

September 2020 | Initial Study/Mitigated Negative Declaration



TAFT CHARTER HIGH SCHOOL

Comprehensive Modernization Project

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Los Angeles Unified School District

Office of Environmental Health and Safety

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MITIGATED NEGATIVE DECLARATION

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

LEAD AGENCY: Los Angeles Unified School District

PROJECT TITLE: Taft Charter High School

PROJECT LOCATION: Taft Charter High School is located at 5461 Winnetka Avenue within the Woodland Hills neighborhood of Los Angeles, California, 91364. The school boundary includes two discontinuous parcels located on opposite sides of Winnetka Avenue totaling 32.4 acres. The larger 29.81-acre parcel to the west of Winnetka Avenue (Assessor Parcel Number [APN] 2166-042-902) includes the main campus of Taft Charter High School and the smaller 2.59-acre parcel to the east (APN 2166-034-900) includes a surface parking lot as well as two portable buildings for the Thoreau Continuation High School.

PROJECT DESCRIPTION: The Project is designed to address the most critical physical concerns of the buildings and grounds at the campus through building replacement, renovation, and modernization to provide facilities that are safe, secure, and better aligned with the current instructional program. The Project includes demolishing eight permanent buildings, removing existing portable buildings, constructing new permanent buildings that provide adequate learning spaces and support areas, upgrading and replacing aging utilities and infrastructure, improving existing athletic facilities, and providing new landscaping and hardscaping. The Project also includes limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act, seismic retrofit pursuant to California Assembly Bill 300, and low voltage upgrades to support current technology.

EXISTING CONDITIONS: The Campus is characterized by a sloping topography, that ranges from approximately 900 feet above mean sea level (msl) in the southeastern corner at the intersection of Santa Rita Street and Del Moreno Drive to approximately 835 feet msl at the intersection of Ventura Boulevard and Winnetka Avenue.

The Campus currently includes 22 permanent buildings and 15 portable/temporary buildings. The Campus exhibits a modified cluster plan, with the original Multi-Purpose Building (Building 1), classrooms (Buildings 6, 18, 19, and 20), and Administrative Building (Building 21) situated around landscaped courtyards in the eastern portion of the Campus. Additional buildings – some original and others later additions – are situated along the perimeter of the athletic fields at the western and northern areas of the Campus. The original, core campus buildings share common design elements that are representative of their Mid-Century Modern architecture.

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The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the students and employees of the Los Angeles Unified School District.

Los Angeles Unified School District

Office of Environmental Health and Safety

DOCUMENT AVAILABILITY: The MND and supporting Initial Study for Taft Charter High School are available for review at the following locations:

- Taft Charter High School website (<https://www.tafthigh.org/>)
- LAUSD Office of Environmental Health and Safety website (<http://achieve.lausd.net/ceqa>)
- California State Clearinghouse (<https://ceqanet.opr.ca.gov/>)

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from the Project and to evaluate the significance of those effects. Based on the environmental analysis, the 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
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

FINDINGS: It is hereby determined that, based on the information contained in the attached Initial Study, the Project with mitigation measures incorporated for geology and soils and hazards and hazardous materials would not have a significant adverse



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- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Draft Arborist Report
- C. Historic Resource Evaluation Report
- D. Historic Resources Technical Report
- E. Geologic and Environmental Hazards Assessment
- F. Phase I Environmental Site Assessment
- G. Site Circulation Report
- H. Preliminary Environmental Assessment Equivalent Report

1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD) is proposing a comprehensive modernization of William Howard Taft Charter High School (Taft Charter High School or Campus), located at 5461 Winnetka Avenue within the Woodland Hills neighborhood of Los Angeles, California, 91364. The proposed Comprehensive Modernization Project (Project) is intended to address the most critical physical needs of the buildings and grounds at the Campus through a range of building replacements, renovations, and modernizations. Pursuant to the requirements of the California Environmental Quality Act (CEQA), this Initial Study (IS) 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 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 LAUSD's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.¹

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

On December 13, 2016, the BOE approved the project definition for the Project at Taft Charter High School to provide facilities that are safe, secure, and better aligned with the current instructional program at the Campus.³

¹ LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.

² LAUSD. Board of Education Report. LAUSD Regular Meeting Stamped Order of Business. Report. 15/16 ed. Vol. 159. Los Angeles, CA: LAUSD, 2015.

³ LAUSD. Board of Education Report. Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Projects. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.



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On September 18, 2019, a Board Informative was issued to further refine the scope, budgets, and schedules of the 17 comprehensive modernization projects that were not yet in construction, including the Project at Taft Charter High School.⁴

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA⁵ and the CEQA Guidelines.⁶ CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: State, regional, and local agencies, boards, commissions, and special districts (e.g., school districts and water districts).

LAUSD is the Lead Agency for the Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the 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 IS is required to determine whether there is a fair argument that construction and operation of the Project would result in potentially significant environmental impacts.⁷

When an IS identifies the potential for significant environmental impacts, either individually or cumulatively, the Lead Agency must prepare an EIR;⁸ however, if all impacts are found to be less than significant or can be mitigated to a less than significant level, the lead agency can prepare a Negative Declaration (ND) or Mitigated Negative Declaration (MND) that incorporates mitigation measures into the project.⁹

1.4 ENVIRONMENTAL PROCESS

A "project" is defined as 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.

⁴ LAUSD. Board of Education Informative. Important Updates Regarding the Facilities Managed Bond Program. Los Angeles, CA: LAUSD, September 2018.

⁵ California PRC, Section 21000 et seq.

⁶ CCR, Title 14, Division 6, Chapter 3, Section 15000 et seq.

⁷ CCR, Title 14, Division 6, Chapter 3, Section 15063.

⁸ CCR, Title 14, Division 6, Chapter 3, Section 15064.

⁹ CCR, Title 14, Division 6, Chapter 3, Section 15070.



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- 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] Section 15378[a])

The Taft Charter High School Comprehensive Modernization Project proposed by LAUSD constitutes a “project” because the activities comprising the Project 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 IS was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the Project could have a potentially significant impact on the environment, either individually or cumulatively. The purposes of this IS, as described in 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 an ND/MND; 2) enable the Lead Agency to modify the Project, mitigating adverse impacts before an EIR is prepared, thereby enabling the Project to qualify for an ND/MND; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of the Project; 5) provide documentation of the factual basis for the finding in an ND/MND that the 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 IS have determined that an MND is the appropriate level of environmental documentation for this Project.

1.4.2 Mitigated Negative Declaration

This IS/MND includes information and analysis necessary for agencies to meet their statutory responsibilities related to the Project. State and local agencies will use this IS/MND when considering any permit or other approvals necessary to implement the Project. A preliminary list of the environmental resource areas that have been identified for study in the IS/MND is provided in the LAUSD CEQA 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 LAUSD. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. Additionally, LAUSD is required to consider comments from the scoping process in the preparation of the Draft IS/MND and to respond to public comments in the Final IS/MND.



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1.4.3 Tiering

Comprehensive modernization projects were one of many types of projects that were analyzed in the SUP Program EIR that was certified by the BOE on November 10, 2015.¹⁰ The 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.”

The SUP Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies. The SUP 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 NDs on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or ND/MND solely on the issues specific to the later project.¹¹

The SUP Program EIR is applicable to all projects implemented under the SUP. The SUP Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by LAUSD. 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:

- 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

Comprehensive modernization projects are 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 potential environmental impacts related to Type 2 and Type 3 projects, and the appropriate design standards and mitigation measures to incorporate, are provided in the SUP Program EIR.

The Project is considered a site-specific project under the SUP Program EIR; therefore, this IS/MND is tiered from the SUP Program EIR. The SUP Program EIR is available for review online at:

¹⁰ LAUSD. 2015. SUP Program EIR. <http://achieve.lausd.net/ceqa>.

¹¹ CCR, Title 14, Division 6, Chapter 3, Section 15152(a).



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<http://achieve.lausd.net/ceqa> and at LAUSD's Office of Environmental Health and Safety (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The Project, along with all other SUP-related projects, is required to be consistent with specific design standards and sustainable building practices. Such standards and practices assist in reducing environmental impacts, such as the California Green Building Code (CALGreen),¹² Collaborative for High-Performance Schools (CHPS) criteria,¹³ and LAUSD's Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs).

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a Statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce greenhouse gas (GHG) emissions 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.

Collaborative for High-Performance Schools. The 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 Project would be consistent with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the Project, including on-site treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project Design Features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation

¹² California Green Building Standards Code, Title 24, Part 11.

¹³ The BOE'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 comprehensive modernization project in LAUSD, from the beginning of the design process, incorporate CHPS criteria to the extent possible.



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measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. SCs are environmental standards that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts, such as the involvement of a Historic Architect (SC-CUL-1) or the preparation of a Biological Resources Report (SC-BIO-1). 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 BOE 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 SUP Program EIR, which was certified by the BOE on November 10, 2015 (Board Report No. 159-15/16). The SCs were recently updated in order to incorporate and reflect recent changes in the laws, regulations and the LAUSD's standard policies, practices, and specifications (i.e., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the SCs). These updated SCs were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19).

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still potential 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.

The specific CHPS prerequisite criteria and SCs are identified in the tables under each environmental resource area pursuant to CEQA.¹⁴ 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.

¹⁴ CHPS criteria are summarized herein; the full requirement can be found at <http://www.chps.net/dev/Drupal/California>.



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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 environmental resource area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY

The content and format of this IS are designed to meet the requirements of CEQA and the CEQA Guidelines. The conclusions in this IS are that the Project would have no significant impacts with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the IS/MND as well as the terminology used.

Chapter 2, *Environmental Setting* describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the Project site (i.e., Taft Charter High School) and surrounding area.

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

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

Chapter 5, *List of Preparers* identifies the individuals who prepared this IS/MND – including supporting technical studies – and their areas of technical expertise.



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Appendices have data supporting the analysis or contents of this CEQA-compliant IS/MND.

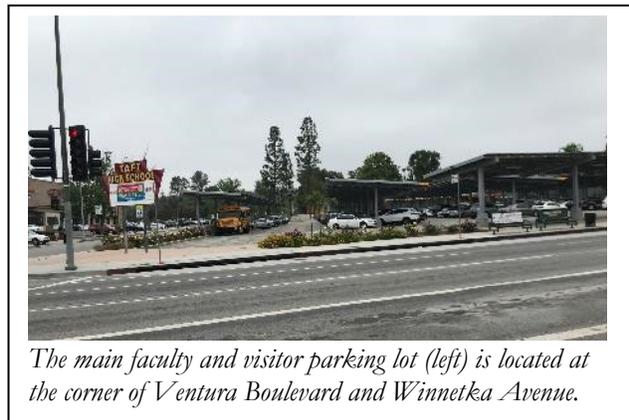
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- C. Historic Resources Evaluation Report
- D. Historic Resources Technical Report
- E. Geologic and Environmental Hazards Assessment
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- G. Site Circulation Report
- H. Preliminary Environmental Assessment Equivalent Report

2. Environmental Setting

2.1 PROJECT LOCATION

Taft Charter High School is located at 5461 Winnetka Avenue within the Woodland Hills neighborhood of Los Angeles, California, 91364. The school boundary includes two discontinuous parcels located on opposite sides of Winnetka Avenue totaling 32.4 acres. The larger 29.81-acre parcel to the west of Winnetka Avenue (Assessor Parcel Number [APN] 2166-042-902) includes the main campus of Taft Charter High School (Campus) and the smaller 2.59-acre parcel to the east (APN 2166-034-900)¹⁵ includes a surface parking lot as well as two portable buildings for the Thoreau Continuation High School (see Figure 1, *Regional Location* and Figure 2, *Project Site*).

Regional access to the Campus is provided by the Ventura Freeway (U.S. Highway 101) located approximately 600 feet to the north and Winnetka Avenue, which borders the Campus. Local access is provided by Ventura Boulevard to the north, which is a six-lane arterial roadway, as well as Santa Rita Street to the south, Winnetka Avenue to the east, and Del Moreno Drive to the west. The main faculty and visitor parking lot is accessible from both Ventura Boulevard and Winnetka Avenue. Additional faculty parking is accessible via two gated entrances on Santa Rita Street. The primary entrance to the Campus is provided from Winnetka Avenue (see Figure 3, *Existing Site Plan*).



The main faculty and visitor parking lot (left) is located at the corner of Ventura Boulevard and Winnetka Avenue.

There are seven bus stops located in close in close proximity to the Campus including: two at the intersection of Ventura Boulevard and Del Moreno serving eastbound and westbound LA Metro Line 150 and five at the intersection of Ventura Boulevard and Winnetka Avenue serving eastbound and westbound Los Angeles County Metropolitan Authority (Metro) Line 150, Metro Line 242, Metro Line 750 as well as westbound Antelope Valley Transit Authority (AVTA) Line 787 (see Figure 2).

2.2 SURROUNDING LAND USES

In general, the community that surrounds the Campus is an urban mix of commercial and residential development, mostly comprised of single-family homes, particularly along the southern and western boundaries. Land uses at the properties bordering the Campus generally consist of commercial and office uses as well as single family residences (see Figure 2, *Project Site*).

¹⁵ This discontinuous parcel is included in the Campus boundary but is not programmed for construction or other ground disturbing activities as a part of the Project. However, for the purposes of this CEQA analysis, it is assumed that this lot may potentially be used for construction-related parking or staging during construction of the Project.



2. Environmental Setting

- **North:** Ventura Boulevard; row of commercial properties including a former gas station, two hotels and a medical plaza; and Ventura Freeway.
- **East:** Winnetka Avenue; commercial mall located at the southeast corner of Ventura Boulevard and Winnetka Avenue anchored by a Ralph's grocery store; and Thoreau Continuation High School located at the northeast corner of Winnetka Avenue and Santa Rita Street.
- **South:** Santa Rita Road; and single-family residential properties.
- **West:** Del Moreno Drive; two separate multi-story office buildings over parking lot located at the southeast corner of Ventura Boulevard and Del Moreno Drive; and single-family residential properties.

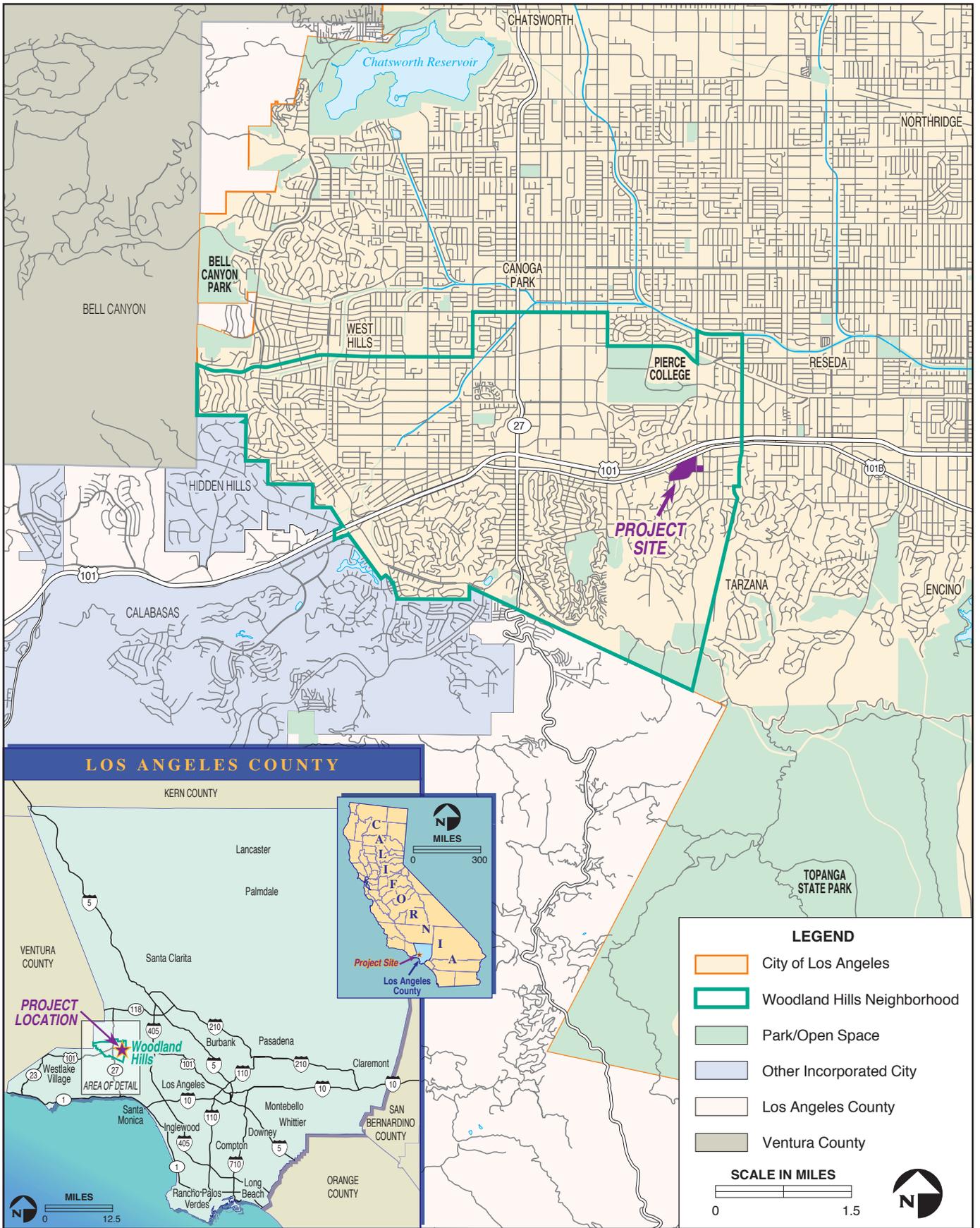


The Campus is bordered by commercial properties to the north and east, including the adjacent Winnetka Square shopping center (left), which includes restaurants and commercial retail businesses. The Campus is otherwise bordered by single-family residential neighborhoods to the south and east (right).

2.3 CAMPUS HISTORY

The Campus and surrounding areas were primarily undeveloped or in agricultural use prior to the construction of Taft Charter High School (originally Taft High School) in the late 1950s. As with all of the San Fernando Valley and greater Los Angeles area, the Woodland Hills neighborhood experienced substantial growth in the years after World War II. In the area immediately surrounding the Campus, between 1953 and 1961, the neighborhood's population increased fivefold, from 1,500 to over 7,500, resulting in a pressing demand for new infrastructure and services.¹⁶ Initial construction of Taft Charter High School began in 1958 and the Campus was opened in 1960. The original facilities included the Multi-Purpose Building (Building 1), Gymnasium (Building 2), four classrooms (Buildings 6, 18, 19, and 20), two Industrial Arts Buildings (Buildings 9 and 10), Administrative Building (Building 21), and Agricultural Building (Building 24) as well as a lunch pavilion, running track and football field, and an outdoor stage and assembly area. Near the southcentral edge of the Campus, three additional classroom buildings (Buildings 3, 4, and 5) were constructed between 1964 and 1967. Today, the southwestern area of the Campus is occupied by portable/temporary buildings, including a restroom (Building 28) and five classrooms (Buildings 29, 30, 31, 32, and 33) that were added to the Campus between 1980 and 1989 as well as five modular buildings (Buildings 34, 35, 36, 37, and 38) that were also added to the southwestern edge of the Campus in 2001.¹⁸ Until recently, these portable and modular buildings were occupied by Ivy Academia Charter School (see Figure 2, *Project Site*).

¹⁶ LAUSD. 2018. Historic Resources Evaluation Report for Taft High School.







2. Environmental Setting

No other significant construction episodes have occurred at the Campus; however, following the 1994 Northridge earthquake, several buildings required minor repair work, which entailed repairing cracks and spalling in walls and ceilings, and replacing damaged ceiling tiles. This type of work was performed on various classrooms (Buildings 3, 6, 18, 19, and 20) as well as the Multi-Purpose Building (Building 1), Gymnasium (Building 2), Industrial Arts Building #1 (Building 9), Industrial Arts Building #2 (Building 10), Administrative Building (Building 21), and Agricultural Building (Building 24).

Because the Campus is more than 50 years old, a Historic Resources Evaluation Report was prepared for Taft Charter High School. This evaluation concluded that the Campus meets the requirements described in the LAUSD Historic Context Statement, 1869-1970 and appears to be eligible for the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and local designation as a historic district under Criteria C/3/3. The campus represents an outstanding example of LAUSD post-war principles of design and campus planning, through its Mid-Century Modern architectural design and its unified, cluster-plan site plan. The evaluation identifies the period of significance for this association is 1960, corresponding with the Campus' original construction.

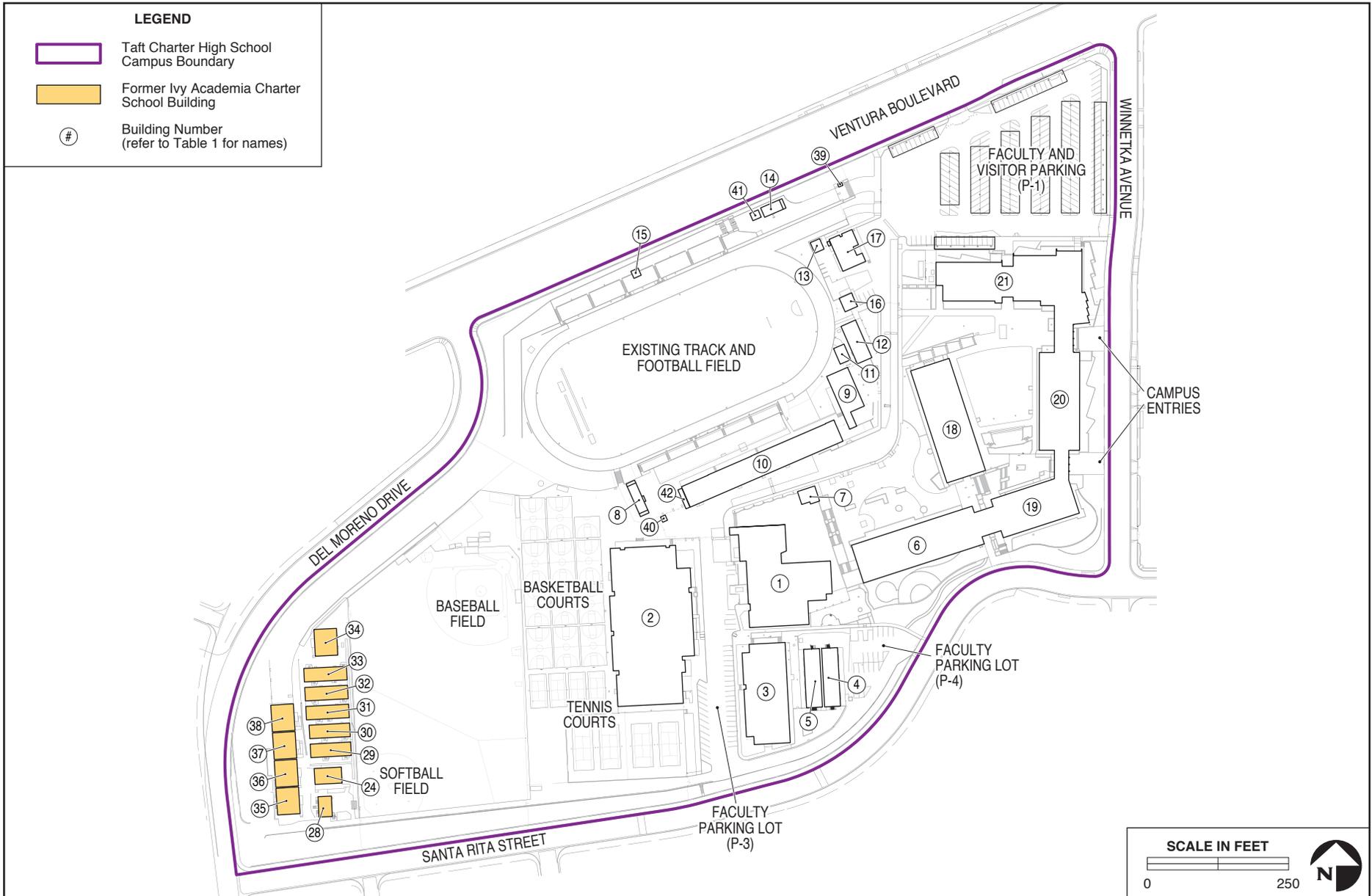


The Campus includes a historic district comprised of seven buildings, the lunch pavilion, and landscaping. Classroom Building A (Building 20; pictured above) is a two-story building with distinctive mid-century modern design elements, including horizontal design composition, lack of ornamentation, smooth wall surface, and bands of flush aluminum-framed windows.

2.4 EXISTING CONDITIONS

The Project site is characterized by a sloping topography, that ranges from approximately 900 feet above mean sea level (msl) in the southeastern corner at the intersection of Santa Rita Street and Del Moreno Drive to approximately 835 feet msl at the intersection of Ventura Boulevard and Winnetka Avenue (refer to Figure 2).

The Campus currently includes 22 permanent buildings and 15 portable/temporary buildings (see Table 2-1 and Figure 3).





2. Environmental Setting

**Table 2-1
Existing Buildings at Taft Charter High School**

Building No.	Building Name	Year Built	Building Type	Square Footage	Number of Stories
1	Multi-Purpose Building	1960	Permanent	21,221	2
2	Gymnasium Building	1960	Permanent	38,068	2
3	Classroom Building G	1967	Permanent	27,002	2
4	Classroom Building F	1964	Permanent	6,992	2
5	Classroom Building E	1964	Permanent	7,096	2
6	Classroom Building C	1960	Permanent	34,755	2
7	Student Store Building	1960	Permanent	823	1
8	Sanitary Building #1	1960	Permanent	839	1
9	Industrial Arts #2	1960	Permanent	4,381	2
10	Industrial Arts #1 (Building H)	1960	Permanent	14,840	2
11	Athletic Equipment Storage Unit	1966	Permanent	383	1
12	Audio Visual Building	1960	Permanent	2,015	1
13	Storage Unit #1	1965	Permanent	381	1
14	Sanitary Building #2	1960	Permanent	589	1
15	Announcer's Booth	1964	Permanent	99	1
16	Storage Unit #2	1960	Permanent	624	1
17	Utility Building	1960	Permanent	2,731	1
18	Classroom Building D	1960	Permanent	35,754	2
19	Classroom Building B	1960	Permanent	22,371	2
20	Classroom Building A	1960	Permanent	25,399	2
21	Administrative Building (Building A)	1960	Permanent	23,178	1
24	Agriculture Building	1960	Permanent	1,297	1
28	Sanitary Relocatable Unit	Post-1981	Portable	895	1
29	Two/Three Unit Relocatable	Post-1981	Portable	1,762	1
30	Two/Three Unit Relocatable	Post-1981	Portable	1,844	1
31	Two/Three Unit Relocatable	Post-1981	Portable	1,749	1
32	Two/Three Unit Relocatable	Post-1981	Portable	1,719	1
33	Two/Three Unit Relocatable	Post-1981	Portable	1,707	1
34	Double Unit Modular	2001	Portable	1,920	1
35	Double Unit Modular	2001	Portable	1,920	1
36	Double Unit Modular	2001	Portable	1,920	1
37	Double Unit Modular	2001	Portable	1,920	1
38	Double Unit Modular	2001	Portable	1,920	1



2. Environmental Setting

**Table 2-1
Existing Buildings at Taft Charter High School**

Building No.	Building Name	Year Built	Building Type	Square Footage	Number of Stories
39	Ticket Booth #1	N/A	Portable	90	1
40	Ticket Booth #2	N/A	Portable	90	1
41	Concessions #1	N/A	Portable	224	1
42	Concessions #2	N/A	Portable	296	1
-	Lunch Pavilion	1960	Permanent	14,341	0

The Campus exhibits a modified cluster plan, with the original Multi-Purpose Building (Building 1), classrooms (Buildings 6, 18, 19, and 20), and Administrative Building (Building 21) situated around landscaped courtyards in the eastern portion of the Campus. Additional buildings – some original and others later additions – are situated along the perimeter of the athletic fields at the western and northern areas of the Campus. The original, core campus buildings share common design elements that are representative of their Mid-Century Modern architecture.¹⁸



The original Multi-Purpose Building (left), classrooms, and Administrative Building (right) are situated around landscaped courtyards. The Project site contains buildings primarily constructed in the 1960s representative of Mid-Century Modern architecture.

2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan Land Use designation for the school property is “Public Facilities.”¹⁷ The land use element of the General Plan is comprised of 35 community plans that together guide the future development of the City of Los Angeles. The school Campus is within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan Area.¹⁸

¹⁷ City of Los Angeles. 2019. Zoning. <http://zimas.lacity.org/>.

¹⁸ City of Los Angeles. 2019. General Community Plans. <http://cityplanning.lacity.org/>.



2. Environmental Setting

Existing zoning for the school property is PF-1XL. PF (Public Facilities) is the designation for the use and development of publicly owned land, including public elementary and secondary schools; '1' is Height District No. 1; and 'XL' is Extra Low Height District where buildings or structures shall neither exceed two stories nor exceed 30 feet in height.¹⁹

The California Legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. Following a two-thirds vote of the BOE, a school site can be exempted from such local zoning requirements. Within 10 days of the action, the BOE must provide the City of Los Angeles with notice of this action. As lead agency for the Project, LAUSD has complied with Government Code Section 53094 and rendered the local City of Los Angeles Zoning Ordinance inapplicable to the Project.²⁰

2.6 NECESSARY APPROVALS

It is anticipated that approval required for the 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 Section 15381). The Responsible Agencies, and their corresponding approvals, for this Project include the following:

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.

