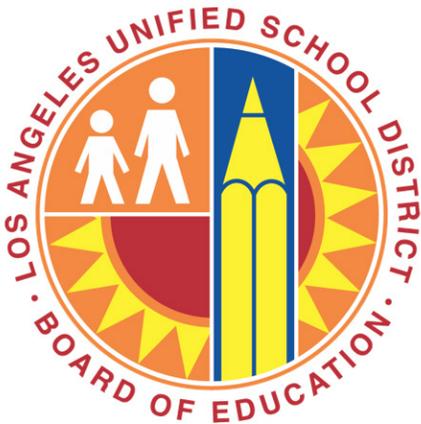


May 2019 | Mitigated Negative Declaration



ELIZABETH LEARNING CENTER

Comprehensive Modernization

Prepared for:

Los Angeles Unified School District

Office of Environmental Health and Safety

333 South Beaudry Avenue, 21st Floor

Los Angeles, California 90017

Contact: Will Meade, LEED AP, Environmental Planning Specialist

213.241.3432

Prepared by:

PlaceWorks

3 MacArthur Place, Suite 1100

Santa Ana, California 92707



Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

MITIGATED NEGATIVE DECLARATION

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

LEAD AGENCY: Los Angeles Unified School District

PROJECT TITLE: Elizabeth Learning Center Comprehensive Modernization

PROJECT LOCATION: The proposed Project site is at the 16.82-acre Elizabeth Learning Center at 4811 Elizabeth Street, in the City of Cudahy, in the County of Los Angeles.

PROJECT DESCRIPTION: The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Elizabeth Learning Center. The proposed Project would modernize the school Campus to facilitate a safe and secure campus that better aligns with the current instructional program. The Project consists of the demolition of three permanent buildings (33,722 square feet: Buildings A, B, and East Classroom Building 3); the removal of 22 portable buildings (26,794 square feet); construction of one or more permanent buildings (~86,900 square feet)(1 to 2-story) providing secondary school classrooms and support facilities, elementary classrooms and support facilities, kindergarten classrooms and support facilities, and a library; seismic retrofit and modernization of the Administrative Building; various improvements to other remaining buildings; site upgrades to infrastructure and utilities, landscape and hardscaping, site lighting, fencing, and gates; and improvements to meet the programmatic access requirements of the Americans with Disabilities Act.

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

EXISTING CONDITIONS: The proposed Project would occur on Elizabeth Learning Center Campus. The school had approximately 1,797 students in Pre-Kindergarten through 12th grade in the 2017–2018 school year. The school is divided into elementary, middle, and high schools; grades 10 through 12 are divided between the Information Technology Academy and the Health Academy. The Campus has an administration building, lunch shelters, permanent and portable classroom buildings, a multi-purpose building, a physical education building, along with maintenance and storage areas, a grass playing field, and hardcourts. The Campus has buildings for academic and athletic functions as well as a Community Wellness Center and Mental Health Clinic and a Head Start State Preschool.

DOCUMENT AVAILABILITY: The MND and supporting Initial Study for the Elizabeth Learning Center Comprehensive Modernization Project are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3432)
- Cudahy Library, 5218 Santa Ana Street, Cudahy, CA 90201
- Elizabeth Learning Center, Main Office, 4811 Elizabeth Street, Cudahy, CA 90201
- LAUSD Local District East Office, 2151 North Soto Street, Los Angeles, CA 90032
- LAUSD Office of Environmental Health and Safety Website: <http://achieve.lausd.net/ceqa>

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

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

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

May 2019 | Initial Study

ELIZABETH LEARNING CENTER

Comprehensive Modernization

Table of Contents

Section	Page
1. INTRODUCTION.....	1
1.1 Overview	1
1.2 Background.....	1
1.3 California Environmental Quality Act	2
1.4 Environmental Process	2
1.5 Impact Terminology.....	6
1.6 Organization of the Initial Study	7
2. ENVIRONMENTAL SETTING	9
2.1 Project Location.....	9
2.2 Surrounding Land Use.....	9
2.3 Campus History	9
2.4 Existing Conditions	9
2.5 General Plan and Existing Zoning.....	11
2.6 Necessary Approvals	12
3. PROJECT DESCRIPTION.....	31
3.1 Background.....	31
3.2 Proposed Project.....	31
4. ENVIRONMENTAL CHECKLIST AND ANALYSIS.....	37
5. LIST OF PREPARERS	137
5.1 Lead Agency	137
5.2 CEQA Consultant.....	137

Table of Contents

APPENDICES

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



Table of Contents

List of Figures

Figure		Page
Figure 1	Regional Location.....	15
Figure 2	Local Vicinity	17
Figure 3	Aerial Photograph	19
Figure 4	Existing Campus.....	21
Figure 5	Photo Location Key.....	23
Figure 5a	Campus Photos.....	25
Figure 5b	Campus Photos.....	27
Figure 5c	Campus Photos.....	29
Figure 6	Conceptual Site Plan	35

List of Tables

Table		Page
Table 1	Existing School Campus	10
Table 2	Maximum Daily Regional Construction Emissions.....	48
Table 3	Localized Construction Emissions	50
Table 4	Localized Construction Emissions – with SC-AQ-4.....	53
Table 5	Building Energy Use	69
Table 6	Construction BMPs.....	76
Table 7	Project-Related Construction GHG Emissions	82
Table 8	Construction Equipment Noise Levels	104
Table 9	Project-Related Construction Noise Levels	105
Table 10	Construction Equipment Vibration Levels.....	108

Abbreviations and Acronyms

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



Abbreviations and Acronyms

ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System
FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LACFD	Los Angeles County Fire Department
LAUSD	Los Angeles Unified School District
L _{dn} or DNL	Day-Night Noise Level
Leq	Equivalent Continuous Noise Level
LID	low-impact development
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
MTCO _{2e}	metric ton of CO _{2e}
MW	Materials and Waste Management
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
O ₃	ozone
OITC	outdoor-indoor transmission class
PDF	project design features
PEA	Preliminary Environmental Assessment
PF	Public Facility
PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators

Abbreviations and Acronyms

REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SO ₂	sulfur dioxide
SoCAB	South Coast Air Basin
SRA	Source Receptor Area
STC	sound transmission class
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra low sulfur diesel
UST	underground storage tank
VdB	vibration decibel
VOC	volatile organic compounds



1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of the Elizabeth Learning Center, at 4811 Elizabeth Street, Cudahy, in the County of Los Angeles. Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at the Elizabeth Learning Center Campus (Campus) through building replacement, renovations, modernizations, and reconfiguration. The proposed Elizabeth Learning Center Comprehensive Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this Project.

1.2 BACKGROUND

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

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

On December 13, 2016, the BOE approved the project definition for the Elizabeth Learning Center to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project

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

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

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

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

1. Introduction

is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.⁵

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA⁶ and the State CEQA Guidelines.⁷ CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

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

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,⁹ however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.¹⁰

1.4 ENVIRONMENTAL PROCESS

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

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

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

⁶ California Public Resources Code, §21000 et seq (1970).

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

⁸ California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

⁹ California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

¹⁰ California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.



1. Introduction

- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

1.4.1 Initial Study

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

1.4.2 Mitigated Negative Declaration

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

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

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.¹¹ LAUSD’s SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one “prepared on a series of actions that can be characterized

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

1. Introduction

as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.¹² The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as “tiering.” Under CEQA Guidelines Sections 15152(a) and 15385, “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and NDs on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or ND solely on the issues specific to the later project.¹³

The Program EIR is applicable to all projects implemented under the School Upgrade Program. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.¹⁴ 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:¹⁵

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

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

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

1.4.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the architectural designs are subject to review and approval by the California Division of the State Architect

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

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

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

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



1. Introduction

(DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),¹⁶ LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁷

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

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects.

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

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

¹⁶ California Green Building Standards Code, Title 24, Part 11.

¹⁷ The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

1. Introduction

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

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

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

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

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

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

1.5 IMPACT TERMINOLOGY

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

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

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



1. Introduction

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

1.6 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

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

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

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

1. Introduction

This page intentionally left blank.



2. Environmental Setting

2.1 PROJECT LOCATION

The 16.8-acre Campus is located at 4811 Elizabeth Street, City of Cudahy, in the County of Los Angeles (Assessor's Parcel Numbers [APNs] 6226-025-900, 6226-024-908, 6226-024-902, 6226-024-900, 6226-024-909, 6226-024-906, 6226-024-905, 6226-024-904, 6226-024-903, 6226-024-901, 6226-024-907, 6226-031-900, 6226-031-901, and 6226-032-903). The Campus is about 0.7-miles northwest of U.S. Interstate 710 (Long Beach Freeway) and 3-miles northeast of Interstate 105 (Century Freeway)(see Figure 1, *Regional Location*). The Los Angeles River is approximately 0.6 miles to the east of the Campus.

2.2 SURROUNDING LAND USE

The Campus is bounded by Elizabeth Street on the south and Clara Street on the north. Single family homes are located south of the Campus across from Elizabeth Street. Clara Street Sports Park, single- and multi-family homes, in addition to a church are located north of the Campus across from Clara Street. Clara Street Park extends the entire east boundary. Mobile homes and multifamily homes adjoin the west property line. Commercial and institutional uses are located a block west, along the major arterial road of Atlantic Boulevard (see Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph*).

2.3 CAMPUS HISTORY

Elizabeth Learning Center was originally built in the 1923 as a K-8 school; however, all of the original structures have since been demolished. The oldest permanent buildings are the Administration Building, constructed in 1932, and two buildings (Buildings A and B) constructed in 1949. The Administration Building was structurally retrofitted in 1958, followed by construction of the Multi-Purpose Room Building in 1960, and the East Classroom Building 3 in 1963. The Administration Building was modernized and structurally retrofitted again in 1976. The remaining permanent structures were constructed between 1989 and 1993. The 22 portables on Campus were installed between 1948 and 2001.

2.4 EXISTING CONDITIONS

Student enrollment for the 2017-2018 academic year was 1,797 students in Pre-Kindergarten (early transitional kindergarten) through 12th grade.¹⁹ The Campus is divided into elementary, middle, and high schools; grades 10 through 12 are divided between the Information Technology Academy and the Health Academy. The Campus is located within the boundaries of LAUSD's Bell Zone of Choice. Zones of Choice are geographic

¹⁹ California Department of Education, 2017-18 Enrollment by Grade, Elizabeth Learning Center Report.
<https://data1.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=19647336016885&agglevel=school&year=2017-18>.

2. Environmental Setting

areas comprised of multiple high school options. The small school options in the Bell Zone of Choice are open to all resident students.

The existing Elizabeth Learning Center Campus includes buildings for academic and athletic functions as well as a Community Wellness Center, Mental Health Clinic, and a Head Start State Preschool. The Wellness Center, which provides services to the students and community, is housed in a portion of the building originally built as the Metal and Wood Shop in the southwest corner of the Campus. The Mental Health Clinic, which provides services for students and their family, is housed in a portion of the building originally built as the Graphic Arts and Electrical Shop also in the southwest corner of the Campus. A Head Start State Preschool is located in a 14,000-square foot portion of the Campus that has been dedicated to the Head Start/California State Preschool Program. It is located along Clara Street west of the physical education building.

The academic core occupies the southern portion of the Campus, and the hardcourts, grass playing field, the Head Start State Preschool, and the physical education building occupy the northern portion of the site. With the exception of the 110,000-square foot grass sports field, the Campus is almost completely paved. The Campus tree canopy is sparsely planted with clusters of mature trees within the academic core separated by large amounts of paving. The Elizabeth Learning Center consists of 38 buildings (16 permanent and 22 portable buildings) with 81 classrooms (see Figure 4, *Existing Campus*, Figure 5, *Photo Location Key* and Figures 5a through 5c, *Campus Photos*). Table 1 shows the year built and square footage for the Campus buildings.

Table 1
Existing School Campus

Building No.*	Building Name	Square Footage	Year Built
1A	Administration Building [Modernization]	21,158	1932 1958
1B	Science Building 1	6,775	1989
2A	Multi-Purpose Building [Kitchen Addition]	3,763 4,179	1960 2009
2B	Science Building 2	9,238	1989
3	Oral Arts and Music Building	4,400	1989
4	Sanitary Building	1,456	1989
5	Lunch Shelter	9,000	1989
6A	Student Store Building	1,064	1989
6B	Classroom Building 4	5,236	1989
7A	Building A	1,807	1949
7B	Graphic Arts and Electrical Shop [partially used for Mental Health Clinic]	3,590	1989



2. Environmental Setting

**Table 1
Existing School Campus**

Building No.*	Building Name	Square Footage	Year Built
8A	Building B	1,807	1949
8B	Metal and Wood Shop Building**	4,785	1989
9A	East Classroom Building 3 (2-story)	20,869	1963
9B	Physical Education Building	20,832	1989
43	Concession Stand	150	Unknown
23-46	22 Portable Buildings	28,000	Various
	Total Building Space	148,109	

Note: All buildings are one story except for the two-story East Classroom Building 3.

*See Figure 4, *Existing Campus*.

** Wellness Center is also in this building

School Operations. Elizabeth Learning Center is on a two-semester, single-track schedule that serves Pre-kindergarten through 12th grades. General hours for Kindergarten and elementary students are 8:15 AM to 2:34 PM. General hours for middle and high school students are 8:00 AM to 2:47 PM.²⁰

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

Community Use. The Campus includes a Wellness Center, which provides services to the community. Additionally, in compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the Campus is available for community use at selected times when not in use by LAUSD.²¹

2.5 GENERAL PLAN AND EXISTING ZONING

The City of Cudahy General Plan Land Use designation for the property is ‘School’.²² The zoning for the Campus is also designated as S (School).²³

²⁰ Elizabeth Learning Center. 2018-2019 Bell Schedule. https://www.elizabethlc.org/apps/bell_schedules/.

²¹ California Education Code Sections 38130–38139.

²² City of Cudahy. Cudahy 2040 General Plan, Land Use Element. March, 2018. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/final_cudahy_gp_may_2018.pdf.

²³ City of Cudahy. Zoning Map. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_zoning_map_051118.pdf.

2. Environmental Setting

2.6 NECESSARY APPROVALS

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

Responsible Agencies

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

- City of Cudahy, Public Works, Engineering Division. Permit for curb, gutter, and any other offsite improvements, and approval of haul route.
- Los Angeles County, Fire Department. Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a Project requires local fire authority (LACFD) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- South Coast Air Quality Management District. Review and file submittals for Rule 403-Fugitive Dust; Rule 1403-Asbestos Emissions from Demolition/Renovation Activities; Rule 1466-Control of Particulate Emissions from Soils with Toxic Air Contaminants; Rule 201-Permit to Construct; Rule 1166-Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific soil mitigation plan; and site monitoring.

