023	1	8	9	<1	1	<1
<b>Year 2024</b>						
Building Construction 2024	1	8	9	<1	1	<1
<b>Year 2025</b>						
Building Construction 2025	1	7	9	<1	1	<1
Paving	1	5	8	<1	<1	<1
Architectural Coating	21	1	2	<1	<1	<1
<b>Maximum Daily Construction Emissions</b>						
Maximum Daily Emissions	21	39	19	<1	4	1
<b>South Coast AQMD Regional Construction Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.

- <sup>a</sup> Based on the preliminary information provided by the Bright Star Schools. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
- <sup>b</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403 and LAUSD SC-AQ-3, which involves watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.
- <sup>c</sup> Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute to minimizing generation of criteria air pollutant emissions during construction.
- <sup>d</sup> Includes compliance with SCAQMD Rule 1113 that requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints.

### Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The proposed Project would result in the development of a middle school on the Project site. While there would be an increase in student capacity at the new middle school campus, the proposed Project would be serving students within the District. Because the students are already generating trips to their current facilities, there would not be a net increase in emissions associated with vehicle trips, and mobile emissions were not included as part of the analysis. In addition, the proposed buildings would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen). As shown in Table 2, it is anticipated that operation of the proposed Project would result in overall minimal emissions and would not exceed the South Coast AQMD regional operation-phase significance thresholds. Therefore, impacts to the regional air quality associated with operation of the proposed Project would be less than significant.



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**Table 2 Maximum Daily Regional Operation Emissions**

Source	Maximum Daily Emissions (lbs. /Day) – Winter or Summer					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Max Daily Emissions</b>						
Area	2	<1	<1	<1	<1	<1
Energy <sup>a</sup>	<1	<1	<1	<1	<1	<1
Mobile	0	0	0	0	0	0
Total	2	<1	<1	<1	<1	<1
<b>South Coast AQMD Regional Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.

Notes: lbs. = Pounds. Highest winter or summer emissions are reported.

<sup>a</sup> For purposes of this analysis, the proposed middle school is assumed to be designed and built to meet the 2019 Building Efficiency Standards and CALGreen Code.

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

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

### Construction LSTs

#### *Localized Significance Thresholds*

Localized significance thresholds (LST) are based on the California AAQS, which are the most stringent AAQS, to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project site or area of disturbance, distance to the nearest sensitive receptor, and Source Receptor Area (SRA).<sup>46</sup> The nearest off-site sensitive receptor is the single-family residence to the north of the Project site along Olympic Boulevard and the multifamily residences south of the Project site.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows that the maximum daily construction emissions (pounds per day) for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> would be less than their respective South Coast AQMD screening-level LSTs. Therefore, air quality impacts from Project-related construction activities would be less than significant.

<sup>46</sup> Source Receptor Area: Using this meteorological data set, LSTs are developed for each of the 37 source receptor areas (SRAs) within the South Coast AQMD's jurisdiction. The Project site is in SRA 1 – Central Los Angeles County.

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**Table 3 Localized Construction Emissions**

Construction Activity	Pollutants(lbs. /day) <sup>a,b,c</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>b</sup>	PM <sub>2.5</sub> <sup>b</sup>
<b>South Coast AQMD ≤1.00 Acre LST</b>	74	680	5.00	3.00
Demolition and Demolition Haul	6	7	0.40	0.29
Site Preparation	6	4	0.45	0.23
Grading and Grading Soil Haul	6	7	0.68	0.46
Building Construction 2023	6	7	0.32	0.29
Building Construction 2024	6	7	0.28	0.26
Building Construction 2025	5	7	0.24	0.22
Paving	5	7	0.22	0.20
Architectural Coating	1	2	0.05	0.05
<b>Exceeds LST?</b>	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.

South Coast Air Quality Management District (South Coast AQMD). 2008, July. Final Localized Significance Threshold Methodology.

South Coast Air Quality Management District (South Coast AQMD). 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. The screening-level LSTs are based on receptors within 82 feet (25 meters) of the Project site. Highest winter or summer emissions are reported in SRA 1.

- <sup>a</sup> Construction activities and schedule are based on information provided or confirmed by the Applicant. Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.
- <sup>b</sup> Includes fugitive dust control measures required by South Coast AQMD under Rule 403 and LAUSD SC-AQ-3, which involves watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.
- <sup>c</sup> Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute to minimizing generation of criteria air pollutant emissions during construction.

### Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame.<sup>47</sup> Construction of the proposed Project is anticipated to be completed in approximately 21 months, which is considered short term and would limit the duration of exposure to on-site and off-site receptors. Furthermore, as demonstrated in Table 3, construction activities would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs. Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. Thus, construction emissions would not pose a health risk to on-site and off-site receptors, and Project-related construction health impacts would be less than significant.

<sup>47</sup> Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments: Appendix D. <https://oehha.ca.gov/media/downloads/cnr/2015gmappendices.pdf>



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### Operation LSTs

#### Localized Significance Thresholds

Operation of the proposed Project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur on-site. The proposed Project does not fall within these uses. Although operation of the proposed Project would result in the use of standard mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units in the building, air pollutant emissions generated from this equipment would be nominal. As shown in Table 4, maximum daily operational emissions would not exceed the South Coast AQMD screening-level operational LSTs. Thus, operational emissions would not exceed the California AAQS and Project operation would not expose sensitive receptors to substantial pollutant concentrations. Project impacts would be less than significant.

**Table 4 Net Localized On-Site Operational Emissions**

Source	Pollutants (lbs./day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project</b>				
Area Sources	<1	<1	<1	<1
South Coast AQMD LST	74	680	2.00	1.00
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25

South Coast Air Quality Management District (South Coast AQMD). 2008, July. Final Localized Significance Threshold Methodology.

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

#### Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact.<sup>48</sup> The Project-related 306 AM peak hour vehicle trips would be minimal compared to the AAQS screening levels. Therefore, the

<sup>48</sup> Bay Area Air Quality Management District (BAAQMD). 2017, May. California Environmental Quality Act Air Quality Guidelines. [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en).

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proposed Project would not substantially increase CO hotspots at intersections and impacts 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.** The proposed Project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed Project involves construction and operation of a middle school campus and schools do not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

**e) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the school?**

**Less Than Significant Impact.** Public Resources Code Section 21151.8(b)(9) and Education Code Section 17213(d)(9) define a “freeway or other busy traffic corridors” as roadways that on an average day have traffic in excess of 50,000 vehicles in a rural area or 100,000 vehicles in an urban area. The Project site is over 1,900 feet from State Route 110 (Harbor Freeway), which is southeast of the site. Olympic Boulevard at the intersection with Union Avenue was reported to have a daily traffic volume of 32,296 vehicles per day in 2018.<sup>49</sup> There are no freeways or busy traffic corridors within 500 feet of the site. Therefore, potential air quality risks due to the school’s proximity to a freeway or busy traffic corridor is not a hazard, and the proposed Project would not create air quality health risks due to placement of the school. Impacts would be less than significant.

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<sup>49</sup> City of Los Angeles, 2020. Navigate LA. <https://navigatea.lacity.org/navigatea/>.



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- f) **Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous material, substances, or waste?**

**Less Than Significant Impact.** Based on the Geological and Environmental Hazards Assessment Report (GEHA) provided in Appendix C, a review of the South Coast AQMD Facility Information Detail (FIND) database show that there are there are 20 facilities within a quarter mile of the Project site, including two char broilers and a gasoline service. However, hazardous air emissions generated from these emission sources are not anticipated to pose an actual or potential endangerment to students and staff occupying the Project site. Furthermore, as seen above, there are no busy traffic corridors, large agricultural operations, or rail yards within a quarter mile of the Project site. Therefore, air quality hazards related to uses near the school site would be less than significant.

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

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-BIO-3	<p>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 <sup>50</sup>) should occur outside of nesting season to avoid take of birds, bats, or their eggs.<sup>51</sup></p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> <li>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</li> </ul>

<sup>50</sup> Substrate is the surface on which a plant or animal lives.

<sup>51</sup> Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.



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### LAUSD Standard Conditions of Approval

birds occupy the area (e.g., Project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).

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

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

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

#### Bat Surveys

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

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- Bats should be flushed from trees prior to felling or trimming.
  - Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
- 

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

**No Impact.** The Project site is fully developed, with most of the site consisting of asphalt and concrete. There is no vegetation on-site; however, there are ornamental street trees including three mature/large-canopy Ficus along Olympic Boulevard and eight California fan palm trees along Beacon Avenue. Though one California fan palm tree and one Ficus would be removed, this would not result in the loss of special status species or other local regulations. See also threshold (e) below. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site. Therefore, no impact would occur.

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

**No Impact.** No locally designated natural communities or riparian habitats exist on or adjacent to the Project site. The nearest Open Space is the City of Los Angeles' Elysian Park approximately 2.2 miles northeast; the nearest Significant Ecological Area is Los Angeles County's Griffith Park approximately 5 miles north.<sup>52,53</sup> The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan and is neither within nor proximate to any significant ecological area, land trust, or conservation plan.<sup>54</sup> Therefore, no impact would occur to 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?**

**No Impact.** The Project site is fully developed with a parking lot and there are no protected wetlands on-site. The nearest wetland to the site is MacArthur Park Lake, an engineered pond approximately 0.5 mile north.<sup>55</sup> However, MacArthur Park Lake is not a protected wetland and would not be impacted by the development activities that would occur on-site as a part of the proposed Project. The proposed Project would not impact any protected wetland areas. Therefore, no impact to state or federally protected wetlands would occur.

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<sup>52</sup> City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf).

<sup>53</sup> Department of Regional Planning (DRP), County of Los Angeles. 2013, December. Significant Ecological Areas and Coastal Resource Areas Policy Map. [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf).

<sup>54</sup> Los Angeles County Department of Regional Planning, Significant Ecological Area Update Study 2000. Figure 1 Significant Ecological Areas Update Study 200 Existing Boundaries. <http://planning.lacounty.gov/sea/faqs>.

<sup>55</sup> US Fish and Wildlife Service (USFWS). 2012, April 23. National Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>.



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

**Less Than Significant Impact.** The Project site is surrounded by fencing and developed with an asphalt and concrete parking lot. The Project site does not have any native habitat and is not available for overland animal movement as a wildlife corridor. Street trees near the Project site may provide nesting sites for resident or migratory birds. Two street trees would be removed as part of the proposed Project—one California fan palm tree on Beacon Avenue and one Ficus on Olympic Boulevard. Project construction near trees and structures may result in disturbances to birds during nesting season. Migratory nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, which prohibit the take of all birds and their active nests, including raptors and other migratory nongame birds.

Bright Star Schools would comply with the California Fish and Game Code and would implement SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures (e.g., nesting bird surveys, avoidance, etc.) would be taken to avoid impacts to nesting birds. With implementation of these laws, regulations, and the standard condition, impacts to nesting birds would be less than significant.

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

**No Impact.** The Project site contains no trees, but three mature Ficus and eight California fan palm trees are in the adjacent sidewalks on Olympic Boulevard and Beacon Avenue. Two street trees would be removed as part of the proposed Project—one California fan palm tree on Beacon Avenue and one Ficus on Olympic Boulevard. Bright Star Schools would complete the City's tree removal process for removal of these street trees. According to the LAMC Section 17.02, a "protected tree" in Los Angeles is any of the following Southern California native tree species which measures 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree:

- Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*)
- Southern California Black Walnut (*Juglans californica* var. *californica*)
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)

Thus, the Ficus and California Palm Trees located within the Project site are not considered protected trees.<sup>56</sup>

The proposed Project includes a landscape plan that incorporates planting several new trees. Trees would be planted at the appropriate size and maturity for the space and selected from LAUSD's Approved Plant List.<sup>57</sup> Landscaping would consist of drought-tolerant plants and a water-efficient irrigation system.

<sup>56</sup> [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-121890](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-121890)

<sup>57</sup> LAUSD Approved Plant List. [http://www.laschools.org/documents/file?file\\_id=310944045](http://www.laschools.org/documents/file?file_id=310944045).

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LAUSD's Tree Trimming and Removal Procedure requires completion of a Tree Inventory Report by a qualified arborist that documents trees to be protected (tree species are the same as those found in both County and City of Los Angeles Protected Tree Code).<sup>58</sup> The procedures also outline requirements for tree trimming or removal during avian breeding and nesting season. The proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur.

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

**No Impact.** The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.<sup>59</sup> No impact would occur.

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<sup>58</sup> LAUSD Tree Trimming and Removal Procedure.

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

<sup>59</sup> California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.



