

April 2019 | Negative Declaration

# 92ND STREET ELEMENTARY SCHOOL

Comprehensive Modernization

*Prepared for:*

**Los Angeles Unified School District**  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21st Floor  
Los Angeles, California 90017  
Contact: Alex Campbell, Assistant Project Manager  
Eimon Smith, CEQA Project Manager  
213.241.3417



*Prepared by:*

**PlaceWorks**  
3 MacArthur Place, Suite 1100  
Santa Ana, California 92707



# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
*Superintendent of Schools*

VIVIAN EKCHIAN  
*Deputy Superintendent*

CARLOS A. TORRES  
*Director, Environmental Health and Safety*

JENNIFER FLORES  
*Deputy Director, Environmental Health and Safety*

## 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 Negative Declaration (ND) for the project described below based on the assessment presented in the attached Initial Study.

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

**PROJECT TITLE:** 92nd Street Elementary School Comprehensive Modernization

**PROJECT LOCATION:** The proposed Project site is at the 92nd Street Elementary School (92nd Street ES) at 9211 Grape Street, in the neighborhood of Watts, in the City of Los Angeles, County of Los Angeles.

**PROJECT DESCRIPTION:** The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of 92nd Street ES. The proposed Project would modernize the school Campus to facilitate a safe and secure campus that better aligns with the current instructional program. The Project consists of the demolition of 2 permanent buildings (1-story Kindergarten Buildings and 2-story Classroom Building D), and removal of 6 portable buildings; construction of 17 classrooms in two permanent buildings (2-story Kindergarten building and 1-story Classroom Building); modernization (remodel, retrofit, paint, HVAC replacement, and roof repairs) of 5 buildings; and site upgrades, including:

- Sitewide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage
- Sitewide upgrades to comply with Americans with Disabilities Act (ADA)
- Landscape, hardscape, and fencing
- Parking lots: Restripe 24-space parking lot, new parking lot (55 spaces; 22,647 square feet) with access from 95<sup>th</sup> Street
- Asphalt demolition
- New asphalt playground

Temporary portable buildings would be installed for interim students housing during Project construction. The interim housing would provide the necessary facilities to maintain a fully functional campus during all construction phases, and would be removed following construction of classroom buildings.

**EXISTING CONDITIONS:** The proposed Project would occur on approximately 3 acres of the 6-acre 92nd Street ES Campus. The school had approximately 996 students in Pre-Kindergarten through 6th grade in the 2017–2018 school year. The campus has administration, library, cafeteria, lunch shelters, permanent and portable classroom buildings, along with maintenance and storage areas, and hardcourt playgrounds.

**DOCUMENT AVAILABILITY:** The ND and supporting Initial Study for the 92nd Street ES Comprehensive Modernization Project are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21<sup>st</sup> Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3199)
- Alama Reaves Wood-Watts Branch Library, 10205 Compton Avenue, Los Angeles, CA 90002
- Graham Library, 1900 East Firestone Boulevard, Los Angeles, CA 90001
- LAUSD Local District South Office, 1208 Magnolia Avenue, Gardena, CA 90247
- LAUSD OEHS website: <http://achieve.lausd.net/ceqa>

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

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

**Findings.** It is hereby determined that, based on the information contained in the attached Initial Study, the proposed Project would not have a significant adverse effect on the environment.

April 2019 | Initial Study

# **92ND STREET ELEMENTARY SCHOOL COMPREHENSIVE MODERNIZATION**



## Table of Contents

<b>Section</b>	<b>Page</b>
<b>1. INTRODUCTION.....</b>	<b>1</b>
1.1 Overview .....	1
1.2 Background.....	1
1.3 California Environmental Quality Act .....	2
1.4 Environmental Process .....	2
1.4.1 Initial Study .....	3
1.4.2 Negative Declaration.....	3
1.4.3 Tiering.....	3
1.4.4 Project Plan and Building Design.....	4
1.5 Impact Terminology.....	6
1.6 Organization of the Initial Study .....	7
<b>2. ENVIRONMENTAL SETTING .....</b>	<b>9</b>
2.1 Project location.....	9
2.2 Surrounding Land Use.....	9
2.3 Campus History .....	9
2.4 Existing Conditions .....	10
2.5 General Plan and Existing Zoning.....	11
2.6 Necessary Approvals .....	12
<b>3. PROJECT DESCRIPTION.....</b>	<b>35</b>
3.1 Background.....	35
3.2 Proposed Project.....	35
3.2.1 Interim Housing.....	36
3.2.2 Site Access, Circulation, and Parking.....	36
3.2.3 Landscaping.....	37
3.2.4 Construction Phasing.....	37
<b>4. ENVIRONMENTAL CHECKLIST AND ANALYSIS.....</b>	<b>41</b>
4.1 Background.....	41
<b>5. LIST OF PREPARERS .....</b>	<b>144</b>
5.1 Lead Agency .....	144
5.2 CEQA Consultant.....	144

## Table of Contents

### **APPENDICES**

Appendices are on CD

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Campus Tree Evaluation
- C. Historic Resource Evaluation Report
- D. Geotechnical Investigation
- E. Phase I Environmental Site Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Site Circulation Report



Table of Contents

**List of Figures**

<b>Figure</b>	<b>Page</b>
Figure 1 - Regional Location.....	15
Figure 2 - Local Vicinity .....	17
Figure 3 - Aerial Photograph .....	19
Figure 4 - Existing Campus.....	21
Figure 5 - Photo Location Key.....	23
Figure 5a - Campus Photos.....	25
Figure 5b - Campus Photos .....	27
Figure 5c - Campus Photos.....	29
Figure 5d - Campus Photos.....	31
Figure 5e - Campus Photos.....	33
Figure 6 - Conceptual Site Plan .....	39

**List of Tables**

<b>Table</b>	<b>Page</b>
Table 1 Existing School Campus .....	10
Table 2 Maximum Daily Regional Construction Emissions.....	55
Table 3 Localized Construction Emissions .....	57
Table 4 Building Energy Use .....	75
Table 5 Construction BMPs.....	82
Table 6 Project-Related Construction GHG Emissions .....	88
Table 7 Construction Equipment Noise Levels .....	111
Table 8 Project-Related Construction Noise Levels .....	113
Table 9 Typical Construction Equipment Vibration Levels.....	115

## Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ACCM	asbestos-containing construction material
ADT	average daily trips
AQMP	air quality management plan
BMP	best management practices
BOE	Board of Education (LAUSD)
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2e</sub>	carbon dioxide equivalent
dBA Leq	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources
EIR	environmental impact report
EPA	US Environmental Protection Agency
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System



## Abbreviations and Acronyms

FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LADOT	Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
LID	low-impact development
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
MTCO <sub>2e</sub>	metric ton of CO <sub>2e</sub>
MW	Materials and Waste Management
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
O <sub>3</sub>	ozone
PDF	project design features
PEA	Preliminary Environmental Assessment
PF	Public Facility
PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill

## Abbreviations and Acronyms

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SO <sub>2</sub>	sulfur dioxide
SoCAB	South Coast Air Basin
SRA	Source Receptor Area
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra low sulfur diesel
UST	underground storage tank
VdB	vibration level
VOC	volatile organic compounds



# 1. Introduction

---

## 1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of 92nd Street Elementary School (92nd Street ES; Project), at 9211 Grape Street, Los Angeles, in the neighborhood of Watts in the City of Los Angeles (Campus). Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at the Campus through building replacement, renovations, modernizations, and reconfiguration. The 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 Project.

## 1.2 BACKGROUND

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

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.<sup>2</sup> Between July 2013 and November 2015, the SUP was analyzed in compliance with CEQA in the Program Environmental Impact Report (Program EIR).<sup>3</sup> On November 10, 2015, the BOE certified the Program EIR.<sup>4</sup>

On December 13, 2016, the BOE approved the project definition for the 92nd Street ES proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.<sup>5</sup>

---

<sup>1</sup> LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.

<sup>2</sup> LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.

<sup>3</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>4</sup> LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

<sup>5</sup> LAUSD. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.

## 1. Introduction

### 1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA<sup>6</sup> and the State CEQA Guidelines.<sup>7</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 this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, LAUSD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.<sup>8</sup>

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,<sup>9</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 an ND or MND that incorporates mitigation measures into the project.<sup>10</sup>

### 1.4 ENVIRONMENTAL PROCESS

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

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

---

<sup>6</sup> California Public Resources Code, §21000 et seq (1970).

<sup>7</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

<sup>8</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

<sup>9</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

<sup>10</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.



## 1. Introduction

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

### 1.4.1 Initial Study

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

### 1.4.2 Negative Declaration

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

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

### 1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.<sup>11</sup> LAUSD’s SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one “prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

---

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

## 1. Introduction

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.<sup>12</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>13</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>14</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>15</sup>

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

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

The proposed Project is considered a site-specific project under the Program EIR; therefore, this ND 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, 21<sup>st</sup> Floor, Los Angeles, CA 90017.

### 1.4.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental

---

<sup>12</sup> Program EIR for the School Upgrade Program. Report. 2015. <http://achieve.lausd.net/ceqa>.

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

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

<sup>15</sup> California Code of Regulations Title 14, § 3 Article 1-15152(a) at 1-7.



## 1. Introduction

impacts, such as the California Green Building Code (CALGreen Code),<sup>16</sup> LAUSD Standard Conditions of Approval (SC), 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 (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The Board of Education adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

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

---

<sup>16</sup> California Green Building Standards Code, Title 24, Part 11.

<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

“cool roof” building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

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

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

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

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

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

## 1.5 IMPACT TERMINOLOGY

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

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.

---

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



## 1. Introduction

- 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.

## 1.6 ORGANIZATION OF THE INITIAL STUDY

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

- **Chapter 1, *Introduction*** identifies the purpose and scope of the ND and supporting Initial Study and the terminology used.
- **Chapter 2, *Environmental Setting*** describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the proposed Project site and surrounding area.
- **Chapter 3, *Project Description*** identifies the location, provides the background, and describes the scope of the proposed Project in detail.
- **Chapter 4, *Environmental Checklist and Analysis*** presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the CHPS criteria, PDFs, Standard Conditions of Approval, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore a stand-alone bibliography section is not required.

**Chapter 5, *List of Preparers*** identifies the individuals who prepared the ND 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. Campus Tree Evaluation
- C. Historic Resource Evaluation Report
- D. Geotechnical Investigation
- E. Phase I Environmental Site Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Site Circulation Report

## 1. Introduction

*This page intentionally left blank*



## 2. Environmental Setting

---

### 2.1 PROJECT LOCATION

The 6.0-acre school site is located at 9211 Grape Street, (Assessor's Parcel Numbers [APNs] 6046-002-901) in the community of Watts in the City of Los Angeles in Los Angeles County, CA. The Campus is on the northeastern edge of the Watts neighborhood. The Campus is about 1.8-miles north of U.S. Route 105 (Glen Anderson Freeway) and 2.7-miles east of Interstate 110 (Harbor Freeway; see Figure 1, *Regional Location*). The Campus is four blocks south of the east-west Firestone Boulevard retail corridor and three blocks west of the north-south Alameda Rail Corridor. The Los Angeles River is approximately 3.7 miles to the north and east of the Campus.

### 2.2 SURROUNDING LAND USE

The Campus is bounded by 92nd Street to the north, Grape Street to the east, 95th Street to the south, and Anzac Avenue to the west. The Campus is in an urbanized area surrounded by adjacent residential, and commercial, manufacturing, industrial, institutional (churches and schools), and a powerline easement (see Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph*). Properties on the north side of 92nd Street are in the Florence-Firestone neighborhood in unincorporated Los Angeles County and to the east of Alameda Street is the City of South Gate.

### 2.3 CAMPUS HISTORY

The property has been used as a school as early as 1931. It originally consisted of small bungalow classrooms, a small wood framed cafeteria, and a 2-story administration building; however, none of the original buildings remain. The Campus boundaries have grown over the years as well. The original Campus only extended from 92nd Street to an alley about halfway between 92nd Street and 95th Street. As enrollment increased, additional buildings were constructed, and the Campus expanded to where it is today spanning between 92nd Street and 95th Street. In 1970 the entire site was shown to be occupied by the school with no residential housing in the southern half.<sup>19</sup>

The Assembly & Classroom Building West (#2; West Building), built in 1940, the oldest building remaining on Campus, is a reinforced brick masonry building and houses classrooms, administration spaces, and a large assembly room.

---

<sup>19</sup> Phase I ESA, Page 2-1.

## 2. Environmental Setting

### 2.4 EXISTING CONDITIONS

The Project would occur on the 92nd Street ES Campus. Student enrollment fluctuates; currently the school has approximately 996 students in Pre-Kindergarten (early transitional kindergarten) through 6<sup>th</sup> grade (2017/18 school year).

The academic core occupies the northern portion, and the hardcourts occupy the southern portion of the Campus. The school grounds are almost completely paved, with the exception of a few small lawns and planters scattered throughout the Campus that contain mature trees. The Campus consists of 18 buildings (12 permanent and 6 portable buildings).<sup>20</sup> In addition, there is one lunch shelter, one storage building and nine storage containers. A covered walkway connects the Administration Building (#1) and the Kindergarten Building (#6) to the finger plan A, B, and C Buildings (#3, 4, 5; see Figure 4, *Existing Campus*, Figure 5, *Photo Location Key* and Figures 5a through 5e, *Camps Photos*). Buildings are clustered in the central and northern portion of the Campus, and the southern end has outdoor hardcourt playgrounds.

**Table 1**  
**Existing School Campus**

<b>Building No.*</b>	<b>Name</b>	<b>Square Footage</b>	<b>Type</b>	<b>Year Built</b>
1	Administrative & Library Building	5,191	permanent	1976
2	Assembly & Classroom Building West	16,842	permanent	1940
3	Classroom Building	7,124	permanent	1957
4	Classroom Building	7,124	permanent	1957
5	Classroom Building C	6,616	permanent	1960
6	Kindergarten Building 1	2,016	permanent	1976
7	Kindergarten Building 2	3,437	permanent	1965
9	2-story Classroom Building D	4,362	permanent	1968
10	Cafeteria Building	6,812	permanent	1976
11	Two/Three Unit Relocatable	1,824	modular	1949
12	Storage Building	376	permanent	1973
13	Boiler Vault Building	320	permanent	1971
14	Single Unit Modular	864	portable	1986
15	Single Unit Modular	864	portable	1986
16	Lunch Shelter	1,700	permanent	2001

<sup>20</sup> Sapphos Environmental, Inc. Historical Resources Evaluation Report for 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California 90002. September 2018.



## 2. Environmental Setting

**Table 1**  
**Existing School Campus**

Building No.*	Name	Square Footage	Type	Year Built
17	Sanitary Modular Building	480	portable	2005
18	Double Unit Modular Building	1,440	portable	1998
19	Double Unit Modular Building	1,920	portable	2005
	Total Building Space	67,743		

Source: Existing Campus Building Data. 92nd Street Elementary School: Pre-Planning Survey. 9211 Grape Street, Los Angeles, CA 90002, LAUSD –Asset Management - Master Planning. October 2011.

\*See Figure 4, *Existing Campus*.

**School Operations.** 92nd Street ES is a two-semester, single-track school that serves Pre-Kindergarten through 6th grades. School hours are 8:01 AM to 2:20 PM each day, except for Tuesdays when school is out early, at 1:20 PM.

**School-Related Events.** The school has after-school programs for the students, such as special-interest clubs, and extracurricular activities that end later than 3:00 PM. There are also occasional nighttime and weekend events during the school year. Some of these events are Campus wide, such as school plays and open houses, while others are grade specific, such as commencement.

**Community Use.** In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the Campus is available for community use at selected times when not in use by LAUSD.<sup>21</sup>

## 2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan Land Use designation for the school property is ‘Public Facilities’.<sup>22</sup> The land use element of the General Plan is comprised of 35 community plans; they are the official guide to the future development of the City of Los Angeles. The Campus is within the Southeast Los Angeles Community Plan Area.<sup>23</sup>

The zoning for the school property is PF-1.<sup>24</sup> PF (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools.<sup>25</sup> On February 19, 2019 the

<sup>21</sup> California Education Code Sections 38130–38139.

