September 9, 2020| Initial Study/Mitigated Negative Declaration

VAUGHN NEXT CENTURY LEARNING CENTER

Administrative, Media/Literacy & Kitchen Building Project

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1. Introduction

1.1 Overview

Vaughn Next Century Learning Center is a public charter school located at 13330 Vaughn Street in the community of Pacoima within the city of Los Angeles. The Campus is owned by the Los Angeles Unified School District (District or LAUSD). The Campus is leased from the District and is operated by the Vaughn Next Century Learning Center (VNCLC).

The proposed New Administration, Media/Literacy Center & Kitchen Building 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 California Environmental Quality Act

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. VNCLC is the Project applicant.

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) is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts.

1.3 Environmental Process

Initial Study

This Initial Study was prepared in accordance with state CEQA Guidelines, as amended, and the LAUSD Procedures for Implementing CEQA,[1], 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 Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), or Negative Declaration (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 ND; (3) assist in the preparation of an EIR, if one is required;

[1] LAUSD. *Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act.* May 2017.

(4) facilitate environmental assessment early in the design of a Project; (5) provide documentation of the factual basis for the finding in an ND that a Project will not have a significant effect on the environment; (6) eliminate unnecessary EIRs; and (7) determine whether a previously prepared EIR could be used with the Project.

The findings in this Initial Study have determined that an MND is the appropriate level of environmental documentation for this Project.

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. 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.

Tiering

This type of Project is one of many that were analyzed in the LAUSD School Upgrade Program (SUP) Program EIR (Program EIR)[2] that was certified by the LAUSD BOE on November 10, 2015. LAUSD's Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large Project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies. 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.

The Program EIR is applicable to all Projects implemented under the SUP, including Charter Schools. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade Projects planned by the District. Due to the extensive number of individual Projects anticipated

[2]LAUSD. *School Upgrade Program Environmental Impact Report*. 2015. Available at: http://achieve.lausd.net/ceqa

to occur under the SUP, Projects were grouped into four categories based on the amount and type of construction proposed. The four categories of Projects are as follows:

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

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

The proposed Project is considered a site-specific Project under the SUP as analyzed in the Program EIR; therefore, this MND is tiered from the 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.

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 (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),[3] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[4]

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.[5] 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

[3] California Green Building Standards Code, Title 24, Part 11.
[4] CHPS criteria are summarized. The full requirement can be found at https://chps.net/chps-criteria.
[5] LAUSD OEHS. *Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects.* November 2015. Available at: https://achieve.lausd.net/ceqa

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 EIR for the SUP, 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, "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 Standard Conditions of Approval, 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 SCs are identified under each CEQA topic. Federal, state, regional, local laws, regulations, plans, guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

Impact Terminology

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

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

It is important to note that this Project would increase the student capacity of VNCLC. Therefore, the application of specific SCs (identified under each following CEQA topic), and federal, state, regional, local laws, regulations, plans, guidelines; CHPS criteria; and PDFs would ensure this Project would have a less than significant impact on the environment.

2. Environmental Setting

2.1 Project Location

The Project would be located on an approximately 10-acre Campus at 13330 Vaughn Street (Assessor's Parcel Number 2524-027-900) in the Arleta-Pacoima Community Plan Area,[6] a part of the Los Angeles City General Plan. The Campus is approximately 200 feet north of the Ronald Reagan Freeway 118, and 0.93 miles southwest of the 210 Foothill Freeway (see Figure 1-*Regional Location* in Appendix A). Major highways in the vicinity are Glenoaks Boulevard, approximately 0.12 miles east of the Campus, San Fernando Road, 0.53 miles west of the Campus, and Paxton Street, located approximately 0.14 miles southeast of the Campus. In addition, the Campus is located approximately 1.55 miles northwest of the Hansen Dam recreational area and approximately 1.15 miles north of the Whiteman Airport.

2.2 Surrounding Land Use

The Campus is referred to as the Mainland Campus and is bounded by Vaughn Street to the north, De Garmo Avenue to the east, Eustace Street to the south, and Herrick Avenue to the west (see Figure 2-*Local Vicinity*, and Figure 3-*Aerial Photograph* in Appendix A). New Christ Memorial Church, an education Center and single-family residences (SFRs) are to the north of the proposed Project site across Vaughn Street. Land east of the Project across De Garmo Avenue is improved with SFRs and paved parking lot for VNCLC employees. Land south of the Project, across Eustace Street, is improved with SFRs and an easement for the Ronald Reagan 118 Freeway bordered by a chain link fence. Land west of the Project site, across Herrick Avenue, is improved with another site called the VNCLC Vaughn International Studies Academy (VISA), several SFRs, and two asphalt-paved parking lots for VNCLC employees. Land northwest of the site, across the intersection of Vaughn Street and Herrick Avenue, is improved with the Mount Zion Baptist Church, and the VNCLC Pandaland campus.

2.3 Mainland Campus History

The Campus was originally developed as a District school site in 1950 to accommodate 500 elementary students. In 1954, the Campus was improved in with portable buildings, and further developed in 1957 with the existing permanent buildings.

VNCLC currently serves a total of 3,153 students (TK-12) and is located within LAUSD's geographic boundary. VNCLC is a California Distinguished School, a National Blue Ribbon School, and is accredited by the Western Association of Schools and Colleges.

[6] City of Los Angeles Planning Department. *Arleta-Pacoima Community Plan General Plan Land Use Map*. September 22, 2009.

VNCLC provides a traditional academic calendar year. School hours are from 7:00 am to 6:00 pm, Monday through Friday. Some programs, including the after-school student programs, parent education courses addressing academics, health and well-being, ESL programs, and medical, social, and counseling services operate outside of the traditional school hours.

2.4 Existing Conditions

The VNCLC has a current academic enrollment of 3,051 students 200 students more than capacity and.[7] On January 9, 2018, the LAUSD Board of Education renewed the Vaughn charter petition and approved a total planned enrollment of 3,220 students, providing a growth of 259 seats by June, 2023 (Board Report No. 274-17/18). Of the 259 growth seats, 90 students are already enrolled as of the 2019-20 school year. Vaughn operates as a resident campus and it is anticipated that the 169 remaining seats will come from the school gaining approximately 56 resident students (two classes) each year (approximately 2% each year) over the next three years.

The Campus currently consists of one administration building, six (6) classroom buildings, Portables to Project Based Pods (P3) "Growthpoint Structures" (pre-fabricated, repurposed shipping container structures located on the western portion of the Campus), a multi-purpose/food service building, and an outdoor play yard with shade structures. The majority of the permanent academic buildings were constructed in 1957, with four additional permanent structures developed in 2017. The Campus has limited indoor athletic facilities, subsequently the asphalt play yard is also used for physical education and recreation during recess. VNCLC does not currently have the space or facilities to serve the planned enrollment number of 3,220 students. The Project is designed to replace existing student learning spaces (from the building that is being demolished) and provide adequate classroom space for the approved or planned campus enrollment through 2023.

Multipurpose/Kitchen/Assembly Space

The Multipurpose facility is located on the northwest portion of the Campus and is adjacent to the only parking lot on Campus, which facilitates food delivery access. It consists of the only assembly space on Campus and has a kitchen and an adjacent small outdoor dining area. The existing assembly space has non-fixed seating and a stage.