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 individual projects to be implemented under the SUP may include the following:

State

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



2. Environmental Setting

- State Lands Commission
- California Highway Patrol

Regional

- Metropolitan Transportation Authority
- Southern California Association of Governments

Local

- City of Cudahy, Community Development Department
- LA County Sheriff
- City of Cudahy, Department of Parks and Recreation

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

Two Native American Tribes have requested notification through the PRC Section 21080.3.1 process: the Gabrieleño Band of Mission Indians - Kizh Nation and the Fernandeño Tataviam Band of Mission Indians. LAUSD notified the Tribes about this and other projects on January 8, 2019. On January 9, 2019, the Gabrieleño Band of Mission Indians - Kizh Nation requested consultation on this and other projects. The Fernandeño Tataviam Band of Mission Indians did not request consultation on this Project. See the Tribal Cultural Resources Section in Chapter 4 for additional information.

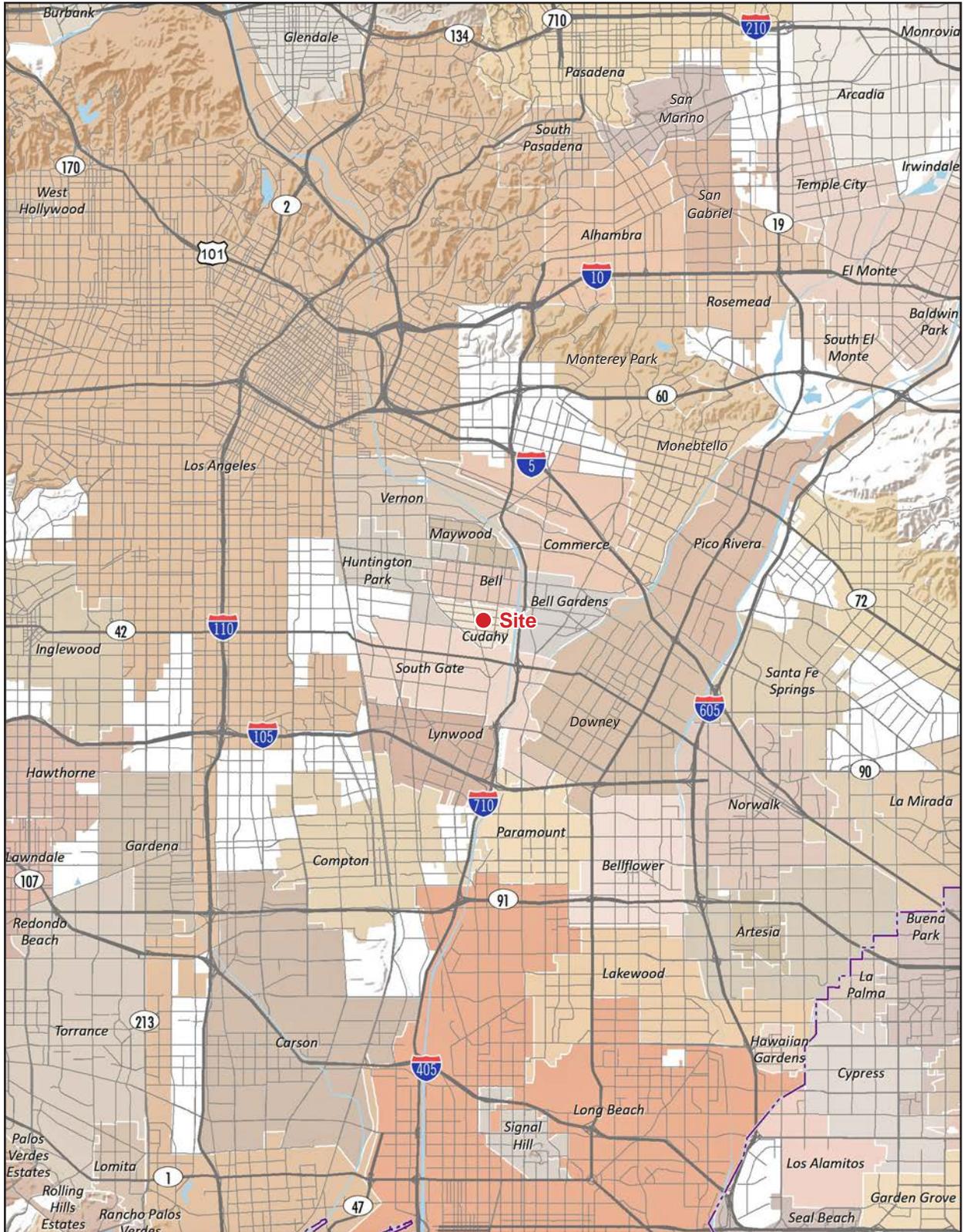
Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental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

2. Environmental Setting

This page intentionally left blank.



Figure 1 - Regional Location
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



Source: ESRI, 2018

2. Environmental Setting

This page intentionally left blank.



2. Environmental Setting

This page intentionally left blank.



Figure 3 - Aerial Photograph
2. Environmental Setting



— — Project Boundary

0 250
Scale (Feet)



Source: Google Earth Pro, 2018

2. Environmental Setting

This page intentionally left blank.



Figure 4 - Existing Campus
2. Environmental Setting



- | | | | |
|----|----------------------------------|---------|------------------------------|
| ①A | Administrative Building | ⑧A | Classroom Building B |
| ①B | Science Building 1 | ⑧B | Metal and Wood Shop Building |
| ②A | Multi-Purpose Building | ⑨A | East Classroom Building 3 |
| ②B | Science Building 2 | ⑨B | Physical Education Building |
| ③ | Oral Arts and Music Building | ④③ | Concession Stand |
| ④ | Sanitary Building | ②③ — ④⑦ | Portables |
| ⑤ | Lunch Shelter | | |
| ⑥A | Student Store Building | | |
| ⑥B | Classroom Building 4 | | |
| ⑦A | Classroom Building A | | |
| ⑦B | Graphic Arts and Electrical Shop | | |

0 200
Scale (Feet)



2. Environmental Setting

This page intentionally left blank.



Figure 5 - Photograph Location Key
2. Environmental Setting



— Project Boundary

① → Photo Location and Direction (18)

0 200
Scale (Feet)



Source: Google Earth Pro, 2018

2. Environmental Setting

This page intentionally left blank.



Figure 5a - Campus Photos
2. Environmental Setting



Photo 1. View of west wide of east Classroom Building 3.



Photo 2. View of east side of east Classroom Building 3.



Photo 3. View of west side of Classroom Building A.



Photo 4. View of west side of Classroom Building B.



Photo 5. View of flagpole planter west of East Classroom Building 3.



Photo 6. View of north side of portable to the east of the Administration Building.

2. Environmental Setting

This page intentionally left blank.



Figure 5b - Campus Photos
2. Environmental Setting



Photo 7. View of north side of portables along Elizabeth Street with holding area.



Photo 8. View of west side of portables along the east boundary of campus.



Photo 9. View of east side of portables adjacent to Physical Education Building.



Photo 10. View of east side of portable adjacent to basketball courts.



Photo 11. View of north side of Administration Building.



Photo 12. View of Physical Education Building.

2. Environmental Setting

This page intentionally left blank.



Figure 5c - Campus Photos
2. Environmental Setting



Photo 13. View of north side of Science Building 1.



Photo 14. View of mobile homes adjacent to the west boundary of campus.



Photo 15. View of single family homes across from campus on Elizabeth Street.



Photo 16. View of Clara Park looking South.



Photo 17. View of single family homes on south side of Clara Street.



Photo 18. View of single family homes on north side of Clara Street.

2. Environmental Setting

This page intentionally left blank.



3. Project Description

3.1 BACKGROUND

The Project is designed to address the most critical physical needs of the building and grounds at the Campus through building replacement, renovations, modernizations, and reconfiguration. The Project would modernize the Elizabeth Learning Center to facilitate a safe and secure Campus that better aligns with the current instructional program.

3.2 PROPOSED PROJECT

The proposed comprehensive modernization Project would occur on the Elizabeth Learning Center Campus at 4811 Elizabeth Street in the City of Cudahy.

3.2.1 Campus Improvements

Campus work would include modernizing, repairing, reconfiguring and/or replacing existing buildings, constructing new buildings, and upgrading deteriorated and outdated Campus infrastructure. Specifically, the Project would demolish three permanent buildings (33,722 square feet (sf)); remove 22 portable buildings (26,794 sf); and construct up to four permanent buildings (~86,900 sf); 54 classrooms would be removed (24 in permanent buildings and 30 in portables) and 53 classrooms would be added. The current Campus has 81 classrooms; following improvements the Campus would have a total of 80 classrooms, one less than existing. All existing buildings as well as all proposed new buildings are one or two stories as shown below (see Figure 6, *Conceptual Site Plan*).

■ Demolition and Removal

- 22 portable buildings (26,794 sf)
- Building A (#7A) (1,807 sf)
- Building B (#8A) (1,807 sf)
- East Classroom Building 3 (#9A) (2-story) (20,869 sf)

■ Modernization

- Seismic retrofit and modernization of Administrative Building (#1A)
- New roofing and HVAC for Physical Education Building (#9B)
- Exterior painting of all buildings

3. Project Description

- Minor modernizations such as interior improvements and paint (Classroom Building 4, Science Building 1, Science Building 2, Multi-Purpose Building, Oral Arts and Music Building, Graphic Arts and Electrical Shop Building, Metal and Wood Shop Building²⁴ and Sanitary Building 4)
- **New Construction**
 - A new building or buildings (1-2 stories)(totaling approximately 86,900 sf) providing:
 - Secondary school classrooms and support facilities
 - Elementary classrooms and support facilities
 - Kindergarten classrooms and support facilities
 - Library
 - Arcades along existing buildings²⁵
- **Site Upgrades**
 - Infrastructure, including utilities, stormwater lines, sewer lines, internet convergence systems, CCTV, and other systems serving the entire Campus
 - Improvements to comply with the Americans with Disabilities Act (ADA); building and site programmatic access improvements
 - New landscaping and hardscaping, including removal of existing trees and landscaped areas, asphalt demolition, repaving and striping of hardcourts, new basketball courts and tennis courts
 - Site lighting, fencing, gates (replace fencing with a 8-foot block wall along east border)

The new buildings would be arranged to remove identified barriers to program accessibility. The current layout of the site mixes kindergarten, elementary, and secondary grade level classrooms; the new layout would provide distinct areas for the three different grade levels.

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

3.2.2 Interim Housing

Interim housing of students during building construction would be provided in about 15 portable buildings installed on the west basketball hardcourts to the south of the turf play field. These temporary portable buildings would provide all facilities to maintain a fully functional Campus, and would be removed following construction of classroom buildings.

3.2.3 Landscaping

Vegetation onsite is limited to 55 ornamental trees (in tree wells and surrounded by asphalt), evergreen shrubs and a turf playfield. All attempts would be made to protect and preserve as many of the mature trees as possible

²⁴ The Graphic Arts and Electrical Shop Building houses the computer lab and part of the Wellness Center. The Metal and Wood Shop Building also has part of the Wellness Center.

²⁵ Exterior arcades are designed to provide a sheltered walkway for pedestrians.



3. Project Description

that are deemed healthy and structurally sound by an arborist. However, removal of some trees would be required to accommodate the new buildings.

3.2.4 Construction Phasing

Project construction is anticipated to start in Q3-2021 and is expected to take four years to complete (Q3-2025); however, because the project has several components, the Campus would not be under construction the entire time. To avoid classroom disruption, some work would be done during instructional breaks when students are off Campus. The following is the anticipated project construction schedule; however, the actual construction schedule will be determined by the Design-Builder. The existing tennis courts would be used for the staging area/construction lay-down area. Modernization of existing buildings would occur throughout the 4 year period.

Phase 1 (Starting in Q3-2021)

- Site preparation would involve removal of trees located on the hardscape area in southeast corner of Campus
- Utility trenches would be excavated and utility pipes and cables would be laid in trenches
- Install 15 interim housing portable buildings. Buildings would be hauled onto the Campus and placed by a crane on the west basketball courts; south of the turf field. A total of approximately 30 trucks would be required for delivery
- Indoor finishing work on the portables would include placement of furniture and equipment
- Remove 6 portable buildings
- Modernization/remodel of the Administration Building
- Remove handball courts
- Repair roofing and replace HVAC at Physical Education Building
- Construct Secondary Building

Phase 2 (Starting in Q2-2022)

- Demolish Buildings #7A, #8A, and #9A and asphalt; debris haul and site clearance
- Remove 14 portable buildings
- Rough grading and utility trenching followed by fine grading
- Construct new hardcourts adjacent to new Secondary Building

3. Project Description

Phase 3 (Starting in Q3-2023)

- Remove 2 remaining portables along Elizabeth Street
- Move staging area and demolish tennis courts, existing elementary play area; debris haul and site clearance
- Rough grading and utility trenching followed by fine grading
- Construct Elementary Building and Library
- Construct parking area on Clara Street
- Construct new elementary play area
- Minor modernization of existing buildings

Phase 4 (Starting in Q3-2024)