Trustee Agencies

"Trustee Agencies" include those agencies that do not have discretionary powers, but that may review the MND for adequacy and accuracy. Potential Reviewing Agencies for this Project include the following:

State

- California Office of Historic Preservation
- California Department of Transportation
- Native American Heritage Commission
- California Department of Toxic Substances Control
- California Highway Patrol

Regional

- Los Angeles Regional Water Quality Control Board
- Metropolitan Transportation Authority
- South Coast Air Quality Management District
- Southern California Association of Governments

¹⁹ City of Los Angeles. 2019. Generalized Summary of Zoning Regulations
https://planning.lacity.org/zone_code/Appendices/sum_of_zone.pdf.

²⁰ LAUSD OEHS. Charter School Zoning Exemption Policy. <https://achieve.lausd.net/Page/1831>.



2. Environmental Setting

Local

- City of Los Angeles, Police Department
- City of Los Angeles, Department of Planning
- City of Los Angeles, Fire Department
- City of Los Angeles, Department of Water and Power
- Los Angeles Department of Transportation
- City of Los Angeles, Department of Building & Safety
- City of Los Angeles, Department of Recreation and Parks
- City of Los Angeles, Department of Environmental Affairs

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

Two Native American Tribes, the Fernandeno Tataviam Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation have requested notification or consultation pursuant to Assembly Bill (AB) 52 through the PRC Section 21080.3.1 process.

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the areas that could be affected by LAUSD’s projects (including the proposed comprehensive modernization at Taft Charter High School) through a letter dated January 8, 2019. The Fernandeno Tataviam Band of Mission Indians and Gabrieleno Band of Mission Indians – Kizh Nation requested consultation regarding this Project. Consultation with Tribal representatives was completed on April 2, 2019 (Fernandeno Tataviam Band of Mission Indians) and March 21, 2019 and May 21, 2019 (Gabrieleno Band of Mission Indians – Kizh Nation). As a result of the consultation, LAUSD confirmed that its existing Standard Conditions (SCs) which include SC-TCR-1 and SC-TCR-2, are consistent with the recommendations and information provided by the Tribes and determined that implementation of SC-TCR-1 and SC-TCR-2 would ensure there would be no potential tribal cultural resources (TCRs) impacted.

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 (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.

3. Project Description

3.1 BACKGROUND

As part of the SUP,²¹ LAUSD proposes to implement a comprehensive modernization project at Taft Charter High School (Project) in the Woodland Hills neighborhood of Los Angeles, California. A campus-wide survey of Taft Charter High School found existing structures and mechanical systems to be outdated, requiring upgrades, replacement, or modernization to meet current needs.

The purpose of the Project is to provide facilities that are safe, secure, and aligned with the instructional program at Taft Charter High School. The Project is designed to address the most critical physical concerns of the buildings and grounds at the Campus while providing renovations and modernizations that are consistent with the Comprehensive Modernization Project Definitions.²²

3.2 PROPOSED PROJECT

The Project components include: 1) demolition; 2) new construction; and 3) modernization ranging from minor interior/exterior improvements to major seismic retrofits pursuant to AB 300. The Project also involves various campus-wide improvements such as utilities upgrades,²³ stormwater improvements, and hardscape/landscape improvements to be consistent with federal, State, and local facilities requirements.

3.2.1 Campus Buildings

Currently, the Campus has approximately 315,863 square feet of building floor space. Following implementation of the Project, the Campus would have an estimated 289,693 square feet, constituting a minor decrease of approximately 26,170 square feet in total building floor space. The planned decrease in building floor space is subject to change as the design of the Project is refined, but the net change would remain minimal. The proposed comprehensive modernization would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-



Various buildings adjacent to the existing football field would be removed to accommodate expansion of the field, including Industrial Arts #2 (Building 9; pictured above).

²¹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ccqa>. Adopted by the Board of Education on November 10, 2015.

²² LAUSD. 2016. Board of Education Report. Report No. 246-15/16. Los Angeles, CA.

²³ LAUSD filed a Notice of Exemption for plumbing repairs and path of travel upgrades that would occur throughout the Campus on January 2, 2018. These necessary upgrades would improve/replace plumbing up to within 5 feet of the existing buildings and would occur prior to the start of the Project components described in this IS which would complete upgrades on the interior of the buildings. While these two Projects are not anticipated to overlap, the evaluation in this IS conservatively considers any potential cumulative impacts associated with any unanticipated overlap between the Project schedules.



3. Project Description

related events, or community use are planned as a component of the Project, although construction may temporarily offset the locations available for certain uses.

The proposed comprehensive modernization would include the changes to the Campus buildings summarized in Table 3-1 and depicted in Figure 4.

**Table 3-1
Project Components
(Demolition, New Construction, and Remodel/Modernization)**

Bldg. No.	CAFM No.	Building Name	Demolition	New Construction	Major Remodel/Modernization	Existing to Remain
1	21405	Multi-Purpose Building			21,461 sf	
2	20468	Gymnasium Building				39,452 sf
3	22299	Classroom Building G				27,063 sf
4	21590	Classroom Building F				7,429 sf
5	21588	Classroom Building E				7,445 sf
6	22595	Classroom Building C				34,523 sf
7	21299	Student Store Building				824 sf
8	20417	Sanitary Building #1				840 sf
9	21943	Industrial Arts #2	7,298 sf			
10	20726	Industrial Arts #1 (Building H)			18,330 sf	
11	38539	Athletic Equipment Storage Unit	383 sf			
12	37504	Audio Visual Building	2,949 sf			
13	22551	Storage Unit #1	381 sf			
14	25767	Sanitary Building #2	557 sf			
15	20393	Announcer's Booth				120 sf
16	23012	Storage Unit #2	624 sf			
17	22000	Utility Building (M&O Building)				2,717 sf
18	20638	Classroom Building D				35,363 sf
19	20727	Classroom Building B				23,673 sf
20	22320	Classroom Building A				24,442 sf
21	28982	Administrative Building (Building A)			23,795 sf	
24, 28-38	see notes below †	12 Buildings: Former Ivy Academia Charter School	20,574 sf			
39	38538	Ticket Booth #1	90 sf			
40	38542	Ticket Booth #2				90 sf



3. Project Description

**Table 3-1
Project Components
(Demolition, New Construction, and Remodel/Modernization)**

Bldg. No.	CAFM No.	Building Name	Demolition	New Construction	Major Remodel/Modernization	Existing to Remain
41	38537	Concessions #1	224 sf			
42	38543	Concessions #2				296 sf
-	36403	Lunch Pavilion				14,730 sf
-	58110	Food Service Enclosure				190 sf
-	-	Administration Addition		4,100 sf		
-	-	Building X		1,982 sf		
-	-	Building Y		1,668 sf		
-	-	Electrical Service Yard		N/A		
Campus Total* Does not include outdoor space (e.g., landscape/hardscape)			Up to 33,142 sf	7,750 sf	63,586 sf	219,197 sf

Note: All areas are provided in square feet (sf). All new areas are approximate and subject to change during final site and architectural planning and design phases. These changes would not significantly change the environmental analysis or findings in this IS.

* Square footages may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Taft Charter High School Comprehensive Modernization Project – Space Program. August 15, 2018.

Current total square footage = Existing + Remodel + Demolition (315,863 sf). After project square footage = Existing + Remodel + New (289,693 square feet). The net difference in campus square footage = -26,170 sf.

† The former Ivy Academia Charter School – which relocated in 2019 – occupied the following portables: Building 24 (CAFM No. 20558), Building 28 (CAFM No. 21252), Building 29 (CAFM No. 23034), Building 30 (CAFM No. 21490), Building 31 (CAFM No. 20786), Building 32 (CAFM No. 21990), Building 33 (CAFM No. 21265), Building 34 (CAFM No. 28836), Building 35 (CAFM No. 28837), Building 36 (CAFM No. 28838), Building 37 (CAFM No. 28839), and Building 38 (28840).

Demolition

The proposed comprehensive modernization would include demolition and removal of 8 permanent buildings as well as the 12 buildings/portables containing classrooms and support spaces for Ivy Academia Charter School, which was recently relocated from Taft Charter High School to an off-site location (see Figure 4, *Project Site Plan*). The demolition and removal of existing buildings/portables would be required to facilitate the expanded track and field as well as the new softball field. The following buildings would be demolished or removed:

- Industrial Arts Building #2 (Building 9)
- Athletic Equipment Storage Unit (Building 11)
- Audio Visual Building (Building 12)
- Storage Unit #1 (Building 13)

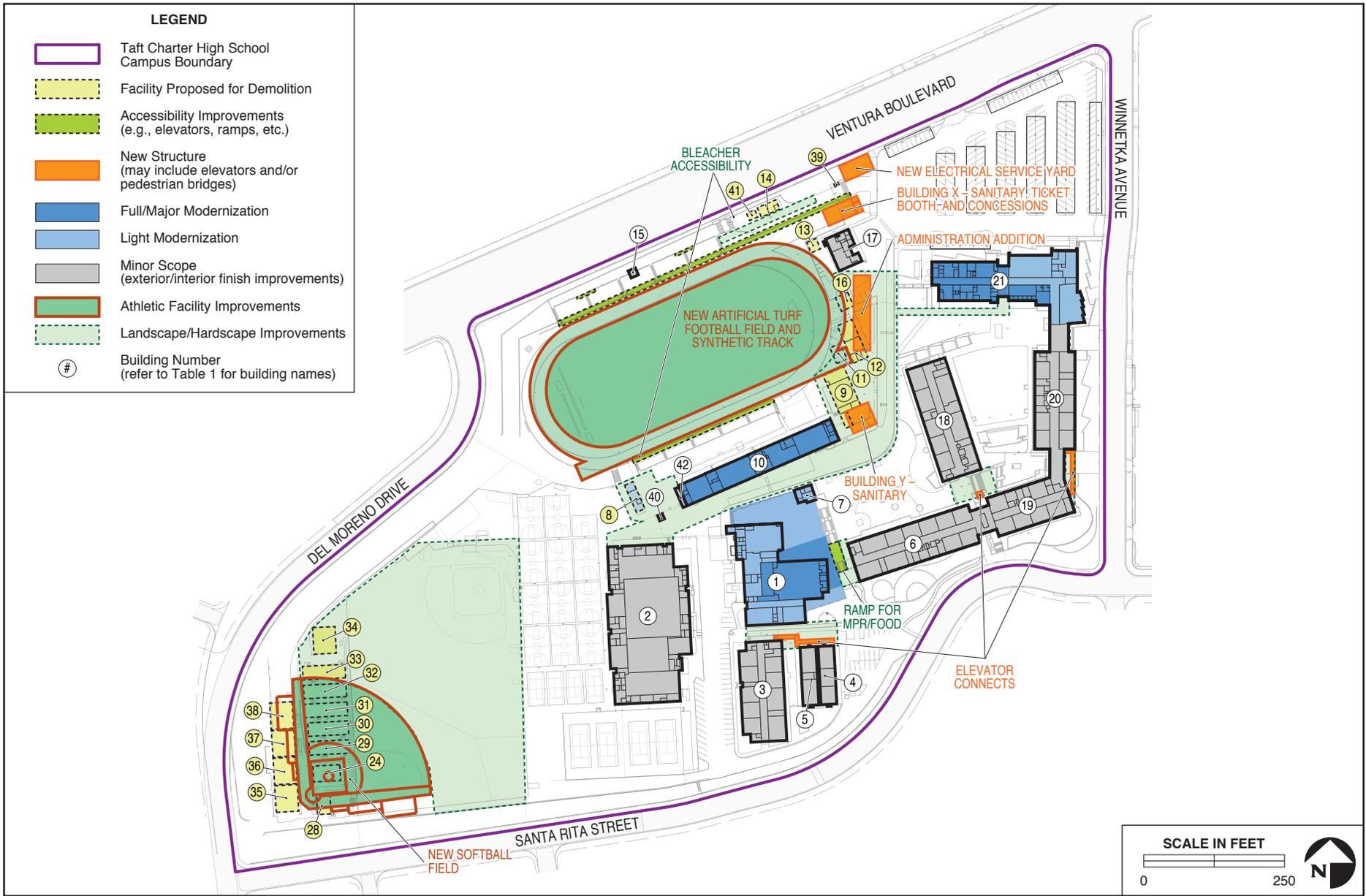


3. Project Description

- Sanitary Building #2 (Building 14)
- Storage Unit #2 (Building 16)
- Ticket Booth #1 (Building 39)
- Concessions #1 (Building 41)
- Ivy Academia Charter School Buildings (Building 24 and Buildings 28-38)
- Existing transformer and various Campus-wide underground utilities proposed for upgrades (see Infrastructure Upgrades in the following discussion)

Due to the demolition of these buildings and the rearrangement of the existing facilities layout, a number of uses are anticipated for relocation to other buildings on Campus, primarily to Industrial Arts #1 and the proposed Administrative Addition, including the following:

- The Locker Room, Weight Room, and Team Room as well as Maintenance & Operations Storage (currently in Building 9).
- Athletic Storage (currently in Building 11).
- Book Storage and College Prep (currently in Building 10).
- The Computer Lab (currently in Building 10).
- The Parent Center (currently in Building 16).
- Some relocation of other existing use from Administrative Building (Building 1) may also be necessary.





3. Project Description

New Construction

New construction at Taft Charter High School would include replacement of the existing restrooms, ticket booth, concessions, and other buildings/facilities that would be demolished in support of the expanded track and field as well as the new softball field (refer to Figure 4, *Project Site Plan*). Additionally, new construction would include a 4,100 square foot Administrative Addition, new electrical services yard, and improvements to the maintenance and operation yard (see Figure 4, *Project Site Plan*).

Buildings

- Building X would be constructed immediately adjacent to the northeast of the expanded track and field.
- Building Y would be constructed generally within the footprint of the demolished Industrial Arts #2 (Building 9).
- A 4,100-square-foot Administrative Addition would be constructed adjacent east of the expanded track and field, generally within the footprint of the demolished Audio Visual Building (Building 12) and Storage Unit #2 (Building 16).
- The existing Electrical Service Yard would be relocated from the center of the Campus to a location that is near the expanded track and field and adjacent to Ventura Boulevard.
- A Screen Wall around the Maintenance and Operations Storage Area would provide a visual shield around this existing building and provide outdoor space for these facilities.

Athletic Facilities

- The proposed improvements to the track and field would include:
 - Expansion of the track in accordance with National Federation of High Schools (NFHS) and LAUSD standards. Approximately 3.78 acres of grading would be required to support the proposed expansion.
 - Installation of synthetic track material to include “D” zones for field events per LAUSD standards.
 - Installation of all new synthetic turf for football and soccer varsity athletics.
 - Identifiable striping for soccer and football, including the Taft Charter High School logo at the 50-yard line and End Zones “Toreadors”.
 - Installation of new football goal posts.
 - Installation of a new electronic score board with field and announcer booth connections.



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- The proposed softball field would be developed within the footprint of the former Ivy Academia Charter School, which was recently relocated from Taft Charter High School to an off-site location. Improvements would include:
 - Grading, irrigation, natural turf with a skinned (i.e., dirt) infield and fencing in accordance with LAUSD standards. Approximately 3.94 acres of grading would be required to support the proposed expansion of the softball field.
 - The outfield (maximum 220 linear feet from home plate to the fence line) would be approximately 20 feet minimum clear of the existing outfield fencing of the baseball field; this would eliminate existing issues related to softballs landing in the baseball field.
 - Consistent with LAUSD Standard 451, the softball field would include a custom backstop, full fence lines, full dugouts, batting cage, warm-up, drinking fountains, score board, etc.

Modernization and Renovations

All or parts of the following buildings would receive major modernization, including seismic retrofit pursuant to AB 300 and low voltage upgrades to support current technology:

- Multi-Purpose Building (Building 1) – Only the Multi-Purpose Room and supporting spaces would receive full modernization; the remainder of the building would not require reconfiguration.
- Industrial Arts #1 (Building 10) – Including removal of equipment and capping of utilities in the unused Boiler Room below grade.
- Administrative Building (Building 21) – Including full modernization of the administrative and drama areas. Upgrades to the Administrative Building (Building 21) would also include interior plumbing replacements (i.e., restrooms, water fountains, sinks, etc.).

The following buildings would receive interior/exterior improvements or light modernizations:

- Gymnasium Building (Building 2) – Provide accessible restrooms, showers, and lockers consistent with the requirements of the Americans with Disabilities Act of 1990 (ADA).
- Classroom Building G (Building 3) – Provide ADA improvements including accessible restrooms, signage, classroom sinks, drinking fountains, ramp at north entry, and assistive listening system. Provide new elevator with enclosure, canopy and bridge connection(s) to floor levels/other buildings, as required.
- Classroom Building F (Building 4) – Provide ADA improvements including accessible classroom sinks, drinking fountain, ramp at north entry, connection to the Classroom Building G (Building 3) elevator, and assistive listening system.
- Classroom Building E (Building 5) – Provide ADA accessible lab and classroom sinks, drinking fountains, ramp at north entry, connection to Classroom Building G (Building 3) elevator and assistive listening system.



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- Classroom Building C (Building 6) – Provide ADA accessible restrooms, signage, classroom sinks, drinking fountains, covered exterior connection to Classroom Building D (Building 18) elevator, and assistive listening system.
- Sanitary Building #1 (Building 8) – Provide internal upgrades, ADA improvements, and replace the fixtures and finishes.
- Announcers Booth (Building 15) – Ticket Booth (Building #40), Concessions #2 (Building 42) – Provide ADA accessible paths to each facility, as necessary.
- Classroom Building D (Building 18) – Provide ADA accessible restrooms, signage, classroom sinks, drinking fountains and assistive listening system. For floor levels accessibility provide new elevator with enclosure, canopy and bridge connection(s) to floor levels and Classroom Building C (Building 6), as required.
- Classroom Building B (Building 19) – Provide ADA accessible restrooms, signage, classroom sinks, drinking fountains, and assistive listening system.
- Classroom Building A (Building 20) – Provide ADA accessible restrooms, signage, classroom sinks, drinking fountains, assistive listening system. For floor levels accessibility provide new elevator with enclosure, canopy and bridge connection(s) to floor levels, as required.
- Additionally, internal upgrades to restrooms, sewer, water, gas, and possibly fire and water in all 2-story classroom buildings would be completed.

The exterior of all existing buildings on Campus will be painted or cleaned, as appropriate, to provide a uniform appearance and enhanced curb appeal. Existing classrooms not being modernized would also receive minor interior improvements to help promote teaching and learning.



3. Project Description

The following athletic facilities would also receive minor upgrades:

- Existing Baseball Field – Fill in any depressions in the outfield and/or infield that exhibit obvious water ponding. Repair any irrigation that serves the baseball field efficiently and prepare for re-seeding with appropriate soil additives.

Infrastructure Upgrades

Infrastructure upgrades would include improvements to and/or replacement of existing utilities, site furnishings and bleacher structures, paving and parking arrangements, and adjustments to the athletic facilities on Campus.

Utilities upgrades would include the following items:

- New storm water management systems, including the installation of stormwater cisterns beneath the football field;
- New bio-detention at the central courtyard;
- New grease interceptor at Food Service;
- New main electrical service along Ventura Boulevard;
- New motorized gate at the north end of internal fire road adjacent to the Administrative Building (Building 21);
- Low voltage services, as needed;
- Campus-wide CCTV security;
- Campus-wide lighting;
- Investigation of and potential adjustments to existing stadium lighting following the proposed expansion of the track and field; and
- Potential installation of lighting for the new softball field.

Structure upgrades for new site furnishings and bleachers would include the following:

- New site furnishings and accessories as deemed necessary by new work, the condition of items, and their location; and
- Bleacher accessibility and seating upgrades.

Paving, Parking, and Landscape upgrades would include the following:

- New Entry Plaza hardscaping/landscaping; and



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- Central Courtyard hardscaping/landscaping.

Updates for Regulatory Compliance

The Project includes various actions to ensure that Taft Charter High School complies with various federal, State, and local statutory and regulatory requirements. These include improvements required by the ADA, DSA, Office of the Independent Monitor, and SCs contained in the SUP Program EIR.

3.2.2 Site Access, Circulation, and Parking

Entry to the Campus is currently provided from Winnetka Avenue (refer to Figure 3, *Existing Site Plan*). Internal circulation is provided via outdoor plazas and courtyards as well as an internal fire access road that connects Ventura Boulevard, Winnetka Avenue, and Santa Rita Street.

Pedestrian facilities within the vicinity of the Campus include sidewalks on both sides of Ventura Boulevard and Winnetka Avenue, sidewalks on the north side of Santa Rita Street, and sidewalks on both sides of Del Moreno Drive (terminating on the west side approximately 500 feet south of Ventura Boulevard). Additionally, there are existing pedestrian crosswalks at the intersections of Winnetka Avenue with Ventura Boulevard and Santa Rita Street as well as Ventura Boulevard and Del Moreno Street.



There are no striped bicycle lanes located within the vicinity of the Campus and therefore bicyclists generally share the sidewalk with pedestrians, or the roadway with vehicles. The school provides bicycle racks for students with a capacity of approximately 30 bicycles.

With regard to vehicle traffic, Taft Charter High School maintains a traffic plan to guide the orderly flow of traffic during drop-off at the Campus. Under this plan, traffic is directed in a clockwise movement to permit students to be picked up and dropped off against the school curb. Designated or signed pick-up/drop-off areas are located at various locations around Taft Charter High School. The main pick-up/drop-off areas are along the west side of Winnetka Avenue and the north side of Santa Rita Street, where vehicles park along the curb. "No Stopping" signs are posted on the west side of Winnetka Avenue from Ventura Boulevard to the faculty lot entrance, and on the south side of Santa Rita from Del Moreno through Penfield.²⁴

There are a total of four parking lots that consists of one main lot used by faculty and visitors (P-1), two internal faculty lots (P-3 inside central campus and P-4 adjacent to Santa Rita Street), and one student lot (P-2) located across the street from the main campus on Winnetka Avenue (refer to Figure 2). The number of parking stalls provided on Campus currently exceeds the LAUSD standards for a campus in comparison to its enrollment size. The minimum number of stalls according to the LAUSD standards is 235, while the Taft Charter High School campus has 575 stalls.²⁵

²⁴ Taft Charter High School. 2019. Student Drop Off. https://www.tafthigh.org/apps/pages/index.jsp?uREC_ID=355033&type=d.

²⁵ LIN Consulting, Inc. 2018. Site Circulation Report for Taft Charter High School.



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Campus access, traffic circulation, and pick-up/drop-off locations would remain unchanged under the Project. Further campus operations after completion of the modernization construction would not generate additional vehicular trips. Therefore, existing travel routes to Taft Charter High School would not be altered as a result of the Project.

3.2.3 Landscaping

The Project landscaping would be designed to be compatible with the Campus and would incorporate, to the extent possible, native plants and vegetation that are appropriate for the Campus and the Southern California setting. All plants and vegetation proposed for the Campus would be selected from the LAUSD's approved plant list or would be approved by the LAUSD prior to being placed on the Campus. No invasive plant species (e.g., species listed on the California Invasive Plant Council [Cal-IPC] Invasive Plant Checklist) would be planted on Campus.

There are at least 417 existing trees on the property,²⁶ of which approximately 67 are proposed for removal, primarily associated with the new softball field, accessibility to the visitor stadium seating, and expansion of the track and field. The number and tree locations may be subject to change as the Project design is refined and finalized. Each of the trees proposed for removal would be replaced on the Campus. Additionally, all tree removal would be consistent with the LAUSD OEHS Tree Trimming and Removal Procedure as well as SC-BIO-3.²⁷ Recommendations from the Final Arborist Report would also be incorporated into the proposed tree removal. This would include, but shall not be limited to, inspection for contagious tree diseases including: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Ennallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*). If any diseased trees are identified at the Campus, these trees would not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

3.2.4 Construction Phasing and Equipment

Construction is planned to start in the first quarter of 2022 (Q1) and be completed by Q3 2025 (approximately 40 months). Site/utility/interim housing activities which may begin in advance of the proposed construction. Temporary relocation of sports and recreational activities is expected to occur throughout construction, as necessary. Public parks and/or other recreational facilities near the school site would provide temporary recreational accommodations for the Taft Charter High School students while sports facilities on campus are unavailable during construction.

Demolition activities would be managed and conducted by the LAUSD's Facilities Environmental Technical Unit (FETU) in accordance with the LAUSD's standard practices. FETU would be responsible for ensuring the safe removal of potential asbestos containing material (ACM) and lead-based paint (LBP) that may be encountered during demolition and construction. LAUSD would ensure that all construction-related activities are completed in accordance with applicable federal, State, and local regulations, including but not limited to the U.S. Environmental Protection Agency (USEPA) Guidance on Conducting Non-Time-Critical Removal

²⁶ NAC Architecture. 2018. Draft Arborist Report for Taft Charter High School.

²⁷ LAUSD. Tree Trimming and Removal Procedure. <https://achieve.lausd.net/ceqa>.



3. Project Description

Actions Under Comprehensive Environmental Response, Compensation, and Liability Act, National Oil and Hazardous Substances Pollution Contingency Plan, and all applicable LAUSD specifications, and standards.

Additionally, soil removal activities would be completed in compliance with a Removal Action Workplan (RAW) that would be prepared for the Project. The RAW would be consistent with the criteria specified in the California Health and Safety Code (H&SC) §25356.1(h) and include a description of the on-site impact, a plan for conducting the removal action, and the goals to be achieved by the removal action, as required by Health & Safety Code (H&SC) §25323.1.

LAUSD’s construction contractor would prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) for erosion and sediment control (see Table 4-4). LAUSD standard practices require that all projects be consistent with applicable National Pollutant Discharge Elimination System (NPDES) stormwater permit requirements, restrict sediment flows into storm drainage systems, and be consistent with the LAUSD Stormwater Technical Manual (2009).

To the extent feasible, construction-related activities would be scheduled to occur during daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours and noise sensitive times as coordinated with the school administration. Consistent with the City of Los Angeles Municipal Code §41.40(b), all non-emergency construction activities would occur between 7:00 a.m. and 9:00 p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays. Construction would be prohibited on Sundays, national holidays, and between the hours of 7:00 p.m. and 7:00 a.m. on weekdays.

Table 3-2 summarizes the proposed construction activities and schedule for implementation of the Project. The proposed construction scenario is based on a conservative phasing plan but is subject to change as the Project design is refined.

**Table 3-2
Construction Schedule and Equipment**

Phase	Schedule	Equipment	Number
Demolition	2022-2022 June to August	Excavators with Breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris Haul Trips; average 10 cubic yard (CY) end-dump trucks	10
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers	2
Grading	2022-2022 August to December	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1
		Water Truck	1



3. Project Description

**Table 3-2
 Construction Schedule and Equipment**

Phase	Schedule	Equipment	Number
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95% soil compaction)	2
		Trencher / Excavator	1
Building Construction	2023-2025 January to February	Concrete Trucks	5
		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Fork Lifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Water Truck	1
		Building Interiors	2025-2025 March to May
Asphalt Paving and Site Improvements (e.g., utilities)	2025-2025 June to September	Skip Loaders	2
		Roller	1
		Paver	1
		Asphalt Trucks	8
		Water Truck	1

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 & Traffic |
| <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"/> Energy | <input type="checkbox"/> Pedestrian Safety | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> None |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | <input checked="" type="checkbox"/> None with Mitigation Incorporated |

DETERMINATION

On the basis of this initial evaluation:

- I find that the Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the 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 Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the 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 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 Project, nothing further is required.



Signature

Digitally signed by Carlos A. Torres
Date: 2020.08.17 15:49:27 -07'00'

8/17/2020

Date

Carlos A. Torres
Printed Name

CEQA Officer for LAUSD
Title



4. Environmental Checklist and Analysis

EVALUATION OF ENVIRONMENTAL IMPACTS:

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



4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.1 AESTHETICS				
Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a. Have a substantial adverse effect on a scenic vista?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to impact aesthetic and visual resources. Projects implemented under the SUP were identified as having less than significant impacts on scenic vistas, scenic resources within designated scenic highways, existing visual character, and day or nighttime views in the LAUSD region.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to aesthetic impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval

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



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<p>School Design Guide</p> <p>This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.</p>
SC-AE-3	<p>LAUSD shall assess the proposed project’s consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the Campus layout, height of buildings, landscaping, and/or the architectural style of buildings.</p>
SC-AE-5	<p>LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.</p> <p>School Design Guide</p> <p>This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.</p>
SC-AE-6	<p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the LAUSD to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize skyglow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.
SC-CUL-1	<p>Historic Architect</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 historic 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. 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 historic resources.</p> <p>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include but are not limited to:</p> <ul style="list-style-type: none"> • 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 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.



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • 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. • 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. • 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. • 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. • 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 historic resources. • 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. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
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 historic resources. 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 LAUSD's adopted policies and goals, historic resources shall be reused rather than destroyed where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treatment distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • 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.