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

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Archaeological reports shall be submitted to the South-Central Coastal Information Center at the California State University, Fullerton.</li> <li>• The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> <li>○ Extent and duration of the monitoring based on the grading plans</li> <li>○ At what soil depths monitoring of earthmoving activities shall be required</li> <li>○ Location of areas to be monitored</li> <li>○ Types of artifacts anticipated</li> <li>○ 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</li> </ul> </li> </ul>

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<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <li>○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources</li> <li>○ 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.</li> <li>○ Accommodation and procedures for Native American monitors, if required.</li> <li>○ Procedures for discovery of Native American cultural resources.</li> <li>● The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.</li> </ul>
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

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

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

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

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

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or



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- D. that have yielded, or may be likely to yield, information important in prehistory or history (36 Code of Federal Regulations [CFR] Section part 63).

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

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

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

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

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

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The Project site was initially developed in the early 1900s with a residential dwelling, shed, and horse stable. By 1950 it was occupied with 13 structures, including a shop, garages, and residential dwellings. From 1977 until around 2002, the Project site was vacant and undeveloped. From 2002 until 2016 the Project site was developed with two commercial structures used as shops and churches. In 2014, the City of Los Angeles processed a CEQA document for a proposed hotel on the site. Following approval of that prior, the church and associated

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parking were removed in 2015, but the hotel was never constructed. The Project site has since been void of development other than the surface parking.

There are 44 listed HCM resources<sup>60</sup> in the Westlake Community Plan Area.<sup>61</sup> The Project site is not listed on the National Register of Historic Places,<sup>62</sup> as a California Historical Landmark or a California Point of Historical Interest;<sup>63</sup> or as a City of Los Angeles HCM.<sup>64</sup> The removal of the parking lot would not constitute an adverse environmental impact. Impacts to historic resources 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.** Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resources. The term “unique archaeological resource” is defined in PRC Section 21083.2(g).

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

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

Prehistoric and historic archaeological resources have been identified in the Hollywood Quadrangle—in which the Project site is located—in the archaeological records search conducted for the City of Los Angeles Citywide General Plan Framework EIR.<sup>65</sup> The Project site sits atop late to middle Pleistocene alluvial fan deposits.<sup>66</sup>

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<sup>60</sup> A Historic-Cultural Monument (HCM) may be a building, site, structure, or resource—including, trees and plant life—recognized for its historic significance; an HCM can identify with important events; notable figures of national, state, or local importance; and/or distinctive architectural styles. <https://planning.lacity.org/preservation-design/historic-landmarks/detail?cpa=westlake>

<sup>61</sup> Historic Landmarks – Westlake. <https://planning.lacity.org/preservation-design/historic-landmarks/detail?cpa=westlake>

<sup>62</sup> National Park Service (NPS). 2020, November (accessed). National Register of Historic Places. <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>.

<sup>63</sup> Office of Historic Preservation (OHP). 2020, November (accessed). California Historical Resources. <p://ohp.parks.ca.gov/listedresources/>.

<sup>64</sup> City of Los Angeles Department of City Planning. 2018, April 3. Historic-Cultural Monument (HCM) List. <https://preservation.lacity.org/sites/default/files/HCMDatabase%23040118.pdf>.

<sup>65</sup> Fowler Museum of Cultural History, UCLA Institute of Archaeology. 1993, August 17. Archaeological Records Search for the City of Los Angeles. [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR\\_AppC.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_AppC.pdf).

<sup>66</sup> PlaceWorks. 2020, February. Geologic and Environmental Hazards Assessment.



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Though underlying soils on-site have been heavily disturbed by prior developments, Project construction would include excavation to a depth of approximately 16 feet 2 inches for the subterranean parking garage, which is likely deeper than previous construction; therefore, Project-related excavation may yield evidence of archaeological resources. As part of the proposed Project, SC-CUL-7 through SC-CUL-10 require that if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. Bright Star Schools will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

As part of the archaeological monitoring program required under SC-CUL-7, scheduling details for participation by a Native American monitor, if required, would be included. If archaeological or Native American resources are discovered, SC-CUL-10 would be implemented for handling and recovery. With these requirements, any potential impacts to archaeological resources would be less than significant.

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

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

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant.

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

### Explanation:

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

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

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

**Less Than Significant Impact.** The following discusses the potential energy demands from construction activities associated with the construction and operation of the Project.

### Short-Term Construction Impacts

Construction of the proposed Project would create temporary increased demands for electricity and vehicle fuels. Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Upon completion of Project construction, all construction-equipment would cease. Furthermore, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction in accordance with 13 CCR, Article 4.8, Chapter 9, Section 2449. In addition, construction trips would not result in unnecessary use of energy since the Project site is served by a number of regional freeway systems (e.g., 1-10 and I-110) that provide the most direct routes from various areas of the region.

While electric-powered construction equipment could be used, it is anticipated that the equipment would be limited to hand tools (e.g., power drills) and lighting, which would result in minimal electricity demands. In addition, it is not anticipated construction activities would require use of natural gas-powered equipment. The proposed Project would comply with LAUSD SC-USS-1, which would require reusing, recycling, salvaging, or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster



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material recovery and reuse and to minimize disposal in landfills. Project construction would also be required to comply with the LAMC, which includes specific requirements sourced from the CALGreen code that include recycling construction materials and energy efficiency standards that apply to construction to minimize wasteful, inefficient, and unnecessary energy consumption. Therefore, energy use during construction of the proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

### Long-Term Impacts During Operation

Operation of the proposed Project would generate new demand for electricity, natural gas, and transportation energy on the Project site. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, and perimeter lighting.

#### *Electrical Energy*

Operation of the proposed Project would consume electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; and use of on-site equipment and appliances. Electrical service to the proposed Project would be provided by Los Angeles Department of Water and Power (LADWP) through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 5, implementation of the proposed Project would result in 515,118 kilowatt hours (kWh) of electricity use per year.

**Table 5 Electricity Consumption**

Land Use	Electricity (kWh/year)
<b>Proposed Project Conditions</b>	
Enclosed Parking with Elevator	35,523
Junior High School	479,595
Other Asphalt Surfaces	0
Other Non-asphalt Surfaces	0
<b>Total</b>	<b>515,118</b>

Source: CalEEMod Version 2016.3.2.25.

NORESCO. 2018, June 29. 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings.

Note: Electricity consumption rates are based on Climate Zone 11 and 2019 Title 24 Building Energy Efficiency Standards (10.7 percent reduction from 2016 Title 24 Standards based on NORESCO study).

While the proposed Project would result in a higher electricity demand than existing conditions on-site, it would be consistent with the requirements of the Building Energy Efficiency Standards and CALGreen. In addition, the proposed Project would comply with LAUSD SC-GHG-5, which would require the proposed Project to be at least 10 percent more energy efficient than the Building Energy Efficiency Standards. Therefore, operation of the proposed Project would not result in wasteful or unnecessary electricity demands and would not result in a significant impact related to electricity.

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### *Natural Gas Energy*

The potential natural gas consumption for the Project site is shown in Table 6. As shown in the table, implementation of the proposed Project would generate an average natural gas demand of 862,937 kilo British thermal units (kBtu) per year, primarily due to natural gas use by the middle school classroom building. While the proposed Project would result in a higher natural gas demand than existing conditions onsite, it would be consistent with the requirements of the Building Energy Efficiency Standards and would not result in wasteful or unnecessary natural gas demands as the energy use would be limited when school is not in session. In addition, the proposed Project would comply with LAUSD SC-GHG-5, which would require the proposed Project to be at least 10 percent more energy efficient than the Building Energy Efficiency Standards. Therefore, operation of the proposed Project would result in less than significant impacts with respect to natural gas usage.

**Table 6 Natural Gas Consumption**

Land Use	Natural Gas (kBtu/year)
<b>Proposed Project Conditions</b>	
Enclosed Parking with Elevator	0
Junior High School	862,937
Other Asphalt Surfaces	0
Other Non-asphalt Surfaces	0
Total	862,937

Source: CalEEMod Version 2016.3.25

NORESCO. 2018, June 29. 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings.

Note: kBtu = kilo British thermal units. Natural gas consumption rates are based on Climate Zone 11 and 2019 Title 24 Building Energy Efficiency Standards (1 percent reduction from 2016 Title 24 Standards based on NORESKO study).

### *Transportation Energy*

A typical new school project would consume transportation energy during operations from the use of motor vehicles associated with students and staff. The efficiency of these motor vehicles is unknown, such as the average miles per gallon. As previously mentioned, though there would be an increase in student capacity at the new middle school campus, the proposed Project would serve students within the District and from the existing Rise Kohyang Middle School (which as noted is located approximately one-mile from the site). Because the students already generate trips to their current facilities, the proposed Project would not result in an increase in motor vehicle transportation energy during operation. Thus, it is expected that operation-related fuel usage associated with the proposed Project would not be inefficient, wasteful, or unnecessary. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

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

**No Impact.** The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill



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(SB) 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for publicly owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 established a new RPS requirement of 50 percent by 2026. It also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as LADWP, which would provide all of electricity needs for the proposed Project. Compliance of LADWP in meeting the RPS goals would help ensure the State meets its objective in transitioning to renewable energy. The proposed Project also would comply with the latest 2019 Building Energy Efficiency Standards and CALGreen in addition to LAUSD SC-GHG-5, which would require the proposed Project to be at least 10 percent more energy efficient than the Building Energy Efficiency Standards. Therefore, implementation of the proposed Project would not conflict or obstruct plans for renewable energy and energy efficiency, and no impact would occur.

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

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

- “Geologic and Environmental Hazards Assessment,” prepared by PlaceWorks, dated February 2020. A complete copy of this report is included as Appendix C to this Initial Study.
- “Phase I Environmental Site Assessment for Proposed 1700 W. Olympic Boulevard School,” prepared by PlaceWorks, dated April 2020. A complete copy of this report is included as Appendix D to this Initial Study.

### Explanation:

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



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

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

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

**No Impact.** The Project site is not in or adjacent to an Alquist-Priolo Earthquake Fault Zone. The boundaries of the closest Alquist-Priolo zones are approximately 4 miles north of the Project site (Hollywood Fault Zone), 6.2 miles southwest of the Project site (Newport-Inglewood-Rose Canyon Fault Zone), and 7.3 miles northeast of the Project site (Whittier fault). Thus, the likelihood of surface fault rupture at the site during the life of the proposed improvements is low. Therefore, there would be no impacts related to fault rupture.

ii) **Strong seismic ground shaking?**

**Less Than Significant Impact.** Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground

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shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region; the nearest fault to the proposed Project is the Puente Hills Blind Thrust fault, which is approximately 20 feet northeast of the Project site and more than three miles below the ground surface. The nearest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault Zone, approximately 4.0 miles north. Thus, the Project site is not on or within 1,500 feet of a known active fault or geologically hazardous area.<sup>67</sup> Therefore, seismic ground shaking impacts would be less than significant.

### iii) Seismic-related ground failure, including liquefaction?

**No Impact.** Liquefaction is the phenomenon in which loosely deposited granular soils with silt and clay contents of less than approximately 35 percent and non-plastic silts below the water table undergo rapid loss of shear strength when subjected to strong earthquake-induced ground shaking.

Liquefaction generally occurs in loose, saturated, relatively clean, fine-grained cohesionless soils at depths shallower than about 50 feet. The Project site is not within a zone of required investigation for liquefaction according to California Geological Survey. In addition, the historical high-water level is 65 feet below the ground surface, and site soils consist of very stiff to hard fine-grained soils and dense to very dense silty sand. Thus, the potential for liquefaction at the site is low and there would be no impact.

### iv) Landslides?

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

The Project site is not in an area with the potential for earthquake-induced landslides. The Project site is flat and not near any significant slopes. Thus, the potential for earthquake-induced landslides at the site is considered low and there would be no impacts.

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

**Less Than Significant Impact.**

#### Construction Phase

Native topsoil was removed, and fill material was compacted during previous development of the Project site; therefore, redevelopment of the site would not result in the loss of topsoil.<sup>68</sup>

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<sup>67</sup> PlaceWorks. 2020, February. Geologic and Environmental Hazards Assessment.

<sup>68</sup> Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem.



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Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud in roads and tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre (such as the Project site) or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 7. The site is one acre; thus, Project construction would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. This is also required under the LAUSD SC-HWQ-2. With these requirements, construction-phase soil erosion impacts would be less than significant.

**Table 7 Construction BMPs**

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind.	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales.
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping.
Tracking Controls	Minimize the tracking of soil off-site by vehicles.	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.
Non-storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

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

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### Operational Phase

After completion of the proposed Project, ground covers at the Project site would consist of the new building, hardscape surfaces, and limited maintained landscaping. No large areas of exposed soil would be left to erode. The proposed Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low-impact development (LID) standards like those provided in the Low Impact Development Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.<sup>69</sup> The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features and minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.<sup>70</sup> Operational phase soil erosion impacts would therefore 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.** Hazards arising from liquefaction and landslides would have no impact, as discussed above in sections a(iii) and a(iv).