[7] VNCLC. *TK-12th Charter Petition, Term 2018-2023 (Board Report 274-17/18)*. 01/09/2018.
California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS).

2.5 General Plan and Existing Zoning

The City of Los Angeles zoning for the Campus is Public Facilities (PF). [8] The immediate parcels surrounding the Project site is zoned Low Density Single-Family Residential (R1).[9] The Campus land use is consistent with the existing PF zone, which allows for the development and operation of public elementary and secondary schools. [10] The Project is consistent with the general character of the surrounding neighborhood, which is consists of single-family residences, churches, and public education facilities operated by VNCLC.

The California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, the LAUSD BOE adopted a resolution on February 19, 2019 to exempt all school sites from local land use regulations.[11]

2.6 Agency Reviews and Approvals

Approval required for the proposed Project would include, but may not be limited to, those agencies 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/reviews, for the proposed Project to be implemented may include the following:

- California Department of General Services, Division of State Architect (DSA). Approval of site-specific construction drawings. Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- Los Angeles Regional Water Quality Control Board (LARWQCB). General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- California Department of Education (CDE) School Facilities Planning Division: Review of Project.
- State Water Resources Control Board (SWRCB): Review of applicable permit coverage. Construction Permit regulates stormwater and non-stormwater discharges associated with construction activities.
- City of Los Angeles, Fire Department: Review and approval of plans for emergency access and emergency evacuation.

[8] City of Los Angeles Municipal Code–*Chapter I, Planning & Zoning. Section 12.04.09, "PF" Public Facilities Zone*.
[9] City of Los Angeles Department of Planning and Zoning. *Zone Information and Map Access System (ZIMAS)*. Accessed June 2019. http://zimas.lacity.org/
[10] City of Los Angeles Municipal Code–*Chapter I, Planning & Zoning. Section 12.04.09, "PF" Public Facilities Zone*.
[11] LAUSD Board. Board of Education Report No. 256 – 18/19, Resolution to Exempt All Los Angeles Unified School Sites from Local Land Use Regulations under California Government Code Section 53094. February 19, 2019.

Trustee Agencies

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

State

- Native American Heritage Commission (NAHC)

Regional

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

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, Gabrieleño Band of Mission Indians - Kizh Nation and Fernandeño Tataviam Band of Mission Indians, have requested notification and consultation through the PRC Section 21080.3.1 process. LAUSD notified the Gabrieleño Band of Mission Indians - Kizh Nation and Fernandeño Tataviam Band of Mission Indians. On September 9, 2019, the Gabrieleño Band of Mission Indians - Kizh Nation requested consultation on this Project. The result of the consultation was to defer this Project to the Fernandeño Tataviam Band of Mission Indians. On September 16, 2019, the Fernandeño Tataviam Band of Mission Indians requested consultation.

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 2.3(c) contains provisions specific to confidentiality.

3. Project Description

3.1 Background

On May 9, 2019, the LAUSD Bond Oversight Committee considered this Project under the Facilities Services Division (FSD) Charter Facilities Program and concluded the Project would help facilitate implementation of the FSD Strategic Executive Plan (SEP). The mission of the FSD is to provide safe and healthy learning environments that support educational achievement throughout the LAUSD. FSD accomplishes this mission by building new school Projects, repairing and modernizing school facilities, and promoting joint planning with local communities.[12]

On January 9, 2018, VNCLC renewed its 5-year charter for the period of July 1, 2018 to June 30, 2023 with an LAUSD Board-approved enrollment capacity of 3,220 students for grades Transitional Kindergarten (TK) through 12, an increase of 259 permanent student seats (and 12 teacher stations) over VNCLC's current enrollment of 3,055 students.

In December 2017, VNCLC applied for an LAUSD Charter School Facilities Augmentation Grant. As part of the grant agreement, VNCLC capped Kindergarten enrollment at 280, and the TK enrollment at 60. In order to provide seats for continuing resident students and meet the planned enrollment of 3,220, VNCLC must increase capacity as students move up the grades, especially in elementary, in an effort to accommodate the young students of residences.[13]

Purpose and Need

Currently, VNCLC has an academic enrollment of 3,055 students. The Project is designed to replace existing student learning spaces (from the 2,582 square feet Administration building that is being demolished) and provide adequate classroom space for the planned campus enrollment.[14] The purpose and need of the proposed Project is to reduce overcrowding and to provide a safe and healthy learning environment that supports educational achievement for students attending the VNCLC.

Goals

The goals of the proposed Project are to provide a building and site design that meets the space and program requirements of the VNCLC and meet LAUSD design requirements for administrative, food services, educational, and library curriculum. Specific proposed Project goals include:

- Provide space to convert from multi-track to traditional calendar
- Alleviate overcrowding at the Campus and eliminate busing out of resident students

[12] LAUSD FSD. *2019 Facilities Services Division Strategic Execution Plan*. August 2019.
[13] Vaughn Next Century Learning Center. *LAUSD Charter School Facilities Augmentation Grant Application.* 2017.
[14] VNCLC. *TK-12th Charter Petition, Term 2018-2023 (Board Report 274-17/18*). 01/09/2018.

- Restore core spaces (library, teachers' workroom, student health office, parent center) lost to create classrooms and to upgrade services
- Create spaces for mandatory Transitional Kindergarten
- Make space for needed technology (California Longitudinal Pupil Achievement Data System (CALPADS) reporting and student assessment)
- Set aside confidential spaces for counseling, social worker and law enforcement interviews, Individualized Educational Plan (IEP) parent conferences
- Create space to implement restorative justice program and Local Control Funding Formula (LCFF) -supported intervention
- Reconfigure a heat-and-serve kitchen to prepare 4,000 meals per day

Objectives

The objective of the proposed Project is to alleviate existing overcrowding on the Mainland Campus, and to provide the school community with a new expanded facility for VNCLC staff to work and students to learn with improved and indoor and outdoor instructional space.

Currently, there are 33 classrooms (or spaces that are being used as classrooms) on the Campus. Following completion of the Project, there would be a total of 45 classrooms on the Campus—an addition of 12 classrooms associated with the Project kindergarten. Upon completion, VNCLC would be able to accommodate the enrollment growth in accordance with its approved Charter petition, alleviate overcrowding, and upgrade student services.

3.2 Proposed Project

The Project site is located at 13330 Vaughn Street in the neighborhood of Pacoima within the City of Los Angeles. The Mainland Campus is approximately 10-acres. Only a portion of the site will be disturbed for the new site improvements. The Project scope consists of demolition, new construction, grading, wet utilities upgrades, and storm water management.[15] The construction phase will take approximately 12 months and consists of the removal of one existing building, shade structures, wet utilities, and hardscape/landscape areas (refer to Figure 4-*Site Overall Demolition Plan* in Appendix A). The grading design consists of grading the new improvements for drainage and accessibility purposes at the site. Grading will result in approximately 65 cubic yards (CY) of cut and 1,210 CY of fill for a net 1,145 CY of fill.