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

<sup>23</sup> City of Los Angeles, Department of City Planning. General Plan. General Community Plans. <http://cityplanning.lacity.org/>

<sup>24</sup> City of Los Angeles zoning. <http://zimas.lacity.org/>; City Municipal Code, Section 12.04.09.

<sup>25</sup> City of Los Angeles Municipal Code, Section 12.21.1. Height of Building or Structures.

[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chaptergeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz\\_ca\\$anc](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chaptergeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc).

## 2. Environmental Setting

LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. (Bd. Of Ed Rpt No. 256-18/19).

Other land use designations for this property include:<sup>26</sup>

- 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. The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. Although, this designation does not apply to the existing school property.

### 2.6 NECESSARY APPROVALS

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

#### Responsible Agencies

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

- California Department of General Services, Division of State Architect (DSA). Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- California Department of Education, School Facilities Planning Division (CDE). If LAUSD is requesting modernization funds from the State Allocation Board (SAB) they must have the plans reviewed and approved by the CDE (Education Code Section 17070.50) prior to submitting a funding request. Approval of design for educational appropriateness.
- California Department of Transportation (Caltrans). Transportation permit for oversized vehicles on State highways.
- State Water Resources Control Board (SWRCB). Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP).
- South Coast Air Quality Management District. Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Asbestos Emissions from Demolition/Renovation Activities; Rule 201, Permit to Construct; Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific soil mitigation plan; and site monitoring.

---

<sup>26</sup> City of Los Angeles zoning <http://zimas.lacity.org/>



## 2. Environmental Setting

- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a Project requires local fire authority (LFA) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).

### Trustee Agencies

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

#### State

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

#### Regional

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

#### Local

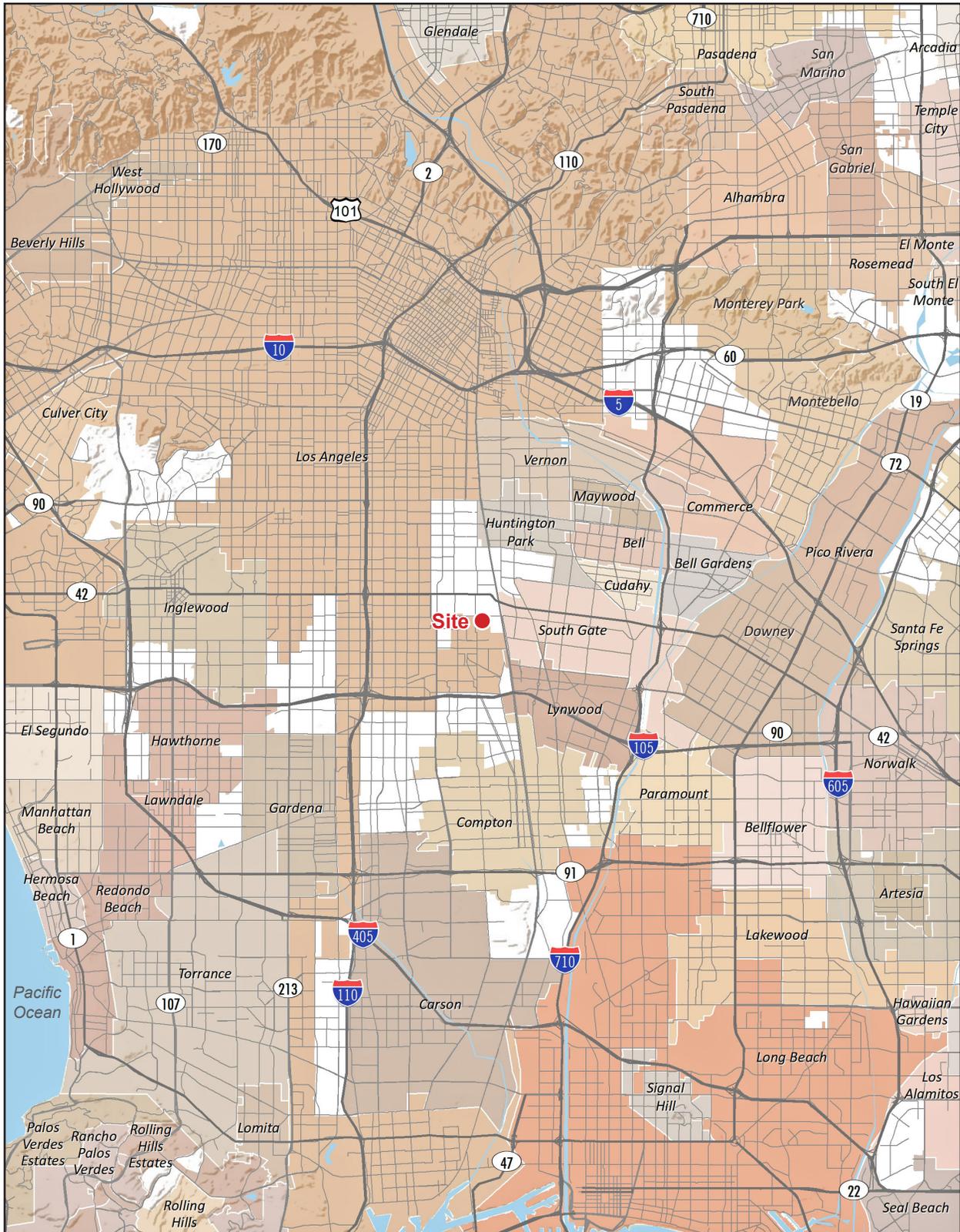
- City of Los Angeles Department of Planning
- City of Los Angeles Police Department
- City of Los Angeles Department of Water and Power
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Environmental Affairs

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 1 - Regional Location  
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



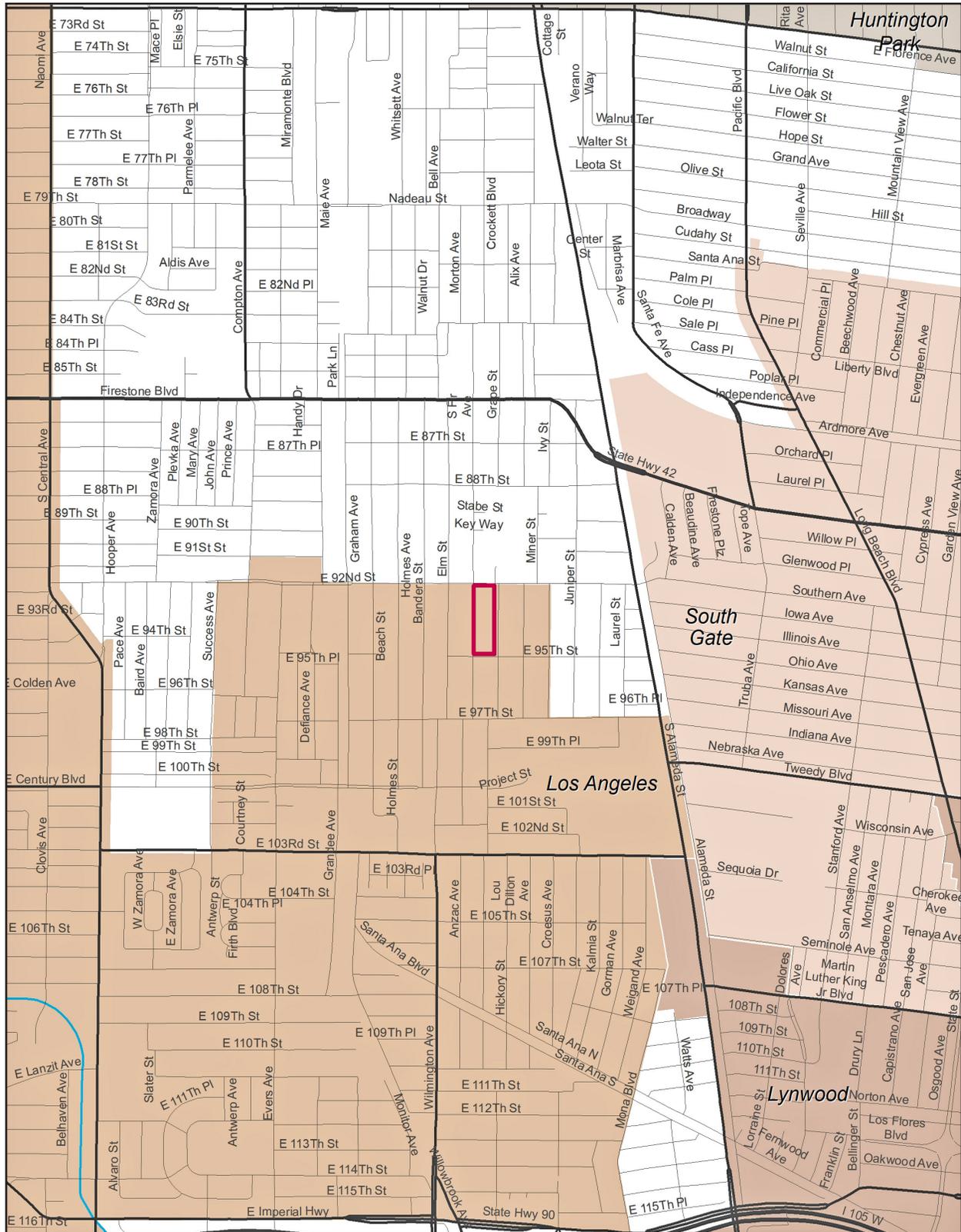
Source: ESRI, 2018

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 2 - Local Vicinity  
 2. Environmental Setting



Note: Unincorporated county areas are shown in white.

— School Boundary



Source: ESRI, 2018

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 3 - Aerial Photograph  
2. Environmental Setting



— School Boundary

0 200  
Scale (Feet)



Source: Google Earth Pro, 2018

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 4 - Existing Campus  
2. Environmental Setting



0 150  
Scale (Feet)



## 2. Environmental Setting

*This page intentionally left blank.*



Figure 5 - Photo Location Key  
2. Environmental Setting



## 2. Environmental Setting

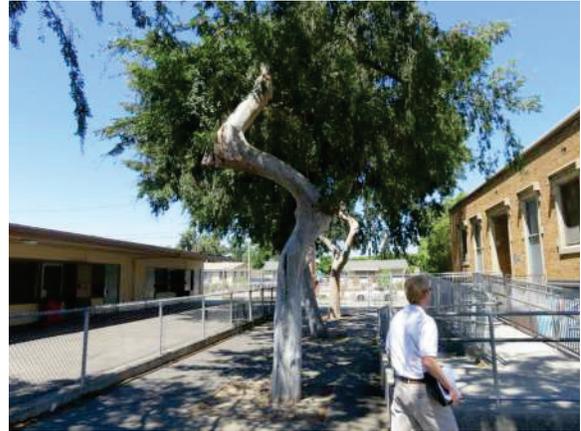
*This page intentionally left blank.*



Figure 5a - Campus Photos  
2. Environmental Setting



1. Exit of West Building towards Main Building



2. Southern Side of West Building



3. North Side of Building A



4. Under Main Arcade towards Building A



5. Kindergarten Playground/Building



6. 2-Story Classroom Building

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 5b - Campus Photos  
2. Environmental Setting



7. Main Arcade East of Building A



8. Courtyard Between Building A & B



9. Courtyard Between Building B & C



10. Main Arcade East of Building C



11. Open Paving South towards Cafeteria



12. New Lunch Shelter

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 5c - Campus Photos  
2. Environmental Setting



13. South of Building C



14. Open Paving North towards Main Building



15. Southern Playground Facilities



16. Southern Playground North towards Cafeteria



17. View East towards the Lunch Shelter  
in between Portables



18. Courtyard in between Building B & C looking  
East

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 5d - Campus Photos  
2. Environmental Setting



19. Main Arcade towards Main Building



20. Main Entry towards South of Campus



21. View from East 92nd Street down Anzac Ave.



22. View from Anzac Avenue down East 92nd St.



23. View from Grape Street down East 92nd St.



24. View from East 92nd Street down Grape St.

## 2. Environmental Setting

*This page intentionally left blank.*



Figure 5e - Campus Photos  
2. Environmental Setting



25. View from East 95th Street down Grape St.



26. View from Grape Street down East 95th St.



27. View from Anzac Avenue down East 95th St.



28. View from East 95th Street down Anzac Ave.

## 2. Environmental Setting

*This page intentionally left blank.*



# 3. Project Description

---

## 3.1 BACKGROUND

The Project would occur on approximately 3 acres of the 6-acre 92nd Street ES Campus at 9211 Grape Street, City of Los Angeles. The Project would modernize 92nd Street ES to facilitate a safe and secure Campus that better aligns with the current instructional program. The Project consists of the demolition of 2 permanent buildings and removal of 6 portable buildings; construction of 17 classrooms in two permanent buildings; modernization of 5 buildings; and site upgrades (see Figure 6, *Conceptual Site Plan*).

## 3.2 PROPOSED PROJECT

Specifically, the proposed Project would include the changes to the Campus Buildings shown below.

- **Demolition and Removal**
  - 6 portable buildings (#11, 14, 15, 17, 18, 19)
  - 2-story Classroom Building D (#9) and adjacent 20-space parking lot
  - Kindergarten Building 1 (#6)
- **Modernization** (remodel, retrofit, paint, HVAC replacement, and roof repairs)
  - Administrative & Library Building (#1)
  - West Building (#2)
  - Cafeteria (#10)
  - Classroom Buildings (#3, 4, and 5)
  - Kindergarten Building 2 (#7)
- **New Construction**
  - 2-story Kindergarten Building 1
  - 1-story Classroom Building 2
- **Site Upgrades**
  - Infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage
  - Improvements to comply with Americans with Disabilities Act (ADA)
  - Landscape, hardscape, and fencing
  - Restripe 24-space parking lot

### 3. Project Description

- Asphalt demolition (92,347 sf)
- New asphalt playground (69,700 sf)
- New parking lot (55 spaces; 22,647 sf) with access from 95<sup>th</sup> Street.

No subterranean construction would occur. The lowest finished floor elevations of new buildings would be approximately the same as the existing buildings.

The new buildings are conceptually designed and their exact architectural style, form, and mass are unknown at this time. However, as shown in Figure 6, the arrangement of buildings would respect the overall layout of the existing Campus by maintaining the linear placement of buildings. All new security lighting would use fixtures designed to reduce glare, sky glow, and light trespass outside of the school property.

#### 3.2.1 Interim Housing

Interim housing of students during construction of the new classroom buildings would be provided in portable buildings that would be installed in the southeast corner of the Campus. These temporary portable buildings would provide all facilities to maintain a fully functional Campus, and would be removed following construction of the new classroom buildings.

#### 3.2.2 Site Access, Circulation, and Parking

The school has 61 parking spaces in three separate on-Campus parking lots:

- 92nd Street, approximately halfway between Anzac Avenue and Grape Street (north lot); 6 marked parking spaces and no ADA spaces.
- Grape Street, south of 92nd Street (east lot); 27 marked parking spaces and 2 van-accessible ADA spaces.
- Grape Street approximately halfway between 95th Street and 92nd Street (service lot); 25 marked parking spaces and 1 van-accessible ADA space.

There is curbside parking on all surrounding streets that varies based upon the day and time on Anzac Avenue and Grape Street, there are also several hours during street sweeping on Wednesdays and Thursdays when parking is not permitted.

The Campus' main entrance is located at 92nd Street. Secured parking, service and delivery, and drop-off/pick-up is on 92<sup>nd</sup> Street, Grape Street, and Anzac Avenue. There are sidewalks on all streets surrounding the school, but no bike lanes. School buses load and unload on the east side of Anzac Avenue. There is a dedicated gate for students arriving by bus at the southwest corner of the Campus. Student access and drop-off/pick-up procedures would not change.

A new staff parking lot would be constructed at the southeast corner of the Campus (55 spaces) with access from 95<sup>th</sup> Street. The north lot would lose 3 spaces and the east lot would be restriped for better circulation



### 3. Project Description

and would lose 5 spaces. The service lot would be replaced by the new Kindergarten building for a loss of 26 spaces. This would provide an increase of 21 (from 61 to 82) on-Campus parking spaces.

The modernization Project would not change the number of students or staff at the school. No changes to traditional school operations, school-related events, or community use would occur as the result of this Project.