**Lateral spreading.** Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The geotechnical investigation found that the Project site is not susceptible to soil liquefaction.<sup>71</sup> Therefore, the proposed Project would not expose people or the new school building to adverse effects associated with lateral spreading. Impacts would be less than significant.

**Subsidence.** The major cause of ground subsidence is withdrawal of groundwater. The Project site is not over a groundwater basin, and groundwater was not encountered in five soil borings to depths of 20 to 40 feet below the ground surface. Also, the school would not increase withdrawal of groundwater. Groundwater was detected at a leaking underground storage tank site (former Shell station, 1600 West Olympic Boulevard) approximately 200 feet southeast of the Project site at approximately 70 feet below ground surface.<sup>72</sup> However, Project

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<sup>69</sup> LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at [http://www.lastormwater.org/wp-content/files\\_mf/lidmanualfinal.pdf](http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf).

<sup>70</sup> US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

<sup>71</sup> Twining Inc., 2022, December 10. Geotechnical Investigation Report.

<sup>72</sup> Twining Inc., 2022, December 10. Geotechnical Investigation Report.



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implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant.

**Collapsible Soils.** Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The collapse potential of the Project site soils is considered low. Considering the depth of groundwater, the risk of soil expansion and collapse are considered low if foundations are embedded a minimum of two feet below the lowest adjacent grade. Therefore, 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), creating substantial direct or indirect risks to life or property?**

**Less Than Significant Impact.** Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. The expansion potential is low for surficial soils and moderate for soils at the building foundation level. Considering the depth of groundwater, the risk of soil expansion and collapse are considered low if foundations are embedded a minimum of two feet below the lowest adjacent grade. Additionally, any imported fill material would consist of granular soil having a “very low” expansion potential (i.e., expansion index of 20 or less). The backfill material behind walls would consist of granular, nonexpansive material and be approved by the project geotechnical engineer, and concrete slabs would be supported on nonexpansive engineered fill. Therefore, impacts would be less than significant.

**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 existing neighborhood does not use septic tanks or other alternative wastewater disposal systems, and the new school would not use septic tanks or other alternative wastewater disposal systems. No impact would occur.

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

**Less Than Significant Impact.** A paleontological resource is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of nonfossil material dating to any period preceding human occupation. Los Angeles is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological sensitivity. Much of Los Angeles has some sensitivity for paleontological resources, depending on soil structure and depth of excavation.<sup>73</sup>

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<sup>73</sup> City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources. <https://planning.lacity.org/eir/LA%20citywide%20GP%20Fmwk/FrameworkFEIR.pdf>

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There were 25 fossil localities identified in the Hollywood Quadrangle, where the Project site is located, in the paleontological records search conducted for the City of Los Angeles Citywide General Plan Framework EIR.<sup>74,75</sup> Excavation to a depth of approximately 16 feet 2 inches for the subterranean parking garage would be required and would disturb native soils that may yield evidence of paleontological resources; therefore, the Project site is considered sensitive for paleontological resources.

As part of the Project implementation, SC-CUL-11 requires that a paleontological monitoring program be prepared and implemented for earthwork activities. A paleontological monitor will be on-site for all ground-altering activities below eight feet. As a result, impacts to paleontological resources would be less than significant.

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<sup>74</sup> City of Los Angeles Citywide General Plan EIR. Los Angeles County Museum of Natural History. 1993, September 10.

Paleontological Records Search. <https://planning.lacity.org/eir/LA%20citywide%20GP%20Fmwk/FrameworkFEIR.pdf>

<sup>75</sup> US Geological Survey (USGS). 2010, July 19. Divisions of Geologic Time. <https://pubs.usgs.gov/fs/2010/3059/pdf/FS10-3059.pdf>.



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

### Explanation:

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

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

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change has identified four major GHGs—water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and ozone (O<sub>3</sub>)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by

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the Intergovernmental Panel that contribute to global warming to a lesser extent include nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.<sup>76</sup>

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the proposed Project are not applicable and are not included in the analysis.<sup>77</sup> Black carbon emissions (soot) are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state’s AB 32 inventory and treats this short-lived climate pollutant separately.<sup>78</sup> A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

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

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

Project-related construction and operation-phase GHG emissions are shown in Table 8. As shown in the table, the proposed Project would generate GHG emissions from energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating) and area sources (e.g., landscaping equipment used on-site, consumer products, coatings). For the purposes of this analysis, while there would be an increase in student capacity at the new middle school campus, the proposed Project would be serving students within the District and from the existing Rise Kohyang Middle School. Because the students already generate trips to their current facilities, there would not be a net increase in emissions associated with vehicle trips, and mobile emissions were not included as part of the analysis. In addition, the students are assumed to already use water and generate wastewater and solid waste at their current school facilities. Upon transferring to the proposed middle school, the students would not use additional water or generate additional wastewater or solid waste.

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<sup>76</sup> Water vapor (H<sub>2</sub>O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

<sup>77</sup> Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see California Natural Resources Agency. 2018, November. Final Statement of Reasons for Regulatory Action [http://resources.ca.gov/ceqa/docs/2018\\_CEQA\\_Final\\_Statement\\_of%20Reasons\\_111218.pdf](http://resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf)). Because the amount of materials consumed during the operation or construction of the proposed Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (See Governor’s Office of Planning and Research (OPR). 2008, June. CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory. <http://opr.ca.gov/docs/june08-ceqa.pdf>).

<sup>78</sup> Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state’s existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (See California Air Resources Board. 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>).



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Thus, water use, wastewater generation, and waste disposal were also not included as part of the analysis. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed Project. Overall, development and operation of the proposed Project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of emissions equivalent to 3,000 metric tons of carbon dioxide (MTCO<sub>2e</sub>) per year.<sup>79</sup> Therefore, the proposed Project’s cumulative contribution to GHG emissions would be less than significant.

**Table 8 Project-Related Operation GHG Emissions**

Source	GHG (MTCO <sub>2e</sub> /Year)
Area	<1
Energy	334
Amortized Construction Emissions <sup>a</sup>	16
<b>Total</b>	<b>350</b>
South Coast AQMD Bright-Line Threshold	3,000 MTCO <sub>2e</sub> /Yr.
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2016.3.2.25.

Notes: MTons = metric tons; MTCO<sub>2e</sub> = equivalent to metric ton of carbon dioxide

<sup>a</sup> Total construction emission are amortized over 30 years per South Coast AQMD methodology.

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

**No Impact.** Applicable plans adopted for the purpose of reducing GHG emissions include CARB’s Scoping Plan and the SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

#### CARB Scoping Plan

On December 24, 2017, CARB adopted the Final 2017 Climate Change Scoping Plan Update (Scoping Plan) to address the 2030 interim target to achieve a 40 percent reduction below 1990 levels by 2030, established by SB 32.<sup>80</sup> The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

<sup>79</sup> South Coast Air Quality Management District (South Coast AQMD). 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. [http://www.aqmd.gov/docs/default-source/ccqa/handbook/greenhouse-gases-\(ghg\)-ccqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ccqa/handbook/greenhouse-gases-(ghg)-ccqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf).

<sup>80</sup> California Air Resources Board. 2017, November. California’s 2017 Climate Change Scoping Plan: The Strategy for Achieving California’s 2030 Greenhouse Gas Target. [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).

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Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32 and SB 32. Also, new buildings are required to comply with the latest applicable Building Energy Efficiency Standards and CALGreen. Though measures in the Scoping Plan apply to state agencies and not the proposed Project, the proposed Project's GHG emissions would be reduced by statewide compliance with measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

### **SCAG's Regional Transportation Plan/Sustainable Communities Strategy**

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) on in September 2020. Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options are consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands.<sup>81</sup> Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed Project would provide new facilities for existing and future students of the Rise Kohyang Middle School. The proposed Project would serve the local population in the nearby communities. Serving the local community may reduce vehicle miles traveled by providing a closer option for future students. Additionally, though the proposed Project may result in some current students traveling farther due to the change in location, the distance between the current school and the new proposed site is approximately one mile. Furthermore, the change in location may result in reducing the distance traveled for some of the existing students. Therefore, the proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and impacts would be less than significant.

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<sup>81</sup> Southern California Association of Governments (SCAG). 2020, May 7. Adopted Connect SoCal Plan: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy of The Southern California Association of Governments. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>



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

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

- “Geologic and Environmental Hazards Assessment,” prepared by PlaceWorks, dated February 2020. A complete copy of this report is included as Appendix C to this Initial Study.
- “Phase I Environmental Site Assessment for Proposed 1700 W. Olympic Boulevard School,” prepared by PlaceWorks, dated April 2020. A complete copy of this report is included as Appendix D to this Initial Study.

### Explanation:

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

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<b>LAUSD Standard Conditions of Approval</b>	
SC-HAZ-4	<p>The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):</p> <ul style="list-style-type: none"> <li>• District Specification Section 01 4524, Environmental Import / Export Materials Testing.</li> <li>• Removal Action Workplan or Remedial Activities Workplan.</li> <li>• California Air Resources Board Rule 1466.</li> <li>• Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.</li> <li>• Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).</li> </ul>
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p><b>School Design Guide.</b> Establishes a minimum non-hazardous construction and demolition (C&amp;D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p><b>Construction &amp; Demolition Waste Management.</b> 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&amp;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&amp;D waste generated by weight.</p>

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

**Less Than Significant Impact.**

### Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” A controlled REC is “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).” A historically REC is “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.”<sup>82</sup>

<sup>82</sup> American Society for Testing and Materials (ASTM) E 1527-13 Standard



## 4. Environmental Checklist and Analysis

Based on the results of the Phase I ESA, REC, controlled RECs, and historically RECs were not identified on or near the Project site that would result in a hazard to the staff or students at the new school.

### **Soil Import and Export and School Site Consideration**

The California Department of Toxic Substances Control (DTSC) requires testing to assess for potential soil impacts from lead-based paint and organochlorine pesticides from possible termiticide usage. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.<sup>83</sup> This specification has the requirements for sampling, testing, transporting, and certifying imported or exported fill materials to or from school sites. A Phase I Environmental Site Assessment and Phase I Environmental Site Assessment Addendum were submitted to the DTSC as a Preliminary Environmental Assessment (PEA) equivalent in December 2020. The PEA equivalent was conducted at the site to investigate organochlorine pesticides from termiticides application and lead from lead-based paint and recommended removal of lead-impacted soil at several areas of the site. The DTSC requested in February 2021 for a Supplemental Site Investigation to be implemented to delineate the area of lead-impacted soil only. The DTSC signed a CDE School Facility Planning Division (SFPD) 4.14 form indicating that the site requires further investigation or a response action for only lead-based paint.

### **Routine Transport, Use, or Disposal**

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

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

The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, State, and local health and safety requirements. All transport, handling, storage, use, and disposal of substances would comply with all federal, State, and local laws and regulations for the management and use of hazardous material, including but are not limited to: the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act, federal

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<sup>83</sup> LAUSD. 2011, October 1. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

## 4. Environmental Checklist and Analysis

Clean Air Act, California Environmental Protection Agency, Caltrans, California Division of Occupational Safety and Health, DTSC, and the Los Angeles Fire Department.<sup>84</sup>

Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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

**Less Than Significant Impact.** The use, handling, storage, and disposal of hazardous materials in the course of Project construction and operation would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at the school, including training school staff to safely contain and clean up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies on-site; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately, pursuant to requirements of regulatory agencies. Therefore, impacts from reasonably foreseeable upset and accident conditions 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.** The following schools are within a quarter mile of the Project site:

- Equitas Academy #3 Elementary Charter
- 10th Street Elementary School
- Loyola Law School, Los Angeles
- Immaculate Conception School

Operation of construction equipment and heavy trucks would generate diesel emissions, which are considered hazardous; however, the construction period would be temporary. Health risk is based on the conservative assumption that exposure is continuous over a 70-year lifetime. A determination of risk is not appropriate for short-term construction activities. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at any of the schools within a quarter mile of the school campus. Operation of the school would not generate hazardous emissions. Therefore, impacts would be less than significant.

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<sup>84</sup> The Los Angeles Fire Department is the Certified Unified Program Agency (CUPA) for the City of Los Angeles; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.