The proposed Project consists of the removal of the existing 2,582 square-foot, one-story administration building and replacement with a new 26,000 square-feet, two-story building that will include six learning pods (equivalent to 12 classrooms), health and administrative offices, a media/literacy center, a teacher work room, and a cooking cafeteria. In addition, the adjacent yard area will be upgraded to renovate the

[15] Wet utilities design includes disconnections and re-connections and new connections for storm drain, sanitary sewer, and potable and fire water lines. The civil scope will also provide storm water management, hydraulics calculations, a Hydrology Report, and a Stormwater Pollution Prevention Plan (SWPPP).

existing outdoor stage, provide more shade and more permeable surfaces. The following table presents the Project components.

Table 3-1
Project Components

Building Name	Demolition	New Construction	Major Remodel/ Modernization	Existing to Remain
New Administrative, Media/Literacy & Kitchen Building		26,000 sf		
Administration Building (DSA# A-1510)	2,582 sf		-	-
Addition of new ADA EVCS at existing parking lot	-	-	470 sf	25,760 sf
Vaughn Next Century Learning Center Portables to Project-Based Pods (P3) (DSA# 03-117391)	-	-	-	22,400 sf
Multi-Purpose Bldg. (DSA# A-1510)	-	-	-	5,200 sf
Bldg. A (DSA# A-1510)	-	-	-	7,650 sf
Bldg. B (DSA# A-1510)	-	-	-	3,570 sf
Bldg. C (DSA# A-1510)	-	-	-	6,250 sf
Bldg. D (DSA# A-26018)	-	-	-	4,100 sf
Bldg. E (DSA# A-1510)	-	-	-	2,030 sf
Lunch Shelter		2,931 sf		
Campus Total	**2,582 sf**	**28,931 sf**	**470 sf**	**51,200 sf**

The new building will provide general administrative and student services on the ground floor (administration offices, student support offices, work room, media/literacy center, and cooking cafeteria). The second floor will consist of the new pods and student restrooms. The existing outdoor stage will be upgraded to provide an assembly area for the entire school and the VNCLC community to utilize. All construction elements will be Americans with Disabilities Act (ADA) compliant, including grates, handrails, bathrooms, ramps, and food-service plumbing and equipment elevations.

A general scope of work is presented below:

- Scope of Work
  - Demolish existing administrative building and associated site elements
  - Construct a new building consisting of:
    - Six educational learning pods (equivalent to twelve classrooms)
    - Administrative area with new reception, individual offices for school principal, staff, health facilities and work room
    - Media & literacy center for all students
    - Cooking kitchen to serve all students on Campus
  - Construct a new outdoor renovated assembly area with site stage
  - Remove two existing shade structures and replace with a new covered dining area
    - Add new 220-seat covered lunch shelter to existing capacity of the 3 permanent lunch shelters which currently seat 192 students
    - Remove one non-ADA accessible existing lunch shelter (seats 65 students)
  - Revitalize play yard area

- General and Specific Requirements
  - Meet Vaughn Next Century Learning Center's programming requirements
  - Meet Los Angeles Unified School District's Design Guidelines, Educational Specifications & Design Standards

- Site Development
  - Construct an accessible Path of Travel from existing accessible parking stalls, street and safe dispersal area
  - Provide the school with trees to provide shade and outdoor space for graduation and other larger community gatherings
  - Provide new outdoor garden spaces along Vaughn Street
  - Connect to existing site utilities
  - Provide new electrical equipment alongside electrical service upgrade
  - Relocate main electrical and low voltage equipment to adjacent building at the Campus
  - Provide new ornamental gates and fences at main student entry along Vaughn Street
  - Provide new marquee exterior school signage

Site Access/Circulation/Parking

The Campus is a predominantly neighborhood school with some students from the surrounding communities. This Project would not involve any changes to pedestrian or vehicular circulation. Vehicles dropping off and picking up students would continue to approach the Campus from the west along Vaughn Street so that students can exit vehicles from the passenger side of the car and enter the Campus through the main entrance. The drop off and pickup area would continue to be designated with City of

Los Angeles traffic street signs and painted curbs, as well as monitored by VNCLC staff during loading and unloading events before and after school. Emergency vehicle access is located on De Garma Avenue (see Figure 5-*Site Plan* in Appendix A).

Parking for the Campus includes:

- Staff parking lot—13330 Vaughn Street (corner of Vaughn and Herrick)—45 parking spaces and 8 accessible parking spaces.
- Parent and Guest parking—13400 Vaughn Street (corner of Vaughn and Herrick)—24 parking spaces.
- Additional staff parking—13254 Cornelius Street (corner of De Garmo and Cornelius)—24 parking spaces
- Parent and Guest parking—Zion Baptist Church (corner of Herrick and Del Sur)—50 parking spaces (Vaughn leases parking spaces from the Church).

There is adequate parking for staff, parents, and guests.

Landscaping

Demolition and construction of the proposed Project could result in impacts to 17 mature trees of various species, sizes, and maturity that are currently within an area of potential impact. Nine of these trees are planned for removal—two are located in the front entrance area, and seven in the play yard. Ten 48" box trees, and six 24" box trees would be installed as part of the Project design—one would be located in the front entrance area and 15 would be located in the play yard (see Appendix G-*Landscape Design and Construction*, Figures 7 and 8, *Landscape Planting Plans*). The proposed Project would add seven trees to the Campus.[16] All trees would be removed and replaced in accordance with the District Tree Trimming and Removal Procedure.[17]

Construction Phasing

The proposed Project construction schedule is expected to last approximately one year, commencing in Fall 2020 and ending Fall 2021. Prior to commencement of work, VNCLC's designated contractor shall prepare and submit to LAUSD's Authorized Representative (OAR) a detailed Project site logistic plan setting forth the plan of work including but not limited to, the following:

- Hauling routes in accordance with local ordinances for truck access routes to and from the Project site.
- The identification of any overhead wire restrictions for power, street lighting, signal or cable.
- Local sidewalk access and street closure requirements.
- Protection of sidewalk pedestrians and vehicular traffic.
- Project site fencing and access gate locations.

[16] CSDA/Brightview Design Group. *Vaughn Mainland Admin/Media/Literacy and Kitchen Building.* December 2019.
[17] https://achieve.lausd.net/ceqa.

- Construction parking.
- Material staging or delivery areas.
- Material storage areas.
- Temporary trailer locations.
- Temporary service location and proposed routing of all temporary utilities.
- Location of temporary or accessible fire protection.
- Trash removal and location of dumpsters.
- Concrete pumping locations.
- Crane locations.
- Location of portable sanitary facilities.
- Mixer truck wash out locations.
- Traffic control signage.
- Perimeter and site lighting.
- Storm Water Pollution Prevention Plan–SWPPP.
- Stockpile or lay down areas.
- Security lighting.

It is important to note that this Project would add 12 classrooms increasing the student capacity on the Campus by approximately 2% each year through 2023.

4. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Digitally signed by Carlos A. Torres
Date: 2020.08.17 15:47:28 -07'00'

Signature _____ Date _____

Carlos A. Torres
Printed Name

CEQA Officer for LAUSD
Title

Environmental Checklist and Analysis

4.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In 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?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Would the project:

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

No Impact (a). The proposed Project would have no effect on scenic vistas and scenic corridors as none are located in the vicinity of the Project site.[18] In addition, due to the relatively flat topography and urbanized character of the Project vicinity with street trees and relatively shallow building setbacks, views are limited in the area. Furthermore, the proposed Project is consistent with the general character of the surrounding neighborhood, which is improved with one- and two-story buildings occupied with single-family homes and public education facilities operated by VNCLC. Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista. No impact would occur and no further analysis is required.

[18] City of Los Angeles Department of City Planning. September 2001. *City of Los Angeles Conservation Element. Section 15: Land Form and Scenic Vistas*. Available at: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed December 2019.

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

No Impact (b). The Project site is not located within or adjacent to a scenic highway, and there are no state-designated or eligible scenic highways within the vicinity of the Project site. The closest state scenic highway is State Route 2 (SR 2) located approximately 13 miles southeast of the Campus. [19] Therefore, the proposed Project would have no effect on scenic resources within a state scenic highway. No impact would occur and no further analysis is required.

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?

No Impact (c). The proposed Project is consistent with the existing zoning—Public Facilities Zone (PF) and One-Family Zone (R1)[20]—and the general character of the surrounding neighborhood, which is improved with one- and two-story buildings occupied with single-family homes and public education facilities operated by VNCLC. The proposed Project's design and use would conform with *LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects* (SCs). Project Application of SC-AE-2 and SC-AE-3 would ensure the proposed Project's compatibility with the general character of the Campus and the surrounding neighborhood. In addition, the proposed Project would not conflict with the General Plan, applicable zoning, or other regulations governing land use compatibility and scenic quality. Therefore, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings. No impact 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 (d). The proposed Project would apply SC-AE-5 and SC-AE-6, which outline illumination criteria, requirements for outdoor lighting, and measures to minimize and eliminate glare that may impact pedestrians, drivers, avoid light trespass onto adjacent properties, and provide outdoor lighting standards that reduce glare, light trespass, and skyglow. Development of the proposed Project would include the addition of new building and security lighting; however, it would be completed in accordance with applicable SCs to ensure that the proposed Project would not create new sources of light or glare that could adversely affect day or nighttime views in the site vicinity. Impacts would be less than significant and no further analysis is required.

[19] Caltrans Scenic Highway Program Scenic Highway System List
s: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/scenic_hwy.htms:
http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/scenic_hwy.htm
[20] City of Los Angeles Planning and Zoning, Sections 12.08 and 12.04.09, amended March 31, 2019.

LAUSD Standard Conditions of Approval for potential Project impacts to Aesthetics are presented below:

LAUSD Standard Conditions of Approval—Aesthetics	
SC-AE-2	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. **School Design Guide** This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3	LAUSD shall assess the proposed Project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the Campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-5	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. **School Design Guide** This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.
SC-AE-6	The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to: • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

4.2 Agricultural and Forestry

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
d) Result in the loss of forest land or conversion of forest land to non-forest use?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact (a-e). The proposed Project site does not include any agriculture or farmland and is zoned Public Facilities Zone (PF). It has been occupied with a public school since 1954. Land surrounding the site is zoned One-Family Zone (R1) and consists of one- and two-story buildings occupied with churches, single-family homes, and schools operated by VNCLC in the immediate vicinity of the Project site. Therefore, development of the proposed Project would not conflict with nor result in impacts of any kind to

agricultural resources, forest land, or timberland resources. No impact would occur and no further analysis is required.

4.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The analysis in this section is based on the *Vaughn Next Century Learning Center Project—South Coast Air Quality Management District Localized Significance Threshold (LST) Analysis Memorandum*, prepared by ECORP Consulting, Inc., dated July 30, 2019 (Appendix B).[21]

Would the project:

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

Less Than Significant Impact (a). The proposed Project would replace and upgrade facilities on the Campus. The Project would provide 259 new permanent seats and 12 staff over 5 years to accommodate students who will continue at VNCLC as they move up in grade, and would not introduce major new emission sources—no new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from on-site sources (such as space heating).

The proposed Project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP

[21] ECORP Consulting. *South Coast Air Quality Management District Localized Significance Threshold (LST) Analysis Memorandum.* July 30, 2019.

is the 2016 AQMP, which was adopted by the SCAQMD Governing Board in March 2017.[22] The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.

The proposed Project is a SUP-related Project and is not a regionally significant Project that would warrant intergovernmental review by SCAG.[23] The proposed Project is designed for the existing and planned enrollment, and would fulfill the educational needs of the existing and planned local community served by the VNCLC. The proposed Project would not be considered by SCAQMD to be a substantial source of air pollutant emissions and would not conflict or obstruct implementation of the AQMP. Potential impacts to implementation of the AQMP would be less than significant. The impact 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 standards?

Less Than Significant Impact (b). The Project area is in nonattainment for ozone (O3) and fine particulate matter (PM2.5) under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The Project area is also in nonattainment for coarse particulate matter (PM10) under the CAAQS, and nonattainment for lead (Los Angeles County only) under the NAAQS. The proposed Project's impacts on criteria pollutants are limited to short-term construction impacts to modernize an existing school campus to relieve overcrowding.

Project emissions would be limited to the construction phase only. The anticipated Project-specific emissions are provided in the California Emissions Estimator Model (CalEEMod) Localized Significance Threshold (LST) Analysis that was prepared for the Project.[24] Due to the short duration of construction and the low emission levels during construction, there would be no cumulatively considerable net increase of the criteria pollutants for which the Project area is in non-attainment. The new building would replace the existing building and would add space for school services such as (health and administrative offices, a media/literacy center, a teacher work room, and a cooking cafeteria). The Project would increase the amount of building square footage as well as the number of permanent seats on Campus (by more than 25,000 square feet and approximately 259 seats over 5 years). Relatively few new vehicle trips would be generated by the addition of 12 staff; as such, there would be no appreciable increase in mobile source emissions. Construction emissions would be lower than the established SCAQMD significance thresholds (see Appendix B). Therefore, there would be no cumulatively considerable net increase in any criteria

[22] SCAQMD (South Coast Air Quality Management District). 2017. Final 2016 Air Quality Management Plan. March 16, 2017. Accessed March 2020. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp
[23] LAUSD SUP Program EIR, p. 5.3-27.
[24] ECORP Consulting. *South Coast Air Quality Management District Localized Significance Threshold (LST) Analysis Memorandum.* July 30, 2019.

pollutant for which the Project area is in non-attainment. Impacts would be less than significant and no further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact (c). A Project-specific LST Analysis was prepared for the proposed Project by ECORP Consulting, Inc.[25] (Appendix B). The analysis and conclusions follow:

Project Localized Significance Analysis (LST)

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute to or cause localized exceedances of the federal and/or state ambient air quality standards. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a Project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. LSTs show whether a Project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level proposed Projects. This analysis makes use of the methodology included in the SCAQMD *Final Localized Significance Threshold Methodology*. The SCAQMD developed LSTs for emissions of nitrogen dioxide (NO2), carbon monoxide (CO), coarse particulate matter (PM10), and fine particulate matter (PM2.5) generated at new development sites. Off-site mobile source emissions are not included in the LST analysis protocol. The significance of localized emissions impacts depends on whether ambient levels in the vicinity of the Project are above or below state standards. In the case of CO and NO2, if ambient levels are below the standards, a Project is considered to have a significant impact if Project emissions result in an exceedance of one or more of these standards. In the case of PM10 and PM2.5, Project emissions are considered significant if they increase ambient concentrations by a measurable amount.