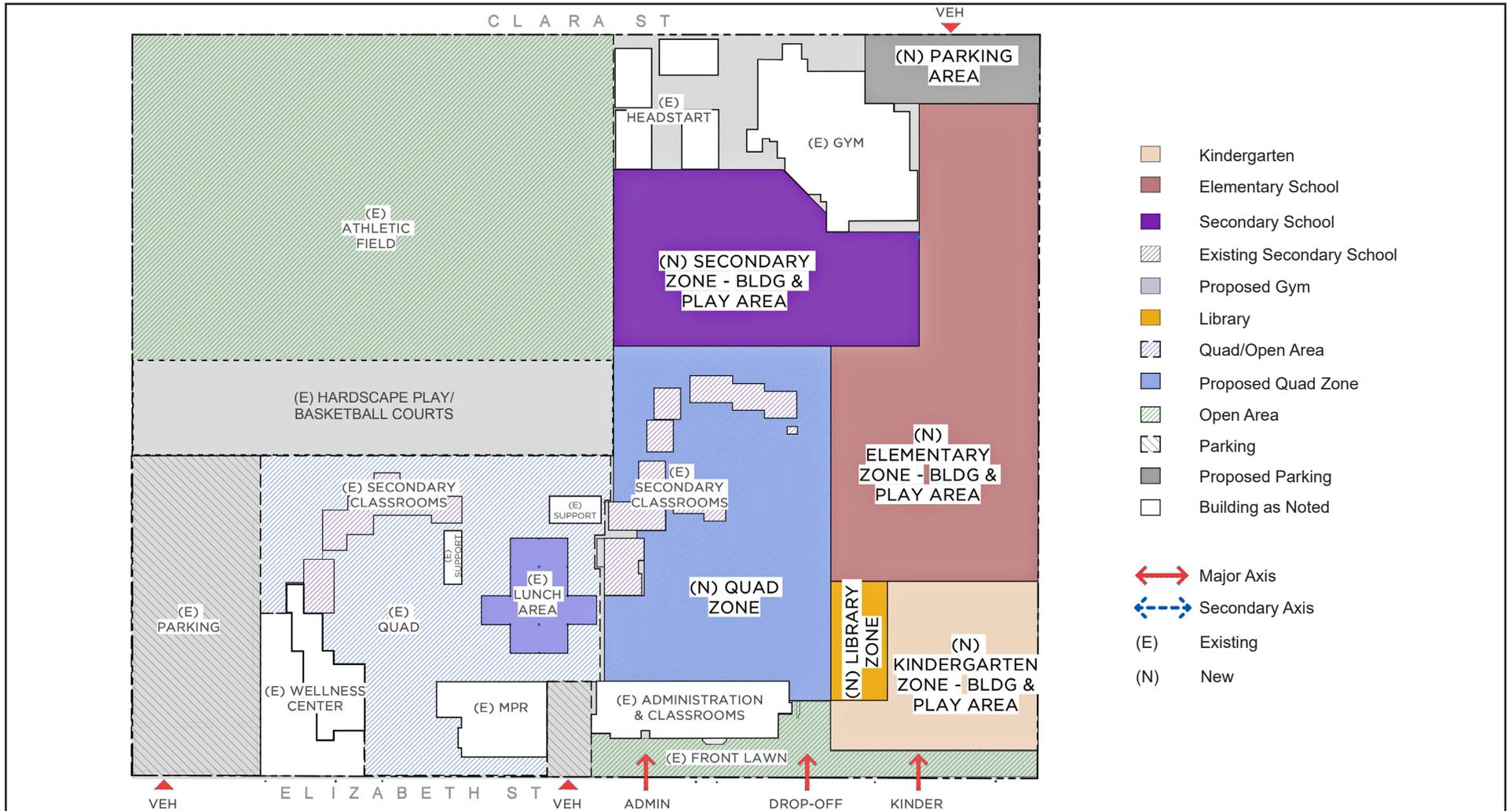
- Demolish secondary play area and repave or repair hardscape.
- Construct Kindergarten Building
- Remove portable buildings used for interim student housing
- Construct new kindergarten play area

Phase 5 (Starting in Q1-2025)

- Complete repaving and/or repair of hardscape areas
- Site finishing and new drought tolerant landscaping

Project close out anticipated and building occupation in Q3 2025

Figure 6 - Conceptual Site Plan
3. Project Description



3. Project Description

This page intentionally left blank.



4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

Signature 

Printed Name Carlos A. Torres

Date 5/10/2019

Title CEQA Officer for LAUSD

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
I. AESTHETICS. Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers) would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

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

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.²⁶

The Campus and surrounding area are flat and developed with urban land uses, including residential, commercial, institutional, and recreation uses. The Campus has one- and 2-story buildings, surface parking, hardcourts, turf play field, and ornamental trees and landscaping. Although the Project would include new buildings, there are no protected or designated scenic vistas or views in the vicinity. New buildings would have a height and mass similar to existing buildings on Campus. Project development would not obscure any scenic vistas. Therefore, no impact would occur and no further analysis is required.

²⁶ City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.
<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

4. Environmental Checklist and Analysis

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

No Impact. There are two officially designated state scenic highway in Los Angeles County, State Route 2 (SR-2; Angeles Crest Highway; part of the Angeles Crest Scenic Byway) approximately 17 miles north of the Campus and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 19 miles west-northwest of the Campus.²⁷ The new buildings would not be visible from SR-2 or SR-27. Additionally, the Campus is not visible from other designated roadways in Los Angeles County (Arroyo Seco Historic Parkway, 7 Eligible State Scenic Highways, and 5 County Scenic Highways).²⁸ Project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Campus is in a fully developed area and surrounded by adjacent residential, commercial, recreational, and institutional uses and qualifies as an ‘urbanized area’.²⁹ The Campus is zoned S (School).³⁰ The Project includes demolition of one- and two-story buildings, removal of portable buildings, and construction of one- and two-story buildings, along with other site and building improvements. The Project would not conflict with School zoning or regulations governing scenic quality. Therefore, no impacts would occur and no further analysis is required.

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

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

The Campus is surrounded by developed land uses. The existing Campus generates nighttime light from parking lot and building lights (interior and exterior). Surrounding land uses also generate light from street lights, parking lot lights, vehicle lights, and building lights.

²⁷ California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

²⁸ California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

²⁹ PRC § 21071/CEQA Guidelines § 15191(m)(1) for an incorporated city “Urbanized area” means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Cudahy has a population of about 24,000; adjacent South Gate has about 95,000 [U.S. Census Bureau. QuickFacts. July 1, 2017 estimates. <https://www.census.gov/quickfacts/fact/>]. A total of 118,000.

³⁰ City of Cudahy. Zoning Map. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_zoning_map_051118.pdf.



4. Environmental Checklist and Analysis

The Project would not significantly increase nighttime lighting on the Campus because the new buildings would replace existing buildings. Furthermore, the Project does not include any new sources of high-intensity nighttime lighting, such as stadium lights. All lights on new buildings and any new site lighting would be focused and directed on Campus to reduce spill light and glare off the Campus. Light and glare impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) 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:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no agriculture and forestry resources SCs.

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

No Impact. The Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the Campus; therefore, no Project-related farmland conversion would occur. The



4. Environmental Checklist and Analysis

Campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.^{31,32} No impact would occur and no further analysis is required.

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

No Impact. The Project would not conflict with agricultural zoning or a Williamson Act contract. The zoning designation for the site is S (School),³³ and is not zoned for agricultural use. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite.³⁴ No impact would occur and no further analysis is required.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”³⁵ Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”³⁶ The zoning for the Campus is S (School), and is not zoned for forest land or timberland use.³⁷ No impact would occur and no further analysis is required.

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

No Impact. Construction of the Project would not result in the loss or conversion of forest land. No vegetation onsite is cultivated for forest resources. Vegetation is limited to ornamental trees, shrubs, and a turf playfield. No forest land would be affected by the Project. No impact would occur and no further analysis 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. There is no mapped important farmland or forest land on or near the Campus, and Project development would not indirectly cause conversion of such land to non-agricultural or non-forest use. No impact would occur and no further analysis is required.

³¹ Division of Land Resource Protection (DLRP). California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>.

³² Most of urbanized Los Angeles County, including the project site, is not mapped on the California Important Farmland Finder due to a lack of farmland.

³³ City of Cudahy. Zoning Map. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_zoning_map_051118.pdf.

³⁴ California Department of Conservation, Division of Land Resources Protection. 2015. Map of Williamson Act Contract Land. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA_2014_11x17.pdf.

³⁵ California PRC Section 12220(g).

³⁶ California PRC Section 4526.

³⁷ City of Cudahy. Zoning Map. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_zoning_map_051118.pdf.

4. Environmental Checklist and Analysis

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

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

Are significance criteria established by the applicable air district available to rely on for significance determinations? 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 non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Explanation:

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

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



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

	<ul style="list-style-type: none"> • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds. 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 prepare an air quality assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and 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 United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • 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><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' 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).

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

- 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 of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- 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 miles per hour (mph).
- Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
- 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 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 as either in attainment or non-attainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated non-attainment for O₃, and PM_{2.5} under the



4. Environmental Checklist and Analysis

California and National AAQS, non-attainment for PM₁₀ under the California AAQS, and non-attainment for lead (Los Angeles County only) under the National AAQS.³⁸

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

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

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

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

Less Than Significant Impact. The SoCAB is currently designated non-attainment for O₃ and PM_{2.5} under the California and National AAQS, non-attainment for PM₁₀ under the California AAQS, and non-attainment for lead under the National AAQS. Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Due to the extent of the SoCAB area and the large number of cumulative project emissions), a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds.³⁹

The SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, CO, NO_x, SO_x, PM₁₀, and PM_{2.5}. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes changes in regional impacts from short-term construction activities and long-term operation of the Project.

³⁸ California Air Resources Board (CARB). 2017, December. Area Designations Maps/State and National. <http://www.arb.ca.gov/design/adm/adm.htm>.

³⁹ South Coast Air Quality Management District (SCAQMD). 1993. California Environmental Quality Act Air Quality Handbook.

4. Environmental Checklist and Analysis

Short-Term Air Quality

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

Construction activities would involve demolition; construction of new buildings; renovation of several existing buildings; installation of temporary portable buildings; landscaping; and paving. It is anticipated that Project construction would be approximately 4 years, from Q3-2021 to Q3-2025. Construction work would be intermittent and conducted in stages during that four-year period; some work would be done during instruction breaks when students are off Campus. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2, based on the Project’s preliminary construction schedule, phasing, and equipment list provided by LAUSD and include the CHPS prerequisites and implementation of SC-AQ-2 through SC-AQ-4. The construction schedule and equipment mix were based on preliminary designs and are subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 2. The maximum daily construction emissions would not exceed SCAQMD’s regional construction significance thresholds. Therefore, air quality impacts from Project-related construction activities would be less than significant and no further analysis is required.

Table 2
Maximum Daily Regional Construction Emissions

Construction Phase	Criteria Air Pollutants (lbs/day) ^{a,b,c}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Phase 1	48	41	30	<1	10	6
Phase 2	17	27	22	<1	4	2
Phase 3	30	35	49	<1	4	2
Phase 4	26	33	41	<1	4	2
Phase 5	3	13	17	<1	1	1
Maximum Daily Emissions	48	41	49	<1	10	6
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.2

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

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

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

^c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.

^d Includes compliance with SCAQMD Rule 1113 that requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints.



4. Environmental Checklist and Analysis

Long-Term Air Quality

Long-term air pollutant emissions are typically generated by 1) area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), 2) mobile sources from vehicle trips (e.g., student drop-off and pick-up, and staff commute trips), and 3) energy use (natural gas for heating) for new buildings. Area sources would not change because the Project would not change the land use.

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Construction

Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the construction site, distance to the nearest sensitive receptor, and Source Receptor Area.⁴⁰ The nearest offsite receptors proximate to the edge of the construction zone are the multi-family residences to the north and south, which are approximately 75 feet from the construction zone/edge of property (see Figure 6). Per LST methodology, any distance within 82 feet has the same screening-level values; therefore, offsite and onsite receptors (students and staff on Campus during construction) within the minimum distance of 82 feet are analyzed under the LST construction impact.

⁴⁰ Source Receptor Area: Using this meteorological data set, LSTs are developed for each of the 37 source receptor areas (SRAs) within the SCAQMD's jurisdiction. The school is in SRA 12 – South Central LA County.

4. Environmental Checklist and Analysis

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows the Project’s maximum daily construction emissions (pounds per day) generated during construction activities compared with the SCAQMD’s screening-level construction LSTs.⁴¹ As shown, site preparation activities during Phase 1 would generate onsite emissions that would exceed the SCAQMD screening-level construction LST for PM_{2.5}.

Table 3
Localized Construction Emissions

Source (based on acres disturbed) ^{d,e}	Pollutants(lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Phase 1 – Utility Trenching	7	8	0.31	0.28
Phase 1 – Utility Trenching & Portables Installation Overlap	12	10	0.51	0.46
Phase 1 – Utility Trenching & Portables Removal Overlap	12	10	0.51	0.46
Phase 2 – Classroom Building Demolition	26	21	1.76	1.23
Phase 2 – Remove 13 Portables	4	2	0.17	0.16
Phase 2 – Utility Trenching	3	5	0.18	0.16
Phase 2 – Construct Hardcourts	11	15	0.57	0.52
Phase 2 – Architectural Coating	1	2	0.08	0.08
Phase 3 – Portables Removal	4	2	0.16	0.15
Phase 3 – Tennis Courts & Elementary School Play Area Demolition	21	20	1.82	1.05
Phase 3 – Utility Trenching	5	8	0.22	0.20
Phase 4 – Asphalt Repaving	10	15	0.47	0.43
Phase 4 - Building Construction & Modernization Overlap	15	18	0.71	0.65
Phase 4 – Architectural Coatings & Asphalt Paving Overlap	12	18	0.59	0.55
Phase 4 – Remove Interim Portables (2024)	4	2	0.15	0.13
Phase 4 – Remove Interim Portables (2025)	3	2	0.13	0.12
Phase 4 Interim Portables Removal & Phase 5 Asphalt Paving Overlap	12	16	0.55	0.51
Phase 5 – Asphalt Paving	9	15	0.42	0.39
Phase 5 – Finishing/Landscaping	3	7	0.15	0.13
SCAQMD ≤1.00-acre LST	46	231	4.00	3.00
Exceeds LST?	No	No	No	No

⁴¹ For purposes of this analysis, the screening-level construction LSTs are based on a disturbed acreage per day of one acre or less, which represent a conservative analysis as a larger disturbed acreage per day would generate higher screening-level LST values.



4. Environmental Checklist and Analysis

**Table 3
Localized Construction Emissions**

Source (based on acres disturbed) ^{d,e}	Pollutants(lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Phase 1 – Building Construction & Modernization Overlap (2021)	17	17	0.96	0.90
Phase 1 – Building Construction & Modernization Overlap (2022)	16	16	0.81	0.76
Phase 1 – Building Construction, Modernization, & Architectural Coatings Overlap	18	20	0.97	0.92
Phase 3 – Building Construction & Modernization (2023)	13	16	0.61	0.58
Phase 3 – Building Construction & Modernization (2024)	13	16	0.61	0.58
Phase 3 – Building Construction, Modernization, Parking Lot Paving, General Paving, & Architectural Coatings Overlap	34	47	1.61	1.50
Phase 4 – Building Construction, Modernization, & Exiting Buildings Architectural Coating Overlap	17	20	0.77	0.71
Phase 4 – Building Construction, Modernization, Architectural Coatings, & Asphalt Paving Overlap	27	37	1.30	1.20
Phase 4 – Architectural Coatings, Asphalt Paving, & Interim Portables Removal Overlap	15	20	0.74	0.69
SCAQMD 1.31-acre LST	52	267	4.94	3.31
Exceeds LST?	No	No	No	No
Phase 1 - Utility Trenching & Handball Court Demolition Overlap	39	29	2.10	1.76
SCAQMD 1.50-acre LST	56	288	5.50	3.50
Exceeds LST?	No	No	No	No
Phase 1 – Trenching, Construction Building, & Modernization Overlap	25	24	1.27	1.18
SCAQMD 1.81-acre LST	61	324	6.43	3.81
Exceeds LST?	No	No	No	No
Phase 2 – Rough Grading	21	15	3.74	2.31
Phase 2 – Fine Grading	21	15	3.74	2.31
Phase 3 – Rough Grading	18	15	3.58	2.15
Phase 3 – Fine Grading	18	15	3.58	2.15
Phase 4 – Secondary Play Area Demolition	21	20	1.66	1.00
Phase 4 – Rough Grading	17	15	3.68	2.15
SCAQMD 2.50-acre LST	71	393	8.00	4.50
Exceeds LST?	No	No	No	No
Phase 1 – Site Preparation	40	21	9.77	6.13

4. Environmental Checklist and Analysis

Table 3
Localized Construction Emissions

Source (based on acres disturbed) ^{d,e}	Pollutants(lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
SCAQMD 3.50-acre LST	82	488	9.99	5.50
Exceeds LST?	No	No	No	Yes

Source: CalEEMod Version 2016.3.2.