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

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

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

The Project site is not included on any list compiled pursuant to California Government Code Section 65962.5. Furthermore, off-site hazardous materials sites within 0.25 mile of the Project site include small quantity generators, underground storage tanks, printing services, gas stations, schools, auto repair shops, and other typical urban uses. Groundwater was detected at a leaking underground storage tank site (former Shell station, 1600 West Olympic Boulevard) approximately 200 feet southeast of the Project site at approximately 70 feet below ground surface. Water is supplied to the Project site by the City of Los Angeles (LADWP) through municipal supply lines and hookups. All off-site hazardous materials cases have been closed or do not pose a risk hazard to students or staff at the new school.<sup>85</sup> Therefore, 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 nearest airports to the Project site are LAX (Los Angeles International Airport) at approximately 9.5 miles southwest, and Hollywood Burbank Airport (formerly Bob Hope Airport) approximately 11 miles north. The site is not within the airport influence area or the airport land use planning area of the airport.<sup>86</sup> Project development would not result in a new use that would result in a safety hazard or excessive noise for people in the project area. Therefore, no impacts related to airport hazards would occur.

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<sup>85</sup> PlaceWorks. April 2020. Phase I Environmental Site Assessment.

<sup>86</sup> Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. <https://dpw.lacounty.gov/avi/airports/default.aspx>

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

**No Impact.** The emergency response plans in effect in the City of Los Angeles are the City’s Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP).

approved by the County Board of Supervisors in 2012.<sup>87</sup> The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multiagency and/or multijurisdictional responses.

Emergency preparedness and response planning for the local schools is through LAUSD’s Office of Emergency Services. The charter school administrators would prepare and implement an emergency school evacuation plan in compliance with District “safe school plans.” Construction and operation of the new school and closure of the existing school would not interfere with any other existing emergency response plans or emergency evacuation plans.

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.<sup>88</sup> Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.<sup>89</sup> Additionally, Bright Star Schools would comply with SC-PS-1, which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshal’s final approval, and SC-PS-2 requires that Bright Star Schools prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures.

The Project construction and operation would not interfere with existing emergency response plans or emergency evacuation plans. Therefore, no emergency response or access impact would occur.

### **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 an urban area, and there is no wildland susceptible to wildfire on or near the site. The nearest Fire Hazard Severity Zone is approximately two miles to the northeast.<sup>90</sup> Project development would not place people or structures at risk from wildfire; therefore, no impact would occur.

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<sup>87</sup> 2012 Los Angeles County Operational Area Emergency Response Plan.  
<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

<sup>88</sup> City of Los Angeles Municipal Code Appendix D Section D102.1.

<sup>89</sup> California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

<sup>90</sup> California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/>



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

### Explanation:

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

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

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

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

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

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

The proposed Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. Currently, local stormwater from the site is collected by an LA City lateral within the Olympic Boulevard right-of-way, then flows southeast then south to a 102-inch reinforced concrete box along Jefferson Boulevard, part of a network of Los Angeles County Flood Control District storm drains discharging into Ballona Creek, which empties into the Pacific Ocean at Marina Del Rey.<sup>91</sup>

The Project site is in the Central Basin Pressure Area of the greater Los Angeles Basin. The groundwater in the Central Groundwater Basin is designated for municipal, agricultural, and industrial water supply beneficial use.<sup>92</sup> No active groundwater wells are within the vicinity or within one mile of the subject site. No wetlands were identified at the property or adjoining/immediately surrounding properties.

### Construction Phase

Construction projects of one acre or more are regulated under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying

<sup>91</sup> Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map). <https://pw.lacounty.gov/fcd/StormDrain/index.cfm>

<sup>92</sup> U.S. Geological Survey and the California State Water Resources Control Board. <https://pubs.usgs.gov/fs/2012/3096/pdf/fs20123096.pdf>



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BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The Project site is one acre and therefore Project construction would comply with the Statewide Construction General Permit and BMPs specified in the SWPPP. This is also required under LAUSD SCs SC-HWQ-2. Construction phase water quality impacts would be less than significant.

### Operation Phase

After completion of the proposed Project, ground surfaces at the Project site would consist of the new building, hardscape surfaces, and limited maintained landscaping. No large areas of exposed soil would be left to erode. The proposed Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low-impact development strategies like those provided in the LID Standards Manual issued by the County of Los Angeles DPW in February 2014.<sup>93</sup> The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID stormwater management would be incorporated into the Project design. LID principles are described further in Section VII(b), *Geology and Soils*, of this Initial Study. LAUSD would comply with existing regulations and SC-HWQ-1. Operational phase soil erosion impacts would be less than significant.

#### 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 site is not over a groundwater basin,<sup>94</sup> and the proposed Project does not include new groundwater wells. LADWP supplies water to the Project site and the surrounding community. LADWP water supplies consist of approximately 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and 2 percent recycled water.<sup>95</sup> The school would serve students already living in the area and attending other schools (including the existing Rise Kohyang Middle School one mile from the Project site) and would not increase groundwater withdrawals. The proposed Project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the school would not lower the groundwater table or deplete groundwater supplies. Furthermore, the one-acre Project site does not

<sup>93</sup> LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at [http://www.lastormwater.org/wp-content/files\\_mf/lidmanualfinal.pdf](http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf).

<sup>94</sup> Department of Water Resources (DWR). 2018, August 10. Groundwater Information Center Interactive Map Application. <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels>

<sup>95</sup> Los Angeles Department of Water and Power (LADWP). 2016, June. 2015 Urban Water Management Plan. [https://ladwp.com/ladwp/faces/wcnav\\_externalId/a-w-sos-uwmpln;jsessionid=nvL8fPQJqf5wdD2WQ5GCpMK2jGDkLy01pB2vVNDZ5rg0DR5ypWsc!1594315665?\\_adf.ctrl-state=19vrtpuo8a\\_4&hc\\_location=ufi%29\)\)&\\_afLoop=173775204397276&\\_afWindowMode=0&\\_afWindowId=blank#%40%3F\\_afWindowId%3Dblank%26hc\\_location%3Dufi%2529%2529%2529%26\\_afLoop%3D173775204397276%26\\_afWindowode%3D0%26\\_adf.ctrl-state%3Dnzzl9vc5d\\_4](https://ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmpln;jsessionid=nvL8fPQJqf5wdD2WQ5GCpMK2jGDkLy01pB2vVNDZ5rg0DR5ypWsc!1594315665?_adf.ctrl-state=19vrtpuo8a_4&hc_location=ufi%29))&_afLoop=173775204397276&_afWindowMode=0&_afWindowId=blank#%40%3F_afWindowId%3Dblank%26hc_location%3Dufi%2529%2529%2529%26_afLoop%3D173775204397276%26_afWindowode%3D0%26_adf.ctrl-state%3Dnzzl9vc5d_4) The percentages of water supply by source identified above are 5-year averages, 2011-2015.

## 4. Environmental Checklist and Analysis

provide intentional groundwater recharge. Therefore, the proposed Project would not interfere with groundwater recharge, and there would be no impacts related to groundwater recharge and management.

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

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

**Less Than Significant Impact.** There are no streams or rivers on the Project site. The site drains into several small City laterals, then into a 102-inch reinforced concrete box in the Jefferson Boulevard right-of-way, part of a network of storm drains discharging into Ballona Creek, which empties into the Pacific Ocean at Marina Del Rey.<sup>96</sup> The proposed Project would not change the drainage pattern of the Project site or its surroundings.

### Construction Phase

Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. During construction, erosion and siltation from the disturbed areas may occur. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction, sediment may enter storm drains. Project construction would comply with the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion and pollution control measures to protect water quality in stormwater runoff. Impacts would be less than significant.

### Operation Phase

Drainage from the school would be captured on campus or conveyed to Ballona Creek via the same storm drains as with existing conditions. The school campus would discharge cleaner stormwater than the existing Project site does because of compliance with County of Los Angeles LID requirements (see item VI(b) for more information about LID). Additionally, California Code of Regulations, Title 23, Division 2, Chapter 2.7, “Model Water Efficient Landscape Ordinance,” requires water conservation for landscaping. Thus, Project development would not cause substantial erosion. Operational impacts related to erosion/siltation would be less than significant.

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

**No Impact.** The drainage pattern of the completed charter school would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance,<sup>97</sup> the proposed on-

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<sup>96</sup> Los Angeles County Department of Public Works (DPW). 2018, August 20. Los Angeles County Storm Drain System. <https://dpw.lacounty.gov/fcd/stormdrain/disclaimer.cfm>.

<sup>97</sup> California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.



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site drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, Project construction would not result in flooding on- or off-site, and no impacts would occur.

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

**Less Than Significant Impact.** Project development would not result in runoff exceeding the capacity of the municipal storm drain system. Development of the proposed Project would not cause substantial water pollution, and impacts related to runoff would be less than significant.

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

**No Impact.** The Project site is not within a dam inundation zone<sup>98</sup> and is outside of the 100-year flood zone mapped by the Federal Emergency Management Agency.<sup>99</sup> The Project buildings would not impede or redirect flood flows, and no impact related to flooding would occur.

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

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

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project site is approximately 250 feet above sea level and 12 miles inland from the Pacific Ocean. The Project site is not within the mapped tsunami inundation areas defined by Tsunami Inundation Maps for Emergency Planning.<sup>101</sup> Therefore, the campus is outside the tsunami hazard zone and would not be affected by a tsunami.

The proposed Project would not release pollutants as the result of floods, tsunami, or seiche, and there would be no impact.

<sup>98</sup> PlaceWorks. 2020, February. Geologic and Environmental Hazards Assessment.

<sup>99</sup> Federal Emergency Management Agency (FEMA). 2018, November 2. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.28472445322258,33.93018828110084,-118.20164034677735,33.96578848287957>.

<sup>100</sup> Federal Emergency Management Agency (FEMA). 2018, August 10. Flood Map Service Center. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html>

<sup>101</sup> California Department of Conservation. Los Angeles County Tsunami Inundation Maps. <https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles>

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

**No Impact.** The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites), which also requires control measures. After completion of the proposed Project, ground surfaces would be either hardscape or maintained landscaping. The proposed Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles DPW in February 2014.<sup>102</sup> The LID Standards Manual is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board. The proposed Project would comply with existing regulations and SC-HWQ-1 and SC-HWQ-2. The proposed Project would not obstruct implementation of a water quality control plan. Additionally, the proposed Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan. No impact would occur.

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<sup>102</sup> LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>



## 4. Environmental Checklist and Analysis

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

### Explanation:

There are no land use and planning LAUSD SCs.

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

**No Impact.** The Project site and surrounding area is fully developed with urban land uses, including residential, commercial, office, and institutional (churches and schools). The new school would be constructed on a developed site and would not divide an established community. Therefore, no impact would occur.

#### 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 has a zoning of C4 (Commercial), which permits a wide variety of retail, service, and institutional uses. According to the LAMC, schools and educational institutions are permitted in the C4 Zoning District.<sup>103</sup> The proposed Project would construct a 4-story, 60-foot-tall building specifically in (Q)C4-2D (Q=Qualified Conditions; C-4 = Commercial; 2=height district; D=Limited floor area ratio permitted from 6:1 to 3:1). Construction in a Height District No. 2 would permit a building to be erected three times the floor area ratio (FAR) (no specific height limit). Thus, construction on the one-acre Project site would allow the building to be up to 130,700 square feet, which is significantly greater than the proposed building of approximately 69,200 square feet. However, there is no maximum height limit or maximum stories allowed for a site zoned C4 in a Height District No. 2.

The California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, LAUSD can render the local zoning ordinance inapplicable to the proposed Project. The District may exercise a zoning exemption on behalf of an individual charter school for a specifically identified property on a case by case basis. BSS would follow the LAUSD Charter School Zoning Exemption Policy as part of their request. If approved, LAUSD would initiate the following procedures for implementation of the City of Los Angeles land use exemptions:

<sup>103</sup> City of Los Angeles. Zoning. <http://zimas.lacity.org/>. Permitted Uses are set forth in City of Los Angeles Municipal Code Section 12.10, Section 12.14 "C4" Commercial Zone.

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

If the request is denied by LAUSD, BSS would need a vesting conditional use permit under the authority of the City Planning Commission, Area Planning Commission, and Zoning Administrator.

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



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

### Explanation:

There are no mineral resource LAUSD SCs.

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

**No Impact.** The Project site is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is in an area where “adequate information indicates that no significant mineral deposits are present, or where it judged that little likelihood exists for their presence.” No active mines are in the local vicinity.<sup>104</sup> Therefore, development of the proposed Project would not cause a loss of availability of a known mineral resource valuable to the region and the state and there would be no impact.

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

**No Impact.** The proposed Project would not cause a loss of locally important mineral resource and there would be no impact.