LSTs are based on the ambient concentrations of pollutants within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all Projects that disturb 5 acres or less on a single day.

The Project site is located within SCAQMD SRA 7 (East San Fernando Valley). Table 1 shows the LSTs for a 1-acre, 2-acre, and 5-acre Project site in SRA 7 with sensitive receptors located within 25 meters of the Project site.

[25] ECORP Consulting. *South Coast Air Quality Management District Localized Significance Threshold (LST) Analysis Memorandum.* July 30, 2019.

Table 1. Local Significance Thresholds (Construction/Operations)				
Project Size	**Pollutant (pounds per day)**			
	NO_2 **Construction/Operation**	**CO** **Construction/Operation**	**PM_{10}** **Construction/Operation**	**$PM_{2.5}$**
1 Acre	80/80	498/498	4/1	3/1
2 Acres	114/114	789/789	7/2	4/1
5 Acres	172/172	1,484/1,484	14/4	8/2

Source: SCAQMD 2009

Project Construction

The SCAQMD has also issued guidance on applying the CalEEMod software to identify a Project's rate of daily disturbance. CalEEMod is a statewide land use emissions computer model designed to quantify pollutant emissions associated with construction and operations from a variety of land use Projects. Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, Table 2 is used to determine the maximum daily disturbed-acreage for comparison to LSTs.

Table 2. Equipment-Specific Grading Rates					
Construction Phase	**Equipment Type**	**Acres Graded/Disturbed per 8-Hour Day**	**Equipment Quantity**	**Operating Hours per Day**	**Acres Graded per Day**
Site Preparation	Rubber-Tired Dozers	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	2	8	1.0
	Demolition Total				**1.5**
Site Preparation	Graders	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	1	8	0.5
	Site Preparation Total				**1.0**
Grading	Rubber-Tired Dozers	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	2	8	1.0
	Grading Total				**1.5**
Maximum Total Grading Per Day					**1.5**

Source: California Emissions Estimator Model version 2016.3.2 (CalEEMod).

As shown in Table 2, Project implementation could potentially disturb up to 1.5 acres daily during demolition activities, 1 acre daily during the site preparation phase of construction, and 1.5 acres daily during the grading phase of construction. Thus, an LST threshold value for 1.5-acres of maximum daily disturbance was sourced from the SCAQMD LST lookup tables.[26]

[26] SCAQMD, Sample Construction Scenarios for Projects Less than Five Acres in Size,http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-sample-construction-scenario-report.pdf?sfvrsn=2 February 2005

The SCAQMD has produced look- up tables for construction activities that disturb less than or equal to 5 acres daily. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters (up to approximately 0.31 miles). Notwithstanding, the SCAQMD Methodology explicitly states: "*It is possible that a Project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.*" Therefore, LSTs for receptors located within 25 meters were utilized in this analysis. In addition, the SCAQMD's methodology also clearly states that "*off-site mobile emissions from a Project should not be included in the emissions compared to LSTs*." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs are considered. The nearest sensitive receptors to the Project site are the residences on Vaughn Street located approximately 65 feet north of the Project site. Also, in the instance that construction activities occur while school is in session, on-site students would also be considered sensitive receptors.

Table 3 presents the results of localized emissions during the demolition, site preparation, grading, and construction phases. The LSTs reflect a maximum disturbance of 1.5 acres daily for the proposed Project at 25 meters from the nearest sensitive receptors.

Table 3. Construction-Related Emissions (Localized Significance Analysis)

Activity	Pollutant (pounds per day)			
	NOX	**CO**	**PM10**	**PM2.5**
Project Demolition	7.87	7.62	2.21	0.71
Project Site Preparation	8.43	4.09	0.86	0.36
Project Site Grading	0.03	0.43	0.11	0.03
SCAQMD Localized Significance Threshold ***Interpolated for 1.5 Acres of Daily Disturbance***	*97.00*	*642.00*	*5.50*	*3.50*
Exceed SCAQMD Localized Threshold?	**No**	**No**	**No**	**No**

Source: California Emissions Estimator Model version 2016.3.2 (CalEEMod) software. Refer to ***Attachment A*** *for Model Data Outputs.*
Notes: Emissions estimates account for the demolition of 4,000 square feet of building space and 60,200 square feet of hardscape, landscape, utilities, and above-ground site features.

Table 3 shows that the emissions of these pollutants on the peak day of construction are well-below LST significance thresholds and would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, construction of the proposed Project would not result in a significant impact causing a net increase in criteria pollutants or expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant and no further analysis is required.

Project Operations

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed Project only if the Project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site, such as commonly associated with heavy-duty trucks (e.g., warehouse or transfer facilities). The proposed Project would not attract such uses, therefore, in the case of the proposed Project, the operational phase LST protocol does not need to be applied. The Implementation of the proposed project would also result in a net increase of vehicle trips to and from the project site as compared to existing conditions. However, VNCLC is predominantly a neighborhood

school where most of the students reside within the surrounding area. However, the proposed Project would result in a net increase of 25,021 sf to the Campus. Additionally, implementation of the proposed Project would result in an increase in stationary source emissions, for HVAC and utilities, as compared to existing conditions. Although the proposed Project would also result in an increase in stationary source emissions, for HVAC and utilities, as compared to existing conditions, operation of the proposed Project would not result in a significant impact causing a net increase in criteria pollutants or expose sensitive receptors to substantial pollutant concentrations. The impact 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 (d). The Program EIR found that implementation of SUP-related Projects would not create objectionable odors.[27] Similarly, implementation of the proposed Project would not create objectionable odors. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed Project has no design features that would create such odors. Schools do not fall within these types of land uses. Construction-related odor emissions from construction equipment exhaust and application of asphalt and architectural coatings would be temporary and intermittent in nature. Short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, potential odor impacts associated with implementation of the proposed Project would be considered less than significant. The impact would be less than significant and no further analysis is required.

Additionally, application of the SCs presented in the following table would ensure that potential impacts to air quality would be less than significant:

LAUSD Standard Conditions of Approval—Air Quality	
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: • 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.

[27] LAUSD SUP Program EIR, p. 5.3-32.

LAUSD Standard Conditions of Approval—Air Quality	
	• During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction Project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • 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. <u>Fugitive Dust</u> • 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).

LAUSD Standard Conditions of Approval—Air Quality	
	• 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. <u>General Construction</u> • 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.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
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 US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state and federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Would the project:

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact (a). The Project site is highly developed with buildings, asphalt, concrete, and landscaped areas. Surrounding areas are also densely developed with little to no native or undisturbed habitat. 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. A review of the

Los Angeles County General Plan Regional Habitat Linkages map,[28] the Campus is not within or adjacent to a regional habitat linkage. Further, there are no waterbodies within or adjacent to the Project site. Therefore, the proposed Project would not have a substantial adverse effect 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 Wildlife or U.S. Fish and Wildlife Service. No impact would occur and no further analysis is required.