4. Environmental Checklist and Analysis

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

No Impact. Scenic vistas provide visual access or panoramic views to a large geographic area. Panoramic views are usually associated with vantage points that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. Taft High School is located in the southwestern portion of the San Fernando Valley. In general, the community that surrounds the Project site is an urban mix of commercial and residential development, mostly comprised of single-family homes, particularly along the southern and western boundary of the Campus (refer to Section 2.2, *Surrounding Land Uses*). The topography of the Project site and the immediate surrounding vicinity does not provide clear views of the valley or other scenic features such as Simi Hills, Santa Susana Mountains, Verdugo Mountains, etc. The Project including all demolition, construction, and modernization/renovation elements – would not affect any designated scenic viewpoints or otherwise conflict with applicable policies from the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan (e.g., Policy 1-3.3, *Preserve existing views in hillside areas*).

The Project site is located in close proximity to U.S. 101 Highway; however, Taft Charter High School is not visible from U.S. 101 Highway due to existing topography, intervening structures, and trees. Further, this segment of the U.S. Highway 101 is neither designated as a scenic highway,²⁸ nor identified for protection in the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan.²⁹ The Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan Area limits preservation of scenic vistas at the entrance of U.S. 101 Highway into the San Fernando Valley at a point located further west of the Campus.

The proposed construction and modernization/renovation included in the Project has been designed to conform with the existing historic architectural style of the existing site (refer to SC-AE-1, SC-CUL-1, and SC-CUL-2; see *Cultural Resources*). Additionally, Project development would not obscure existing views across the Campus as building heights would remain under two stories similar to the existing development. The SUP Program EIR states impacts to scenic vistas with respect to all SUP projects would be less than significant, as the LAUSD is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas.³⁰ Therefore, no impact to scenic vistas would occur. No mitigation or further evaluation is required.

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

No Impact. The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways.³¹ The SUP Program EIR lists highways and corridors considered eligible for Scenic Highway Designation within the Project area. The nearest designated State Scenic Highway

²⁸ California Scenic Highway Mapping System. 2011. Los Angeles County.

<https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a>.

²⁹ City of Los Angeles. 2019. General Community Plans. <http://cityplanning.lacity.org/>.

³⁰ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ccqa>. Adopted by the Board of Education on November 10, 2015.

³¹ California Department of Transportation (Caltrans). 2006. California Scenic Highway Program. <http://www.dot.ca.gov/dist3/departments/mtce/scenic.htm>.



4. Environmental Checklist and Analysis

to the site is State Route 2 (SR-2; Angeles Crest Highway), located approximately 16 miles to the southeast.³² The proposed structures associated with the Project would not be visible from any designated State Scenic Highway. While the Project would alter historic structures and lead to removal of approximately 67 trees, these changes would not be visible from a State Scenic Highway. Therefore, development of the Project would result in no impacts to scenic resources within a designated State Scenic Highway. No mitigation or further evaluation is required.

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

Less than Significant. The Campus exhibits a modified cluster plan, with the original Multi-Purpose Building (Building 1) and Student Store Building (Building 7), classrooms (Buildings 6, 18, 19, and 20), and Administrative Building (Building 21) situated around landscaped courtyards in the eastern portion of the Campus (refer to Section 2.4, *Existing Conditions*). These buildings as well as the lunch pavilion, and landscaping comprise a historic district (see *Cultural Resources*). As previously described, the community that surrounds the Campus is an urban mix of commercial and residential development, mostly comprised of single-family homes, particularly along the eastern and southern boundary of the Campus (refer to Section 2.2, *Surrounding Land Uses*). The Project site is currently designated as “Public Facilities” under the General Plan and is consistent with applicable zoning designations for PF-XL1.³³ While some changes would occur on campus, including the removal of approximately 67 trees and building arrangement changes that would modify views within the site, the proposed campus alterations would not change the overall views of the site as an educational facility within the “Public Facilities” land use designation or PF-XL1 zoning designation, particularly from the surrounding commercialized area and residential neighborhoods.

The proposed comprehensive modernization would adhere to SC-AE-1, SC-CUL-1, and SC-CUL-2 in Project design and maintain consistency in building upgrades in accordance with the historic building resources at the site. Additionally, the Project would adhere to SC-AE-3 to ensure consistency with the general character of the surrounding community, such as consideration for building density, lighting, and landscaping. LAUSD would be consistent with the CCR, Title 5, Section 1410, which gives the California Department of Education School Facilities Planning Division regulatory authority to review and approve school designs based on factors such as scenic resources and aesthetics.

The SUP Program EIR states impacts to views with respect to all SUP projects would be less than significant, as the LAUSD is required to incorporate measures from the LAUSD School Design Guide and SC-AE-3 into site-specific Project design for the protection of character and quality of site surroundings.³⁴ With implementation of SC-AE-3 as well as SC-AE-1, SC-CUL-1, and SC-CUL-2 impacts to the visual character and

³² California Scenic Highway Mapping System. 2011. Los Angeles County.
<https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a>.

³³ City of Los Angeles. 2019. Zone Information and Map Access System (ZIMAS). <http://zimas.lacity.org/>.

³⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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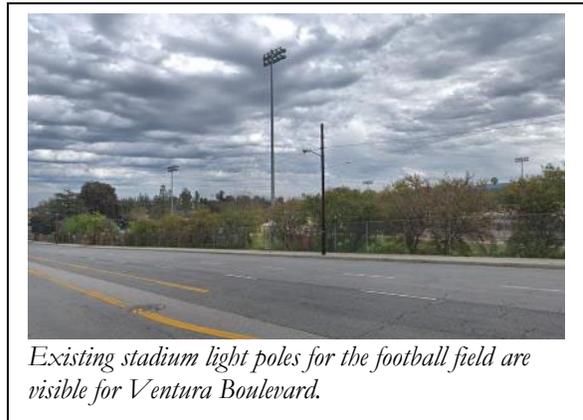
quality of the Campus and the surrounding community would be less than significant. No mitigation or further study is required.

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

Less than Significant. The Project would result in less than significant impacts related to light and glare as described in further detail below.

Light

Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties. Existing lighting conditions in the surrounding vicinity include light emanating from building interiors, security lights and the surrounding commercial and residential land uses, as well as nearby street lighting. As a main arterial roadway, Ventura Boulevard carries high volumes of vehicle traffic with lighting from vehicle headlights. The existing Campus contains two primary sources of light: (1) light emanating from building interiors that passes through windows; and (2) light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Depending upon the location of the light source and its proximity to adjacent light-sensitive use (e.g., residences), light introduction can be a nuisance, affecting adjacent areas and further diminishing the view of the clear night sky in an urban setting like the Campus. The Campus is located within a commercial and residential area.



Existing stadium light poles for the football field are visible for Ventura Boulevard.

The Project would include new and updated lighting campus-wide, providing safety and improved visibility and access to the school facilities. While much of the new and/or upgraded Project lighting would be directed towards the interior of the Project site (e.g., exterior building illumination, security light, landscape lighting, etc.); illumination of the Project site may be increased in some areas of the Campus that are visible from the surrounding area. The proposed comprehensive modernization would include the investigation of existing stadium lighting following the proposed expansion of the track and field in order to determine the need for potential adjustments or the addition of new light poles to provide adequate coverage (refer to Section 3.2.1, *Campus Buildings*). The proposed light poles could potentially be at least 40 feet high. Similar to existing conditions, lighting associated with the track and football field would be visible from Ventura Boulevard and surrounding neighborhoods – particularly during weekday practices during the winter months as well as Friday night football games – similar to existing conditions. The potential installation of lighting for the new softball field would be a new source of lighting visible from Del Moreno Drive and Santa Rita Street. Residents along these roadways are located less than 150 feet from the Campus in this area, with views of the Campus that are partially obscured by existing trees, though a portion of these trees adjacent to the new softball field may be removed or trimmed. The Toreadors softball team play approximately eight home games per season. With the potential lighting associated with the new softball field it is possible that some or all of these games may be



4. Environmental Checklist and Analysis

rescheduled to the evening hours, during which time the lighting would be visible from the adjacent roadways and nearby residents.

All lighting of outdoor areas will be directed onto the Project site to minimize any light spillover from fixtures included in the Project. The Project would be constructed in accordance with the Collaborative for High Performance Schools (CHPS) Criteria SS5.1: Light Pollution Reduction, with the stated goal of minimizing outdoor lighting. In addition, LAUSD would incorporate SC-AE-5 and SC-AE-6, which address new outdoor lighting sources by incorporating dark sky considerations. With the incorporation of these SCs impacts associated with light trespass from new field lighting and other new lighting would be less than significant.

For the reasons discussed above, impacts related to creating a new source of substantial light and glare that would adversely affect day or nighttime would be less than significant. No mitigation or further study is required.

Glare Impacts

Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The proposed facilities would be constructed with limited high-glare materials. Implementation of SC-AE-5 and SC-AE-6 would reduce glare impacts to residences, pedestrians, drivers, students, and sports teams. Given the minimal use of high-glare materials, reflective glare impacts would be less than significant.

Construction activities would be conducted in accordance with the 2018 School Design Guide, all lighting sources in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers and to minimize light spilling onto adjacent properties.³⁵ Implementation of the 2018 School Design Guide and the adherence to the requirements set by CHPS would ensure impacts related to light and glare during construction remain less than significant. No mitigation or further study is required.

³⁵ LAUSD. School Design Guide. Report. 2018.

http://www.laschools.org/documents/download/asset_management/%2fschool_design_guide%2f2018_school_design_guide%2f2018_School_Design_Guide.pdf?version_id=313984351



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ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.2 AGRICULTURE AND FORESTRY RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<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:

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact agriculture and forestry resources. LAUSD is urbanized with small areas of scattered important farmland, no land protected under Williamson Act contract, and no forest land or timberland. According to the SUP Program EIR, projects implemented under the SUP are anticipated to have less than significant impacts related to the conversion of farmland to nonagricultural use and no impacts on land protected under a Williamson Act contract, forest land and timberland uses in the LAUSD region. Therefore, there are no SCs for minimizing impacts to agriculture and forestry resources in areas where future Projects would be implemented under the SUP.

Project specific analysis provided below concludes that implementation of the Project would have no impacts on agriculture and forestry resources.



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- 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 Campus and surrounding areas were primarily undeveloped or in agricultural use prior to the construction of Taft Charter High School (originally Taft High School) in the late 1950s. However, the Project site is currently developed and does not include any existing agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles identified the Campus as urban developed land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Campus.³⁶ Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. No mitigation or further study is required.

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

No Impact. The Campus is currently zoned as PF-1XL (refer to Section 2.5, *General Plan and Existing Zoning*) and does not include any lands enrolled in a William Act contract (i.e., an agreement between private landowners and their city and/or county where the landowner voluntarily restricts their land to agriculture and compatible open-space uses). Further, on February 19, 2019, the BOE adopted a resolution to exempt its school sites (including Taft Charter High School) from all local ordinances, including local jurisdiction zoning regulations.³⁷ Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation or further study is required.

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

No Impact. The proposed comprehensive modernization would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The Project does not involve any changes to the current General Plan land use or zoning designations for forest land, or timberland.³⁸ Additionally, there are no timberland-zoned production areas within the Campus or surrounding areas as the surroundings are identified as urban and developed land.³⁹ Therefore, no impact to forest land or timberland would occur. No mitigation or further study is required.

³⁶ California Department of Conservation, 2016. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>

³⁷ LAUSD OEHS. Charter School Zoning Exemption Policy. <https://achieve.lausd.net/Page/1831>.

³⁸ City of Los Angeles. 2019. Zone Information and Map Access System (ZIMAS). <http://zimas.lacity.org/>

³⁹ California Department of Conservation. 2016. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>



4. Environmental Checklist and Analysis

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

No Impact. Neither the campus nor the surrounding area includes forest land.⁴⁰ Implementation of the Project would result in no impacts related to the loss or conversion of forest land to non-forest use. No mitigation or further study is required.

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

No Impact. As previously described, the Campus does not contain existing agricultural or forest uses. No changes to the existing environment would occur from implementation of the Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Therefore, no impact would occur. No mitigation or further study is required.

⁴⁰ California Department of Conservation, 2016. California Important Farmland Finder.
<https://maps.conservation.ca.gov/DLRP/CIFF/>.



4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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4.3 AIR QUALITY

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

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

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <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 nonattainment 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"/> |

Explanation:

This air quality impact analysis is based upon the Air Quality Technical Study prepared for the Project (see Appendix A). The SUP Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse air quality impacts, including impacts to students and faculty at the upgraded school sites. According to the SUP Program EIR, some impacts, even with implementation of regulatory requirements and SCs would be potentially be significant.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to air quality impacts associated with the 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"> • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.



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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	<p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District’s (SCAQMD) regional and localized significance thresholds.</p> <p>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 a.m. AM and 3:00 p.m.). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the USEPA as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low- emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer’s standards. <p>Fugitive Dust</p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturer’s specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume or more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.



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LAUSD Standard Conditions of Approval

- Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
- Limit traffic speeds on unpaved roads to 15 mph or less.
- Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

- Use ultra-low volatile organic compound (VOC) or zero-VOC surface coatings.
- Phase construction activities to minimize maximum daily emissions.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic control during construction activities to improve traffic flow (e.g. flag person).
- Prepare and implement a trip reduction plan for construction employees.
- Implement a shuttle service to and from retail services and food establishments during lunch hours.
- Increase distance between emission sources to reduce near-field emission impacts.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act (CAA) as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for Pb (Los Angeles County) under the National AAQS (Table 4-1).⁴¹

**Table 4-1
Federal and State Attainment Status**

Pollutants	Federal Classification	State Classification
Ozone (O ₃)	1- and 8-Hour: Nonattainment (Extreme)	1- and 8-Hour: Nonattainment
Particulate Matter (PM ₁₀)	Maintenance	Nonattainment
Fine Particulate Matter (PM _{2.5})	Nonattainment	Nonattainment

⁴¹ SCAQMD. 2018. NAAQS and CAAQS Attainment Status for South Coast Air Basin <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14>.



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**Table 4-1
Federal and State Attainment Status**

Pollutants	Federal Classification	State Classification
Carbon Monoxide (CO)	Maintenance	Attainment
Nitrogen Dioxide (NO ₂)	Maintenance	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment

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

Less than Significant. The most recently adopted comprehensive plan for the SoCAB is the 2016 Air Quality Management Plan (AQMP), adopted on March 3, 2017.⁴² 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/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

The proposed comprehensive modernization would be subject to the SCAQMD’s AQMP, which contains a comprehensive list of pollution control strategies aimed at reducing emissions and achieving identified ambient air quality standards. The proposed comprehensive modernization would be consistent with all applicable AQMP standards related to transportation, economy, and community development as no population or transportation expansion would be anticipated within the Campus or surrounding vicinity. Student and faculty numbers would remain consistent with existing site use.

The Project would not be considered a large, regionally significant project. Therefore, the Project would not affect the regional growth projections made by the SCAG and used by the SCAQMD in forming the AQMP. The student and faculty population at the existing Campus would not increase as a result of Project implementation and projected emissions would not exceed SCAQMD’s regional significance thresholds. Therefore, the Project would be consistent with the AQMP requirements to reduce the SoCAB’s construction-related emissions from construction equipment and related activities, and no conflict would occur with the implementation of the AQMP. Therefore, impacts would be less than significant, and no mitigation or further evaluation is required.

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

Less than Significant. The proposed comprehensive modernization would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and operation (long-term). However, based on the following analysis, construction-related activities and long-term operations at the Campus would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD.

⁴² SCAQMD. 2016. AQMP. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.



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Construction

Project construction activities would generate short-term air pollutant emissions both on- and off-site. On-site air pollutant emissions would consist of: (1) exhaust emissions from off-road heavy-duty construction equipment; and (2) fugitive particulate matter from grading and construction materials handling. Additionally, evaporative emissions would occur in the form of volatile organic compounds (VOCs) from architectural coating application and paving. Off-site emissions would result from the commute of workers to and from the Project site as well as trucks hauling materials to and from the site.

Construction-related criteria pollutant emissions were estimated using CalEEMod, Version 2016.3. As described in Section 3.2.4, *Construction Phasing and Equipment*, construction is planned to start in Q1 2022 and be completed by Q3 2025 (approximately 40 months). Construction activities related to the construction of new buildings and modernization of existing facilities are anticipated to begin in Q1 2022 and is anticipated to be completed in Q3 2025. Site/utility/interim housing activities which may begin in advance of the proposed construction. All modeling output files and additional assumptions are provided in Appendix A.

The following construction phases were considered during analysis:

- Demolition (June 2022 – August 2022)
- Grading (August 2022 – December 2022)
- Exterior building construction (January 2023 – February 2025)
- Interior building construction (March 2025 – May 2025)
- Asphalt paving and site improvements (e.g., utilities; June 2025 – September 2025)

The types and quantity of heavy-duty equipment pieces anticipated in each phase of demolition, construction, modernization/renovation were estimated for each phase using information provided by LAUSD, standard CalEEMod assumptions, and information on similar projects in the area (refer to Table 3-2). Additionally, it was assumed that all construction activities associated with the Project would be consistent with applicable SCAQMD Rule 403 provisions.

**Table 4-2
Maximum Daily Unmitigated Regional Construction Emissions**

Construction Activity	Maximum Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Emissions (with SCAQMD Rule 403)*	9	17	16	<1	<1	<1
SCAQMD Significance Thresholds	75	400	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Wood 2019; see Appendix A.

Notes: This includes the maximum emissions for each criteria pollutant emitted across the entire Project.

For each criteria pollutant, maximum construction emissions would be well below the SCAQMD’s significance threshold (refer to Table 4-2), particularly with the implementation of SC-AQ-2 and SC-AQ-3 requiring the



4. Environmental Checklist and Analysis

use of maintained equipment and implement of other emissions reduction practices. As such, the Project would not violate any air quality standards or substantially contribute to an existing or projected air quality violation for a criteria pollutant that is listed as federal or State nonattainment. Construction emissions would be less than significant, and no mitigation or further evaluation is required.

Operations

With respect to SUP modernization projects, the SUP Program EIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools and net project emissions would be minimal. Additionally, overall enrollment is forecast to decrease over the next 10 years and school operational emissions are not expected to increase in the long-term.⁶¹

The proposed comprehensive modernization would replace or upgrade facilities on the Campus, but it would not increase the number of students or faculty at the high school and would not introduce major new emission sources. The Project would result in a decrease of approximately 26,170 square feet in total building floor space, which would have corresponding reductions in stationary source emissions. Further, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Therefore, there would be no net increase in regional emissions of any criteria pollutant, and the impact would be less than significant, and no mitigation or further evaluation is required.

Carbon Monoxide Hotspots

The SUP Program EIR states the operation of SUP projects would not expose sensitive receptors to substantial pollutant concentrations because stationary sources at schools have nominal emissions related to the use of natural gas heaters and boilers, landscaping equipment, and consumer products (e.g., cleaning products). Further, because no new vehicle trips would be generated by the Project, SUP-related CO hotspot impacts would be less than significant in accordance with the SUP Program EIR.⁴³

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant. Sensitive receptors are persons who are more susceptible to air pollution than the general population, such as children, athletes, the elderly, and the chronically ill. Examples of land uses where substantial numbers of sensitive receptors are often found are schools, daycare centers, parks, recreational areas, medical facilities, nursing homes, and convalescent care facilities. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. Implementation of the Project could result in significant air quality impacts if it would expose sensitive receptors to substantial pollutant concentrations.

⁴³ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



4. Environmental Checklist and Analysis

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 in the nation. They are designated to protect sensitive receptors most susceptible to respiratory distress, such as asthmatics, the elderly, young children, people already weakened by 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. The nearest off-site sensitive receptors proximate to the edge of the Project site, are located in the single-family residential neighborhood immediately to the west of the Campus. The nearest residence at 5323 Del Moreno Drive, is located approximately 150 feet from the Campus boundary (see Figure 5, *Sensitive Receptors*). As described below, none of the sensitive receptors, including the adjacent neighborhood areas, would be exposed to substantial pollutant concentrations as defined by the LSTs.

Following SCAQMD guidance,⁴⁴ only on-site construction emissions of NO_x, CO, PM₁₀, and PM_{2.5} were considered in the localized significance analysis. According to the CalEEMod analysis, the highest on-site emissions would occur during demolition. The maximum daily disturbance for demolition was conservatively estimated to be 0.8 acre. Further, this localized significance analysis compares the Project's peak construction emissions against SCAQMD LSTs for 1-acre of disturbance. Localized significance thresholds were obtained by interpolation from tables in Appendix C of SCAQMD's Final Localized Significance Threshold Methodology. Table 4 -3 shows the results of the localized significance analysis for the Project.

**Table 4-3
Localized Significance Analysis (Unmitigated)**

Receptor	Area (acres)	Distance (meters)	NOx	CO	PM10	PM2.5
ComforCare Home Care	1	157				
Projected Emissions (lbs/day)			17	16	<1	<1
Localized Significance Threshold (lbs/day)			140	1,663	12	4
Exceeds Threshold?			No	No	No	No
Sunrise of Woodland Hills	1	262				
Projected Emissions (lbs/day)			17	16	1	1
Localized Significance Threshold (lbs/day)			174	3,071	20	8
Exceeds Threshold?			No	No	No	No
Temple Kol Tikvah Synagogue	1	95				
Projected Emissions (lbs/day)			17	16	<1	<1
Localized Significance Threshold (lbs/day)			119	1,045	7	2
Exceeds Threshold?			No	No	No	No
5323 Del Moreno Drive	1	46				
Projected Emissions (lbs/day)			17	16	<1	<1
Localized Significance Threshold (lbs/day)			104	616	3	1
Exceeds Threshold?			No	No	No	No

Note: Totals may not add up exactly due to rounding in the model calculations. Detailed emissions calculations are provided in Appendix A.

⁴⁴ Chico, T., Koizumi, J. SCAQMD: Localized Significance Threshold Methodology. 2003. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>





4. Environmental Checklist and Analysis

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. However, the maximum daily NO_x, CO, PM₁₀, and PM_{2.5} construction emissions generated from on-site construction-related activities would be well below the 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 mitigation or further evaluation is required.

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 (HRAs).⁴⁵ 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.

Although sensitive receptors (both on- and off-site) would be exposed to diesel exhaust from construction equipment, which has been associated with lung cancer, the duration of exposure would not be sufficient to result in a significant cancer risk. Additionally, the proposed comprehensive modernization would be constructed in stages over approximately 3 years, which would limit the exposure to receptors. Further, construction activities would not exceed the screening-level construction LSTs. Therefore, 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 mitigation or further evaluation is required.

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

Less than Significant. According to the *SCAQMD CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402.

Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the Project would be consistent with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Therefore, construction of the Project would result in less than significant impacts. No mitigation or further study is required.

⁴⁵ 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.



4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.4 BIOLOGICAL RESOURCES				
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

The following information includes data and analysis from the Draft Arborist Report conducted by NAC Architecture in 2018 (see Appendix B). The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to impact biological resources. According to the SUP Program EIR, upon implementation of regulatory requirements and LAUSD SCs for SUP-related projects, impacts associated with nesting birds, wildlife movement, and native trees would be less than significant.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to biological resource impacts associated with the Project are provided below.



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LAUSD Standard Conditions of Approval

SC-BIO-1

An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the Project site. LAUSD will conduct a literature search, which shall consider a 1-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:

- U.S. Fish and Wildlife Service (USFWS)
- National Marine Fisheries Services (NMFS)
- California Department of Fish and Wildlife (CDFW)
- California Native Plant Society (CNPS)
- County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases
- California Natural Diversity Data Base (CNDDDB) California Native Plant Society (CNPS) Rare Plant Society
- Local Audubon Society
- Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
- California Digital Conservation Atlas for the District-wide location of reserves, plan areas, and land trusts that may overlap with the Project site.

Biological Resources Report

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

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- A current inventory of the biological resources associated with each habitat type on-site and within the area of potential effect. CDFW's CNDDDB should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species on-site and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.



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	<ul style="list-style-type: none"> • A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address Project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. • A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site. • Discussions about direct and indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas. • Mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be outlined. If on-site measures are not feasible or would not be biologically viable, off-site measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. • Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: <ul style="list-style-type: none"> ○ Location of the mitigation site. ○ Plant species to be used, container sizes, and seeding rates. ○ Schematic depicting the mitigation area. ○ Planting schedule. ○ Irrigation method. ○ Measures to control exotic vegetation. ○ Specific success criteria. ○ Detailed monitoring program. ○ Contingency measures should the success criteria not be met. ○ Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. <p>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.</p>
SC-BIO-2	<p>LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.</p>
SC-BIO-3	<p>LAUSD shall comply with the 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) should occur outside of nesting season to avoid take of birds, bats, or their eggs.</p>



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Bird Surveys- Construction Demolition or Vegetation Removal in or adjacent to Native Habitat

- For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., Project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).
- If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the Project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.
- If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.
- If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the Project activities and the nest or tree. Project personnel, including all Construction Contractors working on-site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable federal and State laws pertaining to the protection of birds.
- If the Surveyor/Biologist determines that a narrower buffer between the Project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.
- A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation and shall notify LAUSD immediately if Project activities damage avian nests.

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

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird survey to determine if active nests are within or adjacent to the work area.
 - The survey shall be conducted no more than three 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.
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	<p>Bat Surveys</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ Avoidance ○ Humane exclusion prior to demolition <ul style="list-style-type: none"> ▪ Bats should not be evicted from roost sites during the reproductive period (May through 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 CDFW.
<p>SC-BIO-4</p>	<p>LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:</p> <p>New Construction in Native Habitat</p> <p>LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:</p> <ul style="list-style-type: none"> • Translocation of rare plants is prohibited in most instances. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. • Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • Creation of woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. <ul style="list-style-type: none"> ○ All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. ○ Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period.



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- Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings.

LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.

Removal of Protected Trees on Existing Campuses

LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Procedure. This policy ensures the management of LAUSD trees while ensuring that LAUSD activities will not conflict with locally adopted tree preservation policies and ordinances.

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

No Impact. The Project site encompasses an active high school campus within an area that has been developed for several decades (refer to Section 2.4, *Existing Conditions*). Surrounding land uses include commercial properties to the north and east, as well as single family residential neighborhoods to the south and west (refer to Section 2.2, *Surrounding Land Uses*). The Campus is also located within 0.25 miles of U.S. Highway 101, a major transportation route within the region. Based on a review of the California Natural Diversity Database (CNDDB) conducted during the preparation of the IS/MND, there are no records of federally listed, State listed, or other special status species occurring within 1 mile of Taft Charter High School. The nearest sensitive community – California Walnut Woodland – is located approximately 0.5 mile south of the Campus. Neither the Campus nor the surrounding area provides large areas of native habitat capable of supporting any special status plant or wildlife species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Campus is extremely low. Therefore, the Project would have no impact on special-status species. No mitigation or further study is required.



The existing Campus has a wide variety of trees of various species, sizes, and maturity, primarily along the western perimeter of the Campus along Del Moreno Drive and Santa Rita Street. Smaller pockets of trees are also located along Ventura Boulevard, Winnetka Avenue, and the interior of the Campus.

As described in Section 3.2.3, *Landscaping*, there are at least 417 trees on the property,⁴⁶ of which approximately 67 are proposed for removal. The trees that are proposed for removal are primarily associated with the new softball field, accessibility to the visitor stadium seating, and expansion of the track and field. Tree modification and removal associated with the Project has the potential to impact nesting birds protected under the Migratory

⁴⁶ NAC Architecture. 2018. Draft Arborist Report for Taft Charter High School.



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Bird Treaty Act of 1918 (MBTA). However, all tree removal would be consistent with the LAUSD OEHS Tree Trimming and Removal Procedure and SC-BIO-3, which include measures intended to avoid impacts to nesting birds.⁴⁷ Additionally, each of the trees proposed for removal would be replaced on the Campus. Therefore, the Project would have no construction-related impacts on migratory birds or long-term impacts on their potential habitat. No mitigation or further study is required.

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

No Impact. The Campus does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. The Campus is entirely developed and does not contain any natural drainages or watercourses, which would potentially support habitat, or natural undeveloped areas that may contain any other sensitive natural communities. Therefore, there would be no impacts. No mitigation or further study 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 tip of a north-south riverine wetland is located to the north of U.S. Highway 101 within 0.25 miles of the Campus. The USFWS Wetland Mapper characterized this wetland as a riverine system covering approximately 3.42 acres.⁴⁸ However, the Campus is separated from the wetland by a heavily trafficked highway, U.S. Highway 101. As such, construction activities at Taft Charter High School would have no potential to impact this wetland feature.

The Campus itself is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including playfields. According to the USFWS Wetland Mapper, the Project site does not contain any federally protected wetlands as defined by Section 404 or Section 401 of the CWA (including but not limited to marsh, vernal pool, coastal, etc.). Therefore, no impact to wetlands would occur through direct removal, filling, hydrological interruption or other means. No mitigation or further study 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. The Project site does not contain any watercourses or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. Due to the lack of existing water systems at the site, no resident or migratory fish species are supported; therefore, the Project is not anticipated to have direct or indirect impacts on resident or migratory fish species. Due to the developed nature of Taft Charter High School, the only existing wildlife are common resident wildlife and

⁴⁷ LAUSD. 2019. LAUSD OEHS Tree Trimming and Removal Procedure. <https://achieve.lausd.net/ceqa>

⁴⁸ USFWS, 2019. National Inventory Wetlands Mapper. <https://www.fws.gov/wetlands/data/Mapper.html>



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migratory birds. According to the USFWS Information, Planning and Consultation (IPaC) System, there are 13 migratory bird species that could be potentially present at the Project site.⁴⁹

The Project may have direct or indirect impacts on migratory bird breeding sites and resident wildlife species from tree removal and/or building demolition. The existing site contains 417 trees of which approximately 67 are anticipated to be removed (refer to Section 3.2.3, *Landscaping*). As previously described, all proposed tree removal on the Campus would be consistent with LAUSD's Tree Trimming and Removal Procedure and SC-BIO-3. In particular, SC-BIO-3 requires all construction and operation activities to occur outside of nesting season to avoid impacts to bats, birds, or their eggs. With the implementation of LAUSD's Tree Trimming and Removal Procedure as well as compliance with SC-BIO-2, SC-BIO-3, and SC-BIO-4, the proposed comprehensive modernization would have less than significant impacts on the movement of any wildlife species and would not impede the use of migratory wildlife corridors. No mitigation or further study is required.