<sup>104</sup> California Surface Mining and Reclamation Policies and Procedure. Guidelines for Classification and Designation of Mineral Lands. <https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf>  
Surface mining and Reclamation Act (SMARA) Mineral Lands Classification (MLC) data portal. <https://maps.conservation.ca.gov/mineralresources/>  
USGS. Map - Mineral Resources Online Spatial Data – USGS. <https://mrddata.usgs.gov/general/map-us.html>  
<https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf>

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

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

### Explanation:

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

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



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<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <li>• Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building.</li> <li>• 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.</li> <li>• The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building.</li> <li>• 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.</li> </ul> <p>During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.</p>
SC-N-8	<p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>• Time Constraints – prohibiting work during sensitive nighttime hours.</li> <li>• 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).</li> <li>• Equipment Restrictions – restricting the type of equipment used.</li> <li>• Substitute Methods – using quieter methods and/or equipment.</li> <li>• Exhaust Mufflers – ensuring equipment has quality mufflers installed.</li> <li>• Lubrication &amp; Maintenance – well maintained equipment is quieter.</li> <li>• Reduced Power Operation – use only necessary size and power.</li> <li>• Limit Equipment On-Site – only have necessary equipment on-site.</li> <li>• Noise Compliance Monitoring – technician on site to ensure compliance.</li> <li>• Quieter Backup Alarms – manually-adjustable or ambient sensitive types.</li> </ul> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> <li>• Noise Barriers – semi-permanent or portable wooden or concrete barriers.</li> <li>• Noise Curtains – flexible intervening curtain systems hung from supports.</li> <li>• Enclosures – encasing localized and stationary noise sources.</li> <li>• Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage, and maintenance of equipment.</li> </ul> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>• Window Treatments – reinforcing the building's noise reduction ability.</li> <li>• Community Participation – open dialog to involve affected residents.</li> </ul> <p>Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.</p>

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<b>LAUSD Standard Conditions of Approval</b>	
SC-N-9	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.<sup>105</sup> Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> <li>• Noise Attenuation Barriers<sup>106</sup> – 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.</li> </ul> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• Substitute Methods – using quieter methods and/or equipment.</li> <li>• Exhaust Mufflers – ensuring equipment has quality mufflers installed.</li> <li>• Lubrication &amp; Maintenance – well maintained equipment is quieter.</li> <li>• Reduced Power Operation – use only necessary size and power.</li> <li>• Limit Equipment On-Site – only have necessary equipment on-site.</li> <li>• Quieter Backup Alarms – manually-adjustable or ambient sensitive types.</li> </ul> <p>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD’s noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>• Temporary Window Treatments – temporarily reinforcing the building’s noise reduction ability.</li> <li>• Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity</li> </ul>

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

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

### Construction Noise

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the transport of workers, material

<sup>105</sup> 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.

<sup>106</sup> While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).



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deliveries, and debris/soil hauling and (2) on-site noise from use of construction equipment. Demolition and construction activities are anticipated to start in 2023 and last approximately 21 months.

### *Construction Trips*

The transport of workers and materials to and from the construction site would incrementally increase noise levels along local roadways. Individual construction vehicle pass-by trips may create momentary noise levels of up to approximately 85 dBA ( $L_{max}$ ) at 50 feet from the vehicle, but these occurrences would generally be short lived and during daytime hours. Therefore, noise impacts from construction-related truck traffic would be less than significant at noise-sensitive receptors along the construction routes, and no mitigation measures would be required.

### *Construction Equipment*

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 9 lists maximum ( $L_{max}$ ) construction equipment noise levels at 50 feet.<sup>107</sup> Construction equipment typically moves around the site and has variable power levels. Noise from construction equipment decreases by approximately 6 dBA with each doubling of distance from the source. For example, the noise levels from a bulldozer that generates 85 dBA at 50 feet would attenuate to 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet. Also, noise levels are reduced by the amount of use (usage factor) as well as barrier effects provided by buildings.

**Table 9 Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) $L_{max}$ at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70

<sup>107</sup> Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

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**Table 9 Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) $L_{max}$ at 50 ft
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Scraper	85
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80

Source: FHWA, 2006. Construction Noise Handbook. August.  
Note: KVA = kilovolt amps

### *Construction Noise at Sensitive Receptors*

The nearest sensitive receptors as measured from the acoustical center of the construction site are single-family homes to the southeast and southwest, Equitas Elementary to the southeast, and the Rosemary Hotel to the north. Table 10 shows the maximum and average noise levels—grouped by construction phase based on the distance to the sensitive receptor. The anticipated construction equipment mix was categorized by construction activity using the Federal Highway Administration’s Roadway Construction Noise Model (RCNM).

**Table 10 Project-Related Construction Noise Levels**

Construction Phase	$L_{max}$ dBA
	Maximum at 50 feet
Demolition	90
Site Preparation	85
Grading	90
Building Construction	84
Paving	84
Architectural Coating	78

Source: FHWA RCNM.

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



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LAMC Section 112.05 specifies that the maximum noise level associated with construction, power tools, and powered equipment of 20 horsepower or less shall not exceed 75 dBA  $L_{max}$  at a distance of 50 feet. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers, and/or any other noise reduction device or techniques during the operation of equipment. As shown in Table 10, the construction noise levels would be up to 90 dBA  $L_{max}$  and exceed the LAMC Section 41.40 threshold of 75 dBA  $L_{max}$  at 50 feet. Implementation of SC-N-8 requires all feasible measures to reduce construction noise below the Municipal Code standard through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8, construction noise levels could be reduced by up to 15 dBA. During demolition and grading, which are estimated to be the loudest phases, this would reduce construction noise levels to approximately 75 dBA  $L_{max}$  at 50 feet, which would not exceed the City's 75 dBA  $L_{max}$  criterion. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant.

### Mobile Source Noise

A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels at sensitive receptors. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. A doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dBA traffic noise increase. Based on this, the following thresholds of significance—similar to those recommended by the Federal Aviation Administration—are used to assess traffic noise impacts at sensitive receptor locations:

- Greater than 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher.
- Greater than 3 dBA increase for ambient noise environments of 60 to 64 CNEL.
- Greater than 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

For the cumulative scenario, a significant cumulative traffic noise impact would occur if the project's cumulative contribution would be 1 dBA or more.

Table 11 shows the existing noise environment at each study roadway segment and traffic noise increase, both from the project and cumulative. Traffic noise levels were estimated using the FHWA Traffic Noise Prediction Model and traffic data provided by LLG Engineers (see Appendix G). Traffic noise increases were calculated based on peak hour traffic turning movements that were converted to average daily traffic (ADT) segment volumes by using a peak hour to ADT multiplier of 12.5 applied to "Existing No Project" and "Future No Project" traffic scenarios. The project daily trip generation of 507 was conservatively added to each study roadway segment under the "Existing Plus Project" and "Future Plus Project" traffic scenarios. This provides for a conservative analysis because it does not account for the trip distribution among the study roadway segments and assumes all project-generated trips would occur at each roadway segment. Table 11 shows that

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the project-related traffic noise increase would be up to 2.3 dBA CNEL, and cumulative traffic noise increase would be up to 2.4 dBA CNEL along Beacon Avenue, south of Olympic Boulevard. Because the existing environment is 60 dBA CNEL, the allowable increase is up to 5 dBA CNEL. Therefore, this would not exceed the established thresholds, and impacts would be less than significant.



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**Table 11 Project-Related Traffic Noise Increase**

Roadway Segment	ADT Volumes				CNEL ,dBA			
	Existing No Project	Existing Plus Project	Future without Project	Future with Project	Existing Conditions	Allowable Increase	Project Noise Increase	Cumulative Increase
Beacon Avenue - north of Olympic Boulevard	2,350	2,857	2,613	3,120	59.2	5.0	0.8	1.2
Beacon Avenue - south of Olympic Boulevard	738	1,245	775	1,282	54.2	5.0	2.3	2.4
Olympic Boulevard - east of Beacon Boulevard	36,925	37,432	39,450	39,957	71.5	1.5	0.1	0.3
Olympic Boulevard - west of Beacon Boulevard	37,038	37,545	39,588	40,095	71.5	1.5	0.1	0.3
Beacon Avenue - north of 11th street	738	1,245	775	1,282	54.2	5.0	2.3	2.4
11th Street - east of Beacon Avenue	5,113	5,620	5,438	5,945	62.6	3.0	0.4	0.7
11th Street - west of Beacon Avenue	4,975	5,482	5,288	5,795	62.5	3.0	0.4	0.7
Burlington Avenue - north of Olympic Boulevard	5,063	5,570	5,263	5,770	62.7	3.0	0.4	0.6
Burlington Avenue - south of Olympic Boulevard	5,513	6,020	5,788	6,295	63.1	3.0	0.4	0.6
Olympic Boulevard - east of Burlington Avenue	37,038	37,545	39,550	40,057	71.5	1.5	0.1	0.3
Olympic Boulevard - west of Burlington Avenue	37,013	37,520	39,525	40,032	71.5	1.5	0.1	0.3

Source: LLG Engineers, 2021. See Appendix F for calculations.

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### Stationary Source Noise

Operation of the Project could include use of rooftop HVAC systems. Such equipment would typically generate noise levels ranging up to 72 dBA at a distance of 3 feet. Noise generated by mechanical systems to be installed on the new building is expected to be similar to the mechanical equipment noise generated by surrounding schools and buildings in the area. The HVAC equipment is anticipated to be located in the northern portion of the site where the building is proposed. The nearest sensitive receptors would be residences approximately 130 feet to the southeast. At this distance, HVAC noise would attenuate to approximately 40 dBA, which would not exceed the City's 50 dBA daytime noise standard for residential uses.<sup>108</sup> Additionally, under LAMC Sections 112.02 and 112.05, noise attributable to school-related mechanical equipment (such as HVAC systems or any pumping, filtering, or heating equipment) should not exceed the ambient noise level by more than 5 decibels. HVAC equipment would also not raise the existing ambient noise levels by 5 dBA or more, as the ambient noise level at nearby residences is approximately between 54 and 72 dBA based on traffic noise modeling (Table 11). SC-N 2 also has restrictions on HVAC noise to limit potential noise impacts. Impacts would be less than significant.

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

Vehicle-related sounds during student drop-off and pick-up times (such as braking, car doors closing, honking, and idling engines) is not expected to substantially raise the local ambient noise level along the school frontage since it would be periodic (twice a day during the school year) on school property and not along the curbside. Therefore, student drop-off and pick-up activities would not significantly raise community noise levels. School staff would park in the proposed underground parking garage. Therefore, impacts would be less than significant.

### Noise Compatibility

LAUSD SCs SC-N-1 and SC-N-2 require exterior noise levels of less than 67 dBA  $L_{eq}$ , and interior classroom spaces should achieve noise levels of no more than 45 dBA  $L_{eq}$ , and no greater than 0.6 seconds for reverberation time (in furnished but unoccupied spaces). The primary noise sources in the vicinity of the Project site are traffic from Beacon Avenue and West Olympic Boulevard. School buildings would be required to meet LAUSD's standard for interior reverberation time (i.e., reflective sound buildup inside the classrooms).

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

**Less Than Significant Impact.**

### Operational Vibration

Typically, the type of land uses that result in vibration impacts are industrial businesses that use heavy machinery or railroads where passing trains generate perceptible levels of vibration. The proposed Project is a charter

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<sup>108</sup> Los Angeles Municipal Code Section 111.03.

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school, and there would be no significant vibration-generating sources during operation; therefore, no impacts would occur.

### Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures but can achieve levels in buildings close to a construction site that are perceptible.<sup>109</sup> Table 12 lists vibration levels for different types of construction equipment.

**Table 12 Construction Equipment Vibration Levels**

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

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

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

<sup>b</sup> PPV = peak particle velocity measured in inches/second.

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

Typical construction equipment rarely exceeds vibration levels that are perceptible.<sup>110</sup> Groundborne vibration is rarely annoying to people who are outdoors, so it is evaluated in terms of indoor receivers. For annoyance,

<sup>109</sup> Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.

<sup>110</sup> As measured at a distance of 25 feet from an individual piece of equipment perceptible vibration would be 0.1 peak particle velocity (PPV) in inches per second. Architectural damage at typical building structures may occur at 0.2 to 0.5 PPV in inches per second.



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vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.<sup>111</sup>

### *Construction Vibration-Induced Annoyance*

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is 72 VdB for residential uses.<sup>112</sup> Vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the construction site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using the distance from the center of the construction site to the nearest sensitive receptors.

Table 13 shows the vibration levels from typical construction equipment at adjacent and surrounding sensitive receptors. As shown, vibration from construction activities is not anticipated to exceed the FTA vibration annoyance threshold of 72 VdB at the various nearest receptors.

**Table 13 Construction Equipment Vibration Annoyance**

Equipment	Approximate VdB Level				
	Reference VdB at 25 feet	Residence at 175 feet southwest <sup>a</sup>	Residence at 180 feet southeast <sup>a</sup>	Equitas Academy at 280 feet southeast <sup>a</sup>	Rosemary Hotel at 340 feet north <sup>a</sup>
Vibratory Roller	94	69	68	63	60
Hoe Ram	87	62	61	56	53
Large Bulldozer <sup>b</sup>	87	62	61	56	53
Caisson Drilling <sup>c</sup>	87	62	61	56	53
Loaded Trucks	86	61	60	55	52
Jackhammer	79	54	53	48	45
Small Bulldozer	58	33	32	27	24

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

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

<sup>a</sup> FTA Category 2: Residences and buildings where people normally sleep have a daytime residential threshold of 72 VdB assuming frequent events (more than 70 events per day).