#### 3.2.3 Landscaping

Vegetation onsite consists of 42 ornamental trees (in planter areas and surrounded by asphalt), a few patches of turf, and some potted plants. Several trees would be removed as part of the Project either to accommodate new buildings or because of poor health.<sup>27</sup>

#### 3.2.4 Construction Phasing

Project construction is anticipated to start in Q3-2020 and is expected to take 4 years to complete; however because the Project has several components, the Campus would not be under construction the entire time. Construction work would be intermittent and conducted in stages during the 4-year period. To avoid classroom disruption, some work would be done during school breaks when students are off Campus.

- Starting in 2020.
  - Site Preparation. Removal of trees located on the hardscape area in southeast corner of Campus.
  - Utility Trenching. Utility trenches would be excavated, and utility pipes and cables would be laid in trenches and connected to the portable buildings. Underground utilities for water and wastewater to the restroom building would connect to existing lines along East 5th Street.
  - Portable Installation. 15 portable buildings (17 classrooms) would be hauled onto the Campus and placed by a crane on the southeast portion of the asphalt hardcourt play yard. A total of approximately 30 trucks would be required for delivery.
  - Finishing. Indoor finishing work on the portables would include placement of furniture and equipment.
- Starting in 2021.
  - Building demolition, debris haul, and site clearance.
  - Grading and Utility Trenching. Rough grading and utility trenching followed by fine grading.
  - Building Construction. Building construction for the two new buildings.
  - Modernization of existing buildings.
  - Architectural Coating. Painting the buildings.

---

<sup>27</sup> Arborgate Consulting, Inc. 2017, December 11. Campus Tree Evaluation For: 92nd Street Elementary School (Consulting Arborist's Report). Prepared for HPI Architecture.

### 3. Project Description

- Removal of portable buildings.
- Asphalt paving and Off-Site Street Work. Demolition of asphalt play yards and new asphalt for play yard and sough parking lot, and parking lot and play yard striping.
- Finishing and Landscaping. Finishing and new drought tolerant landscaping.

Project close out and occupation is anticipated in 2024.

Figure 6 - Conceptual Site Plan  
 3. Project Description



Source: HPI Architects, 2018

### 3. Project Description

*This page intentionally left blank.*



# 4. Environmental Checklist and Analysis

---

## 4.1 BACKGROUND

---

1. **Project Title:** 92nd Street Elementary School Comprehensive Modernization

---

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

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

---

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

Alex Campbell, Assistant CEQA Project Manager  
(213) 241-4210

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

---

4. **Project Location:**

9211 Grape Street, City of Los Angeles (Assessor's Parcel Numbers [APNs] 6046-002-901)

---

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

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

---

6. **General Plan Designation:** Public Facilities

---

7. **Zoning:** PF (Public Facilities)

---

8. **Description of Project:**

The Project would modernize 92nd Street ES to facilitate a safe and secure Campus that better aligns with the current instructional program. The Project consists of the demolition of 2 permanent buildings and removal of 6 portable buildings; construction of 17 classrooms in two permanent buildings; modernization of 5 buildings; and site upgrades.

---

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

The Campus is bounded by 92nd Street to the north, Grape Street to the east, 95th Street to the south, and Anzac Avenue to the west. The Campus is in an urbanized area surrounded by adjacent residential, commercial, manufacturing, industrial, institutional (churches and schools), and a powerline easement.

---

10. **Other Public Agencies Whose Approval Is Required:**

None

---

## 4. Environmental Checklist and Analysis

---

### 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, has consultation begun?

One Native American Tribe has requested notification and consultation through the PRC Section 21080.3.1 process: Gabrieleño Band of Mission Indians - Kizh Nation. LAUSD notified the Tribe about this and other projects on January 8, 2019. LAUSD Office of Environmental Health and Safety staff and the Tribe completed consultation regarding this Project with two meetings in 2019. Consultation also covered several LAUSD projects, and the result of the consultation, SC-TCR-1 and SC-TCR-2 to protect potential unanticipated discoveries associated with Tribal Cultural Resources was included in this Initial Study and would be incorporated into this Project.

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



## 4. Environmental Checklist and Analysis

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

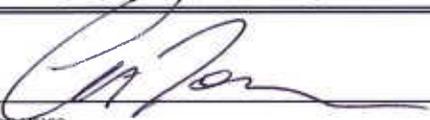
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

### DETERMINATION

On the basis of this initial evaluation:

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

  
Signature

Carlos A. Torres  
Printed Name

4/8/2019  
Date

CEQA Officer for LAUSD  
Title

## 4. Environmental Checklist and Analysis

### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

## 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 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation:

There are no SCs related to aesthetic impacts that would apply to the proposed Project.

#### 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>28</sup>

The Campus and surrounding area are flat and developed with urban land uses, including residential, commercial, education, and recreation uses. The Campus includes two one-story and one two-story building, surface parking, hardcourts, student gathering areas, and ornamental trees and landscaping. Although the Project would include new buildings, there are no protected or designated scenic vistas or views in the Project vicinity. New buildings would have an overall height profile similar to existing buildings. Development of the Project would not obscure any scenic vistas. Therefore, no impact would occur and no further analysis is required.

<sup>28</sup> City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.  
<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

## 4. Environmental Checklist and Analysis

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

**No Impact.** The only officially designated state scenic highway in Los Angeles County is State Route 2 (SR-2; Angeles Crest Highway; part of the Angeles Crest Scenic Byway) located approximately 20 miles north of the Campus.<sup>29</sup> The new buildings would not be visible from SR-2. Additionally, the Campus is not visible from other designated roadways in Los Angeles County (Arroyo Seco Historic Parkway, 7 Eligible State Scenic Highways, and 5 County Scenic Highways),<sup>30</sup> or any City-designated Scenic Highways.<sup>31</sup> Project development would not result in impacts to scenic resources within a designated State scenic highway. Therefore, no impact would occur and no further analysis is required.

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

**No Impact.** The Campus is in a fully developed area and surrounded by adjacent residential, commercial, recreational, and institutional uses and qualifies as an ‘urbanized area’.<sup>32</sup> The Campus is zoned PF-1 (Public Facilities). The Project includes demolition of one- and two-story buildings, removal of portable buildings, and construction of one- and two-story buildings, along with other site and building improvements. The Project would not conflict with Public Facilities zoning or regulations governing scenic quality. Therefore, no impacts to the scenic quality would occur and no further analysis is required.

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

**Less Than Significant Impact.** The two major causes of light pollution in this setting are spill light and glare. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface.

The Campus is fully developed and in an urban setting. The existing school generates nighttime light from parking lot and building lights (interior and exterior). Surrounding land uses also generate significant light from street lights, vehicle lights, and building lights.

The Project would not significantly increase nighttime lighting on the Campus because the new buildings would replace existing buildings. Furthermore, the Project does not include any new sources of high-intensity

---

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

<sup>30</sup> California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm).

<sup>31</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>32</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

nighttime lighting, such as stadium lights. All lights on new buildings and any new site lighting would be focused and directed to reduce spill light and glare off the Campus. Light and glare impacts would be less than significant and no further analysis is required.

## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<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.** The Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the Campus; therefore, no Project-related farmland conversion would occur. The



## 4. Environmental Checklist and Analysis

Campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.<sup>33,34</sup> No impact would occur and no further analysis is required.

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

**No Impact.** The Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is PF (Public Facilities).<sup>35</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 onsite.<sup>36</sup> No impact would occur and no further analysis is required.

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

**No Impact.** Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”<sup>37</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>38</sup> The Campus is zoned for school use as a public facility and is not zoned for forest land or timberland use.<sup>39</sup> No impact would occur and no further analysis is required.

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

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

---

<sup>33</sup> Division of Land Resource Protection (DLRP). California Important Farmland Finder. <http://maps.conservation.ca.gov/ciff/ciff.html>.

<sup>34</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.

<sup>35</sup> City of Los Angeles. 2018. ZIMAS [Zone Info and Map Access System]. <http://zimas.lacity.org/>.

<sup>36</sup> California Department of Conservation, Division of Land Resources Protection. 2015. Map of Williamson Act Contract Land. [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA\\_2014\\_11x17.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA_2014_11x17.pdf)

<sup>37</sup> California PRC Section 12220(g).

<sup>38</sup> California PRC Section 4526.

<sup>39</sup> City of Los Angeles. 2018. ZIMAS [Zone Info and Map Access System]. <http://zimas.lacity.org/>.

## 4. Environmental Checklist and Analysis

- 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 Campus, and Project development would not indirectly cause conversion of such land to non-agricultural or non-forest use. No impact would occur and no further analysis is required.

## 4. Environmental Checklist and Analysis

	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 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"/>

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

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: <ul style="list-style-type: none"> <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> </ul>

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <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.</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/or limit the number of haul trips per day.</li> <li>• Route construction trucks off congested streets.</li> <li>• Employ high pressure fuel injection systems or engine timing retardation.</li> <li>• Utilize 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 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>• Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.</li> <li>• Utilize electric or alternatively fueled equipment, if feasible.</li> <li>• Utilize construction equipment with the minimum practical engine size.</li> <li>• Utilize 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 ten days or more).</li> <li>• Replace ground cover in disturbed areas as quickly as possible.</li> </ul>



## 4. Environmental Checklist and Analysis

---

### LAUSD Standard Conditions of Approval

---

- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- Pave all construction access roads for at least 100 feet from the main road to the project site.
- Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.
- Limit traffic speeds on unpaved road to 15 mph or less.
- Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

#### General Construction

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

## 4. Environmental Checklist and Analysis

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 non-attainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated non-attainment for O<sub>3</sub>, and PM<sub>2.5</sub> under the California and National AAQS, non-attainment for PM<sub>10</sub> under the California AAQS, and non-attainment for lead (Los Angeles County only) under the National AAQS.<sup>40</sup>

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

**Less Than Significant Impact.** The most recently adopted comprehensive plan for the SoCAB is the 2016 Air Quality Management Plan (AQMP), adopted on March 3, 2017. Regional growth projections are used by SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city and county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

The Project involves the renovation and demolition of several existing school buildings in addition to construction of new school buildings. The planned improvements would not result in an increase in the number of students, so it would not have the potential to substantially affect SCAG's demographic projections. Additionally, as discussed in Section III(b), the net change in operation-phase related emissions would be less than the SCAQMD emissions thresholds, and is not considered a substantial source of air pollutant emissions that could affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory and would not conflict with strategies in the AQMP. Impacts would be less than significant and no further analysis is required.

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

**Less Than Significant Impact.** The SoCAB is currently designated non-attainment for O<sub>3</sub> and PM<sub>2.5</sub> under the California and National AAQS, non-attainment for PM<sub>10</sub> under the California AAQS, and non-attainment for lead under the National AAQS. Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Due to the extent of the SoCAB area (and the large number of cumulative project emissions), a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds.<sup>41</sup>

The SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, 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 or projected air quality violation. The following

---

<sup>40</sup> California Air Resources Board (CARB). 2017, December. Area Designations Maps/State and National. <http://www.arb.ca.gov/design/adm/adm.htm>.

<sup>41</sup> South Coast Air Quality Management District (SCAQMD). 1993. California Environmental Quality Act Air Quality Handbook.



## 4. Environmental Checklist and Analysis

describes changes in regional impacts from short-term construction activities and long-term operation of the Project.

### Short-Term Air Quality

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

Construction activities would occur on approximately 3 acres of the 6-acre Campus and would involve demolition; construction of new buildings; renovation of several existing buildings; installation temporary portable buildings; and paving. It is anticipated that Project construction would be approximately 4 years, from 2020 to 2024. Construction work would be intermittent and conducted in stages during that four-year period; some work would be done during school breaks when students are off Campus. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2, based on the Project's preliminary construction schedule, phasing, and equipment list provided by LAUSD and include the CHPS prerequisites and implementation of SC-AQ-2 through SC-AQ-4. The construction schedule and equipment mix were based on preliminary designs and are subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 2. The maximum daily construction emissions would not exceed SCAQMD's regional construction significance thresholds. Therefore, air quality impacts from project-related construction activities would be less than significant and no further analysis is required.

**Table 2**  
**Maximum Daily Regional Construction Emissions**

Construction Activity	Criteria Air Pollutants (lbs/day) <sup>a,b,c</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Phase 1</b>						
Site Preparation	1	8	4	<1	<1	<1
Utility Trenching	<1	5	6	<1	<1	<1
Portable Installation	<1	11	8	<1	<1	<1
<b>Phase 2</b>						
Demolition	3	20	16	<1	1	1
Grading + Utility Trenching	2	20	10	<1	4	2
Building Construction	2	18	17	<1	2	1
Architectural Coating <sup>d</sup>	46	1	2	<1	<1	<1
Portable Building Haul	2	18	17	<1	2	1
Paving	1	11	12	<1	<1	1
Finishing/Landscaping	<1	4	7	<1	<1	<1
Maximum Daily Emissions	46	20	17	<1	4	2

## 4. Environmental Checklist and Analysis

**Table 2**  
**Maximum Daily Regional Construction Emissions**

Construction Activity	Criteria Air Pollutants (lbs/day) <sup>a,b,c</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.2

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

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

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

<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 in 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 Air Quality

Long-term air pollutant emissions are typically generated by 1) area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), 2) mobile sources from vehicle trips (e.g., student drop-off and pick-up, and staff commute trips), and 3) energy use (natural gas for heating) for new buildings. Following completion of the Project, area sources and the related emissions would be comparable to the existing Campus because the school is already built.

The primary source of long-term criteria air pollutant emissions is from mobile sources. Because the Project would not increase the number of students or the enrollment capacity of the Campus it would not introduce new mobile sources. The Project would demolish several existing school buildings and construct two new buildings. The new buildings would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient. The Project would not result in an increase in long-term criteria air pollutant emissions.

As shown in Table 2 and discussed above, Project-related construction and operational activities would not result in emissions in excess of SCAQMD's regional significance thresholds. Therefore, the Project would not result in a cumulatively considerable net increase in criteria pollutants and impacts would be less than significant. No further analysis is required.

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

**Less Than Significant Impact.** The Project could expose sensitive receptors to elevated pollutant concentrations if it causes or contributes significantly to elevated pollutant concentration levels. Unlike regional



## 4. Environmental Checklist and Analysis

emissions, localized emissions are evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

### Construction

#### Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the construction site, distance to the nearest sensitive receptor, and Source Receptor Area.<sup>42</sup> The nearest offsite receptors proximate to the edge of the construction zone are the single-family residences to the east, south, and west at approximately 80 feet. Per LST methodology, any distance within 82 feet has the same screening-level values; therefore, offsite and onsite receptors (students and staff on Campus during construction) within the minimum distance of 82 feet are analyzed under the LST construction impact.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows the Project's maximum daily construction emissions (pounds per day) generated during construction activities compared with the SCAQMD's screening-level construction LSTs.<sup>43</sup> As shown, the maximum daily NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> construction emissions generated from onsite construction-related activities would be less than SCAQMD screening-level construction LSTs. Therefore, Project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutants and localized construction air quality impacts would be less than significant. No further analysis is required.

**Table 3**  
**Localized Construction Emissions**

Source (based on acres disturbed) <sup>d,e</sup>	Pollutants(lbs/day) <sup>a,b,c</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Phase 1 – Site Preparation	8	4	<1	<1
Phase 1 – Utility Trenching	5	6	<1	<1
Phase 1 – Portable Building Installation	9	7	1	<1
Phase 2 – Building Construction	16	15	1	1
Phase 2 – Architectural Coating	1	2	<1	<1
Phase 2 – Portable Building Removal	15	14	<1	<1
Phase 2 – Paving	9	12	<1	<1
Phase 2 – Finishing/Landscaping	4	7	<1	<1

<sup>42</sup> Source Receptor Area: Using this meteorological data set, LSTs are developed for each of the 37 source receptor areas (SRAs) within the SCAQMD's jurisdiction. The school is in SRA 12 – South Central LA County.

<sup>43</sup> For purposes of this analysis, the screening-level construction LSTs are based on a disturbed acreage per day of one acre or less, which represent a conservative analysis as a larger disturbed acreage per day would generate higher screening-level LST values.