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

Less than Significant. The existing Campus has a wide variety of trees of various species, sizes, and maturity, primarily along the western perimeter of the campus along Del Moreno Drive and Santa Rita Street. Smaller pockets of trees are also located along Ventura Boulevard, Winnetka Avenue, and the interior of the Campus.

The County of Los Angeles Tree Preservation Policy recognizes oak trees as historic, aesthetic, and ecological resources.⁵⁰ The County's Oak Tree Ordinance, amended in 1988, protects oaks with a diameter at base height of 8 inches or greater. As currently defined in the Los Angeles Municipal Code (LAMC), a Protected Tree is any of the following Southern California native tree species that measures 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree:

- Oak (*Quercus* spp.), including valley oak (*Quercus lobate*) and California live oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the scrub oak (*Quercus berberidifolia*);
- Southern California black walnut (*Juglans californica*);
- Western sycamore (*Platanus racemosa*); and
- California bay (*Umbellularia californica*)

The trees located on the Campus would be subject to the LAUSD OEHS Tree Trimming and Removal Procedure, which governs all trees within the properties of LAUSD. The off-site trees would be subject to the provisions of the County of Los Angeles Tree Preservation Policy as referenced above and/or the LAMC that regulate relocation, removal, and replacement for Protected Trees.⁵¹

According to the existing Draft Arborist Report for Taft Charter High School (see Appendix B), there are no known protected trees on the Campus. If, during the preparation of the Final Arborist Report, protected trees

⁴⁹ USFWS, 2019. IPaC. <https://ecos.fws.gov/ipac/>

⁵⁰ County of Los Angeles Departments of Parks and Recreation. 2011. Urban Forestry Program Manual.

⁵¹ City of Los Angeles. 2019. Protected Tree Code Amendment Q&A. January 6, 2017.



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are identified, LAUSD shall implement the LAUSD OEHS Tree Trimming and Removal Procedure and SC-BIO-4.

With implementation of the LAUSD OEHS Tree Trimming and Removal Procedure and SC-BIO-4, impacts conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant. No mitigation or further study is required.

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

No Impact. The Project site is not located within an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved State, regional, or local habitat conservation plan; therefore, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved State, regional, or local HCP.^{52, 53} Therefore, no impact resulting from a conflict with an adopted conservation plan would occur. No mitigation or further study is required.

⁵² Data Basin. 2015. Habitat Conservation Plan (HCP) California.
<https://databasin.org/maps/new#datasets=c116dd0d32df408cb44ece185d98731c>

⁵³ CDFW. 2018. California National Community Conservation Plan Map.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.



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ENVIRONMENTAL IMPACTS

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

Explanation:

This analysis incorporates information from the Historic Resources Evaluation Report prepared by LAUSD in 2018 (see Appendix C) and the Historic Resources Technical Report prepared by Wood in 2019 (see Appendix D).

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to cultural resources impacts associated with the Project are provided below.

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SC-CUL-1	<p>Historic Architect</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>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> 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 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.
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	<ul style="list-style-type: none"> • 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. • 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. • 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. • 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. • 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. • 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. The Design Team and Historic Architect shall be responsible for incorporating LAUSD’s recommended updates and revisions during the design development and review process.
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. 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 LAUSD’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"> • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	<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</p>



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	<p>construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	<p>Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package).</p> <p>The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include:</p> <ul style="list-style-type: none"> • Photographs: Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the Campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the LAUSD) and provided in an electronic format. • Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader Campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. Historic Documentation Package Submittal: Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
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 44738-44739). The Archaeologist must have knowledge of both prehistoric and historical archaeology.</p>



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	To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified Archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior’s Professional Qualifications Standards (48 Federal Register 44738-44739). 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: <ul style="list-style-type: none"> ○ Extent and duration of the monitoring based on the grading plans. ○ At what soil depths monitoring of earth-moving 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 workers’ environmental awareness. program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. • The Construction Manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a workers’ 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



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	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 Archaeological Resource Management Reports Guidelines, as prepared by the California Office of Historic Preservation (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. The Historic Resources Evaluation Report (see Appendix C) concluded that the original Taft High School Campus meets the requirements for inclusion in the NRHP, CRHR, and local significance criteria for listing as a Historic District as an outstanding example of Mid-Century Modern architectural design in the post-World War II era in Los Angeles (see Figure 6). The 2019 Historic Resources Technical Report (see Appendix D) concurred with these findings. As such, a “substantial adverse change” in the significance of a historical resource would constitute “a significant effect on the environment” under CEQA provisions (PRC Section 21084.1). The Historic Resources Evaluation Report concluded that seven of the 42 buildings on Campus as well as the Lunch Pavilion, which were all constructed in 1960, contribute to the significance of a historic district according to U.S. Department of the Interior, National Park Service criteria.

- Multi-Purpose Building (Building 1)
- Classroom Building C (Building 6)
- Student Store Building (Building 7)
- Classroom Building D (Building 18)
- Classroom Building B (Building 19)
- Classroom Building A (Building 20)
- Administrative Building (Building 21)
- Lunch Pavilion (attached to Multi-Purpose Building)

The historical significance of the original Taft High School buildings, which are located in the southeastern portion of the Campus, are based on their contributing features. These buildings, all designed by the architecture firm of Balch-Bryan-Perkins-Hutcheson and built in 1960, embody the distinctive characteristics of “Postwar Modern, Functionalist School Plant” in the 1945-1969 era of the LAUSD history, as well as the influential aesthetics of post-World War II and Mid-Century Modernism in Los Angeles institutional architecture in the era of 1945 to 1976. These buildings also meet the requirements described in the LAUSD Historic Context Statement, 1869-1970.

The proposed comprehensive modernization would include demolition, new construction, and modernization/renovation on the Campus. Of the buildings contributing to the significance of the historic district, the Multi-Purpose Building (Building 1), Classroom Building C (Building 6), Classroom Building D



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(Building 18), Classroom Building B (Building 19), Classroom Building A (Building 20), and the Administrative Building (Building 21) would each be directly impacted by physical alterations. The Project includes major modernizations, including seismic retrofitting and low voltage upgrades to support current technology at the Multi-Purpose Building and the Administrative Building. The Classroom Buildings would undergo light modernizations including the provision of accessible restrooms, signage, classroom sinks, drinking fountains, assistive listening systems, and covered exterior connections. In addition, a new elevator would be installed at Classroom Building D to meet ADA requirements.

The Multi-Purpose Building is recognized as a contributing building of a historic district according to national, State, and local eligibility criteria. These features include, but are not limited to its irregular L-shaped building plan with the extended roofline creating an open air, covered lunch pavilion; distinctive Mid-Century Modern design elements, including symmetrical design composition, limited ornamentation, square concrete post and beam roof supports; and use of decorative metal panels to create permanent and sliding walls; and unified, cohesive site design, with buildings oriented around courtyards with concrete walkways, open spaces with landscaping, and site plan connected via circulation corridors, sheltered walkways and breezeways, and curvilinear brick perimeter wall. While these features would be impacted by potential alterations resulting from the proposed modernizations, Project upgrades would be limited to the multi-purpose room and supporting spaces and would not result in demolition or substantial alterations in appearance of the Multi-Purpose Building. As such, the Project would have a less than significant impact on the structure's historic character-defining features.

The Administrative Building is recognized as a contributing building for its character-defining features, including but not limited to its L-shaped building plan; unified, cohesive site design, with buildings oriented around courtyards with concrete walkways, open spaces with landscaping, and site plan connected via circulation corridors, sheltered walkways and breezeways; distinctive Mid-Century Modern architectural design, including horizontal design composition; lack of ornamentation, smooth wall surfaces, and bands of flush aluminum framed windows partially covered by louvers; and double-loaded hallways with brick walls. The proposed comprehensive modernization would provide seismic retrofit and electrical upgrades to the administrative and drama areas of the building. The proposed modernization activities would be limited to a portion of the building and would not result in demolition or substantial alternations in appearance of the building. Therefore, the Project would have a less than significant impact on the contributing historic features of the building.

Classroom Building C, Classroom Building D, Classroom Building B, and Classroom Building A are also recognized as contributing buildings of a historic district for their distinctive Mid-Century Modern design elements, unified and cohesive site design, and other character-defining features (see Appendix C and Appendix D). While the proposed comprehensive modernization would provide accessible restrooms, signage, classroom sinks, drinking fountains, and assistive listening system in each of these buildings. The proposed comprehensive modernization would also provide new elevators with enclosures, canopies, and bridge connection(s) to floor levels as required to maintain ADA accessibility. A covered exterior connection to the Classroom Building D elevator would be provided from Classroom Building C. Additionally, internal upgrades to restrooms, sewer, water, gas, and possibly fire and water in all two-story classroom buildings would be completed. The exterior of all existing buildings on Campus would be painted or cleaned, as appropriate, to



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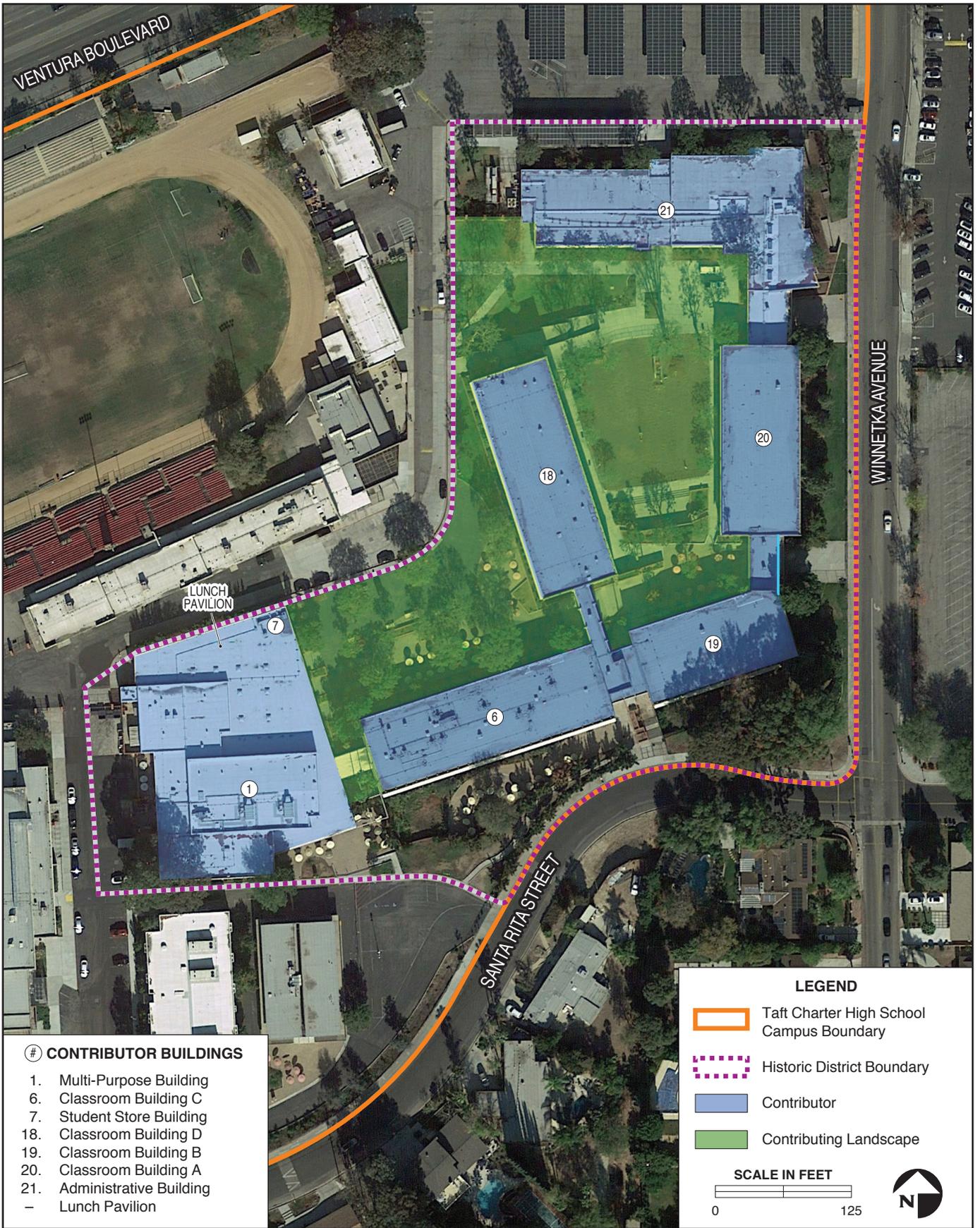
provide a uniform appearance and enhanced curb appeal. However, none of these modifications would substantially remove or alter the character defining features of the historic buildings.

In addition to the effects described above, the Project also includes demolition of 21 buildings throughout the Campus, causing some visual impact to the seven buildings and lunch pavilion, which together are eligible for listing as a historic district. However, none of the buildings programmed for demolition have been determined to be historically or architecturally significant, nor would any of the demolitions take place within the perimeter that encompasses the eligible buildings, adjacent courtyards, walkways, and landscaping.

Proposed new buildings would be constructed consistent with the design, scale and massing of those characterizing Classroom Building C, Classroom Building D, Classroom Building B, and Classroom Building A. With implementation of SC-CUL-1 through SC-CUL-5, the proposed new construction would be consistent with Secretary of Interior Standards, and would be compatible with the size, scale, and height of the Mid-Century Modern style contributing buildings and features that would remain and would not destroy spatial relationships that characterize the historic district. Therefore, the new structures would be compatible with the character-defining external attributes of the historic district and potential indirect effects would be less than significant.

With the incorporation of SC-CUL-1 through SC-CUL-5, which involve protections for historic resources including the involvement of a Historic Architect and development of a Temporary Protection Plan, the Multi-Purpose Building, Administrative Building Classroom Building C, Classroom Building D, Classroom Building B, and Classroom Building A would conform to the Secretary of Interior Standards for Rehabilitation, LAUSD Design Guidelines and Treatment Approaches for Historic Schools, and LAUSD's requirements and guidelines for the treatment of historic resources under the guidance of a qualified Historic Architect. Therefore, with the implementation of SC-CUL-1 through SC-CUL-5, the historic district, including all contributing elements, would retain its integrity, and Taft Charter High School would remain eligible for the NRHP, CRHR, local designations, and LAUSD Historic Context Statement requirements.

Under the CEQA Guidelines, the significance of a historic resource is materially impaired when a project alters, in an adverse manner, those physical characteristics that account for its eligibility as a historical resource. The historic district is seen as a single resource with the buildings, structures and other features, such as landscaping, as either contributing or non-contributing elements, or pieces, of a historic district. With implementation of SC-CUL-1 through SC-CUL-5, the Taft Charter High School historic district would retain sufficient integrity to remain eligible for the NRHP and CRHR (see Appendix D) as a majority of the contributing buildings and landscapes would be rehabilitated in conformance to the Secretary of Interior Standards and new construction would conform to Secretary of Interior Standards, resulting in a less than significant impact. No mitigation or further study is required.





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

Less than Significant. An archaeological resource is defined in CEQA Guidelines Section 15064.5(c) as a site, area or place determined to be historically significant as defined in CEQA Guidelines Section 15064(a), or as a unique archaeological resource defined in Public Resources Code Section 21083.2 as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality. The Administrative Building is recognized as a contributing building for its character-defining features, including but not limited to its L-shaped building plan; unified, cohesive site design, with buildings oriented around courtyards with concrete walkways, open spaces with landscaping, and site plan connected via circulation corridors, sheltered walkways and breezeways; distinctive Mid-Century Modern architectural design, including horizontal design composition; lack of ornamentation, smooth wall surfaces, and bands of flush aluminum framed windows partially covered by louvers; and double-loaded hallways with brick walls. The proposed comprehensive modernization would provide seismic retrofit and electrical upgrades to the administrative and drama areas of the building. The proposed modernization activities would be limited to a portion of the building and would not result in demolition or substantial alternations in appearance of the building. Therefore, the Project would have a less than significant impact on the contributing historic features of the building.

A project may have a significant effect on the environment if it impacts archaeological resources that meet the definition of either historical resources (CEQA Guidelines Section 15064.5[a]) or unique archaeological resources (CEQA PRC Section 21083.1[g]). The proposed comprehensive modernization would not include excavation into previously undisturbed native soils, as the Project site includes only areas within the Campus that have been previously developed since 1960 with existing structures or landscaped areas. The entire Campus has been subject to past subsurface disturbance associated with grading and foundations for the existing buildings and structures. Therefore, the potential to uncover buried prehistoric or historic archaeological resources is considered low. However, in the unlikely event archaeological resources are encountered during ground disturbing activities, SC-CUL-6 through SC-CUL-10 would be implemented to reduce potential impacts to previously unknown archaeological resources. These SCs would require LAUSD to retain a qualified Archaeologist to prepare and implement an Archaeological Monitoring Program, to conduct cultural resources sensitivity training for all construction workers involved in ground-disturbing activities, and to halt work within a 30-foot radius of an archaeological find if encountered during Project construction activities, among other protective measures. With implementation of SC-CUL-6 through SC-CUL-10, potential impacts to archaeological resources would be less than significant. No mitigation or further study is required.

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

Less than Significant. No known cemeteries or other burial places are known to exist within the Campus and the Project is unlikely to disturb human remains. However, in the unlikely event that human remains are encountered, LAUSD would be consistent with California H&SC Section 7050.5 and Public Resources Code Section 5097.98 resulting in a less than significant impact. Impacts would be less than significant. No mitigation or further study is required.



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

Explanation:

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). SCs related to greenhouse gas emissions are also applicable to energy associated with the Project are provided below. All SUP projects are required to meet CCR Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of the SCAG 2012-2035 RTP/SCS, such as encouraging energy efficiency.

The applicable SC related to energy impacts associated with the Project is provided below.

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SC-GHG-5	LAUSD shall ensure 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 California Title 24, Part 6 energy efficiency standards, which are in force at the time the Project is submitted to the DSA.
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a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant. Short-term construction activities associated with the Project 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 (e.g., restrictions on equipment, labor, types of activities, etc.). The proposed comprehensive modernization would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities.



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Operationally, the proposed comprehensive modernization of Taft Charter High School would be consistent with all appropriate design standards and sustainable building practices to reduce potential energy consumption. Standards will include the CALGreen Code, CHPS criteria, and the LAUSD's SCs included in this IS.⁵⁴ The CALGreen Code is a Statewide building standards code, which includes standards for reduced energy and water consumption and the reduction of GHG emissions from buildings.⁵⁵ The CHPS includes design criteria for energy and material efficiency. The proposed comprehensive modernization would replace or upgrade facilities on the campus of Taft Charter High School, but it would not increase the number of students or faculty at the high school. The proposed comprehensive modernization would result in a decrease of approximately 26,170 square feet in total building floor space, which would have corresponding reductions energy use (e.g., heating, cooling, etc.). Further, as the original Campus was constructed in the 1950s, the Project would overall improve energy efficiency. The Project would also include utilities upgrades (e.g., relocation of the existing Electrical Service Yard, new main electrical service along Ventura Boulevard, low voltage services, as needed, etc.), but would not require the expansion or construction of new electrical generation and/or transmission facilities and would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. The proposed comprehensive modernization would continue usage of local and regional energy supplies but would not constrain local or regional energy supplies, so the impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant. The proposed comprehensive modernization would be consistent with all State and local plans and regulations regarding energy use and energy efficiency standards. With the implementation of California Green Building Code, CHPS, and the energy SC, the Project would be consistent with the City of Los Angeles Data Disclosure plan to disclose the Project site's energy and water consumption in an effort to increase energy conservation and efficiency.⁵⁶ The proposed comprehensive modernization would also be consistent with the goals and measures of the City including the Sustainable City pLAN, which was updated in 2019 and named the City of Los Angeles New Deal.⁵⁷ The Sustainable City pLAN sets targets for the reduction of GHG emissions and increased energy efficiency. As previously described the Project would be consistent with design standards and building practices with regard to renewable energy and energy efficiency, so impacts would be less than significant. No mitigation or further study is required.

⁵⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁵⁵ Building Standards Commission. 2018. CALGreen. <https://www.dgs.ca.gov/BSC>.

⁵⁶ LA Energy & Water Efficiency Resource Center. 2019. Data Disclosure Plan. <https://www.betterbuildingsla.com/data-hub/data-disclosure-plan>.

⁵⁷ City of Los Angeles. 2019. Green New Plan. <http://plan.lamayor.org/>.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.7 GEOLOGY AND SOILS				
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to California Geological Survey Special Publication 42.	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

The following evaluation of geology and soils is based, in part, on the Geotechnical Investigation prepared for Taft Charter High School (see Appendix E). The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to impact geological and soil resources. It was determined in the SUP Program EIR that, upon implementation of regulatory requirements and SCs for SUP-related projects, the impacts associated with seismic hazards, underlying soil characteristics, slope stability, and erosion would be less than significant.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts



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(refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to geology and soils are provided below.

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SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. <p>Significant resources found shall be curated as determined necessary by the Paleontologist.</p>
SC-HWQ- 1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual</p> <p>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. 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</p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include 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) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**

Less than Significant. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings.⁵⁸ Fault rupture generally occurs

⁵⁸ California Department of Conservation. 2019. The Alquist-Priolo Earthquake Fault Zoning Act. <https://www.conservation.ca.gov/egs/alquist-priolo>.



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within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. In accordance with SC-GEO-1, a Geotechnical Investigation has been prepared for the Campus (see Appendix E). According to the Geotechnical Investigation, the Campus is not located within or immediately adjacent to (i.e., within a few hundred feet) an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 9 miles northeast of the Project site.⁵⁹

The DSA approves designs for new school construction, and all projects must submit to DSA oversight and inspections during construction.⁶⁰ The DSA must then certify that each new school building meets State of California statutory safety requirements. Compliance with DSA and California Building Code (CBC) requirements would ensure that potential impacts related to surface rupture from a known active fault would be less than significant. No mitigation or further study is required.

ii. Strong seismic ground shaking?

Less than Significant. The Project site is located within the seismically active southern California region and is likely to experience strong ground shaking from seismic events generated on regionally active faults (see Appendix E). As previously discussed, following the 1994 Northridge earthquake, several buildings required minor repair work, which entailed repairing cracks and spalling in walls and ceilings, and replacing damaged ceiling tiles. In addition to implementing all of the required site-specific recommendations included in the Geotechnical Investigation prepared for the Project (see Appendix E), the design and construction of new buildings would be consistent with the seismic safety requirements of the DSA and CBC. Modernization of the existing buildings would involve seismic retrofits – including major modernization of the Multi-Purpose Building (Building 1), Industrial Arts #1 (Building 10), and Administrative Building (Building 21) – that would improve the safety of the buildings related to seismic activity. Compliance with DSA and CBC requirements would ensure potential hazards from strong seismic ground shaking would be less than significant. No mitigation or further study is required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant. According to the Geotechnical Investigation prepared for the Campus (see Appendix E), Taft Charter High School is located within a mapped seismic hazard zone for liquefaction. However, design and construction of new buildings would be consistent with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC requirements would ensure potential hazards from seismic-related ground failure, including liquefaction, would be less than significant. As such, the Geotechnical Investigation concluded the potential for liquefaction and seismic-related ground failure beneath the site to be considered low (see Appendix E). No mitigation measures or further evaluation is required.

⁵⁹ U.S. Geological Survey. 2019 US Quaternary Faults.

<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>.

⁶⁰ Department of General Services, 2018. Division of the State Architect Enforcement Responsibility.

<https://www.dgs.ca.gov/DSA/About>.



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iv. Landslides

Less than Significant. Although the Campus is located in the Hillside Area of the City of Los Angeles, the “initial grading in 1957 leveled the majority of the site for the original construction of [Taft Charter High] school”⁶¹ (see Appendix E). The Project is located within a mapped Landslide Zone by the California Department of Conservation’s California Earthquake Hazards Zone Application; however, the application examines regional areas and cannot be considered site-specific.⁶² The site-specific Geotechnical Investigation prepared for the Campus concluded the topography at the site would prevent “both stability problems and the potential for lurching, earth movement at right angles to a cliff or steep slope during ground shaking,” particularly due to the limited slopes within the Campus and level character of a majority of the Project site (see Appendix E). Additionally, the Geotechnical Investigation concluded there are no previous known landslides within the Campus, nor is the Campus in the path of any known potential landslides; therefore, the potential for slope instability to impact the development is considered low. No mitigation or further study is required.

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

Less than Significant. Ground disturbance would occur during Project construction activities such as excavation, grading, trenching for utilities, and filling. These activities may disturb substantial amounts of soil (i.e., fill), resulting in the potential for soil erosion. However, this erosion would be limited due to the relatively gentle slope across the Project site. During the construction grading phase, excavation (e.g., installation of stormwater cisterns beneath the football field) would require an estimated 490 cubic yard (CY) of soil export (refer to Table 3-2). Soil removal activities would be completed in compliance with a RAW that would be prepared for the Project (see *Hazards and Hazardous Materials*). The RAW would be consistent with the criteria specified in the California H&SC §25356.1(h) and include a description of the on-site impact, a plan for conducting the removal action, and the goals to be achieved by the removal action, as required by H&SC §25323.1 (refer to Section 3.2.4, *Construction Phasing and Equipment*).

LAUSD projects are required to be consistent with the NPDES stormwater permit requirements, restricting sediment flows into storm drainage systems, and compliance with the LAUSD Stormwater Technical Manual (refer to Section 3.2.4, *Construction Phasing and Equipment*). Additionally, the potential for ground disturbance would be further reduced through the implementation of erosion control measures. Required erosion control measures are described in the site-specific Geotechnical Investigation (see Appendix E). In addition, as the Project site is greater than 1 acre, LAUSD’s construction contractor would prepare and comply with a SWPPP, which includes BMPs for erosion and sediment control. General categories of BMPs used in SWPPPs are described in Table 4-4. Compliance with the SWPPP requirements would reduce impacts to soil erosion or the loss of top soil to less than significant levels. No mitigation or further study is required.

⁶¹City of Los Angeles. 2019. ZIMAS. <http://zimas.lacity.org/>.

⁶²California Department of Conservation. 2019. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.



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**Table 4-4
Construction BMPs**

Category	Purpose	Examples
Erosion Controls	Consists of using project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season), preventing or reducing erosion potential by diverting or controlling drainage, as well as preparing and stabilizing disturbed soil areas	Scheduling, preservation of existing vegetation, hydraulic mulch, hydroseeding, soil binders, straw mulch, geotextile and mats, wood mulching, earth dikes and drainage swales, velocity dissipation devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization.
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Silt fence, sediment basin, sediment trap, check dam, fiber rolls, gravel bag berm, street sweeping and vacuuming, sandbag barrier, straw bale barrier, storm drain inlet protection, manufactured linear sediment controls, compost socks and berms, and biofilter bags.
Wind Erosion Controls	Consists of applying water or other dust palliatives to prevent or minimize dust nuisance.	Dust control soil binders, chemical dust suppressants, covering stockpiles, permanent vegetation, mulching, watering, temporary gravel construction, synthetic covers, and minimization of disturbed area.
Tracking Controls	Minimize the tracking of soil off-site by vehicles.	Stabilized construction roadways and construction entrances/exits, and 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.	Water conservation practices, temporary stream crossings, clear water diversions, illicit connection/discharge, potable and irrigation water management, and the proper management of the following operations: paving and grinding, dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing, demolition adjacent to water, material over water, and temporary batch plants.
Waste Management and Controls (i.e., good	Management of materials and wastes to avoid contamination of stormwater.	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management,



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**Table 4-4
Construction BMPs**

Category	Purpose	Examples
housekeeping practices)		sanitary/septic waste management, liquid waste management, and management of material delivery storage and use.

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

- 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 with Mitigation. Initial grading of the Campus in 1957 leveled the majority of the Project site with the exception of the western field (see Appendix E). Exploratory borings from 1957, 2002, and 2011 encountered fill to a maximum depth of 16 feet. Based on the most recent borings collected in 2017, fill could be as much as 20 feet deep between boring locations. The fill consists of silty sand, lean to fat clay, and sandy clay with a trace of gravel. However, records documenting the placement and compaction of the existing fill soils are not available for the Campus; therefore, the existing fill soils are not considered suitable for the support of new structures using conventional spread/continuous footings construction methods. Accordingly, if the existing fill soils are excavated and replaced with properly compacted fill, new structures may be supported on conventional spread/continuous footings established in natural materials and/or properly compacted fill (see Appendix E; see MM-GEO-1).