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

<sup>c</sup> Vibration levels from Auger Cast Displacement (ACD) Rig and Cast-in-Drilled-Hole (CIDH) Rig are similar to a Caisson Drill Rig.

As heavy construction equipment moves around the Project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment and would generally not be perceptible. The geotechnical report for the Project recommends cast-in-drilled-hole soldier piles for shoring. Therefore, it is anticipated that no pile driving would occur for the building foundation. As part of the Project, implementation of SC-N-5 requires the use of less-vibration-intensive equipment when working next

<sup>111</sup> Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

<sup>112</sup> Federal Transit Administration, 2018. *Transit Noise and Vibration Impact Assessment Manual*. September.

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

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

### ***Construction Vibration-Induced Architectural Damage***

The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical nonengineered timber and masonry buildings (residential and school buildings) and 0.3 in/sec PPV for engineered concrete and masonry buildings (commercial buildings).<sup>113</sup> Vibration levels can exceed 0.2 in/sec PPV if a vibratory roller is operated within approximately 25 feet of the receiving structure. Vibration levels can exceed 0.3 in/sec PPV when a vibratory roller is operated within approximately 19 feet of the receiving structure. Table 14 shows the reference vibration levels for typical construction equipment and estimated vibration levels at the nearest off-site buildings and structures.

**Table 14 Construction Equipment Vibration Damage**

Equipment	Vibration Levels at 25 Feet <sup>a</sup>	Vibration Levels, PPV in/sec		
		Commercial Bank to west at 16 Feet	Residential to west at 30 Feet	Residential to east at 120 Feet
Vibratory Roller	0.21	0.410	0.160	0.020
Hoe Ram	0.089	0.174	0.068	0.008
Large Bulldozer <sup>b</sup>	0.089	0.174	0.068	0.008
Caisson Drilling <sup>c</sup>	0.089	0.174	0.068	0.008
Loaded Trucks	0.076	0.148	0.058	0.007
Jackhammer	0.035	0.068	0.027	0.003
Small Bulldozer	0.003	0.006	0.002	<0.001

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

<sup>a</sup> FTA reference at 25 feet and residential uses to south within 25 feet.

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

<sup>c</sup> Vibration levels from Auger Cast Displacement (ACD) Rig and Cast-in-Drilled-Hole (CIDH) Rig are similar to a Caisson Drill Rig

The nearest structures to potential construction activity (including the use of a vibratory roller for paving) are an apartment building approximately 25 feet to the south and a commercial bank building approximately 16 feet to the west. The vibration threshold at the residential building is 0.2 in/sec PPV, and at 25 feet, there could be a potential for architectural damage due to construction vibration from vibratory rollers. The applicable vibration threshold for the commercial bank to the west is 0.3 in/sec PPV, which could also be exceeded.

<sup>113</sup> FTA 2018.



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Although these buildings are not considered historic, they are considered sensitive receptors; thus, SC-N-7 would be applied to reduce the possibility of architectural damage. SC-N-7 requires the use of less-vibration-intensive equipment when working next to existing buildings. Alternatives shall include mechanical methods using static, nonvibratory rollers. Additionally, implementation of inspection and reporting on the current foundation and structural condition of the residential and commercial building may be implemented, as necessary. With implementation of these standard conditions, impacts from vibration-induced architectural damage would be less than significant.

### Groundborne Noise

Construction-related groundborne noise could occur from underground activities such as tunnel boring. Construction of the proposed Project would not include such activities.

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

The Project does not include activities or equipment that would generate substantial construction or operational groundborne noise. No impacts would occur.

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

**No Impact.** There are no private airstrips within 2 miles of the Project site. The nearest airport or airstrip is the Los Angeles International Airport, approximately 9.5 miles southwest of the Project site.<sup>114</sup> Thus, Project development would not expose people working on-site to excessive airport noise levels. No impact would occur.

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<sup>114</sup> Airnav.com. 2021, April 20. Airport Information. <http://www.airnav.com/airports>

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

The analysis in this section is based in part on the Traffic Impact Analysis (TIA) prepared by Linscott, Law, and Greenspan Engineers dated March 2021. A complete copy of this report is included as Appendix G to this Initial Study. <sup>115</sup>

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-PED-1	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p><b>Caltrans SR2S program</b> LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p><b>OEHS Traffic and Pedestrian Safety Program</b> LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian, and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Clearly designate passenger loading areas with the use of signage, painted curbs, etc.</li> <li>Install new walkway and/or sidewalk segments where none exist.</li> <li>Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.</li> <li>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</li> </ul>

<sup>115</sup> Linscott, Law, and Greenspan Engineers. March 2021. Traffic Impact Assessment (TIA).



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<b>LAUSD Standard Conditions of Approval</b>	
SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p><b>School Traffic Safety Reference Guide REF- 4492. 1</b> This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back-to-School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.</p>
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p><b>School Design Guide</b> The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> <li>• Compliance with the local jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project.</li> <li>• 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.</li> <li>• Implementation of SR2S, traffic control and pedestrian safety devices.</li> <li>• Fair share contribution and/or other mitigation measures for potential traffic impacts.</li> <li>• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.</li> <li>• 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.</li> <li>• 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.</li> </ul>
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>

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

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

Construction activity may be considered an incompatible use because it would require the use of haul trucks, equipment, and worker vehicles in an area with schools and residential. The construction and demolition

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activities would result in a temporary increase in truck activity on the roadway network, but the trucks would not exceed the size and weight limits for public roadways and would not travel during peak traffic hours. Construction would not require roadway or sidewalk closures and/or traffic detours.

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

The Project's design has the drop-off and pick-up in the middle of the campus, which would avoid curbside traffic obstructions. The proposed Project would have standard driveway widths, turning radii, and provision of adequate line of sight to avoid conflict hazards. "Sight Distance Standards" from the Caltrans Highway Design Manual relates minimum sight distance values to a range of design speeds.<sup>116</sup> The school driveway would be clearly visible and not obstructed by parked cars. Additionally, LAUSD has design standards to ensure Project design does not create hazards for students or staff:

- Compliance with OEHS Traffic and Pedestrian Safety Program for student drop-off areas and vehicle access (SC-PED-2).
- Separation of foot traffic from vehicular traffic on and adjacent to campus (SC-PED-3).
- Compliance with School Traffic Safety Reference Guide for passenger loading zones and parking restrictions (SC-PED-4).
- Compliance with School Design Guide for student drop-off and pick-up, bus loading areas and parking areas for student safety (SC-PED-5).
- Compliance with City design guidelines for access, parking, and circulation in the vicinity of the Project site (SC-T-3).<sup>117</sup>

The proposed Project would not substantially increase hazards due to a geometric design feature. The proposed Project would construct driveways in approximately the same location as the driveways currently serving the existing Project site, perpendicular to the public right-of-way, and providing an unobstructed line of sight for all modes of travel. Sidewalks are provided along the Project site's Olympic Boulevard and Beacon Avenue frontages, and signalized crossings are within walking distance to the Project site. The proposed Project would improve the existing sidewalks and would not add access points along the Project site's Olympic Boulevard and Beacon Avenue frontages. Therefore, due to the existing physical conditions of the Project site and planned

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<sup>116</sup> California Department of Transportation (Caltrans). 2012, May 7. Highway Design Manual. Table 201.1: Sight Distance Standards. <http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0200.pdf>.

<sup>117</sup> Bright Star Schools has already complied with the City scope of analysis and methodology for the traffic and pedestrian study.



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sidewalk improvements along the Project site's Olympic Boulevard and Beacon Avenue frontages, no safety concerns related to geometric design are noted. The proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use; thus, impacts would be less than significant.

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

**Less Than Significant Impact with Mitigation.** The Project site is in an urban area characterized by residential, commercial, office, and institutional (churches and schools). The existing land use (parking lot) has passenger vehicle traffic (personal vehicles and trucks) and large delivery trucks that use the surrounding roadways. There are four schools in close proximity (within 0.25 mile).

- Equitas Academy #3 Elementary Charter, 1050 Beacon Ave, Los Angeles, CA 90015
- 10th Street Elementary School, 1000 Grattan St, Los Angeles, CA 90015
- Loyola Law School, Los Angeles, 919 Albany St, Los Angeles, CA 90015
- Immaculate Conception School, 830 Green Ave, Los Angeles, CA 90017

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

Currently there is no crosswalk or any pedestrian treatments to provide a safe and adequate crossing on Beacon Avenue. This intersection would experience increased traffic and pedestrian crossings with the proposed Project.

The new school would generate increased motorized (cars and trucks) and nonmotorized (pedestrians and bicyclists) travel in the immediate area surrounding the new site. Vehicle traffic would be transferred from the existing Bright Star Middle School (3020 Wilshire Boulevard), and because of its close proximity (approximately a mile northwest), it is anticipated that most of the pedestrian and bike traffic would be transferred from the existing facility to the new campus. The proposed Project would increase the concentration of pedestrians, bicycles, and vehicles on Beacon Avenue and increase vehicle turning movements at the school driveway and at the Beacon Avenue / Olympic Boulevard, and Beacon Avenue / 11th Street intersections. Because of this concentration, pedestrian hazards may be significant.

Construction of the proposed Project would require temporary closures of the sidewalks along the Project site's Olympic Boulevard and Beacon Avenue frontages. However, signs would be posted advising pedestrians of temporary sidewalk closures and providing alternate routes. No bicycle routes/lanes in the Project area would require temporary closure. Additionally, the Bright Star Schools will prepare and implement a Construction Management Plan that will reduce construction-related impacts on the surrounding community and minimize potential conflicts between construction activities, street traffic, bicyclists, and pedestrians.

As part of the proposed Project and in compliance with LAUSD standard conditions, Bright Star Schools would implement the following:

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

The California Manual on Uniform Traffic Control Devices (CA MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of California Vehicle Code Section 21400. Part 7 of the CA MUTCD has standards for traffic control, warning signs, and markings for school areas.<sup>118</sup>

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

- Article 1, Section 21372, Guidelines for Traffic Control Devices near Schools<sup>119</sup>
- Article 1, Section 21373, School Board Request for Traffic Control Device<sup>120</sup>

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<sup>118</sup> California Manual of Uniform Traffic Control Devices (MUTCD), Part 7: Traffic Control for School Area.  
<http://mutcd.fhwa.dot.gov/pdfs/2009/part7.pdf>.

<sup>119</sup> Amended Ch. 545, Stats. 1974. Effective January 1, 1975.

<sup>120</sup> Amended Ch. 1061, Stats. 1969. Effective November 10, 1969.



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- Article 1, Section 21368, Crosswalks near Schools
- Article 2, Section 21400, Official Traffic Control Devices

As discussed above to improve the overall intersection operation and to reduce pedestrian hazards at the Beacon Avenue / Olympic Boulevard, and Beacon Avenue / 11th Street and to comply with SC-PED-2, SC-PED-4, and SC-T-3, LAUSD and Bright Star Schools shall implement Mitigation Measures MM-PED-1 and MM-PED-2. These measures require the installation of pedestrian safety features to improve operations at the intersections and implementation of a Traffic Control Plan to minimize traffic congestion and enhance safety for students that walk and bike to school.

### Mitigation Measures

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

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

- Enhanced crosswalk and pedestrian safety treatments such as yellow crosswalk, pavement markings, raised crosswalk, safety lighting, warning signage, in-pavement flashing beacons, curb extensions.
- The charter school will provide monitors or crossing guards. Monitors or crossing guards shall be posted at the intersection of Olympic Boulevard / Beacon Avenue during the student drop-off and pick-up to facilitate pedestrian crossings and vehicular traffic flow and to ensure the safety of students.
- Meetings and informational packets shall be distributed to instruct parents/guardians on the student drop-off and pick-up procedure.
- The school facilities staff and school principal shall review student drop-off and pick-up procedures every month for the first year that school is in session, then quarterly after that, to identify bottlenecks and areas for improvement and shall make adjustments to the Traffic Control Plan.
- Charter school administrators shall implement an incentive program to encourage parents of students to rideshare with other students.

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Measures to control traffic and pedestrian movements under Mitigation Measures MM-PED-1 and MM-PED-2 would improve operations at the intersection of Olympic Boulevard / Beacon Avenue and reduce pedestrian hazards to less than significant.