## 4. Environmental Checklist and Analysis

**Table 3**  
**Localized Construction Emissions**

Source (based on acres disturbed) <sup>d,e</sup>	Pollutants(lbs/day) <sup>a,b,c</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>SCAQMD ≤1.00-acre LST</b>	<b>46</b>	<b>231</b>	<b>4</b>	<b>3</b>
<b>Exceeds LST?</b>	No	No	No	No
Phase 2 – Grading + Utility Trenching	20	10	4	2
<b>SCAQMD 1.88-acre LST</b>	<b>63</b>	<b>332</b>	<b>7</b>	<b>4</b>
<b>Exceeds LST?</b>	No	No	No	No
Phase 2 – Demolition	20	15	1	1
<b>SCAQMD 2.0-acre LST</b>	<b>65</b>	<b>346</b>	<b>7</b>	<b>4</b>
<b>Exceeds LST?</b>	No	No	No	No

Source: CalEEMod Version 2016.3.2.

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

- <sup>a</sup> The construction schedule is based on information provided or confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.
- <sup>b</sup> Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.
- <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 in minimizing generation of criteria air pollutant emissions during construction.
- <sup>d</sup> In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the school in Source Receptor Area (SRA) 12
- <sup>e</sup> South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>.

### **Construction Emission Health Risk**

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015 the Office of Environmental Health Hazards Assessment (OEHHA) adopted an updated guidance document for the preparation of health risk assessments.<sup>44</sup> OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The Project would be constructed in stages over approximately 4 years, which would limit the exposure to receptors. Additionally, construction activities would not exceed the screening-level LST significance thresholds. Therefore,

<sup>44</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. [http://oehha.ca.gov/air/hot\\_spots/2015/2015GuidanceManual.pdf](http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf).



## 4. Environmental Checklist and Analysis

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

### Operation

#### *Localized Significance Thresholds*

Operation of the Project would not generate substantial quantities of emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. The Project does not fall within these uses. Although operation of the Project would result in the use of standard mechanical equipment such as new heating, ventilation, and air conditioning (HVAC) units in the buildings, air pollutant emissions generated from this equipment would be nominal, and less than the existing older units. Therefore, localized air quality impacts related to stationary-source emissions would be less than significant and no further analysis is required.

#### *Carbon Monoxide Hotspots*

The SoCAB has been designated “attainment” for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO “hotspot” impact.<sup>45</sup> The Project would not increase the number of students and would not result in generation of additional vehicle trips compared to existing conditions. Thus, the Project would not increase CO hotspots at intersections in the vicinity of the Campus. Localized air quality impacts related to mobile-source emissions would be less than significant and no further analysis is required.

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

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

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating

<sup>45</sup> Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts, but SCAQMD does not.

## 4. Environmental Checklist and Analysis

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

## 4. Environmental Checklist and Analysis

	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"/>

The analysis in this section is based in part on the “Campus Tree Evaluation” prepared by Arborgate Consulting, Inc., dated December 11, 2017. A complete copy of this report is included as Appendix B to this Initial Study.<sup>46</sup>

### 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:

<sup>46</sup> Arborgate Consulting, Inc. 2017, December 11. Campus Tree Evaluation For: 92nd Street Elementary School (Consulting Arborist’s Report). Prepared for HPI Architecture.

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
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>47</sup>) should occur outside of nesting season to avoid take of birds, bats, or their eggs.<sup>48</sup></p> <p><b>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</b></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 birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>

<sup>47</sup> Substrate is the surface on which a plant or animal lives.

<sup>48</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.



## 4. Environmental Checklist and Analysis

---

### LAUSD Standard Conditions of Approval

---

Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

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

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

#### Bat Surveys

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

## 4. Environmental Checklist and Analysis

- 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 Campus is fully developed, with most of the site consisting of buildings, concrete and asphalt. Vegetation onsite is limited to 42 ornamental trees (in planter areas and surrounded by asphalt), a few patches of turf, and some potted plants. There is no native habitat and no suitable habitat for threatened, endangered, or rare species onsite. No impact would occur and no further analysis is required.

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

**No Impact.** No locally designated natural communities or riparian habitats exist on the Campus. The school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. The school is neither within nor proximate to any significant ecological area, land trust, or conservation plan.<sup>49</sup> No impact would occur and no further analysis is required.

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

**No Impact.** The Campus is fully developed, and there are no protected wetlands onsite. The Project would be confined to the Campus and would not have the potential to impact any offsite protected wetland areas. No impact would occur and no further analysis is required.

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

**Less Than Significant Impact.** The Campus is surrounded by fencing and developed with buildings, asphalt, concrete surfaces, and small landscaped areas. The Campus does not have any native habitat or wildlife corridors and is not available for overland wildlife movement. However, 42 trees of various species, sizes, and maturity are spread throughout the Campus and may provide nesting sites for resident or migratory birds. Several trees would be removed as part of the Project. Additionally, Project construction near trees and structures may result in disturbances to birds during nesting season (February 1 through August 31, and as early as January 1 for some raptors).

Migratory nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibit the take of all birds and their active nests. The District would comply with the California Fish and Game Code and would implement SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting

---

<sup>49</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>.



## 4. Environmental Checklist and Analysis

birds. With implementation of these laws, regulations, and the standard condition, impacts to nesting birds would be less than significant and no further analysis is required.

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

**No Impact.** The school has 42 trees of various species, sizes, and maturity that are spread throughout the Campus. Several trees would be removed to accommodate the new buildings. District policy requires that all tree trimming and removal conducted on District property adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Procedure. Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies while ensuring the protection of breeding and nesting habitat of protected birds.<sup>50</sup>

There are no off-site trees on contiguous properties that would be affected by the construction. The Project includes a landscape plan that includes planting new trees on Campus. Trees would be planted at the appropriate size at maturity for the available space, and will be selected from LAUSD's Approved Plant List.<sup>51</sup> The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur and no further analysis is required.

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

**No Impact.** The school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.<sup>52</sup> No impact would occur and no further analysis is required.

---

<sup>50</sup> LAUSD Tree Trimming and Removal Procedure. <https://achieve.lausd.net/ceqa>

<sup>51</sup> LAUSD Approved Plant List. [http://www.laschools.org/documents/file?file\\_id=310944045](http://www.laschools.org/documents/file?file_id=310944045).

<sup>52</sup> California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.

## 4. Environmental Checklist and Analysis

	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 the 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"/>

The analysis in this section is based in part on the “Historic Resource Evaluation Report (HRER) for 92nd Street Elementary School”, prepared by Sapphos Environmental, dated September 2018. A complete copy of this report is included as Appendix C to this Initial Study.<sup>53</sup>

### 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-1	<p><b>Historic Architect</b></p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.</p> <p><b>Role of the Historic Architect</b></p> <ul style="list-style-type: none"> <li>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</li> <li>The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design</li> </ul>

<sup>53</sup> Sapphos Environmental. 2018 September. Historic Resource Evaluation Report (HRER) for 92nd Street Elementary School.



## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<p>Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.</p> <ul style="list-style-type: none"> <li>• For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.</li> <li>• For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.</li> <li>• The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable.</li> <li>• The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review.</li> <li>• The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary’s Standards and/or avoidance of a material impairment of the historical resources.</li> <li>• The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted.</li> <li>• The Design Team and Historic Architect shall be responsible for incorporating LAUSD’s recommended updates and revisions during the design development and review process.</li> </ul>
SC-CUL-2	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary’s Standards for all new construction and modernization projects. In keeping with the District’s adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> <li>• Retain and preserve the character of historic resources.</li> </ul>

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <li>• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.</li> <li>• Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.</li> <li>• Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.</li> </ul> <p>Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.</p>
SC-CUL-3	<p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> <li>• Notation of the historic resource on construction plans.</li> <li>• Pre-construction survey to document the existing physical condition of the historic resource.</li> <li>• Procedures and timing for the placement and removal of temporary protection features, around the historic resource.</li> <li>• Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.</li> <li>• Post-construction survey to document the condition of the historic resource after Project completion.</li> <li>• Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.</li> </ul>
SC-CUL-5	<p>LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.</p>
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>



## 4. Environmental Checklist and Analysis

---

### LAUSD Standard Conditions of Approval

---

SC-  
CUL-7

- The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.
  - LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.
  - The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.
  - The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.
  - If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.
  - Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource.
  - Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.
  - The Archaeological Monitoring Plan shall include:
    - Extent and duration of the monitoring based on the grading plans
    - At what soil depths monitoring of earthmoving activities shall be required
    - Location of areas to be monitored
    - Types of artifacts anticipated
  - Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources
  - Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources
  - Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed.
  - Accommodation and procedures for Native American monitors, if required.
  - Procedures for discovery of Native American cultural resources.
-

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <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 Section 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
- 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).



## 4. Environmental Checklist and Analysis

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

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

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

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

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

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
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 school was built between 1939 and 1976. Additions to the Campus after 1976 consist of construction of the lunch shelter (2001) and installation of portable buildings (1986 through 2005). Three buildings were identified as historical resources:

- The **Assembly & Classroom Building West (West Building)** was determined to be individually eligible for listing in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, and as a City of Los Angeles HCM under Criteria 3 (C/3/3). The West Building was built in 1939/40 in the Renaissance Revival style and is the oldest building on Campus. The West Building was determined to be eligible based on its quality of craftsmanship; as an excellent example of the Renaissance Revival style of architecture in Los Angeles; and its association with architect Alfred Nibecker, whose work included hundreds of school projects in Los Angeles.
- The **Administration & Classroom Building/Kindergarten Building (Main Building)** was found eligible for listing as a City of Los Angeles HCM under Criterion 3. The New Formalist-style building was

## 4. Environmental Checklist and Analysis

built in 1976. This architectural style emphasizes symmetrical plans, flat rooflines with heavy overhanging roofs, and full-height colonnades. The Main Building is eligible due to its design and its association with architect Vincent J. Proby Jr., a significant architect in the Los Angeles region.

- The **Cafeteria Building** was found eligible for listing as a City of Los Angeles HCM under Criterion 3. The Cafeteria Building also has a New Formalist-style architecture designed by Vincent J. Proby Jr.

The Project would not involve demolition or significant alterations to any of the three buildings identified as historical resources. Modernization of all three buildings would include remodeling, retrofitting, painting, HVAC replacement, and roof repairs. These improvements would not affect the significance of the historic resources. Following modernization and new construction on the Campus, the Assembly & Classroom Building West, Administration & Classroom Building/Kindergarten, and Cafeteria Building would all retain eligibility for listing.

The Project design includes input from a qualified historic architect pursuant to SC-CUL-1. Project design, materials, and implementation will comply with historic preservation standards—including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools—as set forth in SC CUL-2 and CUL-3. Impacts to historical resources would be less than significant and no further analysis is required.

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

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

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

- (1) Contains information 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.

Based on historical aerial photographs, topographic maps, and Sanborn fire insurance maps the earliest development on the site was as part of a residential subdivision in 1922.<sup>54</sup> Neither the Campus nor the

---

<sup>54</sup> Accord Engineering, 2018 July 28. Phase I Environmental Site Assessment (ESA) for Proposed Modernization at the 92nd Street Elementary School, 9211 S. Grape Street, Los Angeles, California 90002.



## 4. Environmental Checklist and Analysis

surrounding area has been identified as having a high prehistoric or historic archaeological sensitivity.<sup>55</sup> There is no reason to believe the property has the potential to yield important information regarding archaeological prehistory or history.<sup>56</sup>

Additionally, soil on Campus was previously disturbed by construction of existing and previous development. Therefore, Project construction is not anticipated to encounter archaeological resources.

As part of the Project the District will implement SC-CUL-7 through SC-CUL-10 that states that if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

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

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

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

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

---

<sup>55</sup> City of Los Angeles. Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Chapter 2.15 - Cultural Resources. [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.15.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf).

<sup>56</sup> Sapphos Environmental. 2018 September. Historic Resource Evaluation Report (HRER) for 92nd Street Elementary School.

## 4. Environmental Checklist and Analysis

	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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

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

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

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

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

### Short-Term Construction

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

### Long-term Operation

Operation of the Project would not generate an increase in the demand for electricity, natural gas, or transportation energy compared to existing conditions. During operation energy is used for heating, cooling, and ventilation of buildings; water heating; equipment; appliances; and indoor, outdoor, perimeter, and parking



## 4. Environmental Checklist and Analysis

lot lighting; security systems. Table 4 shows the annual natural gas and electricity usage for the proposed Project. The new buildings would use a total of 288,755 kilowatt-hours (kWh) of electricity and 546,889 kilo-British Thermal Units (kBTU) of natural gas annually. The new buildings would replace existing buildings on the Campus.

**Table 4  
Building Energy Use**

Electricity					
	SQFT	T24 Electricity Rate (kWh/SQFT)	Non-T24 Electricity Rate (kWh/SQFT)	Lighting Electricity (kWh/SQFT)	Electricity (kWh/yr)
Elementary School	46,190	1.89	1.51	2.68	280,835
Asphalt Surfaces	69,700	0	0	0	0
Parking Lot	22,630	0	0	0.35	7,921
					288,756
Natural Gas					
	SQFT	T24 Natural Gas Rate (kBTU/yr/SQFT)	Non-T24 Natural Gas Rate (kBTU/yr/SQFT)	TOTAL (kBTU/yr)	Natural Gas (kBTU/yr)
Elementary School	46,190	10.81	1.03	546,890	
Asphalt Surfaces	69,700	0	0	0	
Parking Lot	22,630	0	0	0	
					546,890

Source: CalEEMod 2016.3.2.

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

Rates based on 2016 Title 24 Building Energy Standards and Climate Zone 8.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle to incorporate new energy efficiency technologies.<sup>57</sup> The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and go into effect for new construction starting January 1, 2020. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements.<sup>58</sup> Under the 2019 standards, nonresidential buildings

<sup>57</sup> The California Energy Code, part 6 of the California Building Standards Code which is title 24 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings.

<sup>58</sup> California Energy Commission (CEC). 2018. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. [http://www.energy.ca.gov/releases/2018\\_releases/2018-05-09\\_building\\_standards\\_adopted\\_nr.html](http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html).

## 4. Environmental Checklist and Analysis

(which include school buildings) will be 30 percent more energy efficient compared to the 2016 standards.<sup>59</sup> Also, in compliance with SC-GHG-5 the new buildings would exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be significantly more energy efficient than the existing buildings on Campus.

Because the project would not result in an increase in students or staff, it would not result in an increase in motor vehicle transportation energy during operation over what is currently used.

The Project would not result in inefficient, wasteful, and unnecessary consumption of energy during construction or operation. No impacts would occur and no further analysis is required.

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

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

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

---

<sup>59</sup> California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. [http://www.energy.ca.gov/title24/2019standards/documents/2018\\_Title\\_24\\_2019\\_Building\\_Standards\\_FAQ.pdf](http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf).



## 4. Environmental Checklist and Analysis

	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 checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	<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 risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based in part on “Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California,” prepared by GPI (Geotechnical Professionals, Inc.), May 17, 2017. A complete copy of this report is included as Appendix D to this Initial Study.<sup>60</sup>

### 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:

<sup>60</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
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><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>
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits</p>
CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> <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>

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

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



## 4. Environmental Checklist and Analysis

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

**Less Than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The site is not within or immediately adjacent to (i.e., within a few hundred feet) a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The closest active fault to the site is the Puente Hills Blind Thrust Fault, located approximately 1.5 miles east of the site. The nearest Alquist-Priolo Earthquake Fault Zone, established for the Newport-Inglewood Fault Zone, is approximately 3.7 miles southwest of the school.<sup>61</sup> There are no known active faults or geologically hazardous areas on or immediately adjacent to the site. Fault rupture impacts would be less than significant and no further analysis is required.

### ii) Strong seismic ground shaking?

**Less Than Significant Impact.** The Project would not increase exposure of people or structures to earthquake impacts. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region. The closest historically active surface fault is the Puente Hills Blind Thrust Fault approximately 1.5 miles east, and the Newport-Inglewood Fault Zone approximately 3.7 miles southwest of the Campus.<sup>62</sup> Because of the proximity to known faults, and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults.

The proposed new school buildings would be designed in accordance with the California Building Code, the California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,”<sup>63</sup> and “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.”<sup>64</sup> The Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and

<sup>61</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>62</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>63</sup> California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,” published in 1997 by the California Department of Mines and Geology as Special Publication 117 (SP117), and revised and readopted September 11, 2008, and published by the California Department of Conservation, California Geological Survey (formerly known as DMG).