As previously described, the Campus is located within liquefaction and landslide zones by the California Department of Conservation; however, the site-specific Geotechnical Investigation prepared for the Campus concluded the generally level topography at the site would prevent “both stability problems and the potential for lurching, earth movement at right angles to a cliff or steep slope during ground shaking” (see Appendix E). Additionally, the Geotechnical Investigation concluded there are no previous known landslides within the Campus, nor is the Campus in the path of any known potential landslides; therefore, the potential for slope instability to impact the development is considered low. This risk of seismically-induced settlement is also considered to be low based on the geologic age and dense/clayey nature of the alluvial deposits and bedrock on the site (see Appendix E).⁶³ The Campus is not within an area of known or anticipated subsidence as no known ongoing oil or groundwater extraction occurs at Taft Charter High School or in the surrounding vicinity (see Appendix E). Design and construction of new buildings would be consistent with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC would ensure impacts associated with liquefaction would be less than significant.

⁶³ California Department of Conservation. 2019. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.



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Mitigation Measure:

Implementation of the following mitigation measure would reduce impacts from potential collapse of excavated soils and soil stability issues to less than significant.

MM-GEO-1. LAUSD shall require the Contractor to replace the existing fill soils with properly compacted fill or to implement drilled cast-in-place concrete pile foundations during construction of new buildings to ensure that all new buildings are structurally supported.

To ensure modernized and new structures are structurally supported to an acceptable level, LAUSD must implement the excavation and replacement of existing fill soils with properly compacted fill soils or support new buildings on drilled cast-in-place concrete pile foundations. The means and methods of installation, design, and implementation of either the replacement of existing fill soils to ensure soil stability underlying new and modernized buildings or the implementation of drilled cast-in-place concrete pile foundations shall be the responsibility of a licensed geologist and general contractor who shall satisfy the requirements of DSA's applicable codes and laws.

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

Less than Significant with Mitigation. The clayey soils underlying the Campus are expansive and will shrink and swell with fluctuations in moisture content, which can result in damage to buildings and infrastructure (see Appendix E). Existing facilities may already be exposed to potentially significant impacts regarding expansive soils. As previously described, the Project would adhere to MM-GEO-1 in all design and construction phases including the excavation of upper clayey soils “to allow for the placement of at least 2 feet of relatively non-expansive soils beneath floor slabs, pavement, and other exterior concrete walks” (see Appendix E). The proposed structures and upgrades to existing facilities would result in an increase in safety to life and property at Taft Charter High School because design and construction methods would meet higher standards than the existing structures. Potential impacts associated with unstable soils will be less than significant with the implementation of MM-GEO-1.

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 Project would be connected to the existing municipal sewer system, and no septic tanks or alternative waste water disposal systems would be necessary.⁶⁴ Therefore, no impact would occur, and no mitigation or further study is required.

⁶⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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

Less than Significant. Taft Charter High School is underlain by young fan deposits, undivided (Qyf) which overlie the older Modelo Formation.⁶⁵ The young fan deposits on the southern side of the San Fernando Valley were deposited from the late Pleistocene through the Holocene and are composed of unconsolidated gravel, sand, and silt deposited by flood stage streams and debris flows. Generally, Holocene-aged deposits are too young to contain fossil resources; whereas, Pleistocene-aged units are highly variable and have an undetermined potential for containing paleontological resources.

In the San Fernando Valley, the Modelo Formation is composed of marine sedimentary rocks, including diatomaceous shale, deposited during the Miocene. A search of the University of California Berkeley Museum of Paleontology (UCMP) for fossil localities associated with the Modelo Formation in Los Angeles County returned 65 total localities including: 20 invertebrate, 42 microfossil, four plant, and one vertebrate fossils localities.⁶⁶ The single vertebrate locality was collected from Sepulveda Canyon to the east of the Campus and includes eight bony fish specimens. Based on the local potential for the Modelo Formation to contain vertebrate fossils, this geological unit is considered to have a moderate sensitivity to impacts to paleontological resources from construction activities.

The Campus is located on urban previously developed land, so the potential for Project implementation to impact unidentified paleontological resources is low. Excavation associated with the Project is not anticipated to extend through Holocene to Pleistocene-aged young fan deposits into the underlying Miocene-aged Modelo Formation. In the highly unlikely event that paleontological resources are encountered during ground-disturbing construction activities LAUSD would contact an on-call paleontological monitor pursuant to SC-CUL-11. Therefore, impacts to paleontological resources would be less than significant.

⁶⁵ Yerkes, R.F. and R.H. Campbell. 2005. Preliminary Geologic Map of the Los Angeles 30' x 60' Quadrangle, Southern California. Department of Conservation – California Geological Survey.

⁶⁶ University of California – Berkeley Museum of Paleontology (UCMP). 2019. Collections Database for Modelo Formation, Los Angeles County.



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ENVIRONMENTAL IMPACTS

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

Explanation:

The SUP Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to contribute to GHG emission impacts. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG compounds, Project-related climate change impacts are inherently cumulative.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to GHG emissions associated with the Project are provided below.

LAUSD Standard Conditions of Approval	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (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 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 California Title 24, Part 6 energy efficiency standards, which are in force at the time the Project is submitted to the DSA.
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: School Design Guide Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. Construction & Demolition Waste Management



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LAUSD Standard Conditions of Approval

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

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

Less than Significant. Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO₂), methane (CH₄), O₃, water vapor, nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere but retain some of the low frequency infrared energy which is radiated back from the Earth toward space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts related to agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires. There continues to be significant scientific uncertainty concerning the extent to which increased concentrations of GHGs have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

Because GHG emissions are evaluated in a global or sometimes regional context, the project-related climate change impacts are inherently cumulative. Section 5.7.1.1 of the SUP Program EIR contains a summary of federal and State laws, regulations, plans and guidelines relevant for analyzing the impacts of GHG emissions from SUP projects. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32.⁶⁷

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

⁶⁷ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the Southern California Association of Governments region, the SCS was adopted in April 2016. On April 29, 2015, Governor Brown signed Executive Order B-30-15, which sets a California GHG reduction target of 40% below 1990 levels by 2030. In August 2016, Senate Bill 32 was passed and requires the State to reduce its greenhouse gas emissions 40% below 1990 levels by 2030.

As discussed in the SUP Program EIR, for projects that are not exempt from CEQA or where no qualifying GHG reduction plans are directly applicable, the SCAQMD proposed a “bright-line” screening-level threshold of 3,000 metric tons CO₂ equivalent (MTCO_{2e}) annually for all land use projects. The SCAQMD proposed this “bright-line” screening-level threshold “to achieve the same policy objective of capturing 90% of the GHG emissions from new development projects in the residential/commercial sectors.” In the California Air Pollution Control Officers Association (CAPCOA), *CEQA and Climate Change* white paper (January 2008), CAPCOA suggested a possible quantitative threshold option that would capture 90% of GHG emissions from future discretionary development projects. According to CAPCOA, the “objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future Statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative Statewide GHG emissions.” According to CAPCOA, a 90% capture rate would “exclude the smallest proposed developments from potentially burdensome requirements...to mitigate GHG emissions.”⁶⁸ The SCAQMD’s proposed screening level of 3,000 MTCO_{2e} per year is a SoCAB-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option and is consistent with the SUP Program EIR. Therefore, this threshold is used to evaluate Project-related GHG emissions.

Construction

A “worst-case” scenario for the construction phase of the Project was developed. GHG emissions for each construction year were estimated with the CalEEMod, Version 2016.3.2. CalEEMod serves as a planning tool for estimation of emissions related to land use projects. Construction emission results for the Project are presented in Table 4-5.

**Table 4-5
Construction and Operation Greenhouse Gas Emissions from the Proposed
Comprehensive Modernization Project**

Topic	GHG Emissions (MTCO _{2e})			
	2022	2023	2024	2025
Construction Year				
Annual GHG Emissions	207.2091	485.4315	487.3068	185.7505
Total Construction Emissions	1,373			
Total Operation Emissions	1,440			
Amortized Annual Emissions	46			
Total Project Emissions	1,486			
SCAQMD Significance Threshold	3,000			

⁶⁸ CAPCOA. 2008. CEQA and Climate Change.



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Table 4-5
Construction and Operation Greenhouse Gas Emissions from the Proposed Comprehensive Modernization Project

Topic	GHG Emissions (MTCO ₂ e)
Exceeds Threshold?	No

Source: Wood 2019; see Appendix A.

Amortized annual GHG emissions are estimated to be 46 MTCO₂e per year. As school enrollment is anticipated to remain the same following the Project and SC-GHG-1 through SC-GHG-5, which guide maintenance and energy goals for landscaping and energy efficiency measures, and SC-USS-1, which describes waste reduction efforts required during construction and demolition activities, would be incorporated to further reduce the per capita operational GHG emissions, the net change in operational emissions would not exceed the SCAQMD's significance threshold of 3,000 MTCO₂e per year based on the Project's CalEEMod. Impacts would be less than significant, and no mitigation or further study is required.

Operational

The proposed comprehensive modernization would replace or upgrade facilities at Taft Charter High School but would not increase the number of students or faculty and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source GHG emissions. Further, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating/cooling and other on-site sources. Therefore, there would be no net increase in regional GHG emissions as a result of Project implementation. Given that mobile source emissions would remain the same and stationary sources would likely decrease, GHG emissions are likely to be less than existing after Project implementation as the improved buildings would be required to meet the California Energy Commission's most recent energy standards (Title 24) and would require that the new buildings use less energy per square foot compared to existing buildings. As described previously, operational emissions would not change as a result of Project implementation and when added to amortized construction emissions, an increase of 101 MTCO₂e would occur, which is well below the 3,000 MT CO₂e, SCAQMD interim threshold. Additionally, LAUSD is required to be consistent with all applicable SCs, and would implement SCs GHG-1 through GHG-5, which would further reduce Project-related GHG impacts. Therefore, the cumulative contribution to GHG emissions would be less than significant. No mitigation or further study 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. Implementation of the Project would be consistent with plans adopted for the purpose of reducing GHG emissions, such as the SCAG Regional Transportation Plan (RTP) and SCS, AB 32, California Air Resources Board Scoping Plan, and other Statewide strategies to reduce GHG emissions⁶⁹. Development of the Project would replace and modernize facilities at Taft Charter High School, but it would not increase the number of students or faculty at the school and therefore, would not result in an increase in vehicle trips

⁶⁹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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to the school. GHG emissions related to vehicle trips would not increase as a result of the Project and would not conflict with the goals of the RTP/SCS.

All SUP-related projects, including the comprehensive modernization of Taft Charter High School, would be consistent with the LAUSD's GHG emission reduction measures. Specifically, LAUSD's School Design Guide requires construction contractors to reuse, recycle, and salvage non-hazardous C&D waste materials, as materials recovery would minimize the need to produce and transport new materials, thereby reducing emissions from mobile sources and energy use. With respect to all SUP projects, implementation of SC-GHG-1 through SC-GHG-5 would ensure that the Project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, with implementation of SC-GHG-1 through SC-GHG-5 and compliance with CALGreen Title 24, the Project would not conflict with plans, policies, or regulations adopted for the objective of GHG emissions reduction. Therefore, impacts would be less than significant. No mitigation or further study is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.9 HAZARDS AND HAZARDOUS MATERIALS				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<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/or 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

The following information includes data and analysis from the site-specific Phase I Environmental Site Assessment (ESA) conducted by Placeworks in 2017 (see Appendix F) and the Proponent's Environmental Assessment Equivalent Report (PEA-E) that was prepared by EFI Global in 2019 (see Appendix H). The Phase I ESA identified the following Recognized Environmental Conditions (RECs) and the PEA-E provided the results of the soil and groundwater sampling completed at the Project site. The PEA-E found exceedances of dieldrin, arsenic, and lead in soil samples from within the planter areas of the Campus, which are likely attributed in part to the following activities at the Project site:

- Historical Herbicide Uses** – LAUSD's prior practice of applying herbicides containing arsenic prior to the placement of asphalt concrete (AC) pavement may have left elevated concentration of arsenic in shallow soil.



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- **Storage of Petroleum Products** – Containers of gasoline are stored in a room within the Utility Buildings and in the tanks of the gasoline powered equipment stored in the Gardener’s Shed. Both of these locations have no secondary containment.
- **Industrial Wastewater** – A three-stage clarifier (i.e., purifier) is located underneath the arcade on the east side of the Industrial Arts #2 (Building 9).
- **Potential Hydraulic Lifts** – Two bays with roll up doors are present on the east side of Industrial Arts #2 (Building 9). This makes it likely that two interior hydraulic lifts were formerly present in this building, which utilized hydraulic fluids. The floor is covered and no records were found documenting the removal of any hydraulic hoists.
- **Historical Agricultural Use** – Historical aerial photographs indicate that agricultural buildings and potential plots for planting were/are present in the southwestern portion of the Campus. Pesticides and herbicides may have been used for insect and weed control during this period of time. Organochlorine pesticides (OCPs) were first introduced into California agriculture in 1944 and reached peak usage in the 1960s. Arsenic in the form of arsenical herbicides has been applied to many agricultural properties and elevated levels of arsenic have been reported in the evaluation of these properties. Although there is no evidence for the presence of such chemicals in on-site, soils, the potential exists given past agricultural practices.
- **Exterior Soil Contamination from LBP and Termiticides** – The primary buildings on the Campus were constructed prior to 1964 and, therefore, the exposed soil around these buildings may contain elevated concentration of lead from LBP. In addition, exposed soil around any timber structures of this vintage may contain elevated concentration of OCPs from former termiticide applications.
- **Radon Gas** – The Campus is located within an area where there are elevated levels of naturally-occurring radon gas (i.e., a high radon zone). Approximately one-third of the radon samples collected and analyzed by the California Department of Public Health within this zip code, exceed the USEPA’s action level of 4.0 picocuries per liter (pCi/l).
- **ACM and LBP** – The primary buildings at the Site were constructed prior to 1964 and, therefore, may contain ACM and/or LBP.

The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to have impacts associated with hazards and/or hazardous materials. LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to hazards and hazardous materials impacts associated with the Project are provided below.

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SC-HAZ-4	<p>The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):</p> <ul style="list-style-type: none"> • LAUSD Specification Section 01 4524, Environmental Import/Export Material Testing.
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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • RAW or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials- particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II, or abatement plan(s).
SC-AQ-1	<p>LAUSD shall complete an HRA for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 miles) of existing sources of adverse emissions.</p> <p>LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within ¼ mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.</p> <p>For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.).</p> <p>The HRA shall comply with Air Toxics HRA. This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.</p> <p>The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.</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. Construction-related activities associated with the Project would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers and paints. In addition, hazardous materials may be required for fueling and servicing construction equipment during construction on the Campus. The use of these materials would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations.

Recognized Environmental Conditions

Based on the RECs identified during the Phase I ESA and in accordance with Education Code Section 17213.1, a PEA-E was prepared for the Project.⁷⁰ The PEA-E provides an assessment of the shallow soils in select portions of the Project site for Title 22 metals, organochlorine pesticide (OCP), polychlorinated biphenyl (PCB), petroleum hydrocarbons, volatile organic compound (VOC) impacts, and for potential vapor intrusion. REC samples that were collected during the PEA-E investigation were below the Site Screening Assessment

⁷⁰ LAUSD OEHS. 2019. Preliminary Environmental Assessment Equivalent Report. . Prepared by EFI Global. Los Angeles, CA.



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Limits (SSALs) for VOCs and total petroleum hydrocarbons. Soil samples were collected and analyzed and analytical results for soil samples collected at the Project site identified elevated concentrations of dieldrin, lead, and arsenic in six locations. Based on the exceedances of dieldrin, arsenic, and lead, a Remedial Action Workplan (RAW) was completed for the removal of approximately 20 cubic yards of impacted soil from six areas within the Project site.⁷¹ LAUSD would enter into a contract with a qualified environmental consultant to complete the removal activities in accordance with the RAW. Implementation of MM-HAZ-1 would require further investigation into the potential contaminants and would require remedial action, if necessary. Two bays with roll up doors are present on the east side of the former Industrial Arts #2 (Building 9) indicating a former auto shop. Prior to demolition of Industrial Arts #2 (Building 9) the existing flooring would be removed down to the concrete slab and inspected for signs of hydraulic hoist. If signs exist (e.g. sawcuts in the slab, concrete of different tint/finish, etc.) then a geophysical survey would be completed to determine if the hoist(s) is/are still present under the slab. If no signs are present, no further investigation would be required. However, if the results of the geophysical survey indicate that the hydraulic hoist(s) may still be present, then the concrete would be removed and the soil beneath it removed to explore for the hoist(s) (see Appendix F). Should the presence of a lift be confirmed, it would be removed in accordance with all current laws, regulation, and guidelines. If the geophysical survey indicates no signs of a hydraulic lift, shallow (15-foot maximum) soil samples would be collected from beneath the center of the “patch” and analyzed for polychlorinated biphenyls (PCBs) and TPH-cc.

Asbestos Containing Material, Lead-Based Paint, and Polychlorinated Biphenyls in Building Materials

Neither the Phase I ESA or PEA-E included an asbestos survey, LBP survey, or testing of materials in buildings proposed for demolition or modernization/renovation. Most of the buildings at Taft Charter High School were constructed prior to 1964 (refer to Table 2-1) and, therefore, have the potential to contain ACM, LBP, and/or PCBs in building materials (see Appendix F and Appendix H). A survey would be completed prior to demolition or modernization activities.

The Project would also include ground disturbing activities that may affect underground utilities. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal CAA regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under SCAQMD Rule 1403. The federal Occupational Safety and Health Administration (OSHA) also regulates asbestos as a potential worker safety hazard. The Asbestos Containing Materials in Schools Rule (Code of Federal Regulations [CFR] Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked USEPA with developing a model plan for States for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

LAUSD provides a complete protocol for the handling of ACMs, including required procedures whenever ACM could be disturbed, in compliance with federal and State regulations.⁷² Compliance with asbestos-related

⁷¹ LAUSD OEHS. 2019. Preliminary Environmental Assessment Equivalent Report. Prepared by EFI Global. Los Angeles, CA.

LAUSD OEHS. 2020. Removal Action Workplan. Prepared by EFI Global. Los Angeles, CA.

⁷² LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.



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regulations and requirements is the responsibility of LAUSD's FETU, which identifies ACM, abates ACM (including repair and removal of asbestos), and prepares project-specific contract specifications and inspections. All materials that contain ACM would be removed by licensed asbestos abatement contractors following specific handling procedures. In addition, LAUSD's Standard Specification Section 13280 (Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003) would be implemented, as needed.⁷³ Procedures to be applied under Standard Specification Section 13280 include the following: Construction Contractors are required to be consistent with the requirements of this LAUSD standard specification during any project where ACM may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection, development of emergency plans, waste management, and reporting. Specific procedures are outlined for the performance of asbestos abatement, including maintenance of regulated areas through polyethylene sheeting and air filtration equipment, wet cleaning and vacuum cleaning of exposed surfaces, and posting of signs.

Coated surfaces applied prior to 1978 are assumed to include LBP. All projects at existing school sites must be reviewed by FETU for impacts to LBP prior to project commencement, as all coated surfaces (e.g., paint, varnish, or glazed) are assumed to contain lead, removal of which must be performed by properly trained and licensed contractors. Specific procedures for handling building materials containing LBP have been established by LAUSD. In addition, LAUSD Section 13282 (Lead Abatement and Lead Related Construction Work, March 15, 2007) and LAUSD Section 13614 (Abatement of Hazardous Materials, July 7, 2003) will be implemented as appropriate.

Procedures to be applied under Standard Specification Section 13282 include the following: Construction Contractors are required to be consistent with the requirements of this LAUSD standard specification during any project where LBP may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection and medical monitoring, development of emergency plans, and waste management. Procedures specific to waste disposal are testing requirements for determining the hazardous properties of the LBP using prescribed federal and State testing procedures. Specific procedures are outlined for the abatement of LBP, including its removal by sanding, chemical agents, or water jets, or its isolation by encapsulation.

Procedures to be applied under Standard Specification Section 13614 include the following: procedures for the proper packaging, transportation, and disposal of any identified or discovered hazardous materials that must be removed before construction can proceed. It specifically excludes underground storage tanks and contaminated soil or groundwater. Construction Contractors are required to be consistent with specific procedures regarding worker training, health and safety, hazardous material containment, and off-site transport and disposal. Existing regulations governing the proper packaging, transportation, and disposal of any identified or discovered hazardous materials would fully mitigate potential environmental effects.

⁷³ LAUSD Facilities Services Division. Asset Management: Guide Specifications - Divisions 02 – 25, Specifications - Division 13 (Special Construction), 13280 Asbestos Abatement & Asbestos Related Disturbance, November 21, 2003.



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Polychlorinated Biphenyls

Prior to 1978, PCBs were widely used as dielectric and coolant fluids in transformers, capacitors, and hydraulic lifts. Leaks and releases from transformers, causing PCB contamination, have been documented (DTSC 2006) at other sites. Production of PCBs was banned in the U.S. by the Toxic Substances Control Act due to evidence of accumulation in the environment and a link to harmful health effects. However, they continued to be allowed in "totally enclosed uses" such as transformers and capacitors, which, in certain failure modes or out-of-specification conditions, can leak, catch fire, or explode. PCBs are listed as carcinogens by the State of California. A transformers enclosure (Station 403) containing three large transformers is located south of the Industrial Arts #2 (Building 9); however, no visible signs of leakage or spills were noted around the transformers. Additionally, the Los Angeles Department of Water and Power (LADWP) confirmed that each of the transformers had been replaced in 2001, more than 20 years after the ban on PCBs.

Soil Contaminants and Soil Vapor Gas

Projects that involve earth-moving activities of more than 50 CY of soil with applicable toxic air contaminants are subject to SCAQMD Rule 1466, which establishes required practices including but not limited to advanced public notification and dust control measures to minimize off-site fugitive dust emissions from earth-moving activities.⁷⁴ As the Project would involve earth-moving activities of more than 50 CY, LAUSD would sample and test soils for the presence of the applicable toxic air contaminants to determine if the Project is subject to SCAQMD Rule 1466. If the applicable toxic air contaminants are found (e.g., arsenic from historical herbicide application, organochlorine pesticides from termiticides, elevated lead concentrations from LBP, etc.) LAUSD would be consistent with the provisions of SCAQMD Rule 1466. Compliance with SCAQMD Rule 1466 would minimize off-site fugitive dust emissions from earth-moving activities at the Project site.

Additionally, the Campus is located within a zip code in which approximately one-third of the samples collected and analyzed for radon gas exceed the USEPA's action level of 4.0 pCi/L (see Appendix E). Structures that would be demolished or undergo major modernization, which have not received radon gas testing at the lowest level, would be tested to identify if the building contains a hazardous gas during the PEA-E. All newly constructed buildings and major modernization improvement structures would be required to be designed and constructed with appropriate radon-resistant features such as depressurization and venting. LAUSD would continue to be consistent with federal and State laws and existing Campus programs, practices, and procedures to eliminate or reduce the consequences of hazardous materials accidents. This would ensure affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Existing regulations governing which eliminate or reduce the consequences of hazardous materials accidents would fully mitigate potential environmental effects.

Operations

Long-term operations at the Campus would involve very little transport, storage, use, or disposal of hazardous materials and substances and would adhere to federal, State, and local health and safety regulations. The types of hazardous materials would generally be limited to those associated with janitorial, maintenance, and repair activities, such as commercial cleansers, paints, aerosol cans, lubricants, and automotive supplies. There would

⁷⁴ SCAQMD. 2019. SCAQMD Rule 1466. <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.



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be no increase in these activities as compared to existing conditions as the Project would not expand student enrollment capacity. LAUSD's OEHS developed and implemented a Chemical Hygiene Plan to minimize employee and student exposure to hazardous chemicals in schools with laboratories. LAUSD would incorporate OEHS programs and procedures regarding hazardous material safety requirements into the design and long-term operations at the Campus. The requirements may include: providing for and maintaining safety data sheets, appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels.⁷⁵ Therefore, adherence to the Chemical Hygiene Plan and OEHS programs would ensure that the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant. No mitigation or further study is required.

Mitigation Measure:

Implementation of the following mitigation measure would reduce impacts from potential soil and soil vapor hazards to less than significant.

MM-HAZ-1. Soil investigation and remediation, as necessary, associated with Industrial Arts #2 (Building 9).

- Two bays with roll up doors were identified on the east side of the former Industrial Arts #2 (Building 9). The existing flooring shall be removed down to the concrete slab and inspected for signs of hydraulic hoist. If signs exist (e.g. sawcuts in the slab, concrete of different tint/finish, etc.), then a geophysical survey shall be completed to determine if the hoist(s) is/are still present under the slab. If no signs are present, no further investigation shall be required. However, if the results of the geophysical survey indicate the hydraulic hoist(s) may still be present, then the concrete shall be removed and the soil beneath it removed to explore for the hoist(s). Should the presence of a lift be confirmed, it shall be removed in accordance with all current laws, regulation, and guidelines. If the geophysical survey indicates no signs of a hydraulic lift, shallow (15-feet maximum) soil samples would be collected from beneath the center of the "patch" and analyzed for PCBs and TPH-cc.
- In the event that the soil and soil vapor samples indicate potentially unsafe materials remain, further remediation shall be applied in accordance with all current laws, regulation, and guidelines.

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

Less than Significant. As previously described, the use of hazardous materials (e.g., petroleum-based products, paints, solvents, sealers, etc.) may be required in small quantities during construction-related activities and long-term operations at the Campus. The amount of hazardous materials that are handled at any one time would be relatively small, reducing the potential consequences of an accident during handling. Hazardous materials would be transported, used, stored, and disposed of in compliance with all applicable federal, State, and local regulations. This would include using appropriate warning signs and labels, installing emergency wash areas, and providing well ventilated areas and special plumbing. Additionally, ACM and LBP contaminants that

⁷⁵ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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could become airborne during demolition and hauling would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities. LAUSD would continue to be consistent with federal and State laws and existing campus programs, practices, and procedures to eliminate or reduce the consequences of hazardous materials accidents. Compliance with applicable laws, regulations and standard LAUSD policies and practices during construction-related activities and long-term operations at the Campus would ensure that impacts associated with upset or accident conditions which could cause a release of hazardous materials into the environment are less than significant. No mitigation or further study is required.

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

Less than Significant. Sensitive human receptors within 0.25 miles of the Project site (i.e., the Campus) are shown in Figure 5. Sensitive receptors also include Taft Charter High School as well as the adjacent Thoreau Continuation High School.

As noted above, ACM and LBP are assumed to be present in the buildings and grounds facilities at Taft Charter High School. As such, contaminants that could become airborne during demolition and hauling (e.g., ACM, LBP, or arsenic) would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities. Therefore, emissions impacts on existing schools within 0.25 miles would be less than significant. No mitigation or further study is required.

Operation of construction equipment and heavy trucks would generate diesel emissions, which are considered hazardous; however, the construction period would be temporary. As previously described in *Air Quality*, short-term acute exposure levels have not been developed for DPM (diesel). Although sensitive receptors (both on- and off-site) may be exposed to diesel exhaust during construction, the duration of exposure would not be enough to result in a significant cancer risk. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at any of the schools within 0.25 mile of the school campus.

As further discussed in *Air Quality*, long-term operations at the Campus would not generate hazardous emissions. During school operations, hazardous materials expected at the Campus would be associated with routine janitorial, maintenance, repair and academic activities (such as chemicals from science, shop, and photography classes). These materials would be used in small quantities and would be stored in compliance with established federal and State requirements. No mitigation or further study is required.

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

No Impact. The Phase I ESA identified that Taft Charter High School was reported on three hazardous materials databases, including HAZNET, Emissions Inventory (EMI), and Facility Index System/Facility Registration System (FINDS; see Appendix F). HAZNET, a California DTSC database which records annual hazardous waste shipments in the U.S., indicates five occurrences of hazardous waste transport originated from the site. Of the five occurrences, four were associated with ACMs and one with an unreported waste category. The EMI, a database that provides annual air pollutants emissions, listed no air pollutants detected at the Campus from the 1990 listing. The Campus is also listed on the FINDS database, which operates as a central



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inventory for facilities monitored by the USEPA, with the USEPA Identification No. CAD982039422. However, a FINDS listing is not necessarily an indication of a significant site hazard. School facilities, including the Project site, typically have disposed of small quantities of hazardous wastes in the past, such as chemicals from science, shop, and photography classes and waste generated during routine campus maintenance, which do not cause a significant hazard.

Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. The Cortese List can be located on the “Envirostor” database, which is managed by the DTSC.⁷⁶ Neither the Project site nor any sites within 0.25 miles were identified on the database. Therefore, no impacts would occur and no mitigation or further study 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. Taft Charter High School is not located within 2 miles of a public airport. The nearest airport is Van Nuys Regional Airport, which is located approximately 5 miles west-northwest of the site. Taft Charter High School is an existing Campus located within an existing developed area, so the proposed comprehensive modernization would not create any safety hazards associated with air travel or airport operations. Therefore, no impacts would occur and no mitigation or further study is required.

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

No Impact. As previously described, the Los Angeles County Department of Public Works considers U.S. Highway 101 a Freeway Disaster Route and Ventura Boulevard a Disaster Route under the County Disaster Routes Map.⁷⁷ The proposed comprehensive modernization would not alter any existing roadways designated as disaster route and would result in no impacts. No mitigation or further study is required.