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

**Less Than Significant Impact.** The site is approximately 0.4 mile west of I-110; approximately 0.7 miles north of I-10; and 1.5 miles south of I-101. The nearest four-lane arterial roadway to the Project site is the adjacent Olympic Boulevard. This north-south roadway has three through-travel lanes in each direction within the Project study area. Separate exclusive left-turn lanes are provided in each direction on Olympic Boulevard at the Burlington Avenue and Beacon Avenue intersections. There are paved sidewalks on both sides, with a posted speed limit of 35 mph outside the school zone and a 25-mph speed limit within the school zone. Because of the other schools in the area, all major intersections have traffic signals, painted crosswalks, and pedestrian push buttons to activate the signal; therefore, crossing at a light would not pose a safety hazard, and impacts would be less than significant.



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

### Explanation:

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

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

**No Impact.** The proposed Project would not induce population growth. The charter school would serve students already living in the area and attending other schools, including the existing Rise Kohyang Middle School. The Project area is a developed urbanized area, and the new school would not attract new residents to the region. The proposed Project would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the proposed Project. No impacts related to population growth would occur.

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

**No Impact.** Project development would not displace any housing and would not require replacement housing. Therefore, no impact would occur.

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

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-PS-1	If necessary, LAUSD shall: Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 1. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
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 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 11 in the Central Bureau at 1819 West 7th Street, approximately 0.4-mile northeast.<sup>121</sup> Station 11 is equipped with paramedic rescue ambulance, Basic Life Support (BLS) rescue ambulance, assessment light force, and an assessment engine.<sup>122</sup>

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The charter school administrators would prepare and implement an emergency school evacuation plan in compliance with District "safe school plans." Construction and operation of the new

<sup>121</sup> City of Los Angeles Fire Department (LAFD). Accessed August 10, 2018. Find Your Station. <https://www.lafd.org/fire-stations/station-results>.

<sup>122</sup> City of Los Angeles Fire Department (LAFD). 2013, September. Fire Station Directory. [http://www.lafdacs.org/pdf\\_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf](http://www.lafdacs.org/pdf_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf).



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school and closure of the existing school would not interfere with any other existing emergency response plans or emergency evacuation plans.

Project site plans would be reviewed by LAFD for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.<sup>123</sup> Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.<sup>124</sup> Additionally, Bright Star Schools is required to comply with SC-PS-1, which requires that the local fire and police departments review all construction and site plans prior to the State Fire Marshal's final approval. SC-PS-2 requires that Bright Star Schools prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures. Therefore, emergency response and access impacts would be less than significant.

### b) Police protection?

**Less Than Significant Impact.** The Los Angeles Police Department (LAPD) provides police service to the City of Los Angeles including the Project site. The site is in LAPD's Rampart Community Police Station; the Olympic Area Station is at 1401 West 6th Street, approximately 0.6 mile to the south.<sup>125</sup> Project development would not increase the total number of students attending schools in the region. General campus activities would be under the direct supervision of the school administrators and staff. Thus, Project development would not substantially increase demands for police services in the Rampart service area or in the City of Los Angeles. The new charter school would not require construction of new or expanded police stations. Additionally, Bright Star Schools is required to comply with SC-PS-1, which requires that the local fire and police departments review all construction and site plans prior to the State Fire Marshal's final approval, and SC-PS-2 requires that Bright Star Schools prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures. Therefore, emergency response and access impacts would be less than significant.

### c) Schools?

**No Impact.** Development of the school would have a favorable effect on school facilities in the Westlake Community by providing additional options for school choice for the existing and projected student population. The proposed Project would not increase demands for schools and would not require construction of other new or expanded school facilities. The proposed Project would not have an adverse physical impact on existing schools, and no impacts would occur.

### d) Parks?

**No Impact.** The proposed Project would not have an adverse physical impact on any parks or necessitate the construction of new parks. The school would include sufficient recreation facilities and an outdoor play area to

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<sup>123</sup> City of Los Angeles Municipal Code Appendix D Section D102.1.

<sup>124</sup> California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

<sup>125</sup> Los Angeles Police Department (LAPD). 2020. Rampart Community Police Station. [http://www.lapdonline.org/rampart\\_community\\_police\\_station](http://www.lapdonline.org/rampart_community_police_station)

## 4. Environmental Checklist and Analysis

serve the student population, and would not require that students use off-campus parks. The proposed Project would not result in the need for new or expanded park facilities and there would be no impact to park facilities.

### e) **Other public facilities?**

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



## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. RECREATION.</b>				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

There are no recreation LAUSD adopted SCs.

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

**No Impact.** The proposed Project would include recreational facilities on-site and would not increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, it would not cause physical deterioration of neighborhood and regional parks or other recreational facilities, and no impact would occur.

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

**No Impact.** Sufficient recreational facilities to support onsite students would be constructed as part of the new school. The environmental effects of the construction and operation of these recreational facilities are considered throughout the environmental analysis in this Initial Study. The proposed Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment, and no impact would occur.

## 4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the Traffic Impact Analysis (TIA), prepared by Linscott, Law, and Greenspan Engineers dated March 2021. A complete copy of this report is included as Appendix G to this Initial Study.<sup>126</sup>

### Explanation:

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

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

<sup>126</sup> Linscott, Law, and Greenspan Engineers. March 2021. Traffic Impact Assessment (TIA).



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<b>LAUSD Standard Conditions of Approval</b>	
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> <li>• Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.</li> <li>• 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.</li> <li>• Implementation of SR2S, traffic control and pedestrian safety devices.</li> <li>• Fair share contribution and/or other mitigation measures for potential traffic impacts.</li> <li>• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.</li> <li>• 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.</li> <li>• 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.</li> </ul>
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>
SC-PED-1	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p><b>Caltrans SR2S program</b></p> <p>LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p><b>OEHS Traffic and Pedestrian Safety Program</b></p> <p>LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian, and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Clearly designate passenger loading areas with the use of signage, painted curbs, etc.</li> <li>• Install new walkway and/or sidewalk segments where none exist.</li> <li>• Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.</li> </ul> <p>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</p>
SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p><b>School Traffic Safety Reference Guide REF- 4492.1</b></p>

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<b>LAUSD Standard Conditions of Approval</b>	
	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.  <b>School Design Guide</b> 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-PS-1	If necessary, LAUSD shall: Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 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) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

**Less Than Significant Impact with Mitigation.** The Project's TIA includes a comprehensive consistency review that compares the Project and site design features with the City of Los Angeles relevant plans and policies (see Appendix G). As evaluated in that assessment, construction and operation of the proposed Project would not conflict with any relevant state, regional, or local plans, policies, or programs because the proposed Project does not include any features that would preclude the City from completing and complying with applicable guiding documents and policy objectives. The proposed Project would not require modifications to the public right-of-way and would not conflict with any plans or policies that govern the public right-of-way; thus, the proposed Project would not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions, or LADOT's Manual of Policy and Procedures (MPP) Section 321, Driveway Design, and the Citywide Design Guidelines – Guideline 2.

The Project would comply with SC-PED-1 through SC-PED-5, which ensure the preparation and distribution of a Caltrans SR2S program that provides information about pedestrian and bicycle safety and would outline the safe travel paths within a 0.25-mile radius of the new school (under SC-PED-1). The proposed Project would also 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 (under SC-PED-2); and infrastructure improvements prior to the opening of a school, including upgrading substandard walkway/sidewalk segments. As part of the Project the sidewalks along the school frontage on Beacon Avenue and Olympic Boulevard would be repaired and widened (under SC-PED-3), in compliance with the LAUSD School Traffic Safety Reference Guide. Crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement are required to ensure the safety of students and staff



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(under SC-PED-4); and new student drop-off, pick-up, bus loading areas, and parking areas would be added, in compliance with LAUSD School Design Guide (under SC-PED-5).

Construction of the proposed Project would not require the closure of any vehicle travel lanes on Olympic Boulevard, which is designated Boulevard II, or Beacon Avenue, which is designated a Local Street – Standard. This is due primarily to the availability of on-street parking adjacent to the Project site which precludes the need to use the adjacent travel lanes on Olympic Boulevard. In addition, temporary closures of the sidewalks along the Project site's Olympic Boulevard and Beacon Avenue frontages may be required during portions of the construction period. However, signs would be posted advising pedestrians of temporary sidewalk closures and providing alternative routes. No bicycle routes/lanes in the Project area would be required to close.

A Construction Management Plan would be prepared and implemented to reduce construction-related impacts on the surrounding community, and will minimize potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and the proposed Project would comply with SC-T-4, which requires 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.

Additionally, the proposed Project would be consistent with GHG reduction targets forecast in SCAG's RTP/SCS, as well as with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, and the Westlake Community Plan, and would utilize transportation demand management (TDM) strategies (as required by Mitigation Measures MM-TR-1 and MM-TR-2, below) to reduce dependence on single-occupancy vehicles. Impacts would be less than significant with mitigation measures incorporated.

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

**Less Than Significant Impact with Mitigation.** CEQA Guidelines section 15064.3, subdivision (b)(1) states that a land use project would have a significant impact if the proposed Project would result in a substantial increase in vehicle miles traveled (VMT), which generally refers to the amount and distance of automobile travel attributable to a project.

The Project's TIA includes a quantitative assessment of potential VMT impacts. Even though there are existing trips associated with the current students at the existing Rise Kohyang Middle School located a mile from the Project site, for the purposes of developing a conservative analysis, it is assumed that all trips associated with the Project are new. Per Section 2.2.3 of the City of Los Angeles Transportation Assessment Guidelines (TAG), a development project will have a potential VMT impact if the project meets the following conditions:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.

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- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Different VMT significance thresholds have been established for each APC boundary area because the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The Project site is located within the Central APC, and the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 7.6 Daily Work VMT per Employee.

The impact methodology set forth in the TAG for a charter middle school project is as follows:

**Office Projects.** Charter middle school projects should be treated as office for screening and analysis. Daily vehicle trips, daily VMT, and daily work VMT per employee for office project should be estimated using the VMT calculator tool. TDM strategies to be included as project design features should be considered in the estimation of a project's daily vehicle trips and VMT.

The proposed Project is estimated to generate a total of 643 daily vehicle trips, with an estimated daily work VMT of 10.6 per employee. The daily work VMT for the proposed Project would be greater than the Central APC significance threshold of 7.6 daily work VMT per employee. Thus, the proposed Project would result in a significant daily work VMT per employee impact.

Mitigation measures (MM-TR-1 and MM-TR-2) have been identified to reduce the impact of daily work VMT per employee to a less than significant level, including transit subsidies and implementation of a rideshare program for employees. After implementation of mitigation, the proposed Project would generate a total of 507 daily vehicle trips and an estimated daily work VMT of 7.2 per employee. Thus, the proposed Project would result in a daily work VMT less than the Central APC significance threshold of 7.6 daily work VMT per Employee. Therefore, with the implementation of Mitigation Measures MM-TR-1 and MM-TR-2, impacts would be less than significant.

### Mitigation Measures

Implementation of MM-TR-1 through MM-TR-2 requires implementation of TDMs that would reduce the daily work VMT per employee impact to a less than significant level.

#### MM-TR-1. Transit Subsidies

This TDM strategy involves the subsidization of transit fare for employees of the Project. The subsidy shall be proactively offered to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project shall offer a daily transit subsidy to all employees of \$2.98 per day.



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### MM-TR-2. Ride-Share Program

The Project shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides.

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

**Less Than Significant Impact.** The proposed Project would not substantially increase hazards due to a geometric design feature. The proposed Project would construct driveways in approximately the same location as the driveways currently serving the existing Project site, and would be located perpendicular to the public right-of-way, providing an unobstructed line of site for all modes of travel. Sidewalks are provided along the Project site's Olympic Boulevard and Beacon Avenue frontages, and signalized crossings are located within walking distance to the Project site. The proposed Project would improve the existing sidewalks and would not add site access points along the Project site's Olympic Boulevard and Beacon Avenue frontages. Additionally, the proposed Project would be in compliance with SC-T-1 which would identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks, and 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 which would require vehicular access and parking of the proposed Project to comply with the Vehicular Access and Parking guidelines of the School Design Guide; and SC-T-3 that requires coordination and agreement with the City on the following:

- Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.
- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number, and location of intersections to be studied, and traffic impact thresholds.
- Implementation of SR2S, traffic control and pedestrian safety devices.
- Fair share contribution and/or other mitigation measures for potential traffic impacts.
- Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.
- Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc. ), unless otherwise required by local jurisdiction.

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- 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.

Therefore, due to the existing physical conditions of the Project site and planned sidewalk improvements along the Project site's Olympic Boulevard and Beacon Avenue frontages, as well as inclusion of the required SCs identified above, no safety concerns related to geometric design are noted. The proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use; thus, impacts would be less than significant.