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

- ^a The construction schedule is based on information provided or confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.
- ^b Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186—compliant sweepers.
- ^c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.
- ^d In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the Campus in Source Receptor Area (SRA) 12
- ^e South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>.

Because site-specific air quality analysis identified potentially significant adverse regional construction air quality impacts, the Exhaust Emissions and Fugitive Dust measures under SC-AQ-4 shall be implemented. As part of the SC-AQ-4, the construction contractor shall use Level 2 diesel particulate filters on off-road construction equipment of 50 horsepower or more during the Phase 1 of construction. Implementation of SC-AQ-4 would reduce the project's regional construction emissions below the SCAQMD screening-level LST as shown in Table 4. Therefore, Project-related construction activities would not expose sensitive receptors to substantial pollutants and localized construction air quality impacts would be less than significant. No further analysis is required.



4. Environmental Checklist and Analysis

Table 4
Localized Construction Emissions – with SC-AQ-4

Source (based on acres disturbed) ^{d,e}	Pollutants(lbs/day) ^{a,b,c}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Phase 1 – Site Preparation	40	21	7.72	4.62
SCAQMD 3.50-acre LST	82	488	9.99	5.50
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.

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

- ^a The construction schedule is based on information provided by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.
- ^b Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.
- ^c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.
- ^d In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the Campus in Source Receptor Area (SRA) 12
- ^e South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>.

Construction Emission Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015 the Office of Environmental Health Hazards Assessment (OEHHA) adopted an updated guidance document for the preparation of health risk assessments.⁴² OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The Project would be constructed in 5 development phases over approximately 4 years, which would limit the exposure to receptors. Additionally, as shown in Table 3 above, construction activities would not generate tailpipe DPM emissions that would exceed the screening-level LST significance threshold for PM₁₀. 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 further analysis is required.

⁴² Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

4. Environmental Checklist and Analysis

Operation

Localized Significance Thresholds

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

Carbon Monoxide Hotspots

The SoCAB has been designated “attainment” for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO “hotspot” impact.⁴³ The Project would not increase the number of students and would not result in generation of additional vehicle trips compared to existing conditions. Thus, the Project would not increase CO hotspots at intersections in the vicinity of the Campus. Localized air quality impacts related to mobile-source emissions would be less than significant and no further analysis is required.

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

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

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Operation would not include these or comparable uses and therefore would not create an odor nuisance. Construction of the Project would include emissions from diesel construction equipment and VOCs from architectural coatings and paving activities, which may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial

⁴³ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts, but SCAQMD does not.



4. Environmental Checklist and Analysis

number of people. Therefore, other emissions (such as those leading to odors) would be less than significant, and no further analysis is required.

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the “Landscape Analysis” prepared by Gonzalez Goodale Architects, dated August, 2018. This report is included as Appendix B to this Initial Study.⁴⁴

Explanation:

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

⁴⁴ Gonzalez Goodale Architects. 2018, August. Landscape Analysis is Section 5 of the Site Analysis Report: Elizabeth Learning Center. Prepared for Los Angeles Unified School District.



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

<p>SC-BIO-3</p>	<p>LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates⁴⁵) should occur outside of nesting season to avoid take of birds, bats, or their eggs.⁴⁶</p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> • 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 State and Federal laws pertaining to the protection of birds. • If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. • A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.
-----------------	---

⁴⁵ Substrate is the surface on which a plant or animal lives.

⁴⁶ Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

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

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

Bat Surveys

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

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

No Impact. The Campus is fully developed, with most of the site consisting of buildings, concrete, and asphalt. Vegetation onsite is limited to 55 ornamental trees (in tree wells and surrounded by asphalt), evergreen shrubs and a turf playfield. There is no suitable habitat for threatened, endangered, or rare species onsite. Additionally, the Campus is not adjacent to any suitable habitat areas for threatened, endangered, or rare species onsite. No impact would occur and no further analysis is required.



4. Environmental Checklist and Analysis

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

No Impact. Sensitive natural communities are natural communities that are known to provide habitat for sensitive animal or plant species or are known to be important wildlife corridors. Riparian habitats occur along the banks of rivers and streams. No locally designated natural communities or riparian habitats exist on the Campus. The Campus is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. The Campus is neither within nor proximate to any significant ecological area, land trust, or conservation plan.⁴⁷ No impact would occur and no further analysis is required.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include playas, ponds, and wet meadows; lakes and reservoirs; rivers, streams, and canals; estuaries; and beaches and rocky shores (SCWRP 2018). The Campus is fully developed, and there are no protected wetlands onsite. There are no protected wetland areas adjacent to the Campus. No impact would occur and no further analysis is required.

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

Less Than Significant Impact. The Campus is surrounded by fencing and concrete block walls, and developed with buildings, asphalt and concrete surfaces, a turf playfield, and small landscaped areas. The Campus has no native habitat and no wildlife corridors and is not available for overland wildlife movement.

There are 55 trees of various species, sizes, and maturity throughout the Campus. Some of these trees may provide nesting sites for resident or migratory birds. All attempts would be made to protect and preserve as many of the remaining mature trees as possible that are deemed healthy and structurally sound by an arborist evaluation. However, removal of some trees and project construction near trees may result in disturbances to birds during nesting season (February 1 through August 31, and as early as January 1 for some raptors).

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

⁴⁷ Los Angeles County Department of Regional Planning, Significant Ecological Area Program. Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf.

4. Environmental Checklist and Analysis

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

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

No Impact. The Project would not impact protected biological resources. The Campus has 55 trees of various species, sizes, and maturity, and several would be removed to accommodate the new buildings. The City of Cudahy does not have a tree preservation policy or ordinance. LAUSD Tree Trimming and Removal Procedure requires completion of a Tree Inventory Report by a qualified arborist that documents trees to be protected (tree species are the same as those found in both County and City of Los Angeles Protected Tree Code).⁴⁸ The procedures also outline requirements for tree trimming or removal during avian breeding and nesting season. The Project includes a landscape plan that includes planting of new trees on Campus. Trees would be planted at the appropriate size and maturity for the space, and will be selected from LAUSD's Approved Plant List.⁴⁹ The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur and no further analysis is required.

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

No Impact. The Campus is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.⁵⁰ No impact would occur and no further analysis is required.

⁴⁸ LAUSD Tree Trimming and Removal Procedure. <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD%20Tree%20Trimming%20Removal%20Procedure.pdf>. Southern California native tree species that measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: Oak, including Valley Oak and California Live Oak, or any other tree of the oak genus indigenous to California but excluding the Scrub Oak; Southern California Black Walnut; Western Sycamore; California Bay. Protected Shrubs: Mexican Elderberry and Toyon.

⁴⁹ LAUSD Approved Plant List. http://www.laschools.org/documents/file?file_id=310944045.

⁵⁰ California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.



4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the “Elizabeth Learning Center Historic Resources Evaluation Report (HRER)”, prepared by Rincon Consultants Inc., dated June 2018. A complete copy of this report is included as Appendix C to this Initial Study.⁵¹

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-CUL-1	<p>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

⁵¹ Rincon Consultants, Inc. June 2018. Elizabeth Learning Center Historic Resources Evaluation Report.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<p>shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.</p> <ul style="list-style-type: none"> • 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.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> • 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.



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. <p>Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.</p>
SC-CUL-3	<p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-5	<p>LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.</p>
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
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 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> • 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 earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the 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.



4. Environmental Checklist and Analysis

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency.

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

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

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history (36 Code of Federal Regulations [CFR] Section part 63).

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

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

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

Local. The City of Cudahy does not have special criteria for historic resources and has no local listing of resources in the City.

Originally named San Antonio School, after the former rancho of which the land was once a part, the Campus opened in 1921, serving kindergarten through the eighth grade. The original campus consisted of approximately eight one-story buildings. The largest building, referred to as the Primary Building, was located at the center of

4. Environmental Checklist and Analysis

the Campus and was flanked by three smaller classroom buildings on each side. The two-story, brick Administrative Building was completed in 1932. Over the following 80 years the Campus expanded, and all buildings except the Administrative Building were demolished and replaced with other buildings.

Although the Campus was originally developed in the context of pre-1933 Long Beach earthquake schools in greater Los Angeles, only one building, the Administrative Building, still exists from this early time period. This building has been altered greatly since its original construction; in particular following a 1976 seismic rehabilitation that removed many of the building's original Mediterranean Revival-style features. The Campus contains other permanent buildings over 45 years of age, but these structures are not unified in their design, nor does their placement contribute to a unified Campus plan.

A review of the National Register of Historic Places (NRHP), the California Register of Historical Resources, California State Historical Landmarks, California Points of Historical Interest, and California Historic Resources Inventory was conducted for the Campus. Additionally, a significance evaluation, which follows NRHP standards, was undertaken to evaluate eligibility standards for Campus buildings. None of the Campus buildings were listed or determined to be eligible for listing on federal, state, or local registries.⁵² Therefore, no impacts to historical resources would occur and no further analysis is required.

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

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

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

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

The soil on Campus was previously disturbed by construction of the original school, and demolition and construction of buildings and grounds over the past 70 years. Because of the significant ground disturbance, Project construction is not anticipated to encounter archaeological resources at shallow depths; where most archaeological resources are found.

⁵² Rincon Consultants, Inc. June 2018. Elizabeth Learning Center Historic Resources Evaluation Report.



4. Environmental Checklist and Analysis

The City of Cudahy General Plan EIR does not identify areas of sensitivity for archaeological resources.⁵³ The Los Angeles County General Plan does not cover archeological resources in the City of Cudahy.⁵⁴

Because of the liquefaction potential new buildings would either require ground improvement and conventional shallow spread footing or mat foundation, or deep foundations (piles) depending on the final engineering geotechnical report. If the buildings must be supported on deep piles, then earthwork would encounter native soils below the fill material. However, because of the depth archaeological resources are not anticipated.

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

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

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

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

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

⁵³ City of Cudahy General Plan EIR. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/general_plan_draft_eir.pdf

⁵⁴ County of Los Angeles General Plan. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf

4. Environmental Checklist and Analysis

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

Explanation:

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

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

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

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

Short-Term Construction

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

Long-term Operation

Operation of the Project would not generate an increase in the demand for electricity, natural gas, or transportation energy compared to existing conditions. During operation energy is used for heating, cooling, and ventilation of buildings; water heating; equipment; appliances; and indoor, outdoor, perimeter, and parking lot lighting; security systems. Table 5 shows the estimated annual natural gas and electricity usage for the



4. Environmental Checklist and Analysis

proposed Project. Total electricity and natural gas usage are based on the CalEEMod, Version 2016.3.2, default electricity and natural gas usage rates for an elementary school and the building square footage of the proposed buildings. The CalEEMod default electricity and natural gas usage rates are based on the 2016 Building Energy Efficiency Standards. The new buildings would use an estimated total of 518,291 kilowatt-hours (kWh) of electricity and 903,604 kilo-British Thermal Units (kBTU) of natural gas annually. The new buildings would replace existing buildings on the Campus.

**Table 5
Building Energy Use**

Electricity					
	sf	T24 Electricity Rate (kWh/sf)	Non-T24 Electricity Rate (kWh/sf)	Lighting Electricity (kWh/sf)	Electricity (kWh/yr)
New Buildings	86,900	1.74	1.59	2.59	514,359
Asphalt Surfaces	212,985	0	0	0	0
Parking Lot	11,235	0	0	0.35	3,932
					518,291
Natural Gas					
	sf	T24 Natural Gas Rate (kBTU/yr/sf)	Non-T24 Natural Gas Rate (kBTU/yr/sf)	TOTAL (kBTU/yr)	
New Buildings	86,900	9.32	1.08	903,604	
Asphalt Surfaces	212,985	0	0	0	
Parking Lot	11,235	0	0	0	
				903,604	

Source: CalEEMod 2016.3.2.

Notes KBTU = kilo British Thermal Units; kWh = kilowatt-hour; sf = square feet
Rates based on 2016 Title 24 Building Energy Standards and Climate Zone 8.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle to incorporate new energy efficiency technologies.⁵⁵ The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and go into effect for new construction starting January 1, 2020. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation

⁵⁵ The California Energy Code, part 6 of the California Building Standards Code which is title 24 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings.

4. Environmental Checklist and Analysis

requirements; 4) and nonresidential lighting requirements.⁵⁶ Under the 2019 standards, nonresidential buildings (which include Campus buildings) will be 30 percent more energy efficient compared to the 2016 standards.⁵⁷ Also, in compliance with SC-GHG-5 the new buildings would exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be significantly more energy efficient than the existing buildings on Campus.

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

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

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

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

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

⁵⁶ California Energy Commission (CEC). 2018. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html.

⁵⁷ California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.



4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on “Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.,” prepared by Delta Group, May 17, 2017. A complete copy of this report is included as Appendix D to this Initial Study.⁵⁸

Explanation:

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

⁵⁸ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-GEO-1*	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-HWQ-1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.</p>
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits</p>
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. • Significant resources found shall be curated as determined necessary by the Paleontologist.
*The District has already complied with this Project-related standard condition; see Appendix D of this Initial Study.	