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

No Impact (b). The Project site is highly developed with buildings and landscaped areas. Areas surrounding the Campus are similarly densely developed. Riparian habitat or other sensitive natural communities, as defined by Section 404 of the *Clean Water Act*, are not present on or in the vicinity of the proposed Project site. Therefore, no impact to riparian habitat or other sensitive natural community would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

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

No Impact (c). The Project site and vicinity have been fully developed for over 50 years—there are no state or federally protected wetlands on or adjacent to the VNCLC. Therefore, the Project would have no impact to state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. 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?

No Impact (d). The Project site is located within a highly developed urban area. Also, the Project site is not within or adjacent to a regional habitat linkage.[29] Existing vegetation on site is ornamental and maintained landscape, and there are no waterbodies within or adjacent to the Project. Therefore, the proposed Project would have no impact upon and would not interfere 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. No impact would occur and no further analysis is required.

[28] Los Angeles County. General Plan 2035. *Figure 9.2: Regional Habitat Linkages.* May 2014.
[29] Ibid.

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

Less Than Significant Impact (e). LAUSD requires that all tree trimming and removal conducted on District property adhere to the procedures outlined in the *LAUSD Tree Trimming and Removal Procedure* which requires completion of a Tree Inventory Report by a qualified arborist that documents the presence or absence of Protected Trees, and outlines the requirements for tree trimming or removal during avian breeding and nesting season.[30]

Demolition and construction of the proposed Project could result in impacts to 17 mature trees of various species, sizes, and maturity that are currently within an area of potential impact. None of the trees are protected species. Nine of these trees are planned for removal—2 in the front entrance area, and 7 in the play yard. Sixteen trees—ten 48" box, and six 24" box—would be installed as part of the Project design—1 in the front entrance area, and 15 in the play yard. The Project would add 7 trees to the Campus.[31]

Tree removal, building demolition, and construction-related noise and vibration have the potential to disrupt birds that could nest in the trees or buildings during breeding season. Therefore, construction activities (including demolition) have the potential to impact nesting birds. However, implementation of SC-BIO-3 would ensure that construction, including the planned removal of 9 trees, would occur outside of the nesting season. If avoidance of nesting season is not feasible, implementation of SC-BIO-3 would then include pre-construction clearance surveys and may require monitoring of nesting birds during vegetation clearing, and protective buffer zones surrounding observed nests during construction activities. Adherence to the *LAUSD Tree Trimming and Removal Procedure* and implementation of SC-BIO-3 would reduce potential Project impacts to less than significant. The impact would be less than significant 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 (f). The Project site is not located within an existing or proposed Habitat Conservation Plan, Natural Community Conservation Plan, or Conservation Plan.[32],[33] In addition, the site is not located within or proximate to a County of Los Angeles Significant Ecological Area.[34] Therefore, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community

[30] LAUSD Tree Trimming and Removal Procedure. https://achieve.lausd.net/ceqa
[31] CSDA/Brightview Design Group. *Vaughn Mainland Admin/Media/Literacy and Kitchen Building.* December 2019.
[32] California Department of Fish and Wildlife. 2018. California Regional Conservation Plans. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline
[33] U.S. Fish and Wildlife Service. 2019. Environmental Conservation Online System. Available at: https://ecos.fws.gov/ecp0/conservationPlan/
[34] Los Angeles County Department of Regional Planning. Sensitive Ecological Areas and Coastal Resource Areas Policy Map: http://planning.lacounty.gov/site/sea/maps/. 2019.

Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Biological Resources are presented in the following table:

LAUSD Standard Conditions of Approval—Biological Resources	
SC-BIO-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, all be listed as dark sky compliant as required under SC-AE-6.
SC-BIO-3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates[35]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[36] Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat • For construction Projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., Project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the Project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies. • If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination. • If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt

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

[36] 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.

LAUSD Standard Conditions of Approval—Biological Resources	
	at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the Project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds. • If the Surveyor/Biologist determines that a narrower buffer between the Project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. • A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if Project activities damage avian nests. Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses • If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area. • The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager. • If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location. • The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager. • No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Bat Surveys • Bat species inventories and habitat use studies shall be completed for demolition or new construction Projects in native habitat as well as Projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings. • Bat surveys must be conducted by a qualified bat Surveyor or Biologist Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the Project. • If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. • Mitigation measures shall be determined on a Project-specific basis and may include: o Avoidance

LAUSD Standard Conditions of Approval—Biological Resources	
	○ 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 Department of Fish and Wildlife.

4.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The analysis in this section is based in part on the *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*, prepared by ECORP Consulting, Inc., dated December 10, 2019.[37]

ECORP conducted a cultural resource records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) located on the California State University, Fullerton Campus. The purpose of the records search was to determine the extent of previous cultural resources investigations and the presence of previously recorded archaeological sites or historic-period (i.e., over 50 years in age) resources within a one-mile (1,600-meter) radius of the Project area. The records search identified resources listed on or determined eligible for listing on the National Register of Historic Places (NRHP) and/or the California Register of Historic Resources (CRHR) located within or near the Project area. Materials reviewed included reports of previous cultural resources investigations, archaeological site records, historical maps, and listings of resources on the NRHP, CRHR, California Points of Historical Interest, California Landmarks, and National Historic Landmarks. ECORP also conducted an historic map and aerial photograph review.

The records search consisted of a review of previous research and literature, records on file with the SCCIC for previously recorded resources, historical aerial photographs, and maps of the vicinity. Within the Project area, there have been no previous cultural resource investigations that were on file with SCCIC. Historic-period maps and photographs show that several of the buildings on the Mainland Campus are historic in age. However, the District completed a significance evaluation for the Campus and determined that it was not eligible as a historic resource for listing on federal, state, or local registries.[38] Twenty-nine cultural resources investigations were conducted within the one-mile records search radius between 1992 and 2014.

[37] ECORP. *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*. December 10, 2019.

[38] LAUSD. 2019. Historic Resources Inventory Database. Los Angeles, CA. On file with the LAUSD Office of Environmental Health and Safety.

The records search also determined that nine previously recorded historic-era cultural resources are located within one mile of the Project area. Some of these are associated with architecturally historic buildings including the home of a great film pioneer, David Wark Griffith, while others are remnants of historical buildings including a foundation and a single concrete arch bridge. These historic sites date from the early nineteenth century up to being used today with modern additions. None of these resources are located within the Project area.

The Office of Historic Preservation's (OHP) *Directory of Properties, Historic Property Data File* for Los Angeles County (dated April 5, 2012) included two resources within one mile of the Project area (OHP 2019). The site records for these two resources (Griffith Ranch [P-19-186559] and the Auditorium [P-19-190687]) were reviewed in detail. Each record stated that the resource was significant to the history of the area. No resources were listed within the Project area.

Reasonably available natural water and soils data was reviewed to assess the potential for buried archaeological sites. The presence of natural water sources is often an indicator for the potential presence of archaeological resources because pre-contact Native American communities and post- contact Euroamerican and Native American communities exploited natural water courses for a variety of subsistence and economic resources. The Pacoima Wash is located approximately 600 meters northwest of the Project area.