### d) Result in inadequate emergency access?

**Less Than Significant Impact.** The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.<sup>127</sup> The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

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

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.<sup>128</sup> Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.<sup>129</sup> Additionally, Bright Star Schools is required to comply with SC-PS-1, which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval, and SC-PS-2 requires that Bright Star Schools prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures.

The Project construction would not result in the closure of two or more travel lanes; thus, the proposed Project would not result in the loss of regular vehicle access and would not impede emergency access. As discussed above, the proposed Project would be in compliance with SC-T-1, SC-T-2, and SC-T-3, which would minimize the potential safety risks and regulate vehicular access and parking of the proposed Project. Additionally, a

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<sup>127</sup> 2012 Los Angeles County Operational Area Emergency Response Plan.

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

<sup>128</sup> City of Los Angeles Municipal Code Appendix D Section D102.1.

<sup>129</sup> California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.



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construction work site traffic control plan would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of construction activity should any lane closure(s) be proposed. Consistent with LADOT's recommendation and requirements, a detailed Construction Staging and Traffic Management Plan (CSTMP) would also be prepared, which would include any applicable street/lane/sidewalk closure information, a detour plan, haul route(s), and a staging plan. Emergency response and access impacts would be less than significant.

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

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.<br>1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

#### Explanation:

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

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



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### LAUSD Standard Conditions of Approval

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

**No Impact.** Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.<sup>130</sup>

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the proposed Project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. There are 44 listed Historic-Cultural Monument resources<sup>131</sup> in the Westlake Community Plan Area. <sup>132</sup> The Project site is not listed on the National Register of Historic Places,<sup>133</sup> as a California Historical Landmark or a California Point of Historical Interest;<sup>134</sup> or as a City of Los Angeles Historic-Cultural Monument. <sup>135,136</sup> The Project site is not listed or eligible for listing as defined in Public Resources Code section 5020.1(k) and no impacts would occur.

**b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §**

<sup>130</sup> California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

<sup>131</sup> An Historic-Cultural Monument (HCM) may be a building, site, structure, or resource — including, trees and plant life — recognized for its historic significance; an HCM can identify with important events; notable figures of national, state, or local importance; and/or distinctive architectural styles. <https://planning.lacity.org/preservation-design/historic-landmarks/detail?cpa=westlake>

<sup>132</sup> Historic Landmarks – Westlake. <https://planning.lacity.org/preservation-design/historic-landmarks/detail?cpa=westlake>

<sup>133</sup> National Park Service (NPS). 2020, November (accessed). National Register of Historic Places. <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>.

<sup>134</sup> Office of Historic Preservation (OHP). 2020, November (accessed). California Historical Resources. <p://ohp.parks.ca.gov/listedresources/>.

<sup>135</sup> City of Los Angeles Department of City Planning. 2018, April 3. Historic-Cultural Monument (HCM) List. <https://preservation.lacity.org/sites/default/files/HCMDatabase%23040118.pdf>.

<sup>136</sup> National Park Service (NPS). 2020, November (accessed). National Register of Historic Places. [https://npgallery.nps.gov/nrhp; Office of Historic Preservation \(OHP\). California Historical Resources. <http://ohp.parks.ca.gov/ListedResources/>.](https://npgallery.nps.gov/nrhp;Office%20of%20Historic%20Preservation%20(OHP).%20California%20Historic%20Resources.%20http://ohp.parks.ca.gov/ListedResources/)

## 4. Environmental Checklist and Analysis

### **5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**Less Than Significant Impact.** No Native American tribes have requested consultation on the proposed Project pursuant to Public Resources Code Section 21080.3.1.

Two Native American tribes, the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, requested notification on District projects through the PRC Section 21080.3.1 process with the LAUSD.

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. LAUSD Office of Health and Safety sent project notification to Fernandeño Tataviam Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrielino-Tongva Tribe (2 separate contacts). As of the time of publication of this Initial Study, no response has been received and no tribes have requested consultation on this proposed Project; the 30-day time period for requesting consultation has expired as of July 11, 2021. However, as the result of the consultations on other projects, LAUSD has adopted SCs (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the proposed Project pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 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
<b>XX. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a. Require or result in the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-USS-1	<p><b>School Design Guide.</b> (Book Two General Criteria, Section 2.4.C.2.f.1)</p> <p>Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction &amp; Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction &amp; Demolition Waste Management.</p> <p>This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage, or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction &amp; Demolition (C&amp;D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&amp;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&amp;D waste generated.</p>
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.

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LAUSD Standard Conditions of Approval	
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

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

**No Impact.** The Project site is in the City of Los Angeles (west of downtown) in the Westlake Community Plan Area. The Project site is developed with a parking lot and is not currently using utilities; however, previous commercial land uses were. Additionally, the Project site is surrounded by urban development and utilities. The new school would serve students currently living in the region and would not generate an increase in the regional student population or utility use. The proposed Project would not require the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and no impact would occur.

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

**No Impact.** LADWP forecasts that it will have sufficient water supplies to meet demands in average-year and dry-year conditions over the 2020-2040 period.<sup>137</sup> The school would serve students living in the region and would not increase overall long-term water demands in the water district. Operation of the proposed Project would not require new or expanded water supplies. Installation of landscape and irrigation improvements would comply with SC-USS-2 and SC-GHG-1, -2, and -3 for water conservation. No impact would occur.

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

**No Impact.** Wastewater from the property is currently treated at the Hyperion Treatment Plant in the Community of Playa Del Rey in the City of Los Angeles.<sup>138</sup> The new school would serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treated at the plant. The proposed Project would not affect wastewater treatment capacity. No impact would occur.

<sup>137</sup> City of Los Angeles Department of Water and Power (LADWP). 2016, June 7. Urban Water Management Plan 2015. [https://wuedata.water.ca.gov/public/uwmp\\_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%20LADWP%2Epdf](https://wuedata.water.ca.gov/public/uwmp_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%20LADWP%2Epdf).

<sup>138</sup> Los Angeles Bureau of Sanitation (LABS). 2015, February 2. Hyperion Treatment Plant Tour: Sewers. [http://www.lasewers.org/treatment\\_plants/hyperion/tour/sewers.htm](http://www.lasewers.org/treatment_plants/hyperion/tour/sewers.htm).



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

**Less Than Significant Impact.** The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon Landfill in the Community of Castaic in unincorporated Los Angeles County; and the Sunshine Canyon Landfill in the Community of Sylmar in the City of Los Angeles.

#### Construction

Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non- RCRA hazardous, or RCRA hazardous waste. The proposed Project may require haul and disposal of contaminated soil and material (see IX, *Hazards and Hazardous Materials*). Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Under SC-USS-1, LAUSD established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the proposed Project would adhere to these established standards. Therefore, the Project improvements would not adversely impact such landfills. Impacts would be less than significant.

#### Operation

The new school would serve students that are already generating trash at existing schools. The proposed Project would not increase solid waste generation in the region. Impacts would be less than significant.

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

**No Impact.**

#### Construction

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This is also required by CHPS criteria. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse requirement of 75 percent. Construction of the proposed Project would adhere to these established standards.

#### Operation

Assembly Bill 939 (Integrated Solid Waste Management Act of 1989; PRC Sections 40050 et seq. ) established an integrated waste-management system for source reduction, recycling, composting, and land disposal of

## 4. Environmental Checklist and Analysis

waste. AB 939 also required California counties to show 15 years disposal capacity for all jurisdictions within the county or show a plan to transform or divert its waste.

AB 341 (2011) requires the statewide waste diversion goal to 75 percent by 2020 and mandated recycling for commercial and multi-family residential land uses.

AB 1826 (PRC Sections 42649.8 et seq. ), signed into law in September 2014, requires recycling of organic matter by businesses and multifamily residences of five or more units that generate such wastes in amounts over certain thresholds. The proposed school would include storage areas for recyclable materials and would take part in a recycling program. The proposed Project would not conflict with laws governing solid waste disposal, and no impact would occur.



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### XXI. WILDFIRE.

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?

Yes  No

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### Explanation:

There are no wildfire LAUSD adopted SCs.

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres, to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.<sup>139</sup> CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The LAFD currently provides fire protection and emergency medical services to the City.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The nearest FHSZ in the SRA is a Very High approximately 14 miles north in La Crescenta along

<sup>139</sup> California Department of Forestry and Fire Prevention (CAL FIRE). Frequently Asked Questions.  
[http://www.fire.ca.gov/firepreventionfee/sra\\_faqs](http://www.fire.ca.gov/firepreventionfee/sra_faqs)

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the foothills of the San Gabriel Mountains. The nearest FHSZ in the LRA is approximately 2 miles northeast in the Silver Lake area, with the western edge along Sunset Boulevard.<sup>140</sup> Land between the edge of the FHSZ and the Project site is dense urban development and SR-101 (Hollywood Freeway).

The Project site is not located in or near state responsibility areas or lands classified as high FHSZ.

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

**No Impact.** Under the Federal Disaster Mitigation Act of 2000 local governments, including counties, cities, and tribes in the United States, are required to prepare a Local Hazards Mitigation Plan as a condition of receiving Federal disaster mitigation funds. This Plan identifies the hazards that have occurred or may occur in the study area, and provides mitigation strategies, or action items, designed to save lives and reduce the destruction of property. The emergency response plans, and emergency evacuation plans in effect are through the County, the District, and the City.

Los Angeles County Operational Area ERP was approved by the County Board of Supervisors in 2012<sup>141</sup> and identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multiagency and/or multijurisdictional responses.

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan, which was last updated in 2018.<sup>142</sup>

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "safe school plans."

The Project construction would not interfere with any other existing emergency response plans or emergency evacuation plans. When complete, the proposed Project would improve emergency access on campus by providing vehicle access lanes throughout the campus. No emergency response impact would occur.

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<sup>140</sup> California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/>

<sup>141</sup> 2012 Los Angeles County Operational Area Emergency Response Plan. <http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

<sup>142</sup> City of Los Angeles. 2018, January. 2018 Local Hazard Mitigation Plan. [https://emergency.lacity.org/sites/g/files/wph496/f/2018\\_LA\\_HMP\\_Final\\_2018-11-30.pdf](https://emergency.lacity.org/sites/g/files/wph496/f/2018_LA_HMP_Final_2018-11-30.pdf)



## 4. Environmental Checklist and Analysis

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

**No Impact.** The school campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site. Furthermore, CAL FIRE does not classify any adjacent areas as a Very High FHSZ. Project development would not place people or structures at risk from wildfire. No impact would occur.

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

**No Impact.** The campus is in an urban area surrounded by development. The campus improvements would not require the installation of new infrastructure that may exacerbate fire risk. No impact would occur.

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

**No Impact.** The campus is surrounded by development with flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. Therefore, the proposed Project would not result in result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

## 4. Environmental Checklist and Analysis

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

### Explanation:

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

**Less Than Significant Impact.** As discussed in Section IV, *Biological Resources*, the proposed Project would neither degrade the quality of the environment nor substantially impact any endangered fauna or flora. The proposed Project includes the demolition of an existing parking lot, construction of a four-story building, and other site improvements.. Because the property was already developed and the surrounding area is highly urbanized, the redevelopment of the property for a school would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Mandatory compliance with Fish and Game Code and SC-BIO-3 would be incorporated into the proposed Project. Impacts would be less than significant.

As discussed under Section V, *Cultural Resources*, the proposed Project would not significantly impact historic, archaeological, paleontological resources, and human remains. Because the property is not historic and was already developed and the surrounding area is highly urbanized, the redevelopment of the property for a school would not impact examples of California history or prehistory. As part of the proposed Project, SC-CUL-7 through SC-CUL-10 would be incorporated. The proposed Project does not have the potential to substantially degrade the quality of the environment. Impacts would be less than significant.



## 4. Environmental Checklist and Analysis

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

**Less Than Significant Impact.** A cumulative impact could occur if the proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the proposed Project is a school, the cumulative analysis is generally confined to the immediate vicinity or within a one-mile radius. The District has several past, present, and planned charter school projects within the District’s boundaries, but none of these would occur within one mile of the Project site. Project impacts would not be cumulatively considerable.

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

**Less Than Significant Impact.** As discussed in the above analyses, the proposed Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings.

## 4. Environmental Checklist and Analysis

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## 5. List of Preparers

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### 5.1 LEAD AGENCY

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## 5. List of Preparers

### 5.4 TRANSPORTATION CONSULTANT

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# **Appendix A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data**

## Appendices

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## **Appendix B. Geotechnical Investigation Report**

## Appendices

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## **Appendix C. Geological Environmental Hazards Assessment (GEHA)**

## Appendices

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# **Appendix D. Phase I Environmental Site Assessment**

## Appendices

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## **Appendix E. Health Risk Assessment**

## Appendices

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## **Appendix F. Noise and Vibration Background and Modeling Data**

## Appendices

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## **Appendix G. Traffic Impact Assessment**

## Appendices

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