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



4. Environmental Checklist and Analysis

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

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The closest active fault to the Campus is the Puente Hills fault about 0.25 mile south. Other nearby faults include: The Lower Elysian Park Fault is approximately 1 mile northeast, Newport-Inglewood Fault Zone is about 6 miles west, the Whittier Fault Zone is about 8 miles east, and the Raymond Fault is about 11 miles north of the site.⁵⁹

The Campus is not within or immediately adjacent to (i.e., within a few hundred feet) an established Alquist-Priolo Earthquake Fault Zone. Fault rupture impacts would be less than significant and no further analysis is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project would not increase exposure of people or structures to earthquake impacts. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region. The closest historically active surface fault is the Puente Hills Fault approximately 0.25 miles south, and the Lower Elysian Park Fault Zone approximately 1 mile northeast of the Campus.⁶⁰ Because of the proximity to known faults, and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults.

The new buildings would be designed in accordance with the California Building Code, the California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,”⁶¹ and “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.”⁶² The Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and

⁵⁹ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.

⁶⁰ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.

⁶¹ California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,” published in 1997 by the California Department of Mines and Geology as Special Publication 117 (SP117), and revised and readopted September 11, 2008, and published by the California Department of Conservation, California Geological Survey (formerly known as DMG).

⁶² California Geological Survey. October 2013.
http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/Documents/Note_48.pdf

4. Environmental Checklist and Analysis

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

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age);⁶³ 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking.

The site is centrally located within the Los Angeles Basin on a broad alluvial fan gently sloping south. Structurally the fan is bound by the Santa Monica-Hollywood-Raymond fault system in the north, the Newport-Inglewood fault zone to the west and the Elsinore fault zone to the east. The alluvial fan deposits derived from erosional debris transported southward from the Santa Monica Mountains.

Test borings identified alluvium of up to 60 feet of loose to medium-dense sand and silty sand with a number of loose layers of varying thicknesses. The alluvium generally consists of interbedded poorly-graded sand to silty sand, silt and lean clay. The profile in the upper 15 feet consists of mostly loose to medium dense poorly-graded sand and silty sand; below 15 feet consists mostly of interbedded medium dense to very dense poorly-graded sand and silty sand and stiff to very stiff lean clay and silt.

Historical high groundwater has been recorded at about 8 feet below the ground surface; however, during field borings on Campus, perched groundwater was encountered at a depth of about 43 feet.

Based on the soil and historic high groundwater the site is potentially susceptible to liquefaction. Additionally, the site is located within the State Earthquake Induced Liquefaction Seismic Hazard Zone for the South Gate Quadrangle.

The geotechnical investigation report provides recommendations for foundation design to minimize hazards from liquefaction. To ensure ground liquefaction does not exceed the typical tolerance for structures, the new building foundations would either involve ground improvement and conventional shallow spread footing or mat foundation, or deep foundations (Auger Cast Displacement (ACD) piles or Cast-in-Drilled-Hole (CIDH) piles) depending on the final engineering geotechnical report.⁶⁴ Adherence to final engineering geotechnical recommendations is required by the DSA. Project development would not subject people or structures to substantial hazards arising from liquefaction, and impacts would be less than significant. No further analysis is required.

⁶³ The Holocene epoch began 12,000 to 11,500 years ago.

⁶⁴ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.



4. Environmental Checklist and Analysis

iv) Landslides?

No Impact. Landsliding is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity. There are no significant slopes at or near the site.⁶⁵ There are no known landslides near the site, nor is the Campus in the path of any known or potential landslides or seismic slope instability. The Project would not expose people or buildings to adverse effects from landslides. No impact would occur and no further analysis is required.

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

Less Than Significant Impact.

Construction Phase

The native topsoil was removed and replaced with stable fill material during development of the original residential parcels and then the Campus; therefore, modernization of the Campus would not result in the loss of topsoil.⁶⁶

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life. Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or rain storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. LAUSD would obtain coverage by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 6. The construction will occur in an area larger than one acre; thus, construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant and no further analysis is required.

⁶⁵ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.

⁶⁶ Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem.

4. Environmental Checklist and Analysis

Table 6
Construction BMPs

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

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

Operational Phase

After completion of the Project, ground surfaces at the Campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the Campus. The Project would incorporate SC-HWQ-1, which requires compliance with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁶⁷ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal

⁶⁷ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW; 5th Edition. http://dpw.lacounty.gov/wmd/dsp_lowimpactdevelopment.cfm



4. Environmental Checklist and Analysis

watersheds of Los Angeles County, Final Order No. R4-2012-0175 as amended by R4-2012-0175-A01 issued by the Los Angeles Regional Water Quality Control Board.⁶⁸

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁶⁹ LAUSD would comply with existing regulations. Operational phase soil erosion impacts would be less than significant and no further analysis is required.

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

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

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The site is situated within a relatively level alluvial plain. The potential hazard for lateral spreading at the site is considered low.

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

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands, in contrast to liquefaction which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. Based on historic high groundwater level, seismically-induced settlement of the site may exceed the typical tolerance for structures supported on conventional shallow foundations. The geotechnical investigation report provides recommendations for foundation design to minimize hazards from seismic settlement. Similar to liquefaction hazard, the geotechnical investigation report provides recommendations for foundation design to minimize hazards from settlement. To ensure ground settlement does not exceed the typical tolerance for structures, the new building foundations would either involve ground improvement and conventional shallow spread footing or mat foundation, or deep foundations depending on the final engineering geotechnical report.⁷⁰ Adherence to final engineering geotechnical recommendations is

⁶⁸ California Water Boards – Los Angeles- R4. AMENDMENT OF LOS ANGELES COUNTY MS4 PERMIT (POSTED NOVEMBER 23, 2016). NPDES PERMIT NO. CAS004001. Waste Discharge Requirements For Municipal Separate Storm Sewer System (Ms4) Discharges Within The Coastal Watersheds Of Los Angeles County, Except Those Discharges Originating From The City Of Long Beach MS4. November 8, 2012; Modified On: September 8, 2016; July 9, 2018. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/losangeles.html

⁶⁹ US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

⁷⁰ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.

4. Environmental Checklist and Analysis

required by the DSA. Project development would not subject people or structures to substantial hazards arising from seismic settlement, and impacts would be less than significant. No further analysis is required.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. On-site geotechnical investigations indicated that the soil on Campus is not susceptible to potential collapse. Project implementation would not pose substantial hazards to people or structures due to collapsible soils, and impacts would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. On-site geotechnical investigations indicated that the soil on Campus is not susceptible to expansion. Project implementation would not pose substantial hazards to people or structures due to expansive soils, and impacts would be less than significant. No further analysis is required.

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

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

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

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

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

The Campus is underlain by up to 3 feet of fill material that consists of sandy lean clay. Fill is underlain by alluvium consisting of fine to medium dense sand and silt.⁷¹ Because the Campus has been highly disturbed and is covered by fill material, discovery of paleontological resources during shallow excavation activities is unlikely.

⁷¹ Group Delta. 2017, May 17. Preliminary Geotechnical Report. Proposed Campus Modification Project. Elizabeth Learning Center 4811 Elizabeth Street, Cudahy, California.



4. Environmental Checklist and Analysis

The City of Cudahy General Plan EIR does not identify areas of sensitivity for paleontological resources.⁷² The Los Angeles County General Plan does not identify the area as sensitive for paleontological resources.⁷³

Because of the liquefaction potential new buildings may require deep piles. If deep piles are required, earthwork may encounter native alluvial soils below the fill material and may encounter fossils. LAUSD shall implement SC-CUL-11 requiring that a paleontological monitor be on-call during construction activities; and that, if paleontological resources are found, construction activities stop in the immediate area; the paleontologist would then recover, analyze, and curate the find(s) and monitor the remaining site earthwork. As a result, impacts to paleontological resources would be less than significant and no further analysis is required.

⁷² City of Cudahy General Plan EIR. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/general_plan_draft_eir.pdf

⁷³ County of Los Angeles General Plan. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf

4. Environmental Checklist and Analysis

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

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

Explanation:

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

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



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

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 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..

The Intergovernmental Panel on Climate Change (IPCC) has identified four major greenhouse gases (GHGs)—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. The primary source of these GHGs is fossil fuel use. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydro fluorocarbons, perfluorocarbons, and chlorofluorocarbons.⁷⁴ This section analyzes the Project’s contribution to global climate change impacts in California through an analysis of Project-related GHG emissions. Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the Project are not applicable and are not included in the analysis.⁷⁵ Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state’s AB 32 inventory and treats this short-lived climate pollutant separately.^{76,77}

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

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

A typical development project may generate an increase in GHG emissions from construction activities, energy use (directly through fuel (natural gas) consumed for new building heating and electricity usage), area sources

⁷⁴ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

⁷⁵ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. See Appendix A for further details regarding “life cycle” emissions.

⁷⁶ Particulate matter emissions, which include black carbon, are analyzed in Section 4.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years.

⁷⁷ California Air Resources Board (CARB). 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.

4. Environmental Checklist and Analysis

(an increase in landscape that requires more use of maintenance equipment), mobile sources (vehicle trips associated with a student increase), water use and wastewater generation, and solid waste disposal.

Short-Term GHG Impacts

Construction emissions generated by the proposed Project are temporary, one-time emissions that would not substantially contribute to the GHG emissions. Table 7 provides both the total and amortized Project-related construction emissions. The amortized emission rate is based on total construction emissions amortized over 30 years per SCAQMD methodology.⁷⁸ As indicated in Table 7, Project-related construction GHG emissions would not exceed the proposed SCAQMD bright-line threshold. Therefore, less than significant impacts would occur and no further analysis is required.

Table 7
Project-Related Construction GHG Emissions

Source	GHG Emissions ^a
Total Construction Emissions	1,063 MTCO ₂ e
Amortized Construction Emissions ^b	35 MTCO ₂ e/Yr
Proposed SCAQMD Bright-Line Threshold	3,000 MTCO ₂ e/Yr
Exceeds Bright-Line Threshold	No

Source: CalEEMod, Version 2016.3.2

Note: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent.

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

^b Total construction emissions are amortized over 30 years per SCAQMD methodology.

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

The modernization would not increase student capacity and, therefore, would not result in an increase in GHG emissions from mobile sources, water usage, or wastewater and solid waste generation. The new buildings would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient.

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

⁷⁸ South Coast Air Quality Management District, 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf).



4. Environmental Checklist and Analysis

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

Less Than Significant Impact.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020.⁷⁹ The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. The new buildings are required to comply with the Building Energy Efficiency Standards and California Green Building Code (CALGreen). CARB adopted Final 2017 Climate Change Scoping Plan Update on December 24, 2017 to address the new 2030 target to achieve a 40 percent reduction below 1990 levels by 2030, established by SB 32.⁸⁰ While measures in the Scoping Plan apply to state agencies and not the proposed Project, the Project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed Project would be consistent with the CARB Scoping Plan, and no impact would occur.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016.⁸¹ The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed Project would provide for the educational needs of the community and would not result in an increase in student capacity or new vehicle trips. Thus, the proposed Project would not generate additional VMT. The Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016 RTP/SCS. No impact would occur and no further analysis is required.

⁷⁹ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan: A Framework for Change.

⁸⁰ California Air Resources Board. 2017, November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

⁸¹ Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS.pdf>.

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the “Final Phase I Environmental Site Assessment Los Angeles Unified School District. 4811 Elizabeth St., Cudahy, Los Angeles County, California, 90201”, prepared by Aptim Environmental and Infrastructure, Inc. dated September 7, 2017. A complete copy of this report is included as Appendix E to this Initial Study.⁸²

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): <ul style="list-style-type: none"> District Specification Section 01 4524, Environmental Import / Export Materials Testing. Removal Action Workplan or Remedial Activities Workplan. California Air Resources Board Rule 1466.

⁸² Aptim Environmental and Infrastructure, Inc. 2017, September 7. Final Phase I Environmental Site Assessment.



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<ul style="list-style-type: none"> 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 Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>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.</p> <p>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 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..</p>

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

Less Than Significant Impact.

Existing Hazardous Materials Present or Potentially Present on the Campus

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.⁸³

The Phase I Environmental Site Assessment (ESA) revealed no evidence of RECs on or adjacent to the Campus.

⁸³ ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

4. Environmental Checklist and Analysis

Asbestos

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁸⁴ Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.⁸⁵

Because the buildings planned for demolition were built in 1949 and 1963 it is anticipated that they contain asbestos. During demolition and renovation of permanent buildings, asbestos would be removed, contained, and disposed. Buildings must be reviewed by LAUSD's Facilities Environmental Technical Unit (FETU) for asbestos prior to Project commencement.⁸⁶ Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACM. In addition, LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of ACM and asbestos-containing construction material (ACCM), in compliance with applicable health and safety and hazardous materials regulations. The proposed Project would not subject people to substantial hazards from ACM or ACCM, and impacts would be less than significant.

Existing Hazardous Substances

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

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

Hazardous materials are managed in accordance with standard LAUSD policies and practices, and regulated by several agencies, including the EPA, the California Department of Toxic Substances Control, California Division of Occupational Safety and Health, and the Los Angeles Fire Department.⁸⁷ The requirements of these agencies would be incorporated into the design and operation of the proposed Project. These

⁸⁴ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

⁸⁵ US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos. <https://www.epa.gov/asbestos/us-federal-bans-asbestos>.

⁸⁶ FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

⁸⁷ The Los Angeles County Fire Department is the Certified Unified Program Agency (CUPA) for the City of Cudahy; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.



4. Environmental Checklist and Analysis

requirements include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. All materials and substances that would be used after Project completion are already being used on the Campus; therefore, no change would occur. Hazards to the public, the students, or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

Soil Import and Export

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.⁸⁸ This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from Campus sites. The proposed Project would not subject people to substantial hazards, and impacts would be less than significant.

Soil Disturbance

Projects that involve earth-moving activities of more than 50 cubic yards of soil that contain identified toxic air contaminants (TACs) are subject to SCAQMD Rule 1466. As the Project will involve earth-moving activities of more than 50 cubic yards, LAUSD will sample and test soils for the presence of TACs to determine if the Project is subject to SCAQMD Rule 1466. If TACs are found, LAUSD will comply with all relevant and appropriate requirements of SCAQMD Rule 1466. Therefore, impacts would be less than significant.

Demolition and Construction Activities

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

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

⁸⁸ LAUSD. 2011, October 1. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

4. Environmental Checklist and Analysis

Offsite

There are three listings for hazardous materials within 0.25 mile of the Campus. These include sites such as leaking underground storage tanks, groundwater contamination, dry cleaners, auto repair shops. None of the hazardous materials sites are considered to be significant threats to the Campus due to the distances and local groundwater flow direction.⁸⁹ Impacts would be less than significant and no further analysis is required.