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

Less than Significant. Taft Charter High School is not located within the Los Angeles County Fire Hazards Severity Zone according to the California Department of Forestry and Fire Protection (CAL FIRE). The nearest fire hazard severity zone is located within the Santa Monica Mountains forest approximately 0.5 miles from the Project site boundary. According to the Los Angeles County Fire Hazard Severity Zone Map, neither the Campus nor the surrounding vicinity are located within a Fire Hazard Severity Zone.⁷⁸ Taft Charter High School is in a previously developed urban area and the proposed comprehensive modernization would not further

⁷⁶ DTSC. 2019. ENVIROSTOR. <https://www.envirostor.dtsc.ca.gov/public/>.

⁷⁷ Department of Public Works Los Angeles County. 2019. Disaster Routes: Los Angeles County Operational Area. https://dpw.lacounty.gov/dsg/DisasterRoutes/map/disaster_rdm-South.pdf.

⁷⁸ City of Los Angeles. 2012. Los Angeles County Fire Hazard Severity Zone Maps. <https://www.arcgis.com/home/webmap/viewer.html?webmap=71ab58665c4f4eed830985f469b8283d>.



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expose people or property to any significant risk associated with wildland fires. Impacts would be less than significant and no mitigation or further study is required.



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ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.10 HYDROLOGY AND WATER QUALITY				
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<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:				
i) Result in substantial on- or off-site erosion or siltation;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<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 groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to have impacts associated with hydrology and water quality. Upon implementation of regulatory requirements and SCs, the impacts associated with hydrology and water quality would be less than significant.

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to hydrology and water quality impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval

SC-HWQ-1	LAUSD shall design and construct the Project to meet or exceed the current and applicable stormwater guidelines.
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LAUSD Standard Conditions of Approval	
	<p>Stormwater Technical Manual The 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. These guidelines meet current post-construction SUSMP and the mandated pos-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 Stormwater Requirements at Construction Sites The checklist has requirements for compliance with the General Construction Activity Permit and is used by the OEHS to evaluate permit compliance. Requirements listed include a SWPPP, BMPs for minimizing stormwater pollution to be specified in a SWPPP, and monitoring stormwater discharges to ensure the sedimentation of downstream waters remains within regulatory limits.</p>
SC-HWQ-3	<p>LAUSD shall implement the following programs and procedures, as applicable:</p> <ul style="list-style-type: none"> • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker’s environmental awareness program that is prepared by LAUSD for the Project • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste) • Medical Waste Management Program • Environmental Compliance Inspections • Safe School Inspections • Integrated Pest Management Program • Fats Oil and Grease Management Program • Solid Waste Management Program • Other related programs overseen by OEHS

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

Less than Significant. Taft Charter High School is located within a dense urban area of the City of Los Angeles and is connected to the City’s network of stormwater drainage facilities, which convey surface water runoff to municipal treatment facilities and ultimately to the Pacific Ocean. The Project would require grading and other construction activities that could cause deterioration of water quality if sediments or construction-related pollutants wash into the surface water system. As earth-moving activities associated with the Project would disturb more than 1 acre, the Project is required to be consistent with the One Water Los Angeles 2040 Plan governing long-term planning for water supplies, the LAUSD OEHS Compliance Checklist including preparation of a SWPPP, BMPs to minimize stormwater pollution (refer to Table 4-6), and a monitoring system for stormwater discharges to ensure sedimentation of downstream water remains within the existing regulatory limits.⁷⁹ The Project is additionally required to provide upkeep and monitoring of the SWPPP and BMPs effectiveness to prevent pollutant runoff during long-term operations at the Campus. For construction sites of 1 acre or more, including the Project, the Construction Contractor must prepare a Permit Registration Document (PRD) demonstrating compliance and coverage under the Regional Water Quality Control Board

⁷⁹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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(RWQCB) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ; NPDES No. CAS000002).

The Program-wide LAUSD SWPPP was developed in coordination with the Los Angeles RWQCB, ensuring the aggregate stormwater runoff from school construction projects do not create a condition of pollution, contamination, or nuisance as defined in California Water Code Section 13050.⁸⁰ The proposed comprehensive modernization would also be required to be consistent with local ordinances and local erosion and sediment control requirements. The proposed comprehensive modernization would be completed in accordance with LAUSD standards and applicable regulations pertaining to stormwater runoff, including:

- Preparing and implementing a sediment and erosion control plan that follows the BMPs outlined by the State Water Resources Control Board to be consistent with the Construction General Permit.
- Developing and implementing a site-specific SWPPP with BMPs, as required by RWQCB NPDES regulations.
- Discharging water accumulated within the construction excavation pits in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES Construction General Permit.
- Preventing construction-related sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of construction site areas.
- Compliance with SC-HWQ-1, SC-HWQ-2, and SC-HWQ-3.

LAUSD would follow the LAUSD Stormwater Technical Manual design requirements and guidelines for cost-effective improvements 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. Specifically, the guidelines in the manual address the mandated post-construction element of the NPDES program requirements, which was updated in June 2019, enforced by the Los Angeles RWQCB in the Los Angeles Region.⁸¹

The proposed comprehensive modernization may create additional sources of non-point source or stormwater pollution associated with vehicular-related contaminants washing into the drainage system during wet weather construction activities. However, the proposed improvements involve the replacement of existing uses in areas that already produce non-point source pollutants. The proposed comprehensive modernization would be required to adhere to the LAUSD Stormwater Technical Manual guidelines, which are intended to ensure that appropriate stormwater reduction and treatment elements are included in SUP projects to the maximum extent practicable. LAUSD's stormwater runoff control programs and SCs, including SC-HWQ-1, which ensures adherence to current stormwater guidelines, SC-HWQ-2, which requires a compliance checklist for stormwater requirements at construction sites, and SC-HWQ-3, would mitigate impacts associated with construction-

⁸⁰ LAUSD. 2009. Stormwater Technical Manual. PDF

⁸¹ USEPA. 2019. Final Modification of the 2017 Construction General Permit (CGP). <https://www.epa.gov/npdes/final-modification-2017-construction-general-permit-cgp>.



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related activities and operations at the Campus. Therefore, the Project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant and no mitigation or further study 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. The LADWP supplies water to Taft Charter High School.⁸² According to its Urban Water Management Plan (UWMP), LADWP's three main sources of water are the Los Angeles Aqueducts, local groundwater, and imported supplemental water purchased from the Metropolitan Water District of Southern California. The proposed comprehensive modernization would not result in any substantial changes in the quantity of groundwater supplies. No groundwater extraction activities would occur at the Project site, and no wells would be constructed as a result consequence of the proposed comprehensive modernization. The Campus currently contains various impervious surfaces. Based upon the proposed sizes and locations of the new buildings and infrastructure, after completion of the Project would be similar to existing conditions with regards to the amount of impervious surfaces; therefore, there would be no net decrease in percolation of water into groundwater because of new impervious surfaces at the site. In addition, PDFs would include mechanisms to control runoff from the newly impervious areas and promote on-site percolation. The proposed comprehensive modernization would not significantly impact groundwater recharge capability.

Water use by LAUSD, including groundwater, is driven by the number of students in attendance. The proposed comprehensive modernization would not induce growth as no increase in students and/or faculty would occur. Compliance with applicable laws, regulations, and LAUSD standards during construction-related activities and long-term operations at the Campus would ensure that impacts associated with groundwater supplies are less than significant. No mitigation or further study is required.

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

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

Less than Significant. Taft Charter High School is currently developed and located in an urbanized area with established drainage patterns. There are no streams, rivers, or other natural water features within the Campus.

The proposed comprehensive modernization may slightly alter the existing drainage pattern on the Project site (e.g., installation of stormwater cisterns beneath the football field; new bio-detention at the central courtyard); however, LAUSD standards that apply to all projects require collection of stormwater runoff, compliance with applicable NPDES stormwater permit requirements, restriction of sediment flows into storm drainage systems, and compliance with the LAUSD Stormwater Technical Manual.⁸³ During construction, disturbance of soil could lead to an increased potential for wind and water erosion. However,

⁸² LADWP. 2017. Urban Water Management Plan.

⁸³ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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soil disturbance would be controlled with implementation of a site-specific SWPPP and utilization of applicable BMPs during construction-related activities. Long-term operations at the Campus would incorporate, as feasible, features outlined in the LAUSD Stormwater Technical Manual to reduce the impact of erosion and siltation. Compliance with applicable laws and regulations and SC-HWQ-1, SC-HWQ-2, and SC-HWQ-3 during construction-related activities and long-term operations at the Campus would ensure that impacts associated with erosion or siltation on- or off-site are less than significant. No mitigation or further study is required.

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

Less than Significant. The proposed comprehensive modernization would not substantially alter the local drainage pattern or increase the risk of flooding in the surrounding area. Construction activities would use minimal water and would thereby not generate a large amount of runoff at the Campus. The SWPPP would include BMPs such as protection of storm drain inlets on-site and downstream and would control on-site drainage reducing the potential for flooding to occur. The Construction Contractor would comply with applicable ordinances regulating drainage improvements and grading plans as they relate to construction of on-site improvements. Compliance with applicable laws, regulations, and LAUSD standards, including SC-HWQ-1, SC-HWQ-2, and SC-HWQ-3 during construction-related activities and long-term Campus operations, would ensure that impacts associated with drainage and flooding are less than significant. No mitigation or further study is required.

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

Less than Significant. The proposed design of the comprehensive modernization is required to include provisions to control surface runoff in compliance with the requirements of applicable NPDES permits, which controls water pollution through regulation of point sources via permitting, and SUSMPs. During construction, stormwater BMPs (e.g., silt screens and designated washing stations) would be implemented to accommodate site runoff to ensure construction activities would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff (refer to Table 4-4). In addition, California Government Code Section 53097 requires school districts to be consistent with county and City ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would be consistent with California Government Code Section 53097 during implementation of the proposed comprehensive modernization.⁸⁴ Compliance would ensure that the Project would not have a significant adverse effect on the local drainage system. Implementation of the proposed comprehensive modernization would not substantially change pervious or impervious surface area ratios as it would not significantly alter existing land uses. Additionally, in accordance with NPDES requirements, the proposed comprehensive modernization would be required to control the rate of surface runoff and ensure runoff would not exceed the capacity of the existing or planned stormwater drainage system on-site. The Project would include the installation of stormwater cisterns beneath the football field and a new bio-detention at

⁸⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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the central courtyard that would be designed to regulate and improve stormwater runoff at the Project site. Thus, no long-term runoff would be created that would exceed the capacity of the existing and planned stormwater drainage system and impacts would be less than significant. No mitigation or further study is required.

iv) Impede or redirect flood flows?

No Impact. The Federal Emergency Management Act (FEMA) Flood Map Program shows that Taft Charter High School and the surrounding area are not within a specified flood hazard zone.⁸⁵ As previously described, the proposed comprehensive modernization is an existing school in an urbanized area; therefore, construction-related activities or long-term operations would not impede or redirect flood flows. No impacts would occur. No mitigation or further evaluation is required.

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

No Impact. Seiches are seismically or wind induced tidal phenomena that occur in enclosed bodies of water. Taft Charter High School is not located adjacent to or near a standing body of water. The nearest body of water is the Encino Reservoir located 3.5 miles southeast of the Campus. Due to its distance from the lake, the Project site would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche. Therefore, no impact from inundation by seiche would occur.

A tsunami is a sea wave of local or distant origin that results from large-scale seafloor displacements associated with earthquakes, major submarine landslides, or exploding volcanic islands. Tsunamis generally affect coastal communities and low-lying river valleys. Taft Charter High School is located more than 8 miles north of the Pacific Ocean. Additionally, the Campus is not located within the Los Angeles County Tsunami Inundation Zone.⁸⁶

As stated above, the FEMA Flood Map Program indicates that Taft Charter High School is not within any known flood hazard area. The Campus is not at risk of pollutant release from inundation, so no impact would occur. No mitigation or further study is required.

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

No Impact. The Project would adhere to the 2014 Sustainable Groundwater Management Act (SGMA) guidelines, which set groundwater basin sustainability requirements to ensure the “management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.”⁸⁷ Taft Charter High School lies within the San Fernando Valley Groundwater Basin (No. 4-012). Under SGMA the California Department of Water Resources was required to prioritize groundwater basins based on a range of groundwater factors, and the San Fernando Valley Groundwater Basin

⁸⁵ Federal Emergency Management Agency. 2019. Flood Mapping Products. <https://www.fema.gov/>

⁸⁶ California Department of Conservation. 2019. Los Angeles County Tsunami Inundation Maps. <https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles>.

⁸⁷ California Department of Conservation. 2019. SGMA Groundwater Management. <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.



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received a prioritization ranking of “very low.”⁸⁸ Groundwater basins ranked as very low are not required to create Groundwater Sustainability Plans.⁸⁹

The County of Los Angeles is under the Los Angeles RWQCB’s Basin Plan and the proposed comprehensive modernization would adhere to all components of the Basin Plan in regards water quality and water usages.⁹⁰ Taft Charter High School is not located within a coastal watershed area and would not have any impacts to any coastal watershed related plan. The proposed comprehensive modernization would be consistent with all groundwater management and water quality plans including but not limited to the City of Los Angeles Upper Los Angeles River Area Watershed and LA Water Quality Control Plan. No impacts would occur and no mitigation or further study is required.

⁸⁸ California Department of Conservation. 2019. SGMA Basin Prioritization. <https://gis.water.ca.gov/app/bp-dashboard/p2/>.

⁸⁹ California Department of Water Resources. 2019. Groundwater Basin Boundary Assessment Tool. <https://gis.water.ca.gov/app/bbat/>.

⁹⁰ California Department of Conservation. 2019. SGMA Groundwater Management. <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.



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ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.11 LAND USE AND PLANNING				
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 type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact existing land uses in the LAUSD service area and to conflict with applicable land use plans, policies and regulations, including habitat for wildlife conservation plans.

To avoid impacts on existing land uses in areas where future projects would be implemented under the SUP, the SUP Program EIR requires site specific projects to be consistent with applicable state regulations. For Taft Charter High School, these include: (1) Education Code Section 17251, (2) CCR, Title 5, Sections 14001 through 14012, and 3) California Education Code Section 38131(b): Civic Center Act. No SCs would apply.

According to the SUP Program EIR, projects implemented under the SUP that include new construction and modernization on existing school campuses would not conflict with applicable land use and conservation plans and regulations, would not physically divide an established community, and would have no impacts on existing land uses in the LAUSD region. Similarly, project-specific analysis provided below concludes that implementation of the Project would have no impacts related to land use and planning.

a) Physically divide an established community?

No Impact. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of an access point, such as a local road or bridge that would impact mobility or access to or between an existing community.⁹¹ The proposed comprehensive modernization would occur entirely within the existing boundaries of Taft Charter High School. The Campus is zoned as PF-1XL and would not result in any zoning changes or changes in usage. Because the proposed comprehensive modernization would be constructed on an established school campus, no impact related to the physical division of an established community would occur. No mitigation or further study is required.

⁹¹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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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?

No Impact. The student and faculty population at Taft Charter High School would not increase as a result of the Project, and the existing land use would remain the same. Additionally, the proposed comprehensive modernization would not significantly increase vehicle trips to or from the Campus. As a result, the Project would not result in long-term operational population or employment growth that exceeds planned growth projections in the SCAQMD AQMP or the SCAG RTP/SCS.⁹²

The California legislature granted school districts the power to exempt school property from local zoning requirements provided the school district complies with the terms of California Government Code Section 53094. On February 19, 2019, the LAUSD Board of Education adopted a resolution to exempt its school sites (including Taft Charter High School) from all local ordinances such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right of way), recordation of parcel maps, signage, site plan review, and inspection. In accordance with Government Code Section 53094, these local codes are inapplicable to the Project.⁹³

The City of Los Angeles General Plan Land Use designation for the school property is “Public Facilities.”⁹⁴ The land use element of the General Plan is comprised of 35 community plans that together guide the future development of the City of Los Angeles. The school Campus is within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan Area.⁹⁵

Even if it were not exempt, the City of Los Angeles General Plan designation for the Campus is “Public Facilities” (refer to Section 2.5, *General Plan and Existing Zoning*). Existing zoning for the school property is PF-1XL. PF (Public Facilities), which is a zone for the use and development of publicly owned land, including public elementary and secondary schools.

The Project would not conflict with applicable land use plans, policies, or regulations. With compliance with applicable State regulations, impacts associated with the proposed comprehensive modernization would be less than significant. No mitigation or further study is required.

⁹² SCAG. 2013. RTP/SCS. <http://www.scag.ca.gov/Documents/scagGeneral2013.pdf>.

⁹³ On February 27, 2019, LAUSD provided notice of this action to the County and all local City planning departments located within LAUSD boundaries (including the City of Los Angeles).

⁹⁴ City of Los Angeles. 2019. Zoning. <http://zimas.lacity.org/>.

⁹⁵ City of Los Angeles. 2019. General Community Plans. <http://cityplanning.lacity.org/>.



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ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.12 MINERAL RESOURCES				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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:

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact mineral resources. The State geologist-classified Mineral Resource Zone-2 (MRZ-2) sites are located in two regions within the LAUSD area: one in central Los Angeles, and the other in the east-central San Fernando Valley.⁹⁶ None of the designated mineral resource zones are located on or near an existing LAUSD school campus. No SCs apply.

According to the SUP Program EIR, projects implemented under the SUP are anticipated to have no impacts on mineral resources in the LAUSD region. The Project-specific analysis provided below concludes that implementation of the Project would have no impacts on mineral resources in the Project area.

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. Taft Charter High School is not located within an area designated as a mineral resource zone. According to the Surface Mining and Reclamation (SMARA) Generalized Mineral Land Classification Map for Los Angeles County, the Campus is not classified within any of the four SMARA designated mineral resource zones.⁹⁷ The proposed comprehensive modernization would be entirely carried out within the existing Campus, and there are no mining sites located on the site. Therefore, no impact to mineral resources would occur. No mitigation or further study 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 Geologic Energy Management Division, formerly Division of Oil, Gas, and Geothermal Resources (DOGGR) “CalStim’D” site, which maps recorded oil and gas field’s geographical locations, shows that Taft Charter High School is not located within a known oil and gas field.⁹⁸ Additionally, the Well Finder

⁹⁶ According to SMARA, MRZ-1 are areas of no significant mineral resource deposits, MRZ-2 are areas that contain identified mineral resources, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 are areas of unknown resource potential.

⁹⁷LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁹⁸ Department of Conservation, 2019. Division of Oil, Gas, and Geothermal Resources-CalStim’D.



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DOGGR Geographical Information Systems (GIS), which provides frequent well location updates, indicates no oil or gas wells are located on or in the vicinity of the Project site.⁹⁹ As discussed above, Project activities would be entirely carried out within an existing school campus. There are no mineral resource recovery sites located on any existing LAUSD school campuses, nor do mineral extraction operations occur on LAUSD property.¹⁰⁰ Therefore, the Project would not result in the loss of availability of a known mineral resource or a mineral resource recovery site. No impact would occur. No mitigation measures or further study is required.

⁹⁹ Department of Conservation, 2019. DOGGR GIS- Well Finder.

¹⁰⁰ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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ENVIRONMENTAL IMPACTS

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

Explanation:

The SUP Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse noise impacts to students and faculty at the upgraded school sites and to surrounding areas. LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval

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



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LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified.
SC-N-3	<p>LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> Buffer zones; Berms; Sound barriers; Buildings; Masonry walls; Enclosed bleacher foot wells; and/or Other site-specific PDFs.
SC-N-4	<p>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.</p>
SC-N-6	<p>For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.</p>
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 pre-construction 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"> Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. The Construction Contractor shall implement alternative methods identified in the pre-construction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. 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. <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 to determine what, if any, feasible Project-specific noise reduction measures are needed.</p>



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LAUSD Standard Conditions of Approval	
	<p>Source Controls</p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 a.m. and 7:00 p.m.). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/ or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on-site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>Path Controls</p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p>Receptor Controls</p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complain 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 LAUSD. 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>	<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. Noise control measures may include, but are not limited to:</p> <p>Path Controls</p> <p>Noise Attenuation Barriers – 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.</p> <p>Source Controls</p> <ul style="list-style-type: none"> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest class rooms has ended; residential areas: only between 7:00am 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.



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LAUSD Standard Conditions of Approval

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

Less than Significant. The predominant source of noise in the vicinity of Taft Charter High School is vehicle traffic. Ventura Boulevard, which forms the school’s northern boundary, serves as a major arterial roadway. The most recently available City of Los Angeles Department of Transportation (LADOT) shows that Ventura Boulevard carried 36,851 annual average daily trips (AADT).¹⁰¹ Additionally, U.S. Highway 101, which carries 272,000 AADT, is located within 0.25 miles north of the Campus.¹⁰²

The Noise Element of the City of Los Angeles General Plan deems the following land uses “noise sensitive.”¹⁰³

- 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
- Parks

The existing sensitive receptors in the vicinity of the Project site are residential neighborhoods immediately adjacent on the south-southwest of Taft Charter High School. Additionally, the Temple Kol Tikvah Synagogue as well as the ComForCare Home Care and Sunrise of Woodland Hills elderly care facilities are within 0.25

¹⁰¹ LADOT. 2019. Current Count Data. <https://ladot.lacity.org/node/576>

¹⁰² Caltrans. 2019. Traffic Census Program. <https://dot.ca.gov/programs/traffic-operations/census>

¹⁰³ Los Angeles County. 2015. Los Angeles County 2015 General Plan. <http://planning.lacounty.gov/generalplan/generalplan>.



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miles of the Campus to the northwest (refer to Figure 5). On-site sensitive receptors include classrooms and outdoor areas where students congregate.

State Noise Regulations

The CALGreen has requirements for insulation that affect exterior-interior noise transmission for non-residential structures. Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission, 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 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 Ldn 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 Leq 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. For construction noise, Los Angeles Municipal Code LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) states that no construction or repair work, or any excavating for, any building or structure, shall be performed between the hours of 9:00 p.m. and 7:00 a.m. 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 p.m. and 7:00 a.m.

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 a.m. or after 6:00 p.m. 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) 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) 75dBA 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...”

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.



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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) on-site noise from use of construction equipment. Construction activities associated with the proposed comprehensive modernization would begin in 2022 and continue through 2025 in multiple phases.

Construction Equipment

Phasing would be broken down by construction activities (i.e., grading, demolition, and building design). Construction activities would require the use of heavy equipment (e.g., excavators, loaders, tractors, etc.) along with the use of smaller power tools and construction workers to operate machinery (refer to Table 3-2). Equipment type and use would vary by phase, but the primary construction noise would be associated with site preparation, grading, and paving activities. The proposed comprehensive modernization would restrict hours of construction to between 7:00 a.m. and 9:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays. Construction would be prohibited on Sundays, national holidays, and between the hours of 7:00 p.m. and 7:00 a.m. on weekdays in compliance with the County of Los Angeles Municipal Code Section 5.12.2.4. Additionally, the proposed comprehensive modernization would be consistent with City of Los Angeles construction noise standards, including but not limited to preventing exceedance of construction equipment noise above 75 dBA at a distance of 50 feet between the hours of 7:00 a.m. and 9:00 p.m.

**Table 4-7
Noise Ranges of Typical Construction Equipment**

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



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**Table 4-7
Noise Ranges of Typical Construction Equipment**

Equipment	Noise Level (dBA) at 50 feet
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: Federal Highway Administration (FHWA) 2006. Construction Noise Handbook. August.

Noise: 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.

Sensitive Receptors

The nearest sensitive receptors from the acoustical center of the Project site are the Temple Kol Tivah Synagogue located approximately 104 feet to the northwest; residential areas located to the west, including the closest residence located at 5323 Del Moreno Drive approximately 151 feet to the west of the Campus; ComforCare Home Care located 172 feet to the north; and Sunrise of Woodland Hills located 287 feet to the west.

The anticipated construction equipment mix was categorized using similar comprehensive modernization projects. The maximum and average noise levels – grouped by construction phase – are summarized in Table 4-8.



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**Table 4-8
Noise Ranges of Typical Construction Equipment**

Equipment	Maximum at 50 feet (L_{max} dBA)	ComforCare Home Care (172 feet; dBA L_{eq})	Sunrise of Woodland Hills (287 feet; dBA L_{eq})	Temple Kol Tivah Synagogue (104 feet; dBA L_{eq})	5323 Del Moreno Drive (151 feet; dBA L_{eq})
Demolition	87	77	72	81	78
Grading	86	76	71	80	77
Building Construction	87	77	72	81	78
Building Interiors	87	77	72	81	78
Asphalt Paving and Site Improvements (e.g., utilities)	90	80	75	84	81

Note: Noise levels at off-site sensitive uses were determined with the following equation: $L_{eq} = L_{eq}$ at 50 feet – $20\log(D/50)$, where L_{eq} = noise level of noise source, D = distance from the noise source to the receiver, L_{eq} at 50 feet = noise level of source at 50 feet. Noise levels have been rounded up to the nearest whole number.

Source: Federal Transit Administration (FTA) 2006.

According to LAMC Section 41.40, construction or repair work is allowed between 7:00 a.m. and 9:00 p.m. Monday through Friday and between 8:00 a.m. and 6:00 p.m. on Saturdays or national holidays (construction is not allowed on Sundays). LAUSD would require Construction Contractors to be consistent with City regulations for construction hours.

As previously described, LAMC Section 112.05 specifies the maximum noise level of 75 dBA at a distance of 50 feet. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment. As shown in Table 4-9, the construction noise levels would average between 81 and 84 dBA L_{eq} at the nearest sensitive receptor. Noise levels would average between 77 and 81 dBA L_{eq} at the nearest residence located at 5323 Del Moreno Drive. However, there is a large difference in topography between this sensitive receptor location and the existing Campus, which would further dampen the noise. Additionally, these construction noise levels do not account for the fact that equipment would be dispersed in various areas of the Campus, such that only a limited amount of equipment can operate near a given location at a particular time. This range of noise levels represents a maximum that would only occur when construction activities occur along the perimeter of the Project site (e.g., demolition and removal of existing buildings/portables and construction of the softball field).

Implementation of SC-N-8 requires all feasible measures to reduce construction noise below the LACM standard through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8 construction noise levels could be reduced by up to 15 dBA. During paving, which is estimated to be the loudest phase, this would reduce construction noise levels to approximately 75 dBA L_{max} , which would



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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 mitigation or further study is required.

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

Less than Significant. Ground-borne vibration would be generated from the operation of heavy construction equipment at the Campus, which could potentially affect the surrounding sensitive land uses. Upon completion of construction there would be no operational sources of ground-borne vibration.

Construction equipment could be close to the residential structures in the vicinity of the Campus (e.g., to the west and east). However, it should be noted that the existing structures on campus would be closer than those residential structures. The construction equipment could be as close as 10 feet from existing structures.

Ground-borne vibration levels resulting from construction activities at the Campus were estimated using data published by the Federal Transit Administration (FTA) in its Transit Noise and Vibration Impact Assessment (2006) document. The SUP Program EIR has adopted vibration standards that are used to evaluate potential human annoyance and architectural damage impacts related to construction activities.

The various peak particle velocity (PPV) expressed in inches per second (in/sec) and root mean square (RMS) velocity expressed in VdB levels for the general construction equipment that would operate during the construction are identified in Table 4-9. Note that it is assumed that impact activities, such as pile driving, would not be used for this proposed comprehensive modernization while school is in session.

**Table 4-9
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate RMS (VdB) at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: FTA 2006.

Structure Damage

For existing school buildings, the construction equipment could be located within 15 feet of structures. However, the proposed comprehensive mitigation would require compliance with SC-N- 6 through SC-N-8, which would require that activities that have the potential to result in significant vibration are minimized or avoided through alternative methods of demolition and construction if feasible and necessary. Therefore, impacts would be less than significant with the incorporation of SC-N-6 through SC-N-8.

The vibration impact threshold for the off-site structures would be 0.2 in/sec PPV. The PPV level of a large bulldozer at 25 feet would be 0.089 in/sec PPV. In order to exceed 0.2 in/sec PPV, a large bulldozer would need to be as close as 15 feet from the off-site structures. The closest off-site structure to the Project site is located approximately 150 feet away. Therefore, there would be no off-site structures within 15 feet of construction and impacts would be less than significant. No mitigation or further study is required.



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Human Annoyance

Construction-related vibration could annoy students on-site and nearby residents surrounding the Campus (particularly those to the west and south of the Campus). However, this annoyance would be temporary and would only be associated with certain aspects of the construction. While various stages of construction have the potential to result in varied levels of vibration, the LAUSD would be consistent with SC-N-5. Implementation of SC-N-5 would require LAUSD to 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 duration of construction-related activities to reduce school and other noise sensitive land use disruptions. Therefore, implementation of SC-N-5 would reduce impacts to less than significant. No mitigation or further study 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. The Campus is not located within 2 miles of an airport and is not located within an area covered by an airport land use plan. The Project does not involve the placement of people in proximity of airport operations, including noise and vibration occurrences. Therefore, no mitigation or further evaluation is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.14 PEDESTRIAN SAFETY				
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 type="checkbox"/>	<input checked="" 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"/>

Explanation:

The following information is supported by information within the site-specific Site Circulation Report conducted by LIN Consulting, Inc. in 2018 (see Appendix G). This report provided a detailed analysis of existing pedestrian safety issues on Campus. The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to impact pedestrian safety. Most of LAUSD’s campuses, including Taft Charter High School, are located in urban areas with established street systems that provide access to the various school sites, including facilities such as crosswalks, crossing signals, etc. As described in Section 2.1, *Project Location*, local pedestrian access to the Campus is provided by Ventura Boulevard to the north, Santa Rita Street to the south, Winnetka Avenue to the east, and Del Moreno Drive to the west.