<sup>64</sup> California Geological Survey. October 2013.  
[http://www.conservation.ca.gov/cgs/information/publications/cgs\\_notes/note\\_48/Documents/Note\\_48.pdf](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/Documents/Note_48.pdf)

## 4. Environmental Checklist and Analysis

construction of the new school buildings. Seismic ground shaking impacts would be less than significant and no further analysis is required.

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

**Less Than Significant Impact.** Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age);<sup>65</sup> 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. The site is in a zone of required investigation for liquefaction.<sup>66</sup>

According to the County of Los Angeles Draft Seismic Safety Element<sup>67</sup> the site is not within an area identified as having a potential for liquefaction. Groundwater was not encountered in subsurface explorations to 60 feet below ground surface (bgs) during the geotechnical investigation for this Project; however, historic high groundwater level has been recorded at 9 feet bgs at this site and was used for the liquefaction and subsidence analyses.<sup>68</sup> Potential ground settlement due to liquefaction is estimated as 0.5 to 0.75 inch and differential seismic settlements are estimated to be 0.25 to 0.38 inch over a 40-foot span.<sup>69</sup> The geotechnical investigation report provides recommendations for foundation design to minimize hazards from liquefaction. Adherence to such recommendations would be required by the DSA and LAUSD in order to meet the design requirements for the school buildings and structures. Project development would not subject people or structures to substantial hazards from liquefaction, and impacts would be less than significant. No further analysis is required.

### iv) Landslides?

**No Impact.** Landsliding is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) 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 relatively flat-lying topography at the school precludes both stability problems and the potential for lurching. According to the County of Los Angeles Safety Element<sup>70</sup> and the City of Los Angeles Safety Element<sup>71</sup> the site is not within an area identified as having a potential for slope instability. There are no known landslides near the site, nor is the school in the path of any known

---

<sup>65</sup> The Holocene epoch began 12,000 to 11,500 years ago.

<sup>66</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>67</sup> Los Angeles County. <http://planning.lacounty.gov/generalplan/draft2014>

<sup>68</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>69</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>70</sup> Los Angeles County General Plan. Adopted October 6, 2015. Chapter 12: Safety Element. [http://planning.lacounty.gov/assets/upl/project/gp\\_final-general-plan-ch12.pdf](http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf)

<sup>71</sup> City of Los Angeles, Department of City Planning. General Plan Safety Element. Adopted November 26, 1996. <https://planning.lacity.org/cwd/gnpln/safteyelt.pdf>



## 4. Environmental Checklist and Analysis

or potential landslides or seismic slope instability. The Project would not expose people or the new school buildings to adverse effects from landslides.<sup>72</sup> No impact would occur and no further analysis is required.

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

#### Less Than Significant Impact.

#### Construction Phase.

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the Campus; therefore, modernization would not result in the loss of topsoil.<sup>73</sup>

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 on roads and in 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 rain storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. LAUSD would obtain coverage by preparing 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 5. The Campus is 6 acres and the project would occur on approximately 3 acres; thus, construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant and no further analysis is required.

<sup>72</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>73</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.

## 4. Environmental Checklist and Analysis

**Table 5  
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), California Construction Best Management Practices Handbook, July 2012.

### Operational Phase

After completion of the Project, ground surfaces at the Campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode. The Project would incorporate SC-HWQ-1, which would be consistent with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.<sup>74</sup> The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los

<sup>74</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; 5<sup>th</sup> Edition. Adopted by the City of Los Angeles, Board of Public Works on May 9, 2016. [http://www.lastormwater.org/wp-content/files\\_mf/lidmanualfinal.pdf](http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf)



## 4. Environmental Checklist and Analysis

Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat 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>75</sup> LAUSD would comply with existing regulations. Operational phase soil erosion impacts would be less than significant and no further analysis is required.

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

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

**Lateral spreading.** Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The Campus is not prone to lateral spreading, as near-surface site sediments are not prone to liquefaction.

**Subsidence.** The major cause of ground subsidence is withdrawal of groundwater. The Project would not withdraw groundwater. Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant. No further analysis is required.

**Seismically Induced Settlement.** Seismically induced settlement occurs in dry sands, in contrast to liquefaction which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. Due to the shallow depths to historic groundwater levels (9 feet bgs) and the limited amount of sandy soils above this groundwater level, the potential for dry seismic induced settlement to adversely affect the site is considered to be low. Therefore, measurable seismic settlement of the soil is not anticipated.<sup>76</sup> Project development would not pose substantial hazards to people or structures arising from seismically induced settlement, impacts would be less than significant, and no further analysis is required.

**Collapsible Soils.** Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The existing fill soils are not considered suitable for support of new structures, so existing fill soils would be excavated and replaced as properly compacted fill soils. Soil under the fill is not considered low density.<sup>77</sup> As part of the DSA review process, LAUSD is required to show

---

<sup>75</sup> US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

<sup>76</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>77</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

## 4. Environmental Checklist and Analysis

how the Project complies with a final engineering-level geotechnical report. This report includes, but is not limited to: identification of building setbacks, site preparation, specific locations and methods for fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of any deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review.

The Project design and development would incorporate all recommended measures outlined in the final engineering-level geotechnical report to ensure that safety is not compromised as required by existing regulations. Compliance with recommendations of the geotechnical investigation would minimize hazards from collapsible soils, impacts would be less than significant, and no further analysis is required.

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

**Less Than Significant Impact.** Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. The upper silty/clayey fill soils are expected to shrink and swell with severe changes in moisture content. Recommendations for earthwork in the Geotechnical Investigation Report include removal of existing soil to seven feet below existing grade or four feet below the base of foundations, whichever is deeper.<sup>78</sup> After compliance with recommendations in the Geotechnical Investigation Report the Project would not expose people or the new school buildings to significant adverse effects associated with expansive soils. Impacts would be less than significant and no further analysis is required.

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

**No Impact.** The existing Campus does not use septic tanks or other alternative wastewater disposal systems. No impact would occur and no further analysis is required.

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

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

Los Angeles County is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles County has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological

---

<sup>78</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.



## 4. Environmental Checklist and Analysis

sensitivity. However, neither the Campus nor the surrounding area has been identified as having a high paleontological sensitivity.<sup>79</sup>

The Campus is underlain by up to 4 feet of fill soils that consist of silts, clayey silts, and sandy silts. Fill is underlain by natural soil consisting of stiff to very stiff silts, sandy silts, silty clays, and clays.<sup>80</sup> Because the Campus has been highly disturbed and is covered by fill soils, discovery of paleontological resources during shallow excavation activities is unlikely. Additionally, neither the school nor the surrounding area has been identified as having a high paleontological sensitivity. LAUSD shall implement SC-CUL-11 requiring that a paleontological monitor be on-call during construction activities; and that, if paleontological resources are found, that construction activities stop in the immediate area; the paleontologist would then recover, analyze, and curate the find(s) and monitor the remaining site earthwork. As a result, impacts to paleontological resources would be less than significant and no further analysis is required.

---

<sup>79</sup> City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources.

[http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.15.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf)

<sup>80</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

## 4. Environmental Checklist and Analysis

	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"/>

Greenhouse gas (GHG) emission regulatory setting and modeling data can be found in Appendix A to this Initial Study.

### Explanation:

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

<b>LAUSD Standard Conditions of Approval</b>	
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.



## 4. Environmental Checklist and Analysis

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>
----------	--

The Intergovernmental Panel on Climate Change (IPCC) has identified four major greenhouse gases (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.<sup>81</sup> The primary source of these GHGs is fossil fuel use. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydro fluorocarbons, perfluorocarbons, and chlorofluorocarbons.<sup>82</sup> This section analyzes the Project’s contribution to global climate change impacts in California through an analysis of Project-related GHG emissions. Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the Project are not applicable and are not included in the analysis.<sup>83</sup> Black carbon emissions are not included in the GHG analysis because 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>84,85</sup>

<sup>81</sup> Intergovernmental Panel on Climate Change <https://www.ipcc.ch/>

<sup>82</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>83</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. See Appendix A for further details regarding “life cycle” emissions.

<sup>84</sup> Particulate matter emissions, which include black carbon, are analyzed in Section 4.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State’s existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years.

<sup>85</sup> California Air Resources Board (CARB). 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.

## 4. Environmental Checklist and Analysis

### 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 GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

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

### Short-Term GHG Impacts

Construction emissions generated by the Project are temporary, one-time emissions that would not substantially contribute to the GHG emissions. Table 6 provides both the total and amortized Project-related construction emissions. The amortized emission rate is based on total construction emissions amortized over 30 years per SCAQMD methodology.<sup>86</sup> As shown in Table 6, the GHG emissions associated with the Project would not exceed the established threshold of significance which is identified as the “bright-line” by the SCAQMD. Less than significant impacts would occur and no further analysis is required.

**Table 6**  
**Project-Related Construction GHG Emissions**

Source	GHG Emissions <sup>a</sup>
Total Construction Emissions	515 MTCO <sub>2</sub> e
Amortized Construction Emissions <sup>b</sup>	17 MTCO <sub>2</sub> e/Yr
Proposed SCAQMD Bright-Line Threshold	3,000 MTCO <sub>2</sub> e/Yr
Exceeds Bright-Line Threshold	No

Source: CalEEMod, Version 2016.3.2

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

<sup>a</sup> Implementation of SC-USS-1, which focuses on construction waste recycling, would contribute to reducing construction-related GHG emissions.

<sup>b</sup> Total construction emissions are amortized over 30 years per SCAQMD methodology.

However, similar to the operation-phase criteria air pollutants as discussed in Section III(b) of this Initial Study, it is anticipated that the net change in operation-phase GHG emissions associated with the Project would be nominal.

<sup>86</sup> South Coast Air Quality Management District, 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf).



## 4. Environmental Checklist and Analysis

The modernization would not increase student capacity; therefore, would not result in an increase in GHG emissions from mobile sources, water usage or wastewater and solid waste generation. Additionally, in compliance with SC-GHG-5 the new buildings would exceed the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing buildings on Campus.

The operation-phase GHG emissions would be nominal and as shown in Table 6, would not cause an exceedance of the SCAQMD bright-line threshold. Therefore, the Project's cumulative contribution to GHG emissions is less than significant and no further analysis is required.

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

**Less Than Significant Impact.**

#### **CARB Scoping Plan**

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020.<sup>87</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.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. The new buildings are required to comply with the Building Energy Efficiency Standards and California Green Building Code (CALGreen). CARB adopted Final 2017 Climate Change Scoping Plan Update on December 24, 2017 to address the new 2030 target to achieve a 40 percent reduction below 1990 levels by 2030, established by SB 32.<sup>88</sup> While measures in the Scoping Plan apply to State agencies and not the proposed Project, the Project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed Project would be consistent with the CARB Scoping Plan, and no impact would occur.

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

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy in their regional transportation plans to achieve the per capita

<sup>87</sup> California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan: A Framework for Change.

<sup>88</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).

## 4. Environmental Checklist and Analysis

GHG reduction targets. For the SCAG region, the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016.<sup>89</sup> The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed Project would provide for the educational needs of the community while meeting the existing demand for school services. Overall, the proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016 RTP/SCS. No impact would occur and no further analysis is required.

---

<sup>89</sup> Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.



## 4. Environmental Checklist and Analysis

	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 “Phase I Environmental Site Assessment. Proposed Modernization at the 92nd Street Elementary School, 9211 S. Grape Street, Los Angeles, California 90002” prepared by Accord Engineering, dated July 28, 2017. A complete copy of this report is included as Appendix E to this Initial Study.<sup>90</sup>

### Explanation:

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

<b>LAUSD Standard Conditions of Approval</b>	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): <ul style="list-style-type: none"> <li>District Specification Section 01 4524, Environmental Import / Export Materials Testing.</li> </ul>

<sup>90</sup> Accord Engineering. 2018, July 28. Phase I Environmental Site Assessment (ESA) for Proposed Modernization at the 92nd Street Elementary School, 9211 S. Grape Street, Los Angeles, California 90002.

## 4. Environmental Checklist and Analysis

	<ul style="list-style-type: none"> <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.**

### Existing Hazardous Materials Present or Potentially Present on the Campus

#### *Recognized Environmental Conditions*

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.<sup>91</sup>

RECs identified by the Phase I Environmental Site Assessment include:

<sup>91</sup> ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.



## 4. Environmental Checklist and Analysis

- Based on the age of the structures (primarily built before 1977), there is the potential for lead residue in the soil around the buildings from peeling-off chips of lead-based paint. Painted surfaces must be reviewed by LAUSD's Facilities Environmental Technical Unit (FETU) for lead-based paint prior to Project commencement. All lead-containing material abatement/removal work must comply with the US Environmental Protection Agency (EPA), US Occupational Safety and Health Administration, and SCAQMD regulations. Lead must be contained during demolition activities (California Health & Safety Code sections 17920.10 and 105255). Title 29 Code of Federal Regulations (CFR) Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring. In addition, LAUSD Section 13282 (Lead Abatement and Lead Related Construction Work) and LAUSD Section 13614 (Abatement of Hazardous Materials) will also be implemented for the removal of lead-based paint and building materials, in compliance with applicable health and safety and hazardous materials regulations.
- Insecticides and organochlorine pesticide may be used during standard termite treatment process and other building maintenance activities for pest control. Additionally, herbicides were used for weed control in pavement area both before and after the pavement installation. Therefore the arsenic levels in shallow soils and subgrade materials beneath the pavement can be higher than the LAUSD exposure limit for school yards. All soils must be tested prior to export from the Campus. Contaminated soils would be removed or paved to prevent student exposure.
- There is a pad-mounted electrical transformer. Cooling oil of the transformer may contain polychlorinated bisphenols (PCBs). PCBs were once used as coolants, insulating materials and lubricants in electrical materials. PCBs were also used widely in caulking and elastic sealant materials, particularly from 1950 through the 1970's until PCBs were banned in 1979. LAUSD Section 13614 (*Abatement of Hazardous Materials*) will be implemented for the removal of PCBs, in compliance with applicable health and safety and hazardous materials regulations.

### **Asbestos**

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).<sup>92</sup> Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.<sup>93</sup>

---

<sup>92</sup> Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. [http://www.dtsc.ca.gov/InformationResources/Glossary\\_of\\_Environmental\\_Terms.cfm](http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm).

<sup>93</sup> US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos. <https://www.epa.gov/asbestos/us-federal-bans-asbestos>.

## 4. Environmental Checklist and Analysis

Buildings must be reviewed by LAUSD's FETU for asbestos prior to Project commencement.<sup>94</sup> Because the school was mostly constructed between 1939 and 1976 it is anticipated that the buildings contain asbestos. During demolition and renovation of permanent buildings, asbestos would be removed, contained, and disposed. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACM. In addition, LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the containment/removal of ACM and asbestos-containing construction material (ACCM), in compliance with applicable health and safety and hazardous materials regulations. The proposed Project would not subject people to substantial hazards from ACM or ACCM, and impacts would be less than significant.

### ***Existing Hazardous Substances***

Hazardous materials that are currently being handled, used, transported, or disposed of include: standard cleaning products; pesticides and herbicides; and paints, fuels, and lubricants used in association with existing campus janitorial, maintenance, and landscaping, along with small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products.

Most hazardous materials stored on Campus present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

Hazardous materials are managed in accordance with standard LAUSD policies and practices, and regulated by several agencies, including the EPA, the California Department of Toxic Substances Control, California Division of Occupational Safety and Health, and the Los Angeles Fire Department.<sup>95</sup> The requirements of these agencies would be incorporated into the design and operation of the proposed Project. These requirements include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. All materials and substances that would be used after Project completion are already being used on the Campus; therefore, no change would occur. Hazards to the public, the students, or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

### ***Soil Import and Export***

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>96</sup> This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill

---

<sup>94</sup> FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

<sup>95</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.

<sup>96</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

materials or exported fill materials from school sites. The proposed Project would not subject people to substantial hazards, and impacts would be less than significant.

### ***Demolition and Construction Activities***

Demolition activities would be managed and conducted by the District's FETU in accordance with the District's standard practices. FETU would be responsible for ensuring the safe removal of potential asbestos containing materials and lead that may be encountered during construction. LAUSD would ensure that all construction related activities are completed in accordance with all applicable federal, State, and local regulations, including but not limited to the EPA Guidance on Conducting Non-Time-Critical Removal Actions Under Comprehensive Environmental Response, Compensation, and Liability Act, National Oil and Hazardous Substances Pollution Contingency Plan, and all applicable LAUSD specifications, and standards. Construction would also comply with the applicable SCs, which include, but are not limited to, SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.

Construction contractors are required to comply with LAUSD standard specifications for proper packaging, transportation, and disposal of any discovered hazardous materials before building construction starts. Specifically, construction contractors are required comply with worker training, health and safety, hazardous material containment, and offsite transport, and disposal of contaminated soil. The proposed Project would not subject people or the environment to substantial hazards related to hazardous materials onsite or potentially onsite, and impacts would be less than significant.

### ***Offsite***

There are nine listings for hazardous materials within 0.25 mile of the Campus. These include sites such as leaking underground storage tanks, groundwater contamination, dry cleaners, auto repair shops. None of the hazardous materials sites are considered to be significant threats to the school due to the distances and local groundwater flow direction.<sup>97</sup> Impacts would be less than significant and no further analysis is required.

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

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

---

<sup>97</sup> Accord Engineering. 2018, July 28. Phase I Environmental Site Assessment (ESA) for Proposed Modernization at the 92nd Street Elementary School, 9211 S. Grape Street, Los Angeles, California 90002.

## 4. Environmental Checklist and Analysis

- 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.** No schools other than 92nd Street Elementary School are within 0.25 mile.<sup>98</sup> No impact would occur.

- 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 (SWRCB) has issued certain types of orders.
- public drinking water wells containing detectable levels of organic contaminants.
- underground storage tanks with reported unauthorized releases.
- solid waste disposal facilities from which hazardous waste has migrated.

The Phase I ESA for the Project included a regulatory agency environmental database search. The Campus is not included on any list compiled pursuant to California Government Code Section 65962.5. The findings were discussed in detail in Section VIII(a). Impacts would be less than significant and no further analysis is required.

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

**No Impact.** The nearest airport to the Campus is Compton Woodley Airport in the city of Compton, a general aviation airport approximately 4 miles north.<sup>99</sup> The Campus is not within the airport influence area or the airport land use planning area of Compton Woodley Airport.<sup>100</sup> The Project would not result in a new use that

---

<sup>98</sup> GreenInfo Network. 2017, January 11. California School Campus Database. [http://www.mapcollaborator.org/mapcollab\\_cscd/?base=map&cy=34.10623&x=-118.09011&z=14&layers=notes%2Cpolygons%2Cuploads%2Cschoolboundaries%2Ccities&opacs=100%2C25%2C90%2C100%2C100](http://www.mapcollaborator.org/mapcollab_cscd/?base=map&cy=34.10623&x=-118.09011&z=14&layers=notes%2Cpolygons%2Cuploads%2Cschoolboundaries%2Ccities&opacs=100%2C25%2C90%2C100%2C100).

<sup>99</sup> California Department of Transportation (Caltrans). 2018, November 2. Caltrans Aviation GIS Data. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>.

<sup>100</sup> Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>; Los Angeles County Department of Public Works. 2018, November. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.



## 4. Environmental Checklist and Analysis

would interfere with air traffic patterns, or increase traffic levels or change traffic patterns. New buildings on Campus would be of similar height as the existing buildings and would not interfere with air traffic patterns or create a safety hazard or excessive noise. No impact would occur and no further analysis is required.

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

**No Impact.** The emergency response plans in effect in the City of Los Angeles are the City’s Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.<sup>101</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.

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan, which was last updated in 2018.<sup>102</sup> Emergency preparedness and response planning and coordination is 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. No emergency response impact would occur and no further analysis is required.

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

**No Impact.** The Campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site as mapped by California Department of Forestry and Fire Prevention (CAL FIRE).<sup>103</sup> The Project would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

---

<sup>101</sup> 2012 Los Angeles County Operational Area Emergency Response Plan.  
<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

<sup>102</sup> City of Los Angeles. 2018, January. City of Los Angeles 2018 Local Hazard Mitigation Plan.  
[http://emergency.lacity.org/sites/g/files/wph496/f/2018\\_LA\\_HMP\\_Final\\_2018-02-09%20%281%20of%202%29.pdf](http://emergency.lacity.org/sites/g/files/wph496/f/2018_LA_HMP_Final_2018-02-09%20%281%20of%202%29.pdf).

<sup>103</sup> California Department of Forestry and Fire Prevention (CAL FIRE). 2011, September. Very High Fire Hazard Severity Zones in LRA: Los Angeles. [http://frap.fire.ca.gov/webdata/maps/los\\_angeles/LosAngelesCounty.pdf](http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf)

## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or substantial ground water management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

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

<b>LAUSD Standard Conditions of Approval</b>	
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>



## 4. Environmental Checklist and Analysis

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

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

The Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. There is a storm drain one block south of the school in 97th Street. That storm drain is part of a network of storm drains extending south and discharging into Compton Creek about 5.2 miles to the south. Compton Creek discharges into the Los Angeles River, which flows south and discharges into the Pacific Ocean at Long Beach.<sup>104</sup>

### 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 SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The Campus is 6 acres; however, because of active school operation, less than 2 acres (contiguous) on Campus would be disturbed at any one time. Project construction would be subject to the Statewide Construction General Permit and implementation

<sup>104</sup> Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map). <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>

## 4. Environmental Checklist and Analysis

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

### Operation Phase

After completion of the Project, ground surfaces at the Campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the Campus. The Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low impact development like those provided in the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.<sup>105</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-A01, issued by the Los Angeles Regional Water Quality Control Board.

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

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

**Less Than Significant Impact.** The Campus is over the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin.<sup>106</sup> The City of Los Angeles Department of Water and Power (DWP) supplies water to the Campus and the surrounding community. DWP water supplies consist of about 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and 2 percent recycled water.<sup>107</sup> Groundwater was not encountered in subsurface explorations to 60 feet below ground surface (bgs) during the geotechnical investigation of the site. The historic high groundwater level is nine feet bgs.<sup>108</sup> The Project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the school improvements would not lower the groundwater table or deplete groundwater supplies. Furthermore,

---

<sup>105</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>

<sup>106</sup> Department of Water Resources (DWR). 2018, November 2. Groundwater Information Center Interactive Map Application. <https://gis.water.ca.gov/app/gicima/>.

<sup>107</sup> Los Angeles Department of Water and Power (LADWP). 2016, June. 2015 Urban Water Management Plan. [https://wuedata.water.ca.gov/public/uwmp\\_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%20DLADWP%2Epdf](https://wuedata.water.ca.gov/public/uwmp_attachments/3381116569/2015%20Urban%20Water%20Management%20Plan%20DLADWP%2Epdf). The percentages of water supply by source identified above are 5-year averages, 2011-2015.

<sup>108</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.



## 4. Environmental Checklist and Analysis

the 6-acre school does not provide intentional groundwater recharge. Therefore, the Project would not interfere with groundwater recharge. Impacts would be less than significant and no further analysis is required.

**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 school is fully developed and the new buildings would not increase impermeable surfaces on Campus.

The nearest storm drain downgrade from the site mapped by the Los Angeles County Department of Public Works is a 27-inch reinforced concrete pipe (RCP) in the 97th Street right-of-way.<sup>109</sup> That storm drain is part of a network of storm drains extending south and discharging into Compton Creek, which in turn empties into the Los Angeles River, which flows south and discharges into the Pacific Ocean at Long Beach. The Project would not change the drainage pattern of the Campus or its surroundings.

### Construction Phase

During construction, erosion and siltation from the disturbed areas may occur. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. 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. 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) that also requires control measures. These requirements include provisions for erosion and pollution control measures to ensure water quality in stormwater runoff. Impacts would be less than significant and no further analysis is required.

### Operation Phase

Upon Project completion, drainage from the Campus would continue to be captured on site or conveyed to Compton Creek via the same storm drains as with existing conditions. The entire Campus would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 Low Impact Development Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID 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

<sup>109</sup> Los Angeles County Department of Public Works (LACDPW). 2018, November 2. Los Angeles County Storm Drain System. <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>.

## 4. Environmental Checklist and Analysis

an ecosystem or watershed by retaining stormwater onsite. Additionally, California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance requires water conservation for landscaping. Thus, Project development would not cause substantial erosion. Impacts would be less than significant and no further analysis is required.

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

**No Impact.** The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance<sup>110</sup> the proposed on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, Project development would not result in flooding on- or off-site, and no impacts would occur. No further analysis is required.

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

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

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

**Less Than Significant Impact.** The Campus is in the dam inundation zone for Hansen Dam, which is on Big Tujunga Creek located approximately 23 miles to the northeast.<sup>111</sup> However, this reservoir is continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design; construction practices; and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake. Additionally, the Campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency.<sup>112</sup> The Project buildings would not impede or redirect flood flows. No impact would occur and no further analysis is required.

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

**No Impact.** The Campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency.<sup>113</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

---

<sup>110</sup> California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.

<sup>111</sup> Office of Emergency Services (OES). 2017, February 9. Dam Inundation Areas. GIS Data Layer.

<sup>112</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>113</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>.



## 4. Environmental Checklist and Analysis

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 school 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 Campus is at an elevation of approximately 117 to 122 feet above sea level<sup>114</sup> and is approximately 11 miles inland from the Pacific Ocean. Therefore, the Campus is outside the tsunami hazard zone and would not be affected by a tsunami.

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

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

**No Impact.** The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites) that also requires control measures. After completion of the Project, ground surfaces would be either hardscape or maintained landscaping. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.<sup>115</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-A01, issued by the Los Angeles Regional Water Quality Control Board. The Project would comply with existing regulations and SC-HWQ-2 and SC-HWQ-2. The Project would not obstruct implementation of a water quality control plan. Additionally, the Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan.

---

<sup>114</sup> GPI (Geotechnical Professionals, Inc.). 2017, May 17. Geotechnical Investigation. Proposed Campus Modifications. 92nd Street Elementary School. 9211 Grape Street, Los Angeles, California.

<sup>115</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 Campus and surrounding land is fully developed with urban land uses, including residential, commercial, manufacturing, industrial, institutional (churches and schools), and a powerline easement. The Project would take place within the Campus boundaries and would not divide an established community. No impact would occur and no further analysis is required.

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

**Less Than Significant Impact.** The zoning for the school property is PF-1. PF (Public Facilities) is the designation for the use and development of publicly owned land, including public elementary and secondary schools.<sup>116</sup> The proposed buildings would be similar in height to the existing buildings on Campus.

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities', which allows public schools.<sup>117</sup> New construction on the Campus would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Although no conflicts would occur, on February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. (Bd. Of Ed Rpt No. 256-18/19). Impacts would be less than significant and no further analysis is required.

<sup>116</sup> City of Los Angeles Department of City Planning. 2018. Parcel Profile Report. <http://zimas.lacity.org/>.

<sup>117</sup> City of Los Angeles zoning. <http://zimas.lacity.org/>



## 4. Environmental Checklist and Analysis

	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 Campus is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is located in an area where significant mineral deposits are known to be absent, or where there is considered to be little likelihood for the presence of such deposits. No active mines are mapped within several miles of the Project site. No active mines are mapped within several miles of the school.<sup>118</sup> Neither the Campus nor the surrounding community is available for mining.

The nearest active oil well is located about 0.9 mile to the southwest; and the Campus is not in an oil/gas field.<sup>119</sup> The Project would not cause a loss of availability of a known mineral resource valuable to the region and the State, and no impact would occur. No further analysis is required.

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

**No Impact.** The Campus is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field.<sup>120</sup> Therefore, development of the Project would not cause a loss of availability of a mining site, and no impact would occur. No further analysis is required.

<sup>118</sup> Office of Mine Reclamation (OMR). 2017, March 27. Mines Online. <http://maps.conservation.ca.gov/mol/index.html>.

<sup>119</sup> Division of Oil, Gas, and Geothermal Resources (DOGGR). 2018, November 5. DOGGR Well Finder. <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>.

<sup>120</sup> City of Los Angeles. 2001. City of Los Angeles Conservation Element. <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>.

## 4. Environmental Checklist and Analysis

	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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

### Explanation:

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

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA $L_{eq}$ .
SC-N-2	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA <math>L_{eq}</math> with a target of 40 dBA <math>L_{eq}</math> (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 <math>L_{eq}</math>.</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 <math>L_{eq}</math>.</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> </ul>



## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <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	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> <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>Source Controls</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> </ul>

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
	<ul style="list-style-type: none"> <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><b>Path Controls</b></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><b>Receptor Controls</b></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>
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>121</sup> Noise control measures may include, but are not limited to:</p> <p><b>Path Controls</b></p> <ul style="list-style-type: none"> <li>• Noise Attenuation Barriers<sup>122</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>

<sup>121</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>122</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).



## 4. Environmental Checklist and Analysis

### LAUSD Standard Conditions of Approval

#### Source Controls

- Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM).
- Substitute Methods – using quieter methods and/or equipment.
- Exhaust Mufflers – ensuring equipment has quality mufflers installed.
- Lubrication & Maintenance – well maintained equipment is quieter.
- Reduced Power Operation – use only necessary size and power.
- Limit Equipment On-Site – only have necessary equipment on-site.
- Quieter Backup Alarms – manually-adjustable or ambient sensitive types.

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:

#### Receptor Controls

- Temporary Window Treatments – temporarily reinforcing the building’s noise reduction ability.
- Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity

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

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

### State Noise Regulations

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for non-residential structures.<sup>123</sup> Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission,<sup>124</sup> wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least

<sup>123</sup> Multi-family residential buildings greater than three stories are considered under the non-residential standards in Title 24.

<sup>124</sup> California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method. <https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5>

## 4. Environmental Checklist and Analysis

50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL or  $L_{dn}$  noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA  $L_{eq}$  during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

### City of Los Angeles Noise Regulations

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect noise sensitive land uses.<sup>125</sup> For construction noise, Los Angeles Municipal Code LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)<sup>126</sup> states that no construction or repair work, or any excavating for, any building or structure, shall be performed between the hours of 9:00 PM and 7:00 AM. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited between the hours of 9:00 PM and 7:00 AM.

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

LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools)<sup>127</sup> states that “Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

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

---

<sup>125</sup> The City of Los Angeles General Plan identifies noise-sensitive receptors as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.

<sup>126</sup> Los Angeles Municipal Code. Chapter IV Public Welfare. Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles\\_ca\\_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)

<sup>127</sup> Los Angeles Municipal Code. Chapter XI Noise Regulation. Article 2 Special Noise Sources Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools).  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles\\_ca\\_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)



## 4. Environmental Checklist and Analysis

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

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

### Construction Noise

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling, and (2) onsite noise from use of construction equipment. Demolition and construction activities are anticipated to begin in Q3 2020 and may last approximately four years. However, because the Project would occur on an active Campus and has several components, the Campus would not be under construction the entire four years. Construction work would be intermittent and conducted in stages during the four-year period; some work would be done during school breaks when students are off Campus.

### Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 7 lists maximum construction equipment noise levels at 50 feet.<sup>128</sup>

**Table 7**  
**Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84

<sup>128</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.

## 4. Environmental Checklist and Analysis

**Table 7  
 Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) at 50 ft
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Scraper	85
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80

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

Note: KVA = kilovolt amps

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

### *Off-Campus Receptors*

The nearest off-site sensitive receptors are homes to the west and east across Grape Street and Anzac Avenue, at approximately 210 feet from the center of the construction site. The anticipated construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The associated, maximum and average noise levels—grouped by construction phase—are summarized in Table 8.



## 4. Environmental Checklist and Analysis

**Table 8**  
**Project-Related Construction Noise Levels**

<b>Construction Phase</b>	<b>Maximum at 50 feet (Lmax dBA)</b>	<b>Residential uses to the east and west at 210 feet (Leq dBA)<sup>a</sup></b>
Site Preparation	84	71
Utility Trenching	82	70
Portable Installation	75	62
Demolition	85	73
Grading and Trenching	84	72
Building Construction	83	71
Architectural Coating	74	61
Portable Building Haul	73	60
Paving	86	73
Finish/Landscaping	84	72

Source: FHWA. August 2006. Construction Noise Handbook.

<sup>a</sup> As measured from the acoustical center of the construction site to the nearest property line.

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

LAMC Section 112.05 specifies the maximum noise level of 75 dBA at a distance of 50 feet. As shown in Table 8, construction Lmax noise levels could exceed the construction noise limit of 75 dBA at 50 feet. However, the nearest sensitive receptors from the center of the construction site are projected to experience average noise levels of 73 dBA Leq or less. There would be short periods, when equipment would be near the Campus boundary and closer to the residences, that would exceed 75 dBA. Likewise, there would be short periods when equipment would be farther from the residences and noise levels would be much lower than the values in Table 8. These instances would be sporadic and intermittent. Additionally, construction activity noise in some areas would be attenuated by school buildings between the construction zone and residents.

Implementation of SC-N-7 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-7 construction noise levels could be reduced by up to 15 dBA. During paving, which is estimated to be the loudest phase, this would reduce construction noise levels to approximately 71 dBA L<sub>max</sub>, which would

## 4. Environmental Checklist and Analysis

not exceed the 75 dBA  $L_{max}$  criterion. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant and no further analysis is required.

### ***On-Campus Receptors***

Interim portable classroom facilities at 50 feet from construction activities that have a direct sightline may experience exterior noise levels as high as 86 dBA  $L_{max}$ . With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 61 dBA  $L_{max}$ .

LAUSD's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Additionally, for some construction activities, noise would be further reduced by shielding effects from buildings between the construction zone and classrooms.

Implementation of SC-N-4, SC-N-7 and SC-N-9 requires: construction equipment that is properly tuned and maintained to ensure excessive noise is not generated, coordination between construction contractor and school administrators prior to and throughout construction to schedule high noise producing activities at times that minimize disruption to classes (SC-N-4); and where feasible, alternative methods of demolition and construction for activities within 25 feet of a historic building (or non-historic buildings more than 45 year old) to reduce vibration impacts (SC-N-7; this measure would also reduce noise in classrooms). Additionally, compliance with SC-N-8 requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers capable of attenuating construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. The specific method under SC-N-8 would depend on the type of construction noise, duration, and classroom disruption. As with other construction projects occurring at schools throughout the District, if construction occurs while classes are in session, SC-N-4 and SC-N-7 would be implemented to avoid noise disruptions. Additionally, SC-N-8 would be implemented to control the timing for the operation of noise-generating equipment and would make every effort to move students away from noisy construction phases. Finally, if the construction noise disruption cannot be avoided the contractor would install noise barriers, as appropriate, to limit construction noise levels. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant and no further analysis is required.

### ***Mobile Source Noise***

The Project would not increase student capacity and therefore would not increase traffic-generated noise levels on local roadways. Traffic noise levels would remain the same as current conditions, and would exceed established standards. No impacts would occur and no further analysis is required.

### ***Stationary Source Noise***

Stationary noise sources includes school buzzers or bells, landscaping equipment, outdoor activities, and heating, ventilation and air conditioning (HVAC) systems. Since the Project would not increase student capacity and the Campus would retain the same footprint, these stationary sources would be similar to the current conditions.



## 4. Environmental Checklist and Analysis

Many of the current HVAC units would be replaced with new systems, so noise would be comparable (or quieter than) other, similar sources at the existing Campus and would not result in notable changes on- or off-Campus. SC-N 2 also has restrictions on HVAC noise to limit potential noise impacts. Permanent stationary source noise increases and would exceed established standards. Impacts would be less than significant and no further analysis is required.

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

**Less Than Significant Impact.**

#### Operational Vibration

Typically, land uses that result in vibration impacts are (a) industrial businesses that use heavy machinery or (b) railroads where passing trains generate perceptible levels of vibration. The Project is a comprehensive modernization of an existing school, and there would be no significant vibration-generating sources during ongoing operations. Therefore, no operational vibration impacts would occur and no further analysis is required.

#### 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 construction vibration can range from no perceptible effects at the lower vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to architectural 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. Table 9 lists vibration levels for different types of commonly used construction equipment.

**Table 9  
Typical Construction Equipment Vibration Levels**

Equipment	Approximate VdB <sup>a</sup> level at 25 feet	Approximate PPV <sup>b</sup> at 25 feet
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

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

<sup>a</sup> VdB – vibration level using the reference of 1 microinch/second.

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

## 4. Environmental Checklist and Analysis

### ***Construction Vibration-Induced Annoyance***

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is 78 VdB for residential uses.<sup>129</sup> Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.

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

### ***Off-Campus Receptors***

The nearest off-site sensitive receptors are homes to the west and east across Grape Street and Anzac Avenue, which are located approximately 210 feet from the center of the construction site. At this distance, average vibration levels generated by operation of a vibratory roller would be 66 VdB and a large bulldozer would be 59 VdB. These levels are below the 78 VdB threshold for vibration annoyance. Receptors at greater distances from the site would experience vibration levels lower than those at the residences immediately to the west and east. Construction-generated average vibration levels would not exceed the annoyance threshold at any offsite receptors, annoyance impacts would be less than significant, and no further analysis is required.

### ***On-Campus Receptors***

Since construction activities may take place while school is in session and since temporary classroom facilities may be located near the construction site, it is possible that the students' learning activities could be affected. However, to the extent feasible, a substantial amount of construction work would be conducted during school breaks when students are not on Campus.

Depending on construction and classroom schedule, construction areas may be adjacent to active classrooms; however, it is not possible to assess specific vibration levels for every possible scenario over the course of the construction period. Generally, students in classrooms may experience vibration levels in excess of 78 VdB when vibratory rollers operate within approximately 85 feet of the classrooms, and within approximately 50 feet of large bulldozers and other heavy equipment. At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 85 feet from classrooms would not be felt. Implementation of SC-N-4 provides requirements for discussions between construction contractor and school administrators prior and throughout construction to schedule high vibration producing activities at times that minimize disruption to classes.

Implementation of SC-N-4 would reduce construction vibration and annoyance to staff and students in adjacent buildings. School administration and the construction contractor will work together to communicate

---

<sup>129</sup> Federal Transit Administration, 2018. *Transit Noise and Vibration Impact Assessment Manual*. September.



## 4. Environmental Checklist and Analysis

and coordinate about construction activities, location, schedule, and potential vibration-intensive activities during each construction phase. Administrators may arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the construction contractor to conduct vibration-intensive activities before or after class instruction at the nearest classrooms. Some construction work would be conducted during school breaks when students are not on Campus. Therefore, construction-generated vibration annoyance for on-Campus receptors would be less than significant and no further analysis is required.

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

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.<sup>130</sup> Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

### ***Off-Campus Receptors***

The nearest off-Campus structures are homes to the east, west, north, and south at approximately 60 feet or greater from the nearest potential construction activity. At that distance, maximum vibration levels would be approximately 0.056 in/sec PPV or less. Therefore, construction-related architectural damage impacts to offsite buildings would be less than significant and no further analysis is required.

### ***On-Campus Receptors***

Many onsite buildings are located adjacent to areas where demolition of existing buildings and/or construction of new buildings would occur. Operation of large heavy construction equipment (vibratory rollers, large bulldozers or loaded trucks) close to Campus buildings may exceed the FTA's 0.2 in/sec PPV criterion, which could potentially result in vibration-induced architectural damage.

The Assembly & Classroom Building West (West Building), Administration & Classroom Building/Kindergarten Building (Main Building), and the Cafeteria Building were identified as historic. As part of the Project, implementation of SC-N-6 requires that if demolition is necessary adjacent to historic or fragile structures the construction contractor would avoid using impact tools, if feasible. SC-N-8 requires the construction contractor to identify alternative methods of demolition and construction for activities that do not involve vibration-intensive equipment or activities.

Implementation of SC-N-6 and SC-N-8 would reduce vibration-induced architectural damage to adjacent, on-Campus buildings to below the threshold of damage. Vibration impacts would be less than significant and no further analysis is required.

---

<sup>130</sup> FTA category "non-engineered timber and masonry buildings"

## 4. Environmental Checklist and Analysis

### Groundborne Noise

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

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

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

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

**No Impact.** There are no private airports within 10 miles of the Campus. The nearest heliport is the Randy Champe – Gary Howe Memorial Heliport at 7600 South Broadway in Los Angeles, about 2.4 miles to the northwest.<sup>131</sup> The Project would not expose students to excessive noise levels from private airstrip or heliports above existing levels. No impact related to noise from heliports or private airstrips would occur and no further analysis is required.

The nearest airport to the school is Compton Woodley Airport in the City of Compton, a general aviation airport is located approximately 4 miles north.<sup>132</sup> The Campus is outside any airport's influence area and the associated 65 dBA CNEL noise contours. Therefore, the Project would not expose students and staff to excessive noise from aircraft at public airports above existing levels. No impact related to noise from public airports would occur and no further analysis is required.

---

<sup>131</sup> Airnav.com. 2018, November 2. Airport Information. <http://www.airnav.com/airports/>.

<sup>132</sup> California Department of Transportation (Caltrans). 2018, November 2. Caltrans Aviation GIS Data. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>.



## 4. Environmental Checklist and Analysis

	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 type="checkbox"/>	<input checked="" 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 “Site Circulation Report: LAUSD Comprehensive Modernization Project, 92nd Street Elementary School”, prepared by LIN Consulting, Inc. dated October 11, 2018. A complete copy of this report is included as Appendix G to this Initial Study.<sup>133</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:

<b>LAUSD Standard Conditions of Approval</b>	
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains 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>
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>

<sup>133</sup> LIN Consulting, Inc. 2018, October 11. Site Circulation Report: LAUSD Comprehensive Modernization Project, 92nd Street Elementary School.

## 4. Environmental Checklist and Analysis

### 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 where soil tilling and/or pesticide use creates air pollution, or a logistic distribution centers that have large tractors, semi-trailer trucks, and oversized equipment consistently traveling the local roadways that may create a hazard to cars or pedestrians. Circulation design that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. These typically consist of new roads or driveways on busy roadways with left or right turns that force cross-traffic and create conflicts between cars and people. The Project would not create new roads or dangerous driveway turning movements.

The school is in a densely developed urban area characterized by residential, commercial, manufacturing, industrial, institutional (churches and schools), and a powerline easement. The school has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways. All four roadways surrounding the school are two lanes each. Existing traffic controls at the four intersections next to the school are:

- Anzac Avenue at 92nd Street: signalized
- Anzac Avenue at 95th Street: 4-way stop
- Grape Street at 92nd Street: unsignalized T-intersection with stop control on the northbound movement
- Grape Street at 95th Street: 4-way stop

Pedestrian access to the school would not change; students would continue to use the main entrance on 92<sup>nd</sup> Street.

Construction activities may be considered an incompatible use because it would require the use of haul trucks, equipment, worker vehicles, and construction activities on the Campus while students are on the Campus. The construction and demolition activities would result in a temporary increase in truck activity on the roadway network. Construction activity would not require roadway or sidewalk closures and/or traffic detours on school days.

To avoid conflicts between construction activities and students, a multi-phased plan has been developed to ensure student safety. Temporary (interim) student classrooms in portable buildings would be placed as far as possible from construction zones, and construction staging areas (i.e., storage of equipment and materials) and would be fenced as required by SC-T-4.

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

## 4. Environmental Checklist and Analysis

Because the Project would construct new parking areas, SC-T-2 requires vehicular access and parking designs to comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, including vehicle and pedestrian access and pedestrian safety.

Compliance with SC-T-2 and SC-T-4 would reduce vehicle, pedestrian, and bicycle impacts during construction. Impacts would be less than significant and no further analysis is required.

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

**Less Than Significant Impact.** The Project would not alter the existing street, sidewalks, or pedestrian routes to school; would not create unsafe routes to schools for students walking from local neighborhoods; and would not bring more students to the Campus. The Campus would continue to house the existing school programs and continue to serve the local student population. Impacts to existing routes to school would be less than significant and no further analysis is required.

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

**Less Than Significant Impact.** The nearest freeway is the I-105 located about 1.5 miles south of the Campus. The nearest four-lane arterial roadway to the Project site is Alameda Street, about 0.3 mile feet to the east, classified as a Secondary Highway in the Los Angeles County Highway Plan.<sup>134,135</sup>

The Project would not change existing operations of the school. The Campus would continue to house existing school programs and would continue to serve the local student population. Student routes to school would not change. The Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant. No further analysis is required.

---

<sup>134</sup> Los Angeles County Department of Regional Planning. 2004, June 17. Los Angeles County Highway Plan. [http://planning.lacounty.gov/assets/upl/project/gp\\_maps-fig-4-5-large-hwy-plan-south.pdf](http://planning.lacounty.gov/assets/upl/project/gp_maps-fig-4-5-large-hwy-plan-south.pdf).

<sup>135</sup> The City of Los Angeles General Plan designates one arterial roadway closer to the school than Alameda Street: Wilmington Avenue, about 350 feet west of the school. See City of Los Angeles. 1999, September 8. Transportation Element of the General Plan. Map A5: Highways and Freeways, Metro Subarea. <http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/A5Mtro.gif>. However, Wilmington Avenue near the school is two lanes; and the discussion of major arterial roadways here is limited to roadways of four or more lanes.

## 4. Environmental Checklist and Analysis

	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 this 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)?**

**No Impact.** The Project would make physical changes to an existing Campus and would not induce population growth. New roads, expanded utility lines, and housing that could induce population growth would not be constructed or be required as part of the school modernization Project. No impacts related to population growth would occur and no further analysis is required.

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

**No Impact.** The Project would modernize an existing Campus and would not displace housing. No replacement housing would be required; therefore, no housing impacts would occur. No further analysis is required.



## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<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, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	<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 adopted SCs that apply uniformly to all projects proposed by the District. The applicable SCs related to public service impacts are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-PS-1	<p>If necessary, LAUSD shall:</p> <ol style="list-style-type: none"> <li>1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval.</li> <li>2. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.</li> </ol>

### 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 school. The LAFD fire station assigned to the school area is Station 65 at 1801 East Century Boulevard, about 0.4 mile southwest.<sup>136</sup> The second-nearest LAFD fire station to the school is Station 64 at 10811 South Main Street about 2.3 miles to the southwest.<sup>137</sup> The Project would not make any programmatic changes at the Campus and would not increase students at the school; therefore, it would not increase the need for fire protection services. LAUSD is required to coordinate with LAFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with SC-PS-1. Additionally, modernization of the school would not require construction of new or expanded fire stations. Impacts would be less than significant and no further analysis is required.

<sup>136</sup> City of Los Angeles Fire Department (LAFD). Find Your Station. Accessed November 5, 2018. <https://www.lafd.org/fire-stations/station-results>.

<sup>137</sup> City of Los Angeles Fire Department (LAFD). Find Your Station.

## 4. Environmental Checklist and Analysis

### b) Police protection?

**Less Than Significant Impact.** LAUSD's Los Angeles School Police Department (LASPD) is responsible for Campus safety and creating safe school passages for students, staff, and the school community.<sup>138</sup> The school is in Beat 603 of the LASPD's South Division. The South Division is operated from the Gardena High School campus at 1230 West 177th Street in the City of Gardena, located approximately 6.4 miles to the southwest of the Campus.<sup>139</sup> If required, LASPD would request assistance from the City of Los Angeles Police Department (LAPD). The Campus is in LAPD's Southeast Division, which is served by the Southeast Community Police Station at 145 West 108th Street Osborne Street approximately 2.2 miles to the southwest.<sup>140</sup> The Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and the entire Campus is currently fenced and would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. General Campus activities are under the supervision of the school administrators and staff. The Project would not increase student population or demand and would not result in new adverse impacts on existing police service. Impacts would be less than significant and no further analysis is required.

### c) Schools?

**No Impact.** The Project would make physical changes to the existing Campus to enhance existing school programs. The modernized Campus would not induce growth in the community, increase students or staff at the school, or otherwise increase demand for school services. The Project would not have an adverse physical impact on any existing schools and would have a beneficial impact on the 92nd Street ES by modernizing the Campus and incorporating seismic and accessibility improvements. No impacts to schools would occur and no further analysis is required.

### d) Parks?

**No Impact.** The Project would not have an adverse physical impact on any parks or necessitate the construction of new parks. The Project would not result in the need for construction of new recreational facilities. The Project would not induce growth in the community, increase students or staff at the school, or otherwise increase the use of or demand for parks. No impacts to parks would occur and no further analysis is required.

---

<sup>138</sup> Los Angeles School Police Department (LASPD). 2018, November 5. About LASPD. <http://achieve.lausd.net/Page/8851>.

<sup>139</sup> Los Angeles School Police Department (LASPD). 2015. Local District South with Los Angeles School Police Beats. [https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/596/Div%206%20South\\_Beats.pdf](https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/596/Div%206%20South_Beats.pdf).

<sup>140</sup> City of Los Angeles Open Data. 2018, November 5. Police Divisions. [http://geohub.lacity.org/datasets/031d488e158144d0b3aecaa9c888b7b3\\_0](http://geohub.lacity.org/datasets/031d488e158144d0b3aecaa9c888b7b3_0).



## 4. Environmental Checklist and Analysis

### e) Other public facilities?

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

## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. RECREATION.</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation:

There are no recreation LAUSD adopted SCs.

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

**No Impact.** The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities. The Project would not result in an increase in students or staff at the school and would not increase population in the surrounding community. The Project would not result in the need for construction of new recreational facilities. Therefore, it would not cause physical deterioration of neighborhood and regional parks or other recreational facilities. No impacts to existing parks would occur and no further analysis is required.

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

**No Impact.** The Project includes improvements to asphalt playgrounds. The environmental effects of the construction and operation is considered throughout the environmental analysis in this Initial Study. The Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. No impacts related to recreational facilities would occur and no further analysis is required.



## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based in part on the “Site Circulation Report: LAUSD Comprehensive Modernization Project, 92nd Street Elementary School”, prepared by LIN Consulting, Inc. dated October 11, 2018. A complete copy of this report is included as Appendix G to this Initial Study.<sup>141</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:

<b>LAUSD Standard Conditions of Approval</b>	
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains 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>
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>

<sup>141</sup> LIN Consulting, Inc. 2018, October 11. Site Circulation Report: LAUSD Comprehensive Modernization Project, 92nd Street Elementary School.

## 4. Environmental Checklist and Analysis

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

**Less Than Significant Impact.**

### **Existing Conditions**

#### *Roadways*

Existing roadways in the Project study area are described below:

- **92nd Street** is an east-west roadway north of the school and is classified as an Avenue II. The roadway consists of one travel lane and a Class II (striped) bicycle lane in each direction and a two-way median turn lane. The posted speed limit is 30 miles per hour (mph). A speed limit of 25 mph when children are present is posted westbound, but not eastbound.
- **95th Street** is an east-west roadway south of the school classified as a Local street. There is one travel lane in each direction.
- **Anzac Avenue** is a north-south roadway west of the school classified as a Local street. There is one travel lane in each direction within the vicinity of the Project.
- **Grape Street** is a north-south roadway east of the school classified as a Local street. There is one travel lane in each direction.

#### *Intersections*

Existing traffic controls at the four intersections next to the school are:

- **Anzac Avenue at 92nd Street:** signalized
- **Anzac Avenue at 95th Street:** 4-way stop
- **Grape Street at 92nd Street:** unsignalized T-intersection with stop control on the northbound movement
- **Grape Street at 95th Street:** 4-way stop

#### *Bicycle and Pedestrian Facilities*

There are Class II (striped) bicycle lanes on each side of 92nd Street. Sidewalks are present on each side of all four of the roadways surrounding the school. Yellow school crossing crosswalks are present at the all intersections; but crosswalk striping is missing for the south leg of the Anzac Avenue and 95th Street intersection.

#### *Public Transit*

Los Angeles County Metropolitan Transportation Authority (Metro) Line 254 operates on 92nd Street and Anzac Avenue next to the school. Line 254 extends north-south between East Los Angeles and Watts,



## 4. Environmental Checklist and Analysis

operating six days per week (Monday through Saturday) at approximately hourly frequencies.<sup>142</sup> Metro Line 612 operates on 92nd Street. Line 612 provides local service for Southeast Los Angeles, operating seven days per week at hourly frequencies.<sup>143</sup> There is one bus stop on the Campus perimeter, for Line 254 northbound at the northeast corner, and southbound at northwest corner of Anzac Avenue and 95th Street.<sup>144</sup>

### Operation

The Project would not result in an increase students or staff at the school and would not cause changes to the school's attendance boundaries. Therefore, it would not change the volume of traffic or the distribution of trips over roadways near the Campus.

Project operation would not change the operation or use of bicycle lanes on 92nd Street or any sidewalks or school crosswalks at roadways or intersections. Project operation would not block or remove, or otherwise interfere with the safety or performance of the circulation system. Project operation would not interfere with Metro bus services operating near the Campus. The Project would not, therefore, conflict with policies, plans, or programs regarding transit, bicycle, or pedestrian facilities, and the Project would not decrease the performance or safety of such facilities. No impacts would occur and no further analysis is required.

### Construction

Project construction is anticipated to start in Q3-2020 and is expected to take 4 years to complete; however because the Project would occur on an active Campus and has several components, the Campus would not be under construction the entire time. Construction work would be intermittent and conducted in stages during the 4 year period. To avoid classroom disruption, some work would be done during school breaks when students are off Campus.

Project construction would generate trips from the work crew, haul trips, and equipment and materials delivery. Consistent with the City of Los Angeles Municipal Code Section 41.40, construction activities would only occur during the hours of 7:00 AM to 9:00 PM during the weekdays and between 8:00 AM to 6:00 PM on Saturdays and national holidays.

Construction staging (i.e., storage of equipment and materials) would be contained on the Campus. Parking for workers is anticipated to be provided in the staging area while school is in session and Campus parking lots during school breaks. Construction trucks would not affect the existing school driveways or parking lots during school hours.

The maximum construction truck traffic would occur during haul of debris from demolition, and delivery and removal of portable buildings; an estimated total of 260 trips over the 4 year schedule. Construction worker traffic would occur during building construction and portable building removal: a maximum of approximately

---

<sup>142</sup> Los Angeles County Metropolitan Transportation Authority (Metro). 2018, November 5. Line 254 Schedule. [https://media.metro.net/riding\\_metro/bus\\_overview/images/254.pdf](https://media.metro.net/riding_metro/bus_overview/images/254.pdf).

<sup>143</sup> Los Angeles County Metropolitan Transportation Authority (Metro). 2018, November 5. Line 612 Schedule. <https://media.metro.net/documents/bb46adce-0f33-4a35-b438-e4b9b3b9a803.pdf>.

<sup>144</sup> LIN Consulting, Inc. 2018, October 11. Site Circulation Report: LAUSD Comprehensive Modernization Project, 92nd Street Elementary School.

## 4. Environmental Checklist and Analysis

54 per day each year during construction of the Project. Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and construction activities.<sup>145</sup>

Compared to the existing traffic generated (1,882 average daily trips<sup>146</sup>) at 92nd Street ES the number of worker trips would be negligible. Additionally, maximum truck trips would be for a short duration and would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with SC-T-4.

Based on the anticipated construction schedule, construction workers are expected to arrive at the school before 7:00 AM (before peak morning commute hours). Construction workers would not arrive at the construction site within the same hour, nor would they all leave the site at the same time. Importantly, construction worker trips and construction haul trips would not occur at the same time because workers would arrive before 7:00 AM and hauling cannot start until 7:00 AM and must avoid peak commute. Typical construction hours end after student dismissal times. Construction worker traffic would not significantly impact nearby roadways. Construction vehicles would cause only temporary and intermittent increases in traffic on area roadways, and would not contribute to a significant increase in traffic volumes. Construction traffic impacts would be less than significant.

Finally, Project construction traffic would not displace bus stops or impact public transit bus services on the surrounding roadways. The Construction Worksite Traffic Control Plan (per SC-T-4) would include measures to prevent traffic and pedestrian hazards between trucks entering and exiting the Campus. Impacts would be less than significant and no further analysis is required.

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

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

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

---

<sup>145</sup> Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.2.

<sup>146</sup> Based on the ITE Trip Generation Manual 9th Edition. Public school daily trip rates for elementary school at 1.89 daily trips per student x 996 students = 1,882 average daily trips.



## 4. Environmental Checklist and Analysis

The City of Los Angeles, along with other agencies, has an opt-in period until July 1, 2020, to adopt the guidelines and new VMT-based criteria. Currently the City continues to use its established LOS criteria.

Because the Project would not generate an increase in traffic or a change in traffic patterns, no impact would occur. The Project would not conflict or be inconsistent with the City of Los Angeles traffic analysis methodology. No impacts would occur and no further analysis is required.

### **c) Substantially increase 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.** Incompatible uses for a school would include agricultural operations where soil tilling and/or pesticide use creates air pollution, or a logistic distribution centers that have large tractors, semi-trailer trucks, and oversized equipment consistently traveling the local roadways that may create a hazard to cars or pedestrians. Circulation design that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. These typically consist of new roads or driveways on busy roadways with left or right turns that force cross-traffic and create conflicts between cars and people. The Project would not create new roads or dangerous driveway turning movements.

### **Construction**

During construction, equipment, trucks, and workers would drive to and from the staging area on Campus. Construction trips would be spread out throughout the workday and would not occur during nonpeak traffic periods in accordance with SC-T-4. Also, construction trips would not overlap with student drop-off and pick-up. In compliance with SC-T-4, LAUSD's construction contractor would prepare a Construction Worksite Traffic Control Plan prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction fencing would be used on Campus to separate construction zones from students and to ensure safety. The Project construction would not create new hazards or conflicts and impacts related to vehicular or pedestrian and bike safety would be less than significant. No further analysis is required.

### **Operational Impacts**

The Project would not increase students or staff at the school and would therefore not increase operational traffic on or around the Campus. The Project would not alter the use of the Campus, and no new incompatible uses would be introduced. Therefore, no operational impacts would occur and no further analysis is required.

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

**No Impact.** The Project would not result in inadequate emergency access. The access and circulation features at the Campus would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All access features are subject to and must satisfy Los Angeles Fire Department design requirements. No impacts would occur and no further analysis is required.

## 4. Environmental Checklist and Analysis

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

### XIX. TRIBAL CULTURAL RESOURCES.

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

Yes                       No

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

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

#### Explanation:

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

<b>LAUSD Standard Conditions of Approval</b>	
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>



## 4. Environmental Checklist and Analysis

	<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> <p>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.</p>
--	--

**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>147</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 project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. There are no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources on the Campus. No impacts would occur and no further analysis is required.

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

**Less Than Significant Impact.** One Native American Tribe, Gabrieleño Band of Mission Indians–Kizh Nation, has requested notification and consultation through the PRC Section 21080.3.1 process with LAUSD. LAUSD Office of Environmental Health and Safety staff and the Tribe completed consultation regarding this Project with two meetings in 2019. Consultation also covered several LAUSD projects, and the result of the

<sup>147</sup> California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

## 4. Environmental Checklist and Analysis

consultation, SC-TCR-1 and SC-TCR-2 to protect potential unanticipated discoveries associated with Tribal Cultural Resources was included in this Initial Study and would be incorporated into this Project. With implementation of the referenced SCs, impacts would be less than significant and no further analysis is required.

## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. 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:

<b>LAUSD Standard Conditions of Approval</b>	
SC-USS-1	<p><b>School Design Guide.</b> (Book Two General Criteria, Section 2.4. C.2.f.1) 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. 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.

## 4. Environmental Checklist and Analysis

<b>LAUSD Standard Conditions of Approval</b>	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

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

**No Impact.** The school is in the community of Watts in the City of Los Angeles. The Campus is completely developed, is currently using utilities, and is surrounded by development. The school modernization would serve existing and future students living in the region and would not increase the student population or utility demands. The Project would not require the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and no impact would occur. No further analysis is required.

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

**No Impact.** The school currently serves students living in the region, and school modernization would not increase the student population or long-term water demands in the Project region. Installation of landscape and irrigation improvements would comply with SC-USS-2 and SC-GHG-1, -2, and -3 for water conservation. No impact would occur and no further analysis is required.

- c) **Result in a determination by the waste water 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.** The school would continue to serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treatment required. The Project would not affect wastewater treatment capacity. No impact would occur and no further analysis is required.

- 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 Project would not increase the student population and thus would not increase solid waste generation.

Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) hazardous, or RCRA hazardous waste. The Project may require haul and disposal of contaminated soil and



## 4. Environmental Checklist and Analysis

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. The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon and Sunshine Canyon Landfills.

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 requirement of 75 percent. Construction of the Project would adhere to these established standards. Therefore, the Project improvements would not adversely impact landfills. Impacts would be less than significant and no further analysis is required.

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

**No Impact.** The District currently complies with or incorporates federal, state, and local statutes and regulations related to solid waste, and would continue this practice. Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This standard is also required under the CHPS criteria. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse requirement of 75 percent. Construction of the Project would adhere to these established standards. No impact would occur and no further analysis is required.

## 4. Environmental Checklist and Analysis

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

### Explanation:

There are no wildfire LAUSD adopted Standard Conditions of Approval.

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

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.<sup>148</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

<sup>148</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)



## 4. Environmental Checklist and Analysis

flammable vegetation in the urban area. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the City.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in a LRA. The nearest FHSZ in the SRA is a Very High about 12.5 miles east in Hacienda Hills between Whittier and Hacienda Heights. The nearest FHSZ in the LRA is 11.5 miles east in the lower elevations of the Hacienda Hills.<sup>149</sup> Land between the edge of the FHSZ and the Project site is dense urban development, along with the I-710 (Long Beach Freeway) and the Los Angeles River.

The Project site is not located in or near state responsibility areas or lands classified as high fire hazard severity zones.

### a) Substantially impair 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. 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.

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan, which was last updated in 2011. A comprehensive 2017 update to the plan is currently in draft form and has been submitted to the State of California Governor's Office of Emergency Services for review.<sup>150</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 proposed renovation and new construction would not interfere with any other existing emergency response plans or emergency evacuation plans. No emergency response impact would occur and no further analysis is required.

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

**No Impact.** The school campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site. Furthermore, the California Department of Forestry and Fire Prevention (CAL FIRE) does not classify the any adjacent areas as a Very High Fire Hazard Severity Zone. Project development would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

<sup>149</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. [http://www.fire.ca.gov/fire\\_prevention/fire\\_prevention\\_wildland\\_zones\\_maps](http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps)

<sup>150</sup> City of Los Angeles. 2017, August. About the Hazard Mitigation Plan. <http://emergency.lacity.org/about-hmp>

## 4. Environmental Checklist and Analysis

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

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

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

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

## 4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<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.** The Project would neither degrade the quality of the environment nor substantially impact any endangered plant, animals, or habitat. Because the Campus is fully developed and the surrounding area is highly urbanized and is not located within or adjacent to an ESA, the Project would not impact the habitat or population level of a fish, plant, animal community or reduce/restrict the range of a rare or endangered plant or animal. The Project would demolish three buildings, construct two buildings, and modernize other buildings on an existing Campus and would not change the character of the surrounding neighborhoods. Impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant. No further analysis is required.

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

**Less Than Significant Impact.** Based on the preceding analysis, with implementation of SCs and compliance with existing regulations, the Project would not result in significant adverse impacts that could contribute to a

## 4. Environmental Checklist and Analysis

cumulatively considerable impact. In consideration of the preceding analysis, the Project's contribution to cumulative impacts would be less than significant, and therefore, Project impacts would not be cumulatively considerable.

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

**Less Than Significant Impact.** As discussed in the above analyses, the Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. No further analysis is required.

## 4. Environmental Checklist and Analysis

*This page intentionally left blank.*

# 5. List of Preparers

---

## 5.1 LEAD AGENCY

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

**Alex Campbell**

Assistant CEQA Project Manager - Contract Professional

**Eimon Smith**

CEQA Project Manager - Contract Professional

**Gwenn Godek**

CEQA Advisor - Contract Professional

## 5.2 CEQA CONSULTANT

### **PlaceWorks**

Alice Houseworth, AICP, LEED AP, Senior Associate

Michael Milroy, Associate

Fernando Sotelo, PE, PTP, Senior Associate

John Vang, JD, Associate

Alyssa Way, Project Planner

Isabel Garcia, Project Planner

Cary Nakama, Graphic Artist

Gina Froelich, Senior Editor

Laura Muñoz, Document Specialist

Maria Heber, Clerical

*This page intentionally left blank.*

## Appendices

### **Appendices**

Appendices are on CD

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Campus Tree Evaluation
- C. Historic Resource Evaluation Report
- D. Geotechnical Investigation
- E. Phase I Environmental Site Assessment
- F. Noise and Vibration Background and Modeling Data
- G. Site Circulation Report



## Appendices

*This page intentionally left blank.*