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

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

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

Less Than Significant Impact. In addition to the existing Campus, Cudahy Pre-School Academy, located at 4900 Clara Street, is 0.15 miles from Elizabeth Learning Center. The Project would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Hazardous materials expected at the existing Campus would be associated with janitorial, maintenance, and repair activities. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, construction materials and site cleanup would comply with existing regulations. Operation of construction equipment and heavy trucks during Project construction would generate diesel emissions, which are considered hazardous; however, the Project construction period would be temporary. Health risk is based upon the conservative assumption that exposure is continuous and occurs over a 70-year lifetime. A determination of risk is not appropriate for short-term construction activities. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at Cudahy Pre-School Academy or the students and staff at Elizabeth Learning Center. Impacts would be less than significant and no further analysis 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?

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

- hazardous waste facilities subject to corrective action.

⁸⁹ Aptim Environmental and Infrastructure, Inc. 2017, September 7. Final Phase I Environmental Site Assessment.



4. Environmental Checklist and Analysis

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

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

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

No Impact. The nearest airport is Compton Woodley Airport in the City of Compton, a general aviation airport about 6 miles southwest.⁹⁰ The Campus is not within the airport influence area or the airport land use planning area of Compton Woodley Airport.⁹¹ Project development would not result in a new use that would interfere with air traffic patterns, or increase traffic levels or change traffic patterns. New buildings on Campus would be of similar height as the existing buildings and would not create a safety hazard or excessive noise. No impact would occur and no further analysis is required.

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

No Impact. The emergency response plans in effect are through the County, the District, and the City.

County. Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012⁹² identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

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

⁹⁰ California Department of Transportation (Caltrans). 2018, November 2. Caltrans Aviation GIS Data. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>.

⁹¹ Los Angeles County Department of Public Works. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>

⁹² 2012 Los Angeles County Operational Area Emergency Response Plan. <http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

4. Environmental Checklist and Analysis

City. Under the Federal Disaster Mitigation Act of 2000 local governments, including counties, cities, and tribes in the United States, are required to prepare a Local Hazards Mitigation Plan as a condition of receiving Federal disaster mitigation funds. This Plan identifies the hazards that have occurred or may occur in the study area, and provides mitigation strategies, or action items, designed to save lives and reduce the destruction of property. The City of Cudahy has addressed this requirement by completing a Local Natural Hazards Mitigation Plan that describes and analyzes several issues of concern to the City, including earthquakes, floods, and severe weather. Furthermore, the Plan provides resources and information, in addition to action items and programs, that are meant to assist Cudahy in reducing risk and preventing loss from future natural hazard events. Per Federal requirements, this Plan is to be reviewed and updated every five years.⁹³

The Project construction would not interfere with any other existing emergency response plans or emergency evacuation plans. When complete, the Project would improve emergency access on Campus by providing vehicle access lanes throughout the Campus. No emergency response impact would occur and no further analysis is required.

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

No Impact. The Campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site as mapped by California Department of Forestry and Fire Prevention (CAL FIRE).⁹⁴ The Project would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

⁹³ City of Cudahy. 2015, September. City of Cudahy Local Natural Hazards Mitigation Plan. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_lhmp.pdf

⁹⁴ California Department of Forestry and Fire Prevention (CAL FIRE). 2011, September. Very High Fire Hazard Severity Zones in LRA: Los Angeles. http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf



4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

Compliance Checklist for Storm Water Requirements at Construction Sites

This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

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

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

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

The Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. There is a storm drain west of the Campus in Atlantic Avenue and to the east in Wilcox Avenue. Both storm drains are part of a network of storm drains that flow south and discharge into the underground East Compton Creek No. 1 storm drain about 0.5 mile south (along the railroad tracks). This storm drain discharges into the Los Angeles River, which flows south and discharges into the Pacific Ocean at Long Beach.⁹⁵ There is also an infiltration basin in Clara Park to the north.⁹⁶

Construction Phase

Construction projects of one acre or more are regulated under the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Final Order No. R4-2012-0175 as amended by R4-2012-0175-A01 issued by the Los Angeles Regional Water Quality Control Board.⁹⁷

⁹⁵ Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map). <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>

⁹⁶ City of Cudahy General Plan EIR. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/general_plan_draft_eir.pdf

⁹⁷ California Water Boards – Los Angeles- R4. Amendment of Los Angeles County MS4 Permit (Posted November 23, 2016). NPDES Permit No. CAS004001. Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except those Discharges Originating from the City of Long Beach MS4. November 8, 2012; Modified on: September 8, 2016; July 9, 2018. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/losangeles.html



4. Environmental Checklist and Analysis

Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The Campus would disturb more than one acre. Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. With compliance with the Statewide Construction General Permit and implementation of the SWPPP, construction phase soil erosion impacts would be less than significant and no further analysis is required.

Operation Phase

After completion of the Project, ground surfaces at the Campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the Campus. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁹⁸ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board.

The LID Standards Manual was developed as part of the municipal stormwater program to address stormwater pollution from new developments and redevelopment projects.⁹⁹ LID stormwater management would be incorporated into the Project design. LID principles are described further in Section VII(b), *Geology and Soils*, of this Initial Study. LAUSD would comply with existing regulations and SC-HWQ-1. Operational phase soil erosion impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Campus is over the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin.¹⁰⁰ Tract 180 Mutual Water Company supplies water to the Campus and the surrounding community and obtains some water supplies from groundwater.^{101,102} During field borings on Campus, perched groundwater was encountered at a depth of about 43 feet. The Project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the Campus improvements would not lower the groundwater table or deplete groundwater supplies. Furthermore, the 16.8-acre Campus

⁹⁸ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>

⁹⁹ County of Los Angeles DPW. 2014, February, LID Standards Manual. <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>

¹⁰⁰ Department of Water Resources (DWR). 2018, November 2. Groundwater Information Center Interactive Map Application. <https://gis.water.ca.gov/app/gicima/>.

¹⁰¹ State Water Resource Control Board. 2018. Drinking Water Supply Service Area Lookup Tool. https://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/water_supplier.shtml

¹⁰² Tract 180 Mutual Water Company. 2015 Consumer Confidence Report. <http://drinc.ca.gov/ear/CCR/CCR2015CA1910159.pdf>

4. Environmental Checklist and Analysis

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

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

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

Less Than Significant Impact. There are no streams or rivers on the Project site. The Campus is fully developed and the new buildings would not increase impermeable surfaces on Campus. The nearest storm drain downgrade from the site mapped by the Los Angeles County Department of Public Works is a 48-inch reinforced concrete pipe (RCP) in the Atlantic Avenue right-of-way to the west.¹⁰³ That storm drain is part of a network of storm drains extending south and discharging into the Pacific Ocean at Long Beach.

Construction Phase

During construction, erosion and siltation from the disturbed areas may occur. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction sediment may enter storm drains. The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP, described in Section VII(b), *Geology and Soils*, and summarized in Table 6. This requirement is also identified in SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion and pollution control measures to ensure water quality in stormwater runoff. Impacts would be less than significant and no further analysis is required.

Operation Phase

The Project would not change the drainage pattern of the Campus or its surroundings. The entire Campus would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 LID Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (R4-2012-0175-A01). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed by retaining stormwater onsite. Additionally California Code of Regulations, Title 23-Waters, Division 2-Department of Water Resources, Chapter 2.7-Model Water Efficient Landscape Ordinance requires

¹⁰³ Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map). <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>



4. Environmental Checklist and Analysis

water conservation for landscaping. Thus, Project development would not cause substantial erosion. Impacts would be less than significant and no further analysis is required.

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

No Impact. The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance¹⁰⁴ the Campus drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, Project development would not result in flooding on- or off-site, and no impacts would occur. No further analysis is required

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

Less Than Significant Impact. The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance¹⁰⁵ the Campus drainage system would discharge a net decrease in runoff to municipal storm drains.. Implementation of SC-HWQ-1 (BMPs specified in the SWPPP) and LID principles and practices described above to retain and treat storm water on site, the Project would not cause substantial water pollution. Runoff water impacts would be less than significant and no further analysis is required.

iv) Impede or redirect flood flows?

No Impact. The Campus is in the dam inundation zone for Hansen Dam, which is on Big Tujunga Creek located approximately 20 miles northeast of the Campus.¹⁰⁶ However, this reservoir is continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design; construction practices; and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake. Additionally, The Campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency.¹⁰⁷ The Project buildings would not impede or redirect flood flows. No impact would occur and no further analysis is required.

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

No Impact. The Campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency.¹⁰⁸

¹⁰⁴ California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.

¹⁰⁵ California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.

¹⁰⁶ Office of Emergency Services (OES). 2017, February 9. Dam Inundation Areas. GIS Data Layer.

¹⁰⁷ Federal Emergency Management Agency (FEMA). 2017, October. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.28472445322258,33.93018828110084,-118.20164034677735,33.96578848287957>

¹⁰⁸ Federal Emergency Management Agency (FEMA). 2018, November 2. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.28472445322258,33.93018828110084,-118.20164034677735,33.96578848287957>.

4. Environmental Checklist and Analysis

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no reservoirs or water storage tanks, at or above ground level, that would pose a flood hazard to the site due to a seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Campus, which is about 14 miles east from the Pacific Ocean and at a 130 foot elevation, is not within a Tsunami zone.

Therefore, because the Campus is not at risk of flooding, the project would not release pollutants during these flooding events. No impact would occur and no further analysis is required.

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

No Impact. The Project would not Conflict with or obstruct implementation of a water quality control plan. Construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP (as identified in SC-HWQ-2) . After completion of the Project, ground surfaces would be either hardscape or maintained landscaping. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.¹⁰⁹ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board. The Project would comply with existing regulations and SC-HWQ-1 and SC-HWQ-2. The Project would not obstruct implementation of a water quality control plan. Additionally, the Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan. No impact would occur and no further analysis is required.

¹⁰⁹ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>



4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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:

There are no land use and planning SCs.

a) Physically divide an established community?

No Impact. The Campus and surrounding land is fully developed with residential, commercial, institutional, and recreational uses. The Project would take place within the Campus boundaries and would not divide an established community. No impact would occur and no further analysis is required.

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

No Impact. The zoning for the Campus is designated as S (School).¹¹⁰ The proposed buildings would be similar in height to the existing buildings in the area.

The City of Cudahy General Plan Land Use designation for the Campus is 'School'.¹¹¹ New construction on the Campus would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. No impacts would occur and no further analysis is required.

¹¹⁰ City of Cudahy. Zoning Map. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_zoning_map_051118.pdf.

¹¹¹ City of Cudahy. Cudahy 2040 General Plan, Land Use Element. March, 2018. http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/final_cudahy_gp_may_2018.pdf.

4. Environmental Checklist and Analysis

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

Explanation:

There are no mineral resource SCs.

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

No Impact. The Campus is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is in an area where significant mineral deposits are known to be absent, or where there is considered to be little likelihood for the presence of such deposits.¹¹² No active mines are mapped within several miles of the Campus.¹¹³

The nearest active oil well to the Campus is about 0.3 mile to the south; and the Campus is not in an oil/gas field.¹¹⁴ Neither the Campus nor the surrounding community is available for mining. The Project would not cause a loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur. No further analysis is required.

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

No Impact. The Campus is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field.¹¹⁵ Therefore, development of the Project would not cause a loss of availability of a mining site, and no impact would occur. No further analysis is required.

¹¹² California Geological Survey. 2010. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf

¹¹³ Office of Mine Reclamation (OMR). 2017, March 27. Mines Online. <http://maps.conservation.ca.gov/mol/index.html>

¹¹⁴ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2018, November 5. DOGGR Well Finder. <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>

¹¹⁵ City of Los Angeles. 2001. City of Los Angeles Conservation Element. <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>.



4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. 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"/>

Noise and vibration background and modeling data used in this analysis along with terminology and noise Descriptors are included as Appendix F of this Initial Study.

Explanation:

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

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

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
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-8	<p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • 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 AM and 7:00 PM). • 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><u>Path Controls</u></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><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability. • Community Participation – open dialog to involve affected residents. <p>Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.</p>



4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval

SC-N-9	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.¹¹⁶ Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Attenuation Barriers¹¹⁷ – 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><u>Source Controls</u></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 classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD’s noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • 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 noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. Noise is unwanted or harmful sound; sound that is too loud is distracting or, worse, injurious. The State of California, City of Cudahy, and LAUSD (shown in Standard Conditions table

¹¹⁶ The need for noise control measures depends on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be required if a major construction project (e.g. demolition of a building and/or construction of a new building) takes place on an active LAUSD campus.

¹¹⁷ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).

4. Environmental Checklist and Analysis

above) have established noise standards to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

State Noise Regulations

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for non-residential structures. Pursuant to CALGreen Section 5.507.4, Acoustical Control, within a 65 dBA¹¹⁸ CNEL¹¹⁹ or Ldn¹²⁰ noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source, a project must use either the prescriptive or performance method to ensure acceptable interior exposure. Under the prescriptive method, 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. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA Leq¹²¹ 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). Under the performance method, wall and roof-ceiling assemblies shall be constructed to provide an interior noise environment that does not exceed an hourly L_{eq} of 50 dBA.

City of Cudahy Noise Regulations

Established operational noise standards by land use are found in the Cudahy Municipal Code Section 20.88.020. For residential receptors, the noise limit is 65 dBA during the hours of 7:00 AM to 10:00 PM and 45 dBA between the hours of 10:00 PM to 7:00 AM. The City has not established noise limits for temporary construction noise. The Federal Transit Administration recommends a noise level limit of 90 dBA Leq for residential receptors, which is used in this analysis.¹²²

Construction Noise

Noise generated during construction is based on the type of equipment used, 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 day¹²³ and the duration of the noise-

¹¹⁸ A Weighted Decibel (**dB**A). An overall frequency-weighted sound level in decibels which approximates the frequency response of the human ear.

¹¹⁹ Community Noise Equivalent Level (**CNEL**). The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring during the period from 7 PM to 10 PM and 10 dB added to the A-weighted sound levels occurring during the period from 10 PM to 7 AM. For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB. As a matter of practice,

¹²⁰ Day-Night Level (**Ldn** or **DNL**). The energy average of the A weighted sound levels occurring during a 24 hour period, with 10 dB added to the A weighted sound levels occurring during the period from 10 PM to 7 AM.

¹²¹ Equivalent Continuous Noise Level (**Leq**); also called the Energy-Equivalent Noise Level. The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the Leq metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.

¹²² Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment.