In addition, geological data from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and rockd.org (Macrostrat 2019) were reviewed to characterize the geology of the local area in reference to archaeological history. Certain geological characteristics and formations are more likely to be of concern for archaeological materials. Compiled information available from rockd.org lists the parcel as composed of Late Pleistocene to Holocene (0.126 to 0 Ma) young alluvial-fan deposits. This means that the parcel is predominantly covered in alluvial sediments deposited by ancient and recent water flow within the period of known human habitation in California. Holocene alluvial deposits have the potential to contain Native American archaeological sites. The Project area has been entirely paved and developed. Thus, any near-surface pre-contact or historic-period archaeological sites that may have been present have likely been mixed, removed, or destroyed by development activities. However, the new building footprint is larger than the existing administrative building and would require subsurface excavation that would likely exceed the previously disturbed area. Additionally, sediments with the Project area have the potential to contain cultural material.[39]

No archaeological resources were identified within the Project area as a result of this records search and literature review. The Project area was entirely paved and developed during the mid- to late twentieth century. This development would have displaced or destroyed any archaeological resources that may have been present on the ground surface.[40]

[39] ECORP. *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*. December 10, 2019.
[40] Ibid.

Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact (a). A review of the National Register of Historic Places, 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 was undertaken to evaluate eligibility standards for Campus buildings. None of the Campus buildings were determined to be eligible for listing on federal, state, or local registries.[41] Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource. The impact would be less than significant and no further analysis is required.

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

Less Than Significant Impact With Mitigation Incorporated(b). No archaeological resources were identified within the Project area as a result of the records search and literature review.[42] Also, the Project area was entirely paved and developed during the mid- to late twentieth century—this development would have displaced or destroyed any archaeological resources that may have been present on the ground surface. However, as previously noted, holocene alluvial deposits have the potential to contain Native American archaeological sites. The proposed Project includes construction of a new building footprint which is considerably larger than the existing building and would require excavation that exceeds the previously excavated area. Therefore, development of the proposed Project has the potential to result in a substantial adverse change in the significance of an archaeological resource. In the event that archeological resources are discovered on the proposed Project site during construction, MM-TCR-1 through MM-TCR-3 and SC-CUL-6 through SC-CUL-10, which includes onsite monitoring during construction by qualified archaeological and Tribal personnel during all excavation activities, would ensure that a less than significant impact to archaeological resources would occur as a result of the proposed Project. The impact would be less than significant with the incorporation of mitigation and no further analysis is required.

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

Less Than Significant Impact (c). The proposed Project site has been previously disturbed; therefore, human remains are not expected to be discovered. However, in the unlikely event that human remains are discovered during construction, the VNCLC shall implement the process specified by SC-CUL-10 and Section 7050.5 of the California Health and Safety Code. The Los Angeles County Coroner will be notified, and no further disturbance shall occur until the County Coroner has made the necessary findings as to

[41] LAUSD. 2019. Historic Resources Inventory Database. Los Angeles, CA. On file with the LAUSD Office of Environmental Health and Safety. LAUSD OEHS Staff: Ms. Godek said an historic building review had been conducted with impact found during 9/5/2019 conference call to discuss Project and initial study.

[42] ECORP. *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*. December 10, 2019.

origin and disposition. Consequently, impacts to human remains, including those interred outside of dedicated cemeteries, would be less than significant. The impact would be less than significant and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Cultural Resources are presented below:

LAUSD Standard Conditions of Approval—Cultural Resources	
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any Project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the Project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o Location of areas to be monitored o Types of artifacts anticipated o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources o Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources

LAUSD Standard Conditions of Approval—Cultural 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 all 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 co he accurate recordation and recovery of the resources.

4.6 Energy

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

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact (a, b). Development of the proposed 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 proposed Project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities.

In addition, the proposed Project would comply with the 2019 Building Energy Efficiency Standards, which were adopted on May 9, 2018, and go into effect for new construction starting January 1, 2020. The 2019 standards focus on four key areas: (1) smart residential photovoltaic systems; (2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); (3) residential and nonresidential ventilation requirements; (4) and nonresidential lighting requirements. Under the 2019 standards, nonresidential buildings (which include Campus buildings) will be 30 percent more energy efficient compared to the 2016 standards. The new building would be considerably larger than the existing structure and as such would result in an increase in the amount of energy that is currently being consumed. However, 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 building planned for demolition, which uses older air conditioning units with lower energy efficient ratios (EER) and seasonal energy efficient ratios (SEER). In addition, the new building meets Title 24 and CHPS requirements.

Furthermore, because the Project would provide permanent seats for existing and planned growth as a neighborhood school, it would not result in a significant increase in motor vehicle transportation energy during operation over existing conditions. Therefore, the proposed Project would not result in inefficient, wasteful, and unnecessary consumption of energy during construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant and no further analysis is required.

4.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The section relies on the research, analysis, and conclusions contained in the Geotechnical Exploration Analysis, which was completed at the Mainland Campus August 30, 2019, by Byer Geotechnical, Inc.[43]. The purpose of the analysis was to evaluate the nature, distribution, engineering properties, and geologic hazards of earth materials underlying the site with respect to construction of the proposed Project.

[43] Byer Geotechnical. *Geotechnical Engineering Exploration Proposed Main Office Replacement Building.* August 30, 2019.

Would the project:

a) Expose people or structures to 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?
ii) Strong seismic ground shaking?
iii) Seismic-related ground failure, including liquefaction?
iv) Landslides?

Less Than Significant Impact (a)(i). The Project site is located in a seismically active area, as is the case throughout Southern California. No known active faults cross the subject site, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone[44]. As depicted on the Earthquake Fault Zone Map,[45] the subject site is located approximately 1.3 miles south of the southern boundary of the Sierra Madre (San Fernando) Fault Zone, which was active in 1971. Despite the proximity of the Project site to the fault, the Project site is located outside of the fault zone so the potential for surface rupture onsite is considered low. Therefore, the potential impact for surface rupture at the Project site presents a less than significant impact with the application of the California Building Code, relevant policy and development code including but not limited to the requirements of the California Building Code and DSA. The impact would be less than significant and no further analysis is required.

(ii) Strong Ground Shaking. Seismically induced settlement of unsaturated soils (dry dynamic settlement) can occur for low density soil layers that are above groundwater level. Based on the high blow count data obtained from onsite borings, the earth materials underlying the site are considered dense to very dense.[46] Therefore, potential dry dynamic settlement at the site in the event of a strong local earthquake is considered negligible. The potential impact to seismically induced settlement would be less than significant with the application of relevant policy and development code. The impact would be less than significant and no further analysis is required.