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

LAUSD Standard Conditions of Approval

SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>School Design Guide</p> <p>The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the Project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.



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LAUSD Standard Conditions of Approval

	<ul style="list-style-type: none"> • Traffic study will use the latest version of Institute of Transportation Engineers (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g. Magnet, Charter, etc.) unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

The proposed comprehensive modernization would occur on the existing Taft Charter High School campus with no increase in enrollment of students or changes to existing roadways, including sidewalks. The Project also includes PDFs to enhance path of travel, accessibility, and other pedestrian travel throughout the Campus. For example, ADA improvements – including new elevators as well as canopy and bridge connects would be provided between existing classrooms (e.g., Classroom Building G [Building 3], Classroom Building F [Building 4], Classroom Building G [Building 4], etc.). In addition, the Project would ensure continued emergency vehicle access for the City of Los Angeles Fire Department (LAFD). Conformance with LAUSD policies and local ordinances would ensure that adequate access would be maintained.

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

Less than Significant. The Project at Taft Charter High School would not alter existing roadways, including sidewalks. Transit service in the Project study area is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Antelope Valley Transit Authority (AVTA). As described in Section 2.1, *Project Location*, Bus transit stops and services are provided adjacent to the Project site on Ventura Boulevard by Metro Routes 150, 750, and 242 as well as AVTA Route 787 (see Appendix G). The Project would not modify these bus transit stops and would not affect the pedestrian safety at these facilities. The proposed comprehensive modernization would include PDFs to enhance path of travel, accessibility, and other pedestrian travel throughout the Campus. The proposed comprehensive modernization would provide continued emergency vehicle access for the LAFD.¹⁰⁴ Conformance with LAUSD policies and local ordinances would ensure that adequate access would be maintained.

Traffic generated during construction would be compatible with the mix of vehicle types (e.g., automobiles and commercial trucks) which currently use the local roadways. During construction, if any pedestrian access is temporarily changed, the Construction Contractor would be required to comply with SC-T-4, which would require the submittal of a Construction Worksite Traffic Control Plan for large construction equipment utilizing

¹⁰⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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public roadways and access to the Campus. LAUSD would require the Construction Contractor to submit a Construction Worksite Traffic Control Plan prior to the start of construction. The Construction Worksite Traffic Control Plan may include restrictions on hauling/delivery truck access during times of school travel to avoid conflicts with pedestrians, defined haul routes to and from the nearest freeway access points, and designation of truck queuing/loading areas. With the implementation of SC-T-4, temporary construction-related and operational traffic impacts to vehicular and pedestrian access points would be less than significant. No mitigation or further study is required.

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

No Impact. Currently pedestrians access the Campus via Ventura Boulevard, Winnetka Avenue, and Santa Rita Road. These routes would continue to be used during construction and after the Project is complete. The anticipated construction and new Campus design may alter the orientation or location of certain Campus features; however, the recommended and primary pedestrian access routes to the Campus would remain unchanged. Existing travel routes to the Campus would not be altered as a result of the Project. Therefore, the comprehensive modernization would not create unsafe routes to school, and there would be no impacts to students walking to the Campus from local neighborhoods. No mitigation or further study 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. Ventura Boulevard, an access point to the Project site, is a six-lane arterial roadway, that is used by students to access the Campus, including those using transit stops within the Project vicinity. The proposed comprehensive modernization would not change the existing pedestrian access routes or alter the Campus in a manner that would create a safety hazard. Thus, implementation of the comprehensive modernization at Taft Charter High School would not pose a new safety hazard, as compared to current conditions.

Exclusive bicycle lanes are not present within the school zone at the Campus. Bicyclists share the sidewalk with pedestrians or the roadways with vehicles; exclusive bicycle lanes are not present within the school zone at the Campus. Sidewalks are present on both sides of Ventura Boulevard and Winnetka Avenue within the school zone (see Appendix G). The north side of Santa Rita Street has sidewalks. Del Moreno Drive has sidewalks present on both sides of the road; however, the sidewalk terminates on the west side approximately 500 feet south of Ventura Boulevard in the school zone. Additionally, major intersections within the school zone such as Ventura Boulevard and Del Moreno Drive's intersection and Ventura Boulevard and Winnetka Avenue's intersection have signalized intersections with pedestrian phase recall and crosswalks from all approaches. Based on these existing safety measures and with implementation of SC-PED-5 as well as SC-T-3 and SC-T-4, potential impacts would be less than significant. No mitigation or further study is required.



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

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact population growth in the LAUSD service area and cause displacement of people and housing. According to the SUP Program EIR, new construction, renovation and modernization projects implemented under the SUP on existing LAUSD campuses are anticipated to have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the LAUSD region. Similarly, the project-specific analysis below concludes that implementation of the Project would also have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the Project area.

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

Less than Significant. The proposed comprehensive modernization would include reconstruction, modernization, renovation, and repair of buildings and infrastructure at Taft Charter High School. The Project would not increase student capacity at the Campus and the reconstructed/renovated facilities would serve students currently attending the school. The proposed comprehensive modernization would generate short-term employment opportunities associated with construction; however, to the extent possible, the regional labor force would be utilized. The Project would not result in increases in school enrollment, jobs, or employment associated with long-term operations. The Project does not include the extension of roads or an increase in capacity of any existing off-site infrastructure. Therefore, the Project is not anticipated to induce population growth in the area, either directly or indirectly. Less than significant impacts would be anticipated. No mitigation or further study is required.



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

No Impact. The Project does not include expansion of the existing Campus, and construction would occur on the existing LAUSD property; therefore, no property acquisition would be required. There is no existing housing at Taft Charter High School, so no people or housing would be displaced due to the Project. Therefore, no impact would occur. No mitigation or further study is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.16 PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	<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:

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact public services in the LAUSD region. Proposed new construction projects under the SUP could lead to an expansion of existing school campuses, an increase in total building area, or changes in access, circulation and site plans, thereby generating increased demands for fire and police protection services. LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval

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

a) Fire protection?

Less than Significant. Fire protection services would continue to be provided by the LAFD. Fire Station 93, located approximately 1.4 miles from the Campus at 19059 Ventura Boulevard, Tarzana CA 93156, would continue to be the primary responder.¹⁰⁵

Construction-related activities on Campus may result in a temporary increase in demand for fire protection and emergency medical services due to the presence of construction workers on-site. However, the proposed

¹⁰⁵ LAFD. 2019. Find Your Station. <https://www.lafd.org/fire-stations/station-results>.



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comprehensive modernization would not result in an increase in enrollment or long-term employment within LAUSD or at Taft Charter High School. Therefore, implementation of the Project would not generate long-term increased operational demands for fire protection and emergency services due to a significant population increase in the local area.

LAFD already serves the Campus and demand for fire protection services would not be affected. Further, the Project would impact response times. Thus, the proposed comprehensive modernization would not generate the need for a new fire station. In addition, the Project would be consistent with LAFD regulations for water availability, fire hydrant pressure, and accessibility for firefighting equipment to minimize the threat of fire. The proposed comprehensive modernization would be consistent with standard design requirements in accordance with the CBC, California Fire Code, and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures.¹⁰⁶ Prior to Project approval, site plans would be reviewed by the appropriate agencies to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools, as outlined in SC-PS-2, which requires adherence to LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

Compliance with applicable State, City and LAUSD requirements, including implementation of SC-PS-1 and SC-PS-2, would ensure that no new or expanded fire protection services or facilities would be required. Impacts on fire protection services would be less than significant. No mitigation or further study is required.

b) Police protection?

Less than Significant. LAUSD operates its own police department, the Los Angeles School Police Department (LASPD), which provides security for the schools and centers within its jurisdiction. Taft Charter High School is located within the Northwest Division of the LASPD.¹⁰⁷ The City of Los Angeles Police Department (LAPD) would be the secondary provider of police protection to the Campus. The Topanga Community Police Station located at 21501 Schoenborn Street, Canoga Park, CA 91304, approximately 5.2 miles from the Campus, would supplement police protection along with the LASPD.¹⁰⁸

Increased demand for police protection are generally created by an increase in the population within a service area. The proposed comprehensive modernization would not increase student capacity or staff employment at Taft Charter High School. Implementation of the proposed comprehensive modernization would not generate increased demand for police services, as the Project would accommodate existing and expected students that already reside within the enrollment boundaries of the school. During construction, the Project has the potential to result in temporary demands for police services from potential trespass, theft, and/or vandalism. However, the Campus is currently fenced and would remain secured during non-work hours.¹⁰⁹ Any increase in police demand would be temporary and would not require the construction of new or expanded police facilities. Further, the Project would be consistent with LAUSD standards regarding emergency response procedures and

¹⁰⁶ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

¹⁰⁷ LAUSD. 2019. Los Angeles School Police Department. <https://achieve.lausd.net/laspd>.

¹⁰⁸ City of Los Angeles. 2019. Topanga Community Police Station. http://www.lapdonline.org/topanga_community_police_station.

¹⁰⁹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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school safety, as required. Therefore, the proposed comprehensive modernization would not result in an increase of student capacity nor would it result in new operations requiring additional police protection. No mitigation or further study is required.

c) Schools?

No Impact. Implementation of the proposed comprehensive modernization would be limited to improvements at Taft Charter High School. Project implementation is not designed to result in a long-term increase population at the Campus, increased long-term employment, or generate new students at Taft Charter High School. Therefore, no impact on the provision of schools would occur. No mitigation or further study is required.

d) Parks?

No Impact. Demand for parks typically increases with housing or population growth in their service areas. The proposed comprehensive modernization would not directly or indirectly induce population growth within the vicinity of the Campus as no changes in student enrollment or increases in long-term employment are anticipated. Additionally, Taft Charter High School has its own athletic playfields and recreational facilities for use by its students, which would be improved with implementation of the proposed comprehensive modernization. Therefore, the Project would not create increased demands for parks. No impact would occur. No mitigation or further study is required.

e) Other public facilities?

No Impact. Demands for other public services and facilities such as libraries are generated by an increase in population in the facilities' service areas. The proposed comprehensive modernization would not increase current student enrollment at Taft Charter High school or generate new long-term employment or population growth within the vicinity of the Campus. Therefore, the Project would not generate an increased demand for additional public facilities (including libraries), and no new or physically altered government or public facilities would be required as a result of the proposed comprehensive modernization. No impact would occur. No mitigation or further study is required.



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

Explanation:

The SUP Program EIR evaluated the potential for implementation of SUP-related projects to impact existing recreation facilities and parks in the LAUSD region, due to increased demand or adverse effect on the environment from the provision of new and/or expanded recreational facilities. According to the SUP Program EIR, projects implemented under the SUP are anticipated to have no impacts on parks and recreation facilities in the LAUSD region. Therefore, Project-specific analysis provided below concludes that implementation of the Project would have less than significant impacts on existing park and recreation facilities in the Project area and no impact on the provision of new and/or expanded facilities.

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. Demands for park and recreational facilities are typically generated by an increase in population in the park’s service area. The proposed comprehensive modernization would not increase the student enrollment, long-term employment, or population in the area as it consists of replacement, modernization and repair of buildings and other infrastructure at Taft Charter High School. In addition, as previously described, Taft Charter High School has its own athletic playfields and recreational facilities for use by its students, which would be enhanced and expanded with the implementation of the Project. While there may be short-term use of nearby parks or schools when the Project site fields are undergoing improvements, the proposed comprehensive modernization would not create increased demands for parks and recreational facilities over the long-term. No impact would occur. No mitigation or further study is required.

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

No Impact. The proposed comprehensive modernization would not develop recreational facilities outside of LAUSD-owned properties.¹¹⁰ Taft Charter High School has existing athletic and recreational facilities including a gymnasium, a football field, a baseball and softball field, and tennis courts (refer to Section 2.4, *Existing*

¹¹⁰ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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Condition(s)). Under the Project, the existing gymnasium building, softball field, and track and field would undergo modernization and/or expansion. Proposed improvements would expand the area of the softball and track and field for recreational use, as well as increase ADA accessibility and resurface grass fields and the track. During construction, neighboring LAUSD facilities or public parks may be used to provide temporary recreational accommodation for the students (e.g., student athletes), while the recreational facilities at the Campus are undergoing construction. However, LAUSD does not anticipate the need to make improvements to the local City parks or facilities located outside of its jurisdiction.

The proposed comprehensive modernization would not result in any unique impacts to recreational resources in the Woodland Hills community. Pursuant to the requirements of the Civic Center Act, school facilities such as gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms may be permitted by LAUSD for public use within designated times outside school hours (California Education Code Sections 38130-38139). Therefore, improvement of existing recreation facilities would have, via joint-use, a positive impact on the availability of recreational facilities in communities near the Campus. No mitigation or further study is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.18 TRANSPORTATION AND CIRCULATION				
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

The following information is supported by information within the site-specific Site Circulation Report conducted by LIN Consulting, Inc. in 2018 (see Appendix G). The SUP Program EIR evaluated the potential for implementation of SUP-related projects to result in impacts related to transportation and traffic. All SUP projects are required to meet CCR Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of the SCAG 2012-2035 RTP/SCS, such as encouraging active/non-motorized transportation (such as bicycling and walking). Additionally, LAUSD has SCs for minimizing impacts to transportation and circulation. Applicable SCs related to transportation and circulation impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval

SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide</p> <p>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"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to the 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>



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

Less than Significant. Level of service standards established by jurisdictions/agencies are intended to regulate long-term traffic increases associated with new development and do not apply to short-term, temporary traffic increases that occur during construction. School enrollment and long-term employment would remain the same following the proposed comprehensive modernization, and there would be no permanent increase in traffic generated by the Project. Potential impacts associated with the proposed comprehensive modernization would be limited to construction activities. Specifically, increased vehicle trips and potential congestion generated by construction-related passenger vehicles and trucks would cease when construction is complete, and implementation of the Project would not result in any long-term, ongoing effects related to traffic and congestion. The Los Angeles County Congestion Management Program (CMP) requires evaluation of all CMP arterial monitoring intersections where the project adds 50 or more new peak hour trips. Because the proposed comprehensive modernization would not increase capacity for enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project. The proposed comprehensive modernization would not add 50 trips to any surrounding roadway or intersection as there is no anticipated long-term increase in vehicle trips.

The Project is located on an existing school campus, and does not include changes to existing public transit, bicycle, or pedestrian facilities. The Project site has no publicly accessible throughways and no bicycle paths are located directly adjacent to the site. Transit service in the vicinity of the Campus is provided by Metro. The Campus is served by Metro Routes 150, 244, 750, and 787, with stops along Ventura Boulevard. The bus transit service varies in frequency, with most routes providing service every day, with 20- to 40-minute trip headways during the weekday and 30- to 60-minute trip headways on the weekends and holidays. Long-term operations at the Campus would not affect existing transit route or bus facilities in the Project area. The proposed comprehensive modernization would not conflict with existing policies, plans, or programs supporting alternative transportation.

During construction activities, the comprehensive modernization may affect sidewalk accessibility at Taft Charter High School. However, any effects on sidewalk accessibility would be temporary and transient. Pedestrian access to the school during the construction phase would be minimally altered and any temporary changes to pedestrian access during construction would be completed as outlined in a Construction Worksite Traffic Control Plan (refer to SC-T-4, which requires the implementation of a Construction Worksite Traffic Control Plan subject to OEHS review and approval). The Project does not include changes to existing roadways or study area intersections or public transit, bicycle or pedestrian facilities in the vicinity of the Campus. With the implementation of SC-T-4, temporary, construction-related impacts to pedestrian safe access points would be less than significant. For these reasons, the proposed comprehensive modernization would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant. Because the Project would not increase capacity for student enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project with associated vehicle miles



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travelled. The origin and destination of vehicle trips and thus VMT are not expected to change under the Project. Construction activity associated with the proposed comprehensive modernization is not expected to generate a substantial number of vehicle trips or vehicle miles travelled (truck trips or otherwise). Therefore, less than significant impacts would occur, and no mitigation or further study is required.

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

No Impact. As previously described, the proposed comprehensive modernization does not include changes to roadways, sidewalks, driveways, or intersections in the vicinity of the Project site. Therefore, the Project would not result in a substantial increase in roadway hazards and no impact would occur. No mitigation or further study is required.

d) Result in inadequate emergency access?

No Impact. The proposed comprehensive modernization is located on an existing school campus and does not include changes to roadways, vehicle access, or intersections in the vicinity of the Campus. Taft Charter High School is located in a developed urban area with an existing roadway network. While U.S. Highway 101 and Ventura Boulevard are designated disaster routes, the proposed comprehensive modernization would not interfere with any adopted emergency response plan or emergency evacuation plan. Although the site plan concept has not been finalized, the concept site plans show that internal vehicular emergency access would not be modified. The Construction Contractor shall prepare and implement a Construction Worksite Traffic Control Plan (refer to SC-T-4) that would ensure emergency access to the site is maintained throughout the construction period. No impact would occur. No mitigation or further study is required.



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

4.19 TRIBAL CULTURAL RESOURCES

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)? Yes No

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation:

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to tribal cultural resources impacts associated with the Project are provided below.

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SC-TCR-1	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. 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 LAUSD.
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 LAUSD and must have at least one or more of the following qualifications:</p> <ul style="list-style-type: none"> • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. <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>



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	<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>
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Native American Consultation

AB 52 requires meaningful consultation with California Native American tribes on potential impacts to TCRs. As part of the AB 52 process, California 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 notification to those tribes upon deciding to undertake a project. The Native American tribe must respond to LAUSD 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 TCR; or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

Pursuant to AB 52, LAUSD notified the California Native American Heritage Commission (NAHC)-listed tribes and tribal representatives that are traditionally and culturally affiliated with the areas of LAUSD’s projects through a notification letter dated January 8, 2019. These projects included the 11 Comprehensive Modernization Projects, including the Project at Taft Charter High School.

Mr. Jairo Avila, of the Fernandeno Tataviam Band of Mission Indians, contacted LAUSD on January 29, 2019 via email requesting formal consultation and stating that the Project site is located within traditional Fernandeno Tataviam Band of Mission Indians territory. Mr. Avila requested excavation plans, geotechnical reports, and any environmental impact report or archaeological investigation reports prepared for the Project. Additionally, Mr. Avila provided a confidential map on file with the Fernandeno Tataviam Band of Mission Indians, to show sensitive tribal cultural resource areas within the vicinity of the Project site. Consultation with a tribal representative from the Fernandeno Tataviam Band of Mission Indians was completed on April 2, 2019. The Fernandeno Tataviam Band of Mission Indians provided mitigation measures that were largely consistent with SC-TCR-1 and SC-TCR-2 and requested notification in the event that unanticipated discoveries are identified.

Ms. Brandy Salas, representing Chairman Andrew Salas and the Gabrieleno Band of Mission Indians - Kizh Nation, contacted LAUSD on January 9, 2019 via email requesting formal consultation regarding the Project. Consultation with the Gabrieleno Band of Mission Indians – Kizh Nation was completed on March 21, 2019 and May 21, 2019. As a result of this consultation, the Gabrieleno Band of Mission Indians-Kizh Nation, provided mitigation measures that they suggested LAUSD utilize for the various LAUSD projects, including the Project at Taft Charter High School. The language provided in the mitigation measures was consistent with SC-TCR-1 and SC-TCR-2.

Following the meeting with the Gabrieleno Band of Mission Indians – Kizh Nation, LAUSD sent a conclusion letter on June 19, 2019 determining that the Gabrieleno Band of Mission Indians – Kizh Nation have not provided sufficient evidence demonstrating that the Project site has TCRs as defined by Public Resources Code (PRC) 21074. LAUSD also noted that SC-TCR-1 and SC-TCR-2 covered the discovery of any unanticipated resources. Chairman Salas responded to this letter with a request for an additional meeting. During a meeting



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held via conference call on August 15, 2019, Chairman Salas provided additional oral history and stated that because of the proximity to known TCRs, the Project may encounter resources. Following the meeting and LAUSD's request for supporting evidence, Chairman Salas provided further tribal history and requested to have a Native American monitor present during all ground disturbances. Included with this request was a document describing the same mitigation measures that was previously provided for TCRs. In addition, the following publicly available documents were included in response to LAUSD's request for supporting documentation:

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

A review of these documents did not result in a determination of substantial evidence of an existing TCR within the Project site.

A California Historical Resources Information System (CHRIS) records search was also completed for the Project and indicated that there was one resource within approximately 1 mile of Taft Charter High School (no resources were identified within 0.5 mile).

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

Less than Significant. As previously described, the publicly available documents provided by the Gabrieleno Band of Mission Indians – Kizh Nation did not provide substantial evidence of existing TCRs within the Project site. Additionally, no supporting documents indicated that the Project site should be considered to have a high potential for containing TCRs. The CHRIS records search identified no resources – including Native America or prehistoric within 0.5 mile of the Project site, none of which include Native American or prehistoric cultural resources. While the Campus meets the requirements for inclusion in the NRHP, CRHR, and meets local significance criteria (refer to Section 4.5, *Cultural Resources*), this eligibility is not based on the presence of any known TCRs. Therefore, Native American monitoring for TCRs during all ground disturbances is not required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to TCRs are avoided. LAUSD confirmed that the existing TCR SCs (SC-TCR-1 and SC-TCR-2), are consistent with the recommendations and information provided by the tribes and determined that implementation of SC-TCR-1 and SC-TCR-2 would ensure there would be no potential TCRs impacts.



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

Less than Significant. The Project is subject to compliance with AB 52, which requires consideration of impacts to TCRs as part of the CEQA process. AB 52 requires that the Lead Agency notify California Native American tribes that are traditionally or culturally affiliated with the geographic area of the Project and have requested notification. On January 8, 2018 LAUSD sent letters to seven NAHC-listed California Native American tribal representatives: Chairman Andrew Salas, Gabrieleño Band of Mission Indians - Kizh Nation, Mr. Jairo Avila, Fernandeño Tataviam Band of Mission Indians, Chairman Robert Dorame, Gabrielino Tongva Indians of California, Chairman Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians, Councilwoman Linda Candelaria, Gabrielino-Tongva Tribe, Chairwoman Sandonne Goad, Gabrielino/Tongva Nation, and Councilman Charles Alvarez, Gabrielino-Tongva Tribe. The letters contained a description of the Project, outline of AB 52 timing, request for consultation, and contact information for the appropriate Lead Agency representative. Contacted individuals included. The confidential documentation pertaining to AB 52 consultation is on file at LAUSD's Office of Environmental Health and Safety (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

As previously described, there are no known TCRs within the Project site. LAUSD received two requests for formal consultation: Ms Brandy Salas, representing Chairman Andrew Salas and the Gabrieleño Band of Mission Indians - Kizh Nation and Mr. Jairo Avila, of the Fernandeño Tataviam Band of Mission Indians. As a follow-up to the consultation, with the Gabrieleño Band of Mission Indians - Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, LAUSD has included SC-TCR-1 and SC-TCR-2 into this Project.

To date, no other responses have been received from the AB 52 NAHC-listed tribal contacts, regarding TCRs or other concerns regarding the Project. AB 52 government-to-government consultation, initiated by LAUSD, acting in good faith and after a reasonable effort, has not resulted in the identification of a specific TCR within the Project site that have been determined by LAUSD to be significant, pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, in the event that unknown subsurface TCRs are uncovered during construction ground disturbance, SC-TCR-1 and SC-TCR-2 will ensure that impacts remain less than significant.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.20 UTILITIES AND SERVICE SYSTEMS				
Would the project:				
a. Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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:

The SUP Program EIR evaluated the potential for implementation of the SUP-related projects to impact utilities and service systems. LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts (refer to Section 1.4.4, *Project Plan and Building Designed*). Applicable SCs related to utilities and service systems impacts associated with the Project are provided below.

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SC-USS-1 Consistent with current LAUSD requirements for recycling C&D waste, the Construction Contractor shall implement the following solid waste reduction efforts during C&D activities:

School Design Guide

Establishes a minimum non-hazardous C&D debris recycling requirement of 75% by weight. C&D waste shall be recycled to the maximum extent feasible.

Construction & Demolition Waste Management

This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers



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	or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
SC-USS-2	LAUSD shall coordinate with the LADWP or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.

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

Less than Significant. Water, electric, and natural gas usage may nominally increase during construction activities; however, these activities would be limited, temporary, and would not consume large amounts of utility resources. The Campus would generate additional wastewater and require additional electrical and natural gas for construction activities. However, the existing facilities and temporary portable facilities would be used to accommodate the construction-related surge. Additionally, due to the temporary nature of the construction activities and the minimal number of construction workers, the amount of construction-related consumption of utility services would not be substantial. The Project would replace or upgrade facilities on the Campus, but it would not increase the or total building square footage or the number students or faculty at the high school. Throughout all construction-related activities and long-term operations at the Campus, all wastewater would be treated at wastewater treatment plants in the City of Los Angeles and the Sanitation Districts of Los Angeles County.¹¹¹ As described in Section 3.2.1, *Campus Buildings*, implementation of the proposed comprehensive modernization would result in various utilities upgrades (e.g., new storm water management systems, including the installation of stormwater cisterns beneath the football field; new bio-detention at the central courtyard; new main electrical service along Ventura Boulevard; low voltage services, as needed). Modernization of utilities and construction of the artificial turf football field would likely reduce water consumption from irrigation and aged infrastructure. As previously described, the Project would not expand the existing student enrollment capacity and would increase energy efficiency in compliance with the Sustainable City pLAN, so utility resource consumption would remain similar to (or be reduced in comparison with) existing conditions. Therefore, impacts associated with Project construction would be less than significant. No mitigation or further study is required.

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

Less than Significant. The Project would not result in an increase student enrollment capacity, so it can be anticipated water demand would remain similar to current usage. Construction of the proposed comprehensive modernization would require water use (e.g., for dust control measures). However, these activities would be limited and temporary, and as such, would not consume large quantities of water to the degree that additional

¹¹¹ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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supplies would be required. Additionally, the Campus is within the San Fernando Valley Groundwater Basin, which is not considered to be at current or foreseeable significant risk of groundwater overdraft by the Department of Water Resources and is subject to the One Water Los Angeles 2014 Plan, which governs water long-term water planning.¹¹² No new or expanded water supplies would be needed in the foreseeable future for the Campus; therefore, impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant. During construction-related activities, wastewater at the Campus would be primarily generated by construction activities and construction workers. However, due to the temporary nature of the construction activities and the low number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Following completion of the proposed comprehensive modernization, the overall student enrollment capacity would not increase at Taft Charter High School, so the Campus would not increase site demand for wastewater treatment services. Therefore, the Project would not require new or expanded wastewater treatment. Therefore, short- and long-term impacts associated with wastewater treatment would be less than significant. No mitigation or further study is required.

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

Less than Significant. As previously described, the Project would not expand student enrollment capacity; therefore, solid waste generation would remain consistent with existing conditions. During construction and demolition, LAUSD would be consistent with the C&D waste recycling/reuse requirement in the California Green Building Standards Code Section 5.408, and LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, as detailed under SC-USS-1.¹¹³ LAUSD SC-USS-1 requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

Incorporation of SC-USS-1 would ensure that long-term impacts regarding solid waste disposal capacity would be less than significant. No mitigation or further study is required.

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

No Impact. As previously noted, the Project would be consistent with federal, State, local, and LAUSD statutes and regulations related to solid waste. During all construction-related activities, LAUSD would require its Construction Contractors to reuse, recycle, salvage or dispose of non-hazardous C&D waste materials, to foster material recovery and reuse and to minimize disposal in landfills. With the incorporation of SC-USS-1, there

¹¹² Department of Water Resources. 2019. SGMA Basin Prioritization Dashboard. <https://gis.water.ca.gov/app/bp-dashboard/p2/>.

¹¹³ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



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would be no impacts related to solid waste during construction-related activities or long-term operations at the Campus. Further, LAUSD would be consistent with all applicable State, county, and City solid waste diversion, reduction, and recycling mandates; thereby ensuring that there would be no impact in this regard. No mitigation or further study is required.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.21 WILDFIRE				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?			<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

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. CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The LAFD currently provides fire protection and emergency medical services to the City.

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

No Impact. The Project would conform to the existing LAUSD, County of Los Angeles, and City of Los Angeles, Emergency Response Plans. LAUSD has developed a District-wide Emergency Operations Plan,



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which meets the County's requirements on policies regarding emergency response and the Standardized Emergency Management System (SEMS).¹¹⁴ The proposed comprehensive modernization would be consistent with California Education Code Sections 32281-32889 requiring the preparation of a "safe school plan" to address emergency response and emergency evacuation preparedness.

The proposed comprehensive modernization would not alter any County designated disaster route including but not limited to the U.S. Highway 101 and Ventura Boulevard.¹¹⁵ Therefore, the Project would not impair any adopted emergency response plan or emergency evacuation plan. No impacts would occur. No mitigation or further study 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?

Less than Significant. Slope steepness and prevailing wind direction are the most significant factors in determining the rate of wildfire spread. Additionally, slope steepness and the ruggedness of terrain may affect both fire behavior and firefighting access. The predominant wind direction in Woodland Hills varies seasonally. From approximately March to October the wind comes from the west and from the end of October to the end of March the wind comes from the north.¹¹⁶ The Campus is located within 0.5 miles of the local High Fire Hazard Severity Zone to the south. In the event of a wildfire, the southerly wind direction, depending on the time of year, could increase the potential exposure of the Campus and the school population; however, the site is an existing school with access to main transportation access points including Ventura Boulevard and the U.S. Highway 101. As stated above, Ventura Boulevard and U.S. Highway 101 are designated as a disaster routes, by the Los Angeles County Public Works Department.¹¹⁷ Additionally, the Campus is within the service zone of the LAFD. Overall, the Campus is located on a less than an approximate 20% slope, which gives optimal chance for success of combating fires utilizing direct attack methods such as all-wheel drive fire trucks, bulldozers, hand crews, and aerial resources; therefore, impacts are considered less than significant. No mitigation or further evaluation is required.