¹²³ Sensitive Receptors: The City of Cudahy does not define sensitive receptors; therefore, the City of Los Angeles definition is used. The Los Angeles General Plan identifies noise-sensitive receptors as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks. City of Los Angeles, Department of City Planning. General Plan. <http://cityplanning.lacity.org/>



4. Environmental Checklist and Analysis

generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling, and (2) onsite noise from use of construction equipment. Project construction is anticipated to start in Q3-2021 and is expected to take four years to complete (Q3-2025); however, because the Project has several components, the Campus would not be under construction the entire time. Construction work would be intermittent and conducted in stages during the four-year period. To avoid classroom disruption, some work would be done during instructional breaks when students are off Campus.

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along access roadways. Throughout construction, the size of the work crew at the Campus each day would vary depending on the construction phase and construction activities. A maximum of 84 construction-related vehicle trips (67 from construction workers and 17 from vendors) would occur daily during the overlap of Phase 4 building construction, building modernization, architectural coating, and asphalt paving activities.¹²⁴

The number of construction-related trips would not significantly increase traffic noise when compared to the level of noise currently generated on the roadways. Compared to the existing traffic generated at the Elizabeth Learning Center (~3,635 average daily trips¹²⁵), noise from construction trips would be negligible. The addition of 84 daily trips, the most trips out of all construction phases, would contribute a 0.1 dBA increase.

Construction trips would be for a short duration; would be spread out throughout the workday; and would occur during non-peak traffic periods in accordance with SC-T-4. While individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, these occurrences would be infrequent and primarily during nonpeak traffic periods. Therefore, noise impacts from construction-related traffic would be less than significant and no further analysis is required.

Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 8 lists maximum construction equipment noise levels at 50 feet.¹²⁶

¹²⁴ Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.2.

¹²⁵ Based on the ITE Trip Generation Manual 10th Edition. Public school daily trip rates for Elementary School (grades K to 5) at 1.89 daily trips per student x 582 students = 1,100 average daily trips + Middle School/Junior High School (grades 6 to 9) at 2.13 daily trips per student x 686 students = 1,461 average daily trips + High School (grades 10 to 12) at 2.03 daily trips per student x 529 students = 1,074 average daily trips. Total 3,635 ADT. Student grades based on CDE.
<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=19647336016885&aggllevel=school&year=2017-18>

¹²⁶ Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

4. Environmental Checklist and Analysis

**Table 8
Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Scraper	85
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80

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

Note: KVA = kilovolt amps

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



4. Environmental Checklist and Analysis

Off-Campus Receptors

The nearest off-site sensitive receptors are residences to the south across Elizabeth Street at approximately 425 feet, and residences to the west at 460 feet from the center of the construction site. The anticipated construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The Project would consist of five construction phases. Some phases have repeated activities such as paving, portable removal, and demolition. The associated average noise levels—grouped by construction stage—are summarized in Table 9.

Table 9
Project-Related Construction Noise Levels

Construction Phase	Maximum at 50 feet (L_{max} dBA)	Residential to south at 425 feet (L_{eq} dBA)^a
Site Preparation	87	68
Utility Trenching (with drill rig)	83	64
Utility Trenching (without drill rig)	82	63
Portable Installation	73	54
Portable Removal	73	54
Demolition	87	68
Building Construction (without drill rig)	85	66
Building Construction (with Drill Rig)	85	66
Architectural Coating	74	55
Rough Grading	86	67
Fine Grading	89	70
Paving	90	71

Source: FHWA. August 2006. Construction Noise Handbook.

^aAs measured from the acoustical center of the construction site to the nearest residential property line.

The City has not established noise limits for temporary construction noise. The Federal Transit Administration recommends a noise level limit of 90 dBA Leq for residential receptors.¹²⁷ As shown in Table 9, the construction noise levels would average between 54 and 71 dBA Leq at the nearest residences. At times when construction equipment is operating at the west edge of the construction site, noise levels could sporadically reach 90 dBA L_{max} only during the paving phase. However, this would not be constant or long term; therefore, construction activity would not exceed the 90 dBA Leq on a day-to-day or week-to-week basis. Impacts would be less than significant.

¹²⁷ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment.

4. Environmental Checklist and Analysis

On-Campus Receptors

Interim portable classroom facilities at 50 feet from construction activities that have a direct sightline may experience exterior noise levels as high as 90 dBA L_{max} . With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 75 dBA L_{max} .

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

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

Mobile Source Noise

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

Stationary Source Noise

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

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

4. Environmental Checklist and Analysis

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

Less Than Significant Impact.

Operational Vibration

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

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of construction vibration can range from no perceptible effects at the lower vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to architectural damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures, but can achieve levels in buildings close to a construction site that are perceptible.¹²⁸ Table 10 lists vibration levels for different types of commonly used construction equipment. Construction vibration effects are typically assessed in terms of either architectural damage or annoyance to nearby people. Construction equipment such as pile drivers, jackhammers, high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) could generate vibration in the immediate vicinity.

¹²⁸ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.

4. Environmental Checklist and Analysis

Table 10
Construction Equipment Vibration Levels

Equipment	Approximate VdB^a level at 25 feet	Approximate PPV^b at 25 feet
Vibratory Roller	94	0.210
Large Bulldozer ^c	87	0.089
Caisson Drilling ^d	87	0.089
Loaded Truck	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

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

^a VdB – vibration level using the reference of 1 microinch/second.

^b PPV – peak particle velocity measured in inches/second

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

^d Vibration levels from Auger Cast Displacement (ACD) Rig and Cast-in-Drilled-Hole (CIDH) Rig are similar to a Caisson Drill Rig.

Construction Vibration-Induced Annoyance

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

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

Off-Campus Receptors

There are sensitive receptors near the Campus: to the north are residences, Centro Avangelistico Ebenezer Church, and Clara Park along Clara Street; to the south and west are residences; and to the east is an Clara Park with residences beyond. As shown in Table 10, the nearest sensitive receptor to construction activities would be residences to the south at about 425 feet from the center of the construction zone.¹³⁰ At this distance,

¹²⁹ Federal Transit Administration, 2018, September. *Transit Noise and Vibration Impact Assessment Manual*.

¹³⁰ Annoyance threshold is 78 VdB based on 30-70 events per day at this level (FTA 2018). Vibratory roller would have the greatest potential for annoyance since it's vibration levels are higher than other standard equipment. Based on the small construction site, a vibratory roller would not pass within 25 feet of the nearest residence more than 30 times per day.



4. Environmental Checklist and Analysis

average vibration levels generated by operation of a drill rig would be 50 VdB,¹³¹ a vibratory roller would be 57 VdB and a large bulldozer would be 50 VdB. These levels are below the 78 VdB threshold for vibration annoyance.

Generally, nearby residences may experience vibration levels in excess of 78 VdB when vibratory rollers operate within approximately 85 feet, and within approximately 50 feet of large bulldozers and other heavy equipment. At 25 feet vibration would be 94 VdB. At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment. Because the FTA threshold of 78 is based on 30-70 events that exceed the threshold, and project construction would not expose residents to more than 30 events per day annoyance impacts would be less than significant, and no further analysis is required.

On-Campus Receptors

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

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

Implementation of SC-N-4 would reduce construction vibration and annoyance to staff and students in adjacent buildings. School administration and the construction contractor will work together to communicate and coordinate about construction activities, location, schedule, and potential vibration-intensive activities during each construction phase. Administrators may arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the construction contractor to conduct vibration-intensive activities before or after class instruction at the nearest classrooms. Therefore, construction-generated vibration annoyance for on-Campus receptors would be less than significant and no further analysis is required.

¹³¹ To ensure ground liquefaction does not exceed the typical tolerance for structures, the new building foundations would either involve ground improvement and conventional shallow spread footing or mat foundation, or deep foundations (Auger Cast Displacement (ACD) piles or Cast-in-Drilled-Hole (CIDH) piles) depending on the final engineering geotechnical report.

4. Environmental Checklist and Analysis

Construction Vibration-Induced Architectural Damage

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.¹³² Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

Off-Campus Structures

The nearest off-Campus structures are:

- North, 75 feet – Residence
- North, 300 feet – Centro Avangelistico Ebenezer Church
- East, 160 feet – Residence
- South, 70 feet – Residence
- West, less than 15 feet – Residence

At the nearest residences within 15 feet to the west, there could be a potential for architectural damage due to construction vibration from vibratory rollers, and would, therefore, be considered potentially significant. Implementation of Mitigation Measure MM N-1 would reduce this impact to less than significant.

On-Campus Structures

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

At the nearest buildings within 10 feet, vibration levels would exceed 0.2 PPV in/sec and there could be a potential for architectural damage due to construction vibration from vibratory rollers, therefore, impacts would be considered potentially significant. Implementation of Mitigation Measure MM N-1 would reduce this impact to a level of less than significant.

Mitigation Measure

MM N-1: To avoid vibration-induced architectural damage to off-campus and on-campus buildings from vibratory rollers, LAUSD shall meet with the Construction Contractor to discuss alternative methods for use of vibratory rollers within 25 feet of buildings. During the preconstruction meeting, the Construction Contractor shall identify methods not involving vibration-intensive construction equipment.

- Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of nearby buildings.

¹³² FTA category "non-engineered timber and masonry buildings"



4. Environmental Checklist and Analysis

- The Construction Contractor shall avoid the use of vibratory rollers and packers adjacent to buildings that could be damaged, and shall implement alternative methods, such as, static non-vibratory rollers.
- If any vibration-induced cosmetic or structural damage occurs, 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.

Mitigation Measure MM N-1 would require the use of less-vibration-intensive equipment when working near off-site buildings. Therefore, vibration-induced architectural damage impacts would be less than significant and no further analysis is required.

Groundborne Noise

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

Operation-related groundborne noise occurs when trains operate in tunnels that are located in close proximity to occupied structures.

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

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

No Impact. The nearest private airport is Goodyear Blimp Base Airport approximately 9.25 miles southwest of the Campus. The nearest heliports are the Commerce Business Park Heliport about 2 miles northeast and Saint Francis Medical Center Heliport located about 2.5 miles southwest.¹³³ The Project would not expose students or staff to noise levels from private airstrip or heliports above existing levels. No impact related to noise from heliports or private airstrips would occur and no further analysis is required.

The nearest airport to the Campus is Compton Woodley Airport in the City of Compton, a general aviation airport about 6 miles southwest.¹³⁴ The Campus is outside any airport’s influence area and the associated 65 dBA CNEL noise contours.¹³⁵ Therefore, the Project would not expose students and staff to excessive noise from aircraft at public airports above existing levels. No impact related to noise from public airports would occur and no further analysis is required.

¹³³ Airnav.com. 2018, December 11. Airport Information. <http://www.airnav.com/airports/>.

¹³⁴ California Department of Transportation (Caltrans). 2018, November 2. Caltrans Aviation GIS Data. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>.

¹³⁵ Los Angeles County Department of Public Works. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the “Site Circulation Report: LAUSD School Modernization Project – Elizabeth Learning Center”, prepared by LIN Consulting, Inc. dated October 17, 2018. A complete copy of this report is included as Appendix G to this Initial Study.¹³⁶

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

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

¹³⁶ LIN Consulting, Inc. October 17, 2018. Site Circulation Report: LAUSD School Modernization Project – Elizabeth Learning Center.



4. Environmental Checklist and Analysis

The Campus is in a densely developed area characterized by residential, commercial, institutional, and recreational uses. The Campus has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for deliveries on the surrounding roadways.

The Elizabeth Learning Center is generally surrounded by Elizabeth Street to the south and Clara Street to the north, Wilcox Avenue to the east, and Atlantic Avenue to the west. Wilcox Avenue, Elizabeth Street, and Clara Street have two lanes. Atlantic Avenue has four lanes. Existing traffic controls at the four intersections next to the Campus are:

- Elizabeth Street & Atlantic Avenue: signalized
- Elizabeth Street & Wilcox Avenue: unsignalized with stop control on all movements
- Clara Street & Wilcox Avenue: signalized
- Clara Street & Atlantic Avenue: signalized

Pedestrian access to the Campus would not change; students would continue to use the main entry gate on Elizabeth Street.

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

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

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

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

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

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

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. The nearest freeway to the Campus is I-710 at about 0.7-miles northwest. The nearest four-lane arterial roadway is Atlantic Avenue about 0.2 miles east.

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

4. Environmental Checklist and Analysis

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

Explanation:

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

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

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

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

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

4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-PS-1	<p>If necessary, LAUSD shall:</p> <ol style="list-style-type: none"> 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.

a) Fire protection?

Less Than Significant Impact. The County of Los Angeles Fire Department (LACFD) currently provides fire protection and emergency medical services to the Campus. The LACFD fire station assigned to the area is Station 54 at 4867 Southern Place, about 1 mile south. The second-nearest LACFD fires station is Station 163 at 6320 Pine Avenue, about 1.2 miles to the northeast. The Project would not make any programmatic changes and would not increase students; therefore, it would not increase the need for fire protection services. LAUSD is required to coordinate with LACFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with SC-PS-1. Additionally, the Project would not require construction of new or expanded fire stations. Impacts would be less than significant and no further analysis is required.



4. Environmental Checklist and Analysis

b) Police protection?

Less Than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) is responsible for Campus safety and creating safe passages for students, staff, and the community.¹³⁷ The Campus is in Beat 505 of the LASPD's East Division.¹³⁸ The East Division is operated from the Woodrow Wilson Senior High School campus at 4500 Multnomah Street, in the City of Los Angeles approximately 7.5 miles north.¹³⁹ If required, LASPD would request assistance from the County of Los Angeles Police Department (LACPD). The local vicinity is served by the East Los Angeles Station at 5019 East Third Street approximately 5 miles to the northeast.¹⁴⁰ The Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and the entire Campus is currently fenced and would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. General Campus activities are under the supervision of the Campus administrators and staff. The Project would not increase student population or demand and would not result in new adverse impacts on existing police service. Impacts would be less than significant and no further analysis is required.

c) Schools?

No Impact. The Project would make physical changes to the existing Campus to enhance existing programs. The environmental effects of the construction and operation of the Project is considered throughout the environmental analysis in this Initial Study. The modernized Campus would not induce growth in the community, increase students or staff at the Campus, or otherwise increase demand for school services. The Project would not have an adverse physical impact on any existing schools and would have a beneficial impact on the Elizabeth Learning Center. No impacts to schools would occur and no further analysis is required.

d) Parks?

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

¹³⁷ Los Angeles School Police Department (LASPD). 2018, November 5. About LASPD. <http://achieve.lausd.net/Page/8851>.

¹³⁸ Los Angeles School Police Department (LASPD). 2015. Local District East with Los Angeles School Police Beats. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/596/Div%205%20East_Beats.pdf.

¹³⁹ Los Angeles School Police Department (LASPD). East Division, Campus Services Bureau Region 2. <https://achieve.lausd.net/Page/9415>.