(iii) Liquefaction. The California Geological Survey (CGS) has not mapped the site within an area where historic occurrence of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacement such that mitigation as defined in Public Resources Code Section 2693 (c) be required[47]). The Mainland Campus is underlain by dense to very dense alluvium. In addition, current and historic-high groundwater levels are deeper than 50 feet. Therefore, the earth materials underlying the subject site are not considered subject to liquefaction.[48] The potential

[44] CGS 2000 (INSERT CITATION), do not use in text citation when using footnotes throughout document.
[45] Byer Geotechnical. *Geotechnical Engineering Exploration Proposed Main Office Replacement Building.* August 30, 2019.
[46] Ibid.
[47] CGS 1999 (INSERT CITATION), do not use in text citation when using footnotes throughout document.
[48] Byer Geotechnical. *Geotechnical Engineering Exploration Proposed Main Office Replacement Building.* August 30, 2019.

impact to liquefaction would be less than significant impact with the application of relevant policy and development code. The impact would be less than significant and no further analysis is required.

(iv) Landslides. The CGS has not designated the subject site within a state zone requiring seismic landslide investigation per Public Resources Code, Section 2693 (c). The subject site is relatively level, so earthquake-induced land sliding is considered nil. Therefore, the potential impact to landslides would be less than significant impact with the application of relevant policy and development code. The impact would be less than significant and no further analysis is required.

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

Less Than Significant Impact (b). Construction activities associated with the Project would involve earth movement and the exposure of soil, temporarily increasing erosion susceptibility. Development of the proposed Project would increase pervious surface cover with landscaping on the Project site, thereby reducing the potential for erosion and loss of topsoil that currently occurs. Compliance with the applicable regulations, plans, and standards would reduce all impacts due to soil erosion to below the level of significance. The potential impact to soil erosion and loss of topsoil would be less than significant impact with the application of relevant policy and development code. The impact 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 (c). See discussions above **(a-b)**.

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?

Less Than Significant Impact (d). Soils to be exposed at finished grade are expected to exhibit a very low expansion potential. The expansion testing completed at the Project site indicated near surface soils at the site have a very low expansion potential.[49] The impact would be less than significant and no further analysis is required.

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

No impact (e) The proposed Project would be connected to the city's existing wastewater system—no septic tank or alternative wastewater system would be required. No impact would occur and no further analysis is required.

[49] Ibid.

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

Less Than Significant Impact (f). ECORP Consulting conducted a thorough search for paleontology collection records for the locality and specimen data for the proposed Project and found no vertebrate fossil localities lying directly within the boundaries of the proposed Project area. However, the records search did find evidence of localities nearby from sedimentary deposits similar to those that occur at depth in the proposed Project area.[50]

The surface deposits in the proposed Project area consist of younger Quaternary Alluvium, derived as alluvial fan deposits from the San Gabriel Mountains to the northeast via Pacoima Wash that currently flows just to the northwest. These deposits typically do not contain significant vertebrate fossil remains, at least in the uppermost layers. At depth, however, older Quaternary sediments that contain significant fossil vertebrate materials are likely to be encountered. The closest fossil vertebrate localities from similar deposits are just north and west of the proposed Project area at or near the Van Norman Reservoir.

Shallow excavations in the younger Quaternary Alluvium exposed throughout the proposed Project area are unlikely to produce significant fossil vertebrate remains. Deeper excavations in the proposed Project area that extend down into older Quaternary deposits, may encounter significant vertebrate fossils. Any substantial excavations in the proposed Project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development.

The Project area has been paved and developed. Thus, any near-surface pre-contact or historic-period archaeological sites, or unique geologic feature that may have been present have likely been mixed, removed, or destroyed by development activities. There is the potential for the proposed Project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Standard conditions of development SC-CUL-11 would ensure that a less than significant impact to paleontological resources would occur as a result of the proposed Project. The impact would be less than significant and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Geology and Soils are presented below:

LAUSD Standard Conditions of Approval—Geology and Soils	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-CUL-11	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.

[50] ECORP (INSERT CITATION)

LAUSD Standard Conditions of Approval—Geology and Soils	
	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. • 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.

4.8 Greenhouse Gas Emissions

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

Would the project:

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

Less Than Significant Impact (a)—Operations. The Project would replace and upgrade facilities on the Mainland Campus, but it would not significantly increase the number of students or faculty and would not introduce major new emission sources. Project emissions increases would be limited to the construction phase only as demonstrated by the CalEEMod modeling (see Appendix B—LST Analysis).[51] Due to the short duration of construction and the low emission levels during construction, there would be no significant direct or indirect impact of the criteria pollutants. The new building will replace the existing building that would be removed as a part of the Project—no significant number of new vehicle trips would be generated, and there would be no increase in mobile source emissions. Additionally, construction emissions would be lower than the established SCAQMD significance thresholds.[52]

The Project would provide 259 new permanent seats and 12 staff over 5 years, therefore, would not result in a significant increase in GHG emissions from mobile sources, water usage, or wastewater and solid waste generation. The proposed Project would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing building. The impact would be less than significant and no further analysis is required.

Construction. Construction emissions generated by the proposed Project are temporary, and one-time emissions that would not substantially contribute to the GHG emissions that would have an adverse impact on the environment (see Appendix B—LST Analysis). Also, SC-GHG-1 through SC-GHG-5 would

[51] ECORP Consulting. *South Coast Air Quality Management District Localized Significance Threshold (LST) Analysis Memorandum.* July 30, 2019.
[52] Ibid.

ensure the proposed Project would have a less than significant impact on the generation of greenhouse gas emissions. The impact would be less than significant and no further analysis is required.

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

Less Than Significant Impact (b). The Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) is the applicable plan adopted for the purpose of reducing the emissions of greenhouse gases. The 2016 RTP/SCS incorporates local land use projections and circulation networks from cities' and counties' general plans.

The projected regional development pattern, including location of land uses and residential densities in local general plans, when integrated with the proposed regional transportation network identified in the 2016 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

Consistent with the expected RTP/SCS, schools that serve the local community, such as the VNCLC, reduce the average travel distance for students and promotes non-motorized travel (e.g., walking and biking), thereby reducing the overall VMT. Accordingly, a reduction in the overall VMT would reduce GHG emissions from mobile sources. Therefore, the proposed Project would not conflict with the 2016 RTP/SCS, and impacts would be less than significant. The impact would be less than significant and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Greenhouse Gas Emissions are presented below:

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

4.9 Hazards and Hazardous Materials

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

Would the project:

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 (a). In general, the proposed Project, as a school site, would not engage in the *routine* transport, use, or disposal of hazardous materials. However, construction and operation of the proposed Project would result in the use and storage of hazardous materials such as paint and cleaning supplies. Compliance with SC-HAZ-4, and all applicable federal, state, and local laws and regulations controlling the use, generation, storage, transport, and/or the disposal of hazardous materials (including

asbestos containing materials), would reduce potential impacts to risk of upset of hazardous materials to less than significant.[53] The impact 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 (b). The presence of asbestos containing material (ACM) and lead-based paint (LBP) was identified in a Phase II site assessment conducted for the LAUSD Facilities Environmental Technical Unit (FETU) at the existing administration building. The Phase II presented a plan for the removal of ACM and treatment of LBP prior to demolition of the Project building.[54] Requirements for limiting asbestos emissions from building demolition and renovation activities are also specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). In addition, LAUSD Section 13614 (Abatement of Hazardous Materials) would be implemented to address the removal of ACM and asbestos-containing construction material (ACCM) from