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

No Impact. As previously described, the Campus is located within the vicinity of two County-designated disaster routes and within the service area of the LAFD. The nearest station, Fire Station 93, is located 1.4 miles from the Project site.¹¹⁸ The site is an existing LAUSD school in an urbanized area and would not require the

¹¹⁴ LAUSD OEHS. School Upgrade Program Final Environmental Impact Report. <http://achieve.lausd.net/ccqa>. Adopted by the Board of Education on November 10, 2015.

¹¹⁵ Los Angeles County Department of Public Work, 2019. LA County Operational Area - Disaster Routes. <https://dpw.lacounty.gov/dsg/DisasterRoutes/>.

¹¹⁶ Weather Spark, 2019. Average Weather in Woodland Hills. <https://weatherspark.com/y/1745/Average-Weather-in-Woodland-Hills-California-United-States-Year-Round>.

¹¹⁷ Los Angeles County Department of Public Work, 2019. LA County Operational Area - Disaster Routes. <https://dpw.lacounty.gov/dsg/DisasterRoutes/>.

¹¹⁸ LAFD. 2019. Find Your Station. <https://www.lafd.org/fire-stations/station-results>.



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installation of any infrastructure that may exacerbate fire risk; therefore, no impacts would occur. No mitigation or further evaluation 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?

Less than Significant. The proposed comprehensive modernization would not exacerbate exposure of people or structures to significant risks related to post-fire slope instability. No major changes would occur to the Campus's topography under implementation of the Project.

The proposed comprehensive modernization would not substantially alter the local drainage pattern or increase the risk of flooding in the surrounding area. The proposed comprehensive modernization would use minimal water during construction and operation and would thereby not generate a large amount of runoff as a result of Project activities. Please see the Hydrology and Water Quality analysis for additional information related to flooding.

Additionally, the site-specific Geotechnical Investigation (see Appendix E) concluded the topography at the site prevents "both stability problems and the potential for lurching, earth movement at right angles to a cliff or steep slope during ground shaking". The Investigation concluded there are no previously known landslides within the site, nor is the site in the path of any known potential landslides; therefore, the potential for slope instability is considered low. Refer to see the *Geology and Soils analysis* for additional information on landslides. The impacts would be less than significant. No mitigation or further evaluation is required.



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

Less than Significant. As discussed in *Biological Resources*, the proposed comprehensive modernization would neither degrade the quality of the environment nor substantially impact any endangered fauna or flora. The Project would demolish existing buildings, construct new buildings, and modernize/reconfigure others on the existing Campus. Because the property is already developed and the surrounding area is highly urbanized, the proposed comprehensive modernization would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Mandatory compliance with the California Fish and Game Code, LAUSD’s Tree Trimming and Removal Procedure, and SC-BIO-3 would be incorporated into the Project. Impacts would be less than significant and no further analysis is required.

As discussed in *Cultural Resources* the Project would not significantly impact historic, archaeological, paleontological resources, or human remains. Implementation of SC-CUL-1 through SC-CUL-5, the historic district, including all contributing elements, would retain its integrity, and Taft Charter High School would remain eligible for the NRHP, CRHR, local designations, and LAUSD Historic Context Statement requirements. With implementation of SC-CUL-6 through SC-CUL-10, potential impacts to archaeological



4. Environmental Checklist and Analysis

resources would be less than significant. Therefore, the Project does not have the potential to substantially degrade the quality of the environment. Impacts would be less than significant and no further study 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. A cumulative impact could occur if the Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the Project is limited to the proposed comprehensive modernization of Taft Charter High School, the cumulative analysis is generally confined to the immediate vicinity or within a 1-mile radius surrounding the Campus. LAUSD has several past, present, and planned school projects within its boundaries, but none of these would occur within 1 mile of the Campus. There are also several projects located in the City of Los Angeles that would result in air quality emissions or add traffic to the surrounding roadways. However, as described in *Air Quality* and *Transportation and Circulation*, the contribution of the Project to cumulative impacts would be less than significant. 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. As discussed in the analyses provided in this IS, 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.

5. List of Preparers

5.1 LEAD AGENCY

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

Eimon Smith, CEQA Manager

Christine Lan, Assistant CEQA Project Manager

Alex Campbell, Assistant CEQA Project Manager

Gwenn Godek, CEQA Advisor

5.2 CEQA CONSULTANT

Wood Environment & Infrastructure Solutions, Inc.

Nick Meisinger, Project Manager

Matthew Buggert, Deputy Project Manager

Dan Gira, Senior Technical Advisor

Hannah Thomas, Environmental Analyst

Sydney Margallo, Environmental Analyst

Taylor Lane, Air Quality Specialist

Brian Cook, Noise Specialist

David Stone, Cultural Resources Manager

Jay Carlander, Architectural Historian

Brian Jacobs, Hazardous Materials Specialist

Lind Conlan, Hazardous Materials Specialist

September 2020 | Response to Comments



TAFT CHARTER HIGH SCHOOL

Comprehensive Modernization Project

Prepared for:

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

Prepared by:

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9210 Sky Park Court, Suite 200
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Table of Contents

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1. Introduction

1.1 INTRODUCTION

This document includes the public comments received on the Initial Study / Mitigated Negative Declaration (IS/MND) prepared for the Taft Charter High School Comprehensive Modernization Project (Project) and provides Los Angeles Unified School District's (LAUSD's) responses to these comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code, Division 13, Sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.), a lead agency has no affirmative duty to prepare formal responses to comments on an IS/MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the IS/MND. In the spirit of public disclosure and engagement, LAUSD – as the lead agency for the Project – has responded to all written comments submitted during the 30-day public review period.

1.2 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration. Per CEQA Guidelines Section 15072 and 15073, LAUSD determined that an MND would be appropriate for the Project and circulated a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and the IS/MND. The public review period for this CEQA-compliant document was from August 17, 2020 to September 16, 2020. Public outreach included the following methods:

1.2.1 Newspaper Publications

- NOI published in the legal announcement section of the Daily News (English) on August 20, 2020.
- NOI published in the legal announcement section of the La Opinión (Spanish) on August 20, 2020.

1.2.2 Mailings

- NOI sent to 26 Federal, State, and local agencies as well as the State Clearinghouse.
- NOI sent to addresses within 0.25 mile of Project site – 469 owner/occupant mailings.
- NOI sent to student / parent guardian addresses – 2,466 mailings.



1. Introduction

1.2.3 Document Availability

The NOI and IS/MND were available for review at the following locations:

- Taft Charter High School website (<https://www.tafthigh.org/>)
- LAUSD Office of Environmental Health and Safety website (<http://achieve.lausd.net/ceqa>)
- California State Clearinghouse (<https://ceqanet.opr.ca.gov/>)

1.2.4 Community Outreach

A virtual public meeting was held via Zoom on August 27, 2020 at 6:00 PM. The meeting provided agencies and the public with an opportunity to comment on the Project and the IS/MND.

1.2.5 Document Format

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and the content of this document.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the IS/MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned an alphabetical letter. Individual comments have been numbered in each letter, and the letter is followed by responses from LAUSD with references to the corresponding comment number.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments on an IS/MND and reminds persons and public agencies that the focus of review and comment should be “on the proposed findings that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, they should: (1) identify the specific effect; (2) explain why they believe the effect would occur; and (3) explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an IS/MND is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204(c) advises, “[re]viewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

CEQA Guidelines Section 15204(d) also states, “[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” CEQA Guidelines



1. Introduction

Section 15204(e) states, “[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.



1. Introduction

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2. Response to Comments

This section provides all written comments received on the IS/MND and LAUSD's response to each comment. No verbal comments on the IS/MND were received during the virtual public meeting.

Table 1
Summary of Comments Received

Letter Reference	Commenting Person / Agency	Date of Comment	Page Number
A	California Department of Transportation	September 10, 2020	6
B	California Department of Fish and Wildlife	September 15, 2020	12



2. Response to Comments

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2. Response to Comments

COMMENT A – Miya Edmonson, California Department of Transportation (Caltrans) (2 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

September 10, 2020

Los Angeles Unified School District
Attn: Eimon Smith
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017

RE: Taft Charter High School Comprehensive
Modernization Project – Mitigated Negative
Declaration (MND)
SCH# 2020080265
GTS# 07-LA-2020-03340
Vic. LA-101 PM 23.29

Dear Eimon Smith,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the campus through building replacement, renovation, and modernization to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project includes demolishing eight permanent buildings, removing existing portable buildings, constructing new permanent buildings that provide adequate learning spaces and support areas, upgrading and replacing aging utilities and infrastructure, improving existing athletic facilities, and providing new landscaping and hardscaping. The proposed Project also includes limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act, seismic retrofit pursuant to California Assembly Bill 300, and low voltage upgrades to support current technology. The Project would not expand student enrollment capacity or change existing site access, circulation, roadways or sidewalks.

The nearest State facility to the proposed project is US 101. After reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

A-1

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

A-2

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



2. Response to Comments

Eimon Smith
September 10, 2020
Page 2

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03340.

Sincerely,

Miya Edmonson

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

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



2. Response to Comments

A. Response to Comments from Miya Edmonson, Caltrans, dated September 10, 2020

- A-1 Comment noted. LAUSD recognizes and appreciates Caltrans' concurrence with the impact analysis provided in the IS/MND.
- A-2 Comment noted. LAUSD will comply with permit requirements for State highways. Additionally, LAUSD has Standard Conditions of Approval that require construction activities that affect traffic flow are restricted to off-peak hours (e.g. between 10:00 AM and 3:00 PM) (refer to SC-AQ-4 in Section 4.3, *Air Quality* of the IS/MND).



2. Response to Comments

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2. Response to Comments

COMMENT B – Ein Wilson, California Department of Fish and Wildlife (CDFW) (9 pages)

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 15, 2020

Eimon Smith
Los Angeles Unified School District
333 S Beaudry Avenue, 21st floor
Los Angeles, CA 90017
cp-eimon.smith@lausd.net

**Subject: Taft Charter High School Comprehensive Modernization Project, Mitigated
Negative Declaration (MND), Los Angeles County, SCH #2020080265**

Dear Mr. Smith:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Taft Charter High School Comprehensive Modernization Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

B-1

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1800 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or State-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*) authorization as provided by the applicable Fish and Game Code will be required.

B-2



2. Response to Comments

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Project Description and Summary

Objective: The Los Angeles Unified School District (LAUSD) is proposing to address physical ground and building concerns on campus through building replacement, renovation, and modernization. The proposed Project includes demolishing eight permanent buildings, removing existing portable buildings, constructing new permanent buildings that provide adequate learning spaces and support areas, upgrading and replacing aging utilities and infrastructure, improving existing athletic facilities, and providing new landscaping and hardscaping. The proposed Project also includes limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act, seismic retrofit pursuant to California Assembly Bill 300, and low voltage upgrades to support current technology.

Location: Taft Charter High School is located at 5461 Winnetka Avenue within the Woodland Hills neighborhood of Los Angeles, California, 91364. The school boundary includes two discontinuous parcels located on opposite sides of Winnetka Avenue totaling 32.4 acres. The larger 29.81-acre parcel to the west of Winnetka Avenue (Assessor Parcel Number [APN] 2166-042-902) includes the main campus of Taft Charter High School (Campus). The smaller 2.59-acre parcel to the east (APN 2166-034-900) includes a surface parking lot as well as two portable buildings for the Thoreau Continuation High School. The community that surrounds the Campus is an urban mix of commercial and residential development, mostly comprised of single-family homes, particularly along the southern and western boundaries. Land uses at the properties bordering the Campus generally consist of commercial and office uses as well as single family residences.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the LAUSD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

B-3

Comment #1: Biological Report and Survey

Issue: The LAUSD Conditions of Approval SC-BIO-1 of the Initial Study states, "If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared." Thus, it appears that a biological assessment has not yet been made for the Project.

Specific impacts: Project implementation may result in impacts to wildlife that may be located on site or near the Project vicinity. The impacts from construction activity may result in direct mortality, reduced reproductive capacity, or population declines in protected or CDFW special status species.

B-4

Why impact would occur: CEQA Guidelines sections 15070 and 15071 require the Negative Declaration to analyze if the Project may have a significant effect on the environment as well as review if the Project will "avoid the effect or mitigate to a point where clearly no significant



2. Response to Comments

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effects would occur." Relying on future surveys, a future biological report and investigation, or the preparation of future management plans are considered deferred mitigation under CEQA.

In order to analyze if a project may have a significant effect on the environment, Project related impacts, including survey results for species that occur in the Project footprint, need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

Evidence impact would be significant: CEQA Guidelines sections 15070 and 15071 require the Negative Declaration to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. In order to analyze if a project may have a significant effect on the environment, the Project related impacts, including survey results for species that occur in the entire Project footprint should be disclosed during the public comment period. This information allows CDFW to comment on alternatives to avoid impacts as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity). Absent survey data, CDFW is unable to provide meaningful avoidance, minimization, or mitigation measures related to biological resources.

B-4
(Cont.)

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: CDFW recommends a Biological Resources Survey be conducted. Such a survey should include specific information regarding impacts to any potential habitat, including trees, vegetation, or buildings that are scheduled for deconstruction. This should also include the acreage of any temporary and permanent construction impacts and types of vegetation to be removed. CDFW concurs that the Biological Resources Report should include, "a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats," as stated in the Initial Study.

Comment #2: Mitigation for Impacts to Birds

Issue: The measures "Bird Surveys- Construction Demolition or Vegetation Removal in or adjacent to Native Habitat" and "Bird Surveys- Construction, Demolition, or Vegetation Removal at Existing Campuses" in SC-BIO-3 do not address the potential need for mitigation for removal of potentially occupied habitat.

Specific impacts: Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in trees in or directly adjacent to the Project boundary. In addition, construction and demolition activities and temporary increase in human activity, even outside of breeding activity, may result in habitat disturbance or destruction. These activities may cause the death or injury of adults or juveniles as well as impact potential foraging areas, absent specific mitigation.

B-5

Why impact would occur: Impacts to nesting birds could result from ground disturbing and demolition activities. Project disturbance activities could potentially result in mortality or injury to nestlings. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment. In addition, Project



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implementation includes vegetation removal and demolition activities that may result in direct mortality, population declines, or local extirpation of special status bird species.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment, reproductive suppression, or adequate habitat removal would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species, not only special status species, are protected under State laws and regulations, including Fish and Game Code sections 3503 and 3503.5.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To account for unavoidable impacts to occupied habitat, on-site habitat restoration or enhancement should be discussed in detail. CDFW recommends LAUSD consider phased removal of trees to minimize impacts resulting from the temporal loss of tree habitat and to still provide available habitat while mitigation (i.e., restoration or enhancement) of habitat occurs. If on-site mitigation is not feasible or would not be biologically viable and therefore would not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be pursued. If off-site mitigation is selected, CDFW recommends it be at a state-approved mitigation bank or via an entity that has been approved by CDFW to hold and manage mitigation lands pursuant to AB 1094 (2012), which amended Government Code, sections 65965-65968. All mitigation and mitigation plans should be provided in advance of any Project entitlements and the MND should include the specific performance standards detailed in these plans. CDFW can provide guidance to LAUSD regarding appropriate mitigation ratios.

Mitigation Measure #2: Permanent impacts to special status species, including occupied and foraging habitat should be offset by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, that should include an appropriate non-wasting endowment to provide for the long-term management of mitigation lands.

Comment #3: Tree Removal and Planting List

Issue #1: Section 3.2.3 Landscaping in the Initial Study states, "The Project landscaping would be designed to be compatible with the Campus and would incorporate, to the extent possible, native plants and vegetation that are appropriate for the Campus and the Southern California setting." While CDFW recognizes that the Project plans to utilize native plants "to the extent possible," CDFW is concerned that there is no mention of the avoidance of the use of invasive plant species.

Issue #2: Section 3.2.3 Landscaping in the Initial Study also states, "The Project would involve the removal of approximately 16 percent of the existing trees on Campus. There are at least 417 trees on the property, of which approximately 67 are proposed for removal." CDFW is concerned that, with this number of trees to be removed, the MND does not contain procedures for disposal of removed trees that may be infested with invasive pests and disease.

Specific Impact: Using plants not native to California in a landscape plan, reduces the value of habitat for native wildlife. Habitat loss and invasive plants are a leading cause of native

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(Cont.)

B-6



2. Response to Comments

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biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. Invasive plants reduce native plant species diversity. The list of invasive plants is available at [Cal-IPC Invasive Plant Checklist](#) (Cal-IPC 2018).

In addition, Project activities have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of trees in California which may support a high biological diversity including special status species.

Why impact would occur: CDFW is concerned that planting known non-native or potentially invasive plant species as part of this Project, would contribute to the degradation of native plant populations. CDFW is concerned that by not requiring all trees and plants be replaced by native tree and plant species, the replacement trees would not be fully mitigating the function and improving the value of the impacted tree species.

In addition, trees will be removed and presumably hauled to off-site locations for disposal, thereby exposing off-site tree species to potential infestation and disease.

Evidence Impact would be significant: Invasive species have contributed to the decline of forty-two percent of U.S. threatened and endangered species (USDA, 2019). Increased competition of water from invasive tree species stresses native tree species, increasing the probability of being attacked by invasive insects (USDA PNRS, 2019).

The Project may result in a substantial adverse effect, either directly or through habitat modifications, by exposing other habitats to insect and/or disease pathogens. Exposure to insect and/or disease pathogens may have a substantial adverse effect on any sensitive natural communities (e.g., California walnut woodlands) identified in local or regional plans, policies, and regulations or by the CDFW or U.S. Fish and Wildlife Service.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends that the Project prohibit the planting of any species contained in the [Cal-IPC Invasive Plant Checklist](#) (Cal-IPC 2018) listed for any region.

Mitigation Measure #2: CDFW recommends replacing all trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees.

Mitigation Measure #3: To reduce impacts to less than significant the final environmental document should describe an infectious tree disease management plan and how it will be implemented to avoid significant impacts under CEQA. All trees identified for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: [thousand canker fungus](#) (*Geosmithia morbida*), [Polyphagous Shot Hole Borer](#) (*Euwallacea spp.*), and [goldspotted oak borer](#) (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

Filing Fees

B-6
(Cont.)



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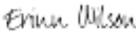
The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the LAUSD and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs. tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

B-7

Conclusion

We appreciate the opportunity to comment on the Project to assist LAUSD in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the LAUSD has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at felicia.silva@wildlife.ca.gov or (562) 430-0098.

Sincerely,

DocuSigned by:

Erinn Wilson
Environmental Program Manager I

ec: CDFW

Victoria Tang – Los Alamitos – victoria.tang@wildlife.ca.gov
Felicia Silva – Los Alamitos – felicia.silva@wildlife.ca.gov
Andrew Valand – Los Alamitos – andrew.valand@wildlife.ca.gov
Ruby Kwan-Davis – Los Alamitos – ruby.kwan-davis@wildlife.ca.gov
Susan Howell – San Diego – susan.howell@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQA@wildlife.ca.gov

State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

- [Cal-IPC] California Invasive Plant Council. 2018. Invasive Plant Checklist for California Landscaping. Accessed at: <https://www.cal-ipc.org/wp-content/uploads/2018/05/InvasivePlantChecklistforCaliforniaLandscaping.pdf>.
- [TCD] Thousand Cankers Disease. 2020. What is Thousand Cankers? Accessed at: <http://thousandcankers.com/>.
- [UCANR] University of California Agriculture and Natural Resources Division. 2020. Invasive Shot Hole Borers. Accessed at: <https://ucanr.edu/sites/eskalenlab/?file=/avocado.html>.
- [UCIPM] University of California Statewide Integrated Pest Management Program. 2013. How to Manage Pests. Pests in Gardens and Landscapes. Goldspotted Oak Borer. Accessed at: <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>.

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USDA Pacific Northwest Research Station.
<https://www.fs.fed.us/outernet/pnw/invasives/index.shtml>. Accessed 2/12/19.



2. Response to Comments

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
MM-BIO-1- Biological Report and Survey	CDFW recommends including specific information regarding impacts to any potential habitat, including trees, vegetation, or buildings that are scheduled for deconstruction. This shall include the acreage of any temporary and permanent construction impacts and types of vegetation to be removed. CDFW concurs that the Biological Resources Report should include, "a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats," as stated in the Initial Study.	Prior to Construction	LAUSD Project Proponent
MM-BIO-2- Impacts to Birds	To account for unavoidable impacts to occupied habitat, on-site habitat restoration or enhancement shall be discussed in detail. LAUSD shall conduct a phased removal of trees (i.e., phased approach) to minimize impacts resulting from the temporal loss of tree habitat and to still provide available habitat while mitigation (i.e., restoration or enhancement) of habitat occurs. If on-site mitigation is not feasible or would not be biologically viable and therefore would not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity shall be pursued. If off-site mitigation is selected, CDFW recommends it be at a state-approved mitigation bank or via an entity that has been approved by CDFW to hold and manage mitigation lands pursuant to AB 1094 (2012), which amended Government Code, sections 65985-65988. All mitigation and mitigation plans shall be provided in advance of any Project entitlements and the MND shall include the specific performance standards detailed in these plans. CDFW can provide guidance to LAUSD regarding appropriate	Prior to Construction	LAUSD Project Proponent



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	mitigation ratios.		
MM-BIO-3- Impacts to Birds	Permanent impacts to special status species, including occupied and foraging habitat shall be offset by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, that shall include an appropriate non-wasting endowment to provide for the long-term management of mitigation lands.	Prior to Construction	LAUSD Project Proponent
MM-BIO-4- Planting List	The Project shall prohibit the planting of any species contained in the Cal-IPC Invasive Plant Checklist (Cal-IPC 2018) listed for any region.	Prior to Construction	LAUSD Project Proponent
MM-BIO-5-Tree Removal	All trees removed as a result of the proposed work activities shall be replaced by at least a 1:1 ratio with native trees.	Prior to Construction	LAUSD Project Proponent
MM-BIO-6- Tree Removal	To reduce impacts to less than significant the final environmental document shall describe an infectious tree disease management plan and how it will be implemented to avoid significant impacts under CEQA. All trees identified for removal resulting from the Project shall be inspected for contagious tree diseases including but not limited to: thousand canker fungus (<i>Geosmithia morbida</i>), Polyphagous Shot Hole Borer (<i>Euwallacea spp.</i>), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.	Prior to Construction	LAUSD Project Proponent



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B. Response to Comments from Erinn Wilson, CDFW, dated September 15, 2020

B-1 Comment noted. LAUSD recognizes CDFW's role as California's Trustee Agency for fish and wildlife (biological) resources as well as its jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitats necessary for biologically sustainable populations of those species. LAUSD appreciates CDFW's review of the IS/MND and the comments provided on the fish and wildlife (biological) resources within CDFW's jurisdiction.

B-2 As described in the analysis provided in Section 4.4, *Biological Resources*, "[t]he Campus itself is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including playfields. According to the USFWS Wetland Mapper, the Project site does not contain any federally protected wetlands as defined by Section 404 or Section 401 of the [Clean Water Act] CWA (including but not limited to marsh, vernal pool, coastal, etc.)." Based on a review of the California Natural Diversity Database (CNDDB) conducted during the preparation of the IS/MND, there are no records of federally listed, State listed, or other special status species occurring within 1 mile of Taft Charter High School. The nearest sensitive community – California Walnut Woodland – is located approximately 0.5 mile south of the Campus. This has been clarified and explicitly stated within Section 4.4, *Biological Resources* of the IS/MND. As described in the IS/MND, given the developed nature of the Campus, and its location immediately adjacent to U.S. Highway 101, "neither the Campus nor the surrounding area provides large areas of native habitat capable of supporting any special status plant or wildlife species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by CDFW or USFWS. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Campus is extremely low." Therefore, while LAUSD recognizes and appreciates CDFW's role as a Responsible Agency when permitting or other discretionary actions are required by CDFW, the Project would not affect waters under the jurisdiction of CDFW, State listed species, or any other special status species. Therefore, no permits or other discretionary actions would be required by CDFW.

B-3 As described in Section 4.4, *Biological Resources* in the IS/MND "[t]he Campus itself is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including playfields." Potential impacts to biological resources are limited to the removal of approximately 67 trees, primarily associated with the new softball field, accessibility to the visitor stadium seating, and expansion of the track and field. Tree modification and removal associated with the Project has the potential to impact nesting birds protected under the Migratory Bird Treaty Act of 1918 (MBTA). However, all tree removal would be consistent with the LAUSD Office of Environmental Health and Safety (OEHS) Tree Trimming and Removal Procedure, which provides measures that intended to avoid impacts to nesting birds:

"Tree trimming or removal during avian non-breeding and non-nesting season (September 1st through January 31st).

- *Tree trimming or dead tree removal may proceed without a nesting and breeding bird survey by a Qualified Biologist.*
- *If an active bird nest is found by the tree trimming or removal workers, activities must be halted and OEHS immediately contacted. If an inactive nest is observed, it should be left in place whenever feasible. Birds and their nests cannot be removed from the school grounds unless there are special circumstances. Injured birds may be transported to a local veterinarian or the California Wildlife Center at 26026*



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Pioma Road, Calabasas California. Tree trimming or removal during avian breeding and nesting season (February 1st through August 31st).

If tree trimming or removal activities cannot feasibly avoid the breeding season, the following guidelines must be followed.

- *A Qualified Biologist shall conduct a nesting and breeding bird survey no more than three days prior to trimming or removal of the tree to detect any breeding or nesting behavior in or within 300 feet of the work area (limited to District property). If an active bird nest is found, tree trimming must be halted and OEHS immediately contacted. If an inactive nest is observed, it should be left in place whenever feasible.”*

Additionally, the relevant requirements provided in SC-BIO-1, SC-BIO-2, SC-BIO-3, and SC-BIO-4 would also be implemented, as appropriate. With the implementation of these Standard Conditions of Approval described in the IS/MND, impacts to biological resources – including nesting birds – would be less than significant. As described in Comment Response B-4, B-5, and B-6, clarifications have been made to the IS/MND, as appropriate; however, additional mitigation measures are not required.

B-4 SC-BIO-1 describes that “LAUSD will conduct a literature search, which shall consider a 1-mile radius beyond the project construction site.” As described in Comment Response B-3, during the preparation of the IS/MND, LAUSD conducted a review of the CNDDDB during the preparation of the IS/MND and determined that there are no records of federally listed, State listed, or other special status species occurring within 1 mile of Taft Charter High School. The nearest sensitive community – California Walnut Woodland – is located approximately 0.5 miles to the south. As described in the IS/MND, given the developed nature of the campus, and its location immediately adjacent to U.S. Highway 101, “neither the Campus nor the surrounding area provides large areas of native habitat capable of supporting any special status plant or wildlife species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by CDFW or USFWS. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Campus is extremely low.” Therefore, based on this substantial evidence, LAUSD determined that a Biological Report was not required. Nevertheless, LAUSD prepared an Arborist Report, provided as Appendix B to the IS/MND, which surveyed all of the 417 trees on campus, including the 67 trees proposed for trimming or removal as a part of the Project.

B-5 As described in Section 3.2.3, *Landscaping*, there are at least 417 trees on the property, of which approximately 67 are proposed for removal as a part of the Project. However, all tree removal would be required to comply with the LAUSD OEHS Tree Trimming and Removal Procedure, which provides measures that are designed to avoid impacts to nesting birds (refer to Comment Response B-3). Additionally, SC-BIO-3, describes additional protective measures for nesting birds.

The 67 trees proposed for removal represent approximately 16 percent of the total number of trees on the Campus. As such, even with the removal of these trees, suitable nesting habitat would remain available during and following the completion of construction activities. As described during the public meeting on August 27, 2020, each of the trees proposed for removal would be replaced on the Campus, consistent with the request by CDFW. This has been clarified and explicitly stated within Section 4.4, *Biological Resources* of the IS/MND. Compliance with the LAUSD OEHS Tree Trimming and Removal Procedure, implementation of SC-BIO-3, and replacement of the trees proposed for removal would reduce impacts to less than significant and additional mitigation measures are not required.



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- B-6 Comment noted. As described in Section 3.2.3, *Landscaping*, “All plants and vegetation proposed for the Campus would be selected from the LAUSD’s approved plant list or would be approved by the LAUSD prior to being placed on the Campus.” LAUSD’s approved plant list does not include any invasive species; however, the IS/MND has been revised to clarify and explicitly describe that invasive plant species listed California Invasive Plant Council (Cal-IPC) Invasive Plant Checklist (Cal-IPC 2018) would be avoided.

Section 3.2.3, *Landscaping* has been revised to clarify and explicitly describe that all recommendations from the Final Arborist Report would be incorporated into the proposed tree removal. This would include, but shall not be limited to, inspection for contagious tree diseases including: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Eurwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*). As requested by CDFW, to avoid the spread of infectious tree diseases, if any diseased trees are identified at the Campus, these trees would not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

- B-7 Comment noted. LAUSD recognizes its responsibility to pay for all appropriate filing fees and will do so upon filing the Notice of Determination (NOD).



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