¹⁴⁰ Los Angeles County Sheriff's Department. 2014. East Los Angeles Station. <http://shq.lasdnews.net/pages/patrolstation.aspx?id=ELA>.

4. Environmental Checklist and Analysis

e) Other public facilities?

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

4. Environmental Checklist and Analysis

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

Explanation:

There are no recreation LAUSD adopted SCs.

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

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

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

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

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on the “Site Circulation Report: LAUSD School Modernization Project – Elizabeth Learning Center”, prepared by LIN Consulting, Inc. dated October 17, 2018. A complete copy of this report is included as Appendix G to this Initial Study.¹⁴¹

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

Less Than Significant Impact.

Existing Conditions

Roadways

Existing roadways in the Project study area are described below:

¹⁴¹ LIN Consulting, Inc. October 17, 2018. Site Circulation Report: LAUSD School Modernization Project – Elizabeth Learning Center.



4. Environmental Checklist and Analysis

- **Elizabeth Street** is an east-west roadway classified as a Collector Street with one travel lane in each direction within the ‘school zone’. 20-minute parking is allowed on the south side. Curb parking is prohibited between 3:00 AM to 6:00 AM from Tuesday to Sunday on the south side of Elizabeth Street except for vehicles displaying a valid Overnight Parking Permit. Approximately 800 feet of 3-minute loading and unloading zone is located on the north side of Elizabeth Street, between the Administrative Building and a faculty parking lot on the west side of Campus. The posted speed limit is 25 mph. Speed humps exist within the ‘school zone’ on this street.
- **Clara Street** is an east-west roadway classified as a Collector Street with one travel lane in each direction within the ‘school zone’. No stopping is allowed any time on both sides of Clara Street. There is no posted speed limit. Speed humps exist within the ‘school zone’ on this street.
- **Wilcox Avenue** is a north-south roadway classified as a Collector Street with one travel lane in each direction within the ‘school zone’. Curb parking is prohibited between 3:00 AM to 6:00 AM from Tuesday to Sunday except for vehicles displaying a valid Overnight Parking Permit on both sides of Wilcox Avenue. The posted speed limit is 30 mph, and 25 mph when children are present.
- **Atlantic Avenue** is a north-south roadway classified as a Major Highway with two travel lanes in each direction and a raised median within the ‘school zone’. Curb parking is prohibited between 3:00 AM to 6:00 AM from Tuesday to Sunday west of Atlantic Avenue except for vehicles displaying a valid Overnight Parking Permit. The posted speed limit is 35 mph, and 25 mph when children are present.

Intersections

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

- **Elizabeth Street & Atlantic Avenue:** signalized
- **Elizabeth Street & Wilcox Avenue:** unsignalized with stop control on all movements
- **Clara Street & Wilcox Avenue:** signalized
- **Clara Street & Atlantic Avenue:** signalized

Bicycle and Pedestrian Facilities

None of the surrounding streets have bicycle lanes and no bicycle racks are provided on Campus.

There are sidewalks on both sides of Elizabeth Street, Clara Street, Wilcox Avenue, and Atlantic Avenue, and appear to be in compliance with ADA requirements.

Yellow school crosswalks and push button walk signals are at all intersections with traffic lights. There are two midblock crosswalks with center island refuge on Clara Street (one at the Campus and one at the adjacent park). There is also a midblock crosswalk on Elizabeth Street at the main Campus entrance.

Public Transit

Los Angeles County Metropolitan Transportation Authority (Metro) is the transit operator that provides public transit service. Bus stops near Elizabeth Learning Center are:

4. Environmental Checklist and Analysis

■ Atlantic Avenue

- Northeast corner of Elizabeth Street: Metro 260 (northbound)
- Southwest corner of Elizabeth Street: Metro 260 (southbound)
- Northeast corner of Clara Street: Metro 260 (northbound)
- Southwest corner of Clara Street: Metro 260 (southbound)

■ Wilcox Avenue

- Southeast corner of Clara Street: Metro 611 (northbound)
- Southwest corner of Clara Street: Metro 611 (southbound)
- Northwest corner of Elizabeth Street: Metro 611 (southbound)
- Southeast corner of Elizabeth Street: Metro 611 (northbound)

Metro Local Route 260 operates seven days a week between Altadena and Compton via Atlantic Boulevard. Metro Local Route 661 operates seven days a week in a loop between South Los Angeles and Cudahy.

Operation

The Project would not result in an increase students or staff; therefore, it would not change the volume of traffic or the distribution of trips over roadways near the Campus.

Project operation would not change the operation or use of any sidewalks or crosswalks at roadways or intersections. Project operation would not block or remove, or otherwise interfere with the safety or performance of the circulation system. Project operation would not interfere with Metro bus services operating near the Campus.

The Project would not change the student drop-off and pick-up areas or the circulation around the Campus. The Project operation would not conflict with programs, plans, ordinances or policies addressing the transit, roadway, bicycle, and pedestrian facilities. No impacts would occur and no further analysis is required.

Construction

Project construction is anticipated to start in Q3-2021 and is expected to take 4 years to complete; however because the project has several components, the Campus would not be under construction the entire time. Construction work would be intermittent and conducted in stages over the 4 year period. To avoid classroom disruption, some work would be done during instructional breaks when students are off the Campus.

Project construction would generate trips from the work crew, debris and soil hauling, and vendors (equipment and materials delivery). The City of Cudahy does not have restrictions on the hours for construction activities. Construction staging (i.e., storage of equipment and materials) would be restricted to the Campus. Construction workers would not park in the surrounding community. Construction trucks would not affect the existing driveways or parking lots during school hours.

Overall, a total of 615 truck haul trips would be generated from haul of demolition debris and transport of portable buildings. Throughout construction, the size of the work crew at the Campus each day would vary depending on the construction phase and construction activities. A maximum of 84 construction-related vehicle



4. Environmental Checklist and Analysis

trips (67 from construction workers and 17 from vendors) would occur daily during the overlap of Phase 4 building construction, building modernization, architectural coating, and asphalt paving activities.¹⁴²

Compared to the existing traffic generated at the Elizabeth Learning Center (~3,635 average daily trips¹⁴³) the maximum number of construction trips would be negligible. Additionally, construction trips would be for a short duration; would be spread out throughout the workday; and would occur during non-peak traffic periods in accordance with SC-T-4.

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

Finally, Project construction traffic would not displace bus stops or impact public transit bus services on surrounding roadways. The Construction Worksite Traffic Control Plan would include measures to prevent traffic and pedestrian hazards between trucks entering and exiting the Campus. The Project construction would not conflict with programs, plans, ordinances or policies addressing the transit, roadway, bicycle, and pedestrian facilities. Less than significant impacts would occur and no further analysis is required.

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

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

¹⁴² Construction worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.2.

¹⁴³ Based on the ITE Trip Generation Manual 10th Edition. Public school daily trip rates for Elementary School (grades K to 5) at 1.89 daily trips per student x 582 students = 1,100 average daily trips + Middle School/Junior High School (grades 6 to 9) at 2.13 daily trips per student x 686 students = 1,461 average daily trips + High School (grades 10 to 12) at 2.03 daily trips per student x 529 students = 1,074 average daily trips. Total 3,635 ADT. Student grades based on CDE.
<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=19647336016885&aggllevel=school&year=2017-18>

4. Environmental Checklist and Analysis

Daily VMT is an average of the total number of miles traveled by all vehicles each day on principal arterials in the City of Cudahy. This is then divided by the city's total population for Daily VMT per Capita.¹⁴⁴ Data for the figures are reported annually in the Caltrans publication, *California Public Road Data*.

The City of Cudahy, along with other agencies, has an opt-in period until July 1, 2020, to adopt the guidelines and new VMT-based criteria. Currently the City continues to use its established LOS criteria. Because the Project would not generate an increase in traffic or a change in traffic patterns, no impact would occur. The Project would not conflict or be inconsistent with the city of Cudahy traffic analysis methodology. No impacts would occur and no further analysis is required.

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

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

Construction

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

¹⁴⁴ It should be noted that the available Daily VMT metric is based on all travel through the City, from City residents and non-residents. Therefore, deriving an average daily per capita VMT based on just City population growth may under-estimate the change compared to a County or regional-wide viewpoint because the larger growth in total potential vehicle travelers is not accounted for.



4. Environmental Checklist and Analysis

Operation

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

d) Result in inadequate emergency access?

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

4. Environmental Checklist and Analysis

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

XIX. TRIBAL CULTURAL RESOURCES.

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

Yes No

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

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	<p>In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications:</p> <ul style="list-style-type: none"> • 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</p>



4. Environmental Checklist and Analysis

	<p>resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).</p> <p>Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.</p> <p>The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.</p>
--	--

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

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.¹⁴⁵

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. There are no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources on the Campus. No impacts would occur and no further analysis is required.

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

Less Than Significant Impact. Two Native American Tribes, the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, have requested notification through the PRC Section 21080.3.1 process with the LAUSD. The District notified the Tribes about this and other projects on January 8, 2019. On January 9, 2019, the Gabrieleño Band of Mission Indians - Kizh Nation requested consultation on this and other projects. The Fernandeño Tataviam Band of Mission Indians did not request consultation on this Project. LAUSD Office of Health and Safety staff and the Gabrieleño Band of Mission Indians–Kizh Nation completed consultation in February and March 2019. Consultation with the Gabrieleño Band of Mission Indians - Kizh Nation covered several LAUSD projects. The result of the consultation was

¹⁴⁵ California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

4. Environmental Checklist and Analysis

the inclusion of Standard Condition of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the project pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1 would be less than significant and no further analysis is required.



4. Environmental Checklist and Analysis

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

Explanation:

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

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

4. Environmental Checklist and Analysis

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.

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

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

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

No Impact. The Campus currently serves students living in the region, and Project would not increase the student population or long-term water demands. Water would be used on site during construction for dust suppression and similar activities. The small amount of water that would be used for the Project construction would not result in the need for new or expanded water entitlements. Installation of landscape and irrigation improvements would comply with SC-USS-2 and SC-GHG-1, -2, and-3 for water conservation; therefore, the Project would not result in an increase in water demands for landscaping. No impact would occur and no further analysis is required.

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

No Impact. The Campus would continue to serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treatment required. The Project would not affect wastewater treatment capacity. No impact would occur and no further analysis is required.



4. Environmental Checklist and Analysis

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

Less Than Significant Impact. The two largest destinations for solid waste generated in Cudahy are the Olinda Alpha Sanitary Landfill and Frank R. Bowerman Sanitary Landfill.¹⁴⁶ The Project would not increase the student population and thus would not increase solid waste generation.

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

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the Project would adhere to these established standards. Therefore, construction and demolition waste generated during construction of the Project would not adversely impact such landfills. Impacts would be less than significant and no further analysis is required.

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

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

¹⁴⁶ California Department of Resources Recycling and Recovery (CalRecycle). 2017 Jurisdiction Disposal by Facility, City of Cudahy. <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>.

4. Environmental Checklist and Analysis

XX. WILDFIRE.

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

Yes No

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

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

Explanation:

No Impact. 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.¹⁴⁷ 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 City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the City of Cudahy.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in a LRA. The nearest FHSZ in the SRA is a Very High about 9.5 miles east in Hacienda Hills between Whittier

¹⁴⁷ California Department of Forestry and Fire Prevention (CAL FIRE). Frequently Asked Questions. http://www.fire.ca.gov/firepreventionfee/sra_faqs



4. Environmental Checklist and Analysis

and Hacienda Heights. The nearest FHSZ in the LRA is 8.5 miles east in the lower elevations of the Hacienda Hills.¹⁴⁸ Land between the edge of the nearest FHSZ and the Project site is dense urban development, along with the I-710 (Long Beach Freeway) and the Los Angeles River.

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

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

No Impact. The emergency response plans and emergency evacuation plans in effect are through the County, the District, and the City.

County: Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012¹⁴⁹ identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

City: Under the Federal Disaster Mitigation Act of 2000 local governments, including counties, cities, and tribes in the United States, are required to prepare a Local Hazards Mitigation Plan as a condition of receiving Federal disaster mitigation funds. This Plan identifies the hazards that have occurred or may occur in the study area, and provides mitigation strategies, or action items, designed to save lives and reduce the destruction of property. The City of Cudahy has addressed this requirement by completing a Local Natural Hazards Mitigation Plan that describes and analyzes several issues of concern to the City, including earthquakes, floods, and severe weather, but does not specifically address wildfire. The Plan also provides resources and information, in addition to action items and programs, that are meant to assist Cudahy in reducing risk and preventing loss from future natural hazard events.¹⁵⁰

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

The Project construction would not interfere with any other existing emergency response plans or emergency evacuation plans. When complete, the Project would improve emergency access on Campus by providing vehicle access lanes throughout the Campus. No emergency response impact would occur and no further analysis is required.

¹⁴⁸ California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer.

http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps

¹⁴⁹ 2012 Los Angeles County Operational Area Emergency Response Plan.

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

¹⁵⁰ City of Cudahy. 2015, September. City of Cudahy Local Natural Hazards Mitigation Plan.

http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/cudahy_lhmp.pdf

4. Environmental Checklist and Analysis

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

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

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

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

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

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

4. Environmental Checklist and Analysis

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

Explanation:

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

Less Than Significant Impact. The Project would neither degrade the quality of the environment nor substantially impact any endangered plant, animal, or habitat. Because the Campus is fully developed and the surrounding area is fully developed, the Project 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. The Project would demolish three buildings, remove 22 portables, construct four buildings, and modernize other existing buildings on an existing Campus and would not change the character of the surrounding neighborhoods. Impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Based on the preceding analysis, with implementation of LAUSD Standard Conditions of Approval and compliance with existing regulations, the Project would not result in significant adverse impacts that could contribute to a cumulatively considerable impact. In consideration of the preceding

4. Environmental Checklist and Analysis

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

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

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

5. List of Preparers

5.1 LEAD AGENCY

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

Will Meade, Environmental Planning Specialist

Gwenn Godek, CEQA Advisor - Contract Professional

5.2 CEQA CONSULTANT

PlaceWorks

Alice Houseworth, AICP, LEED AP, Senior Associate

Dina El Chammas Gass, EIT, Project Planner/Engineer

Joshua Carman, Senior Associate

John Vang, JD, Associate

Alyssa Way, Project Planner

Isabel Garcia, Project Planner

Cary Nakama, Graphic Artist

Gina Froelich, Senior Editor

Laura Muñoz, Document Specialist

Maria Heber, Clerical

5. List of Preparers

This page intentionally left blank.



Appendices

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

Appendix

This page intentionally left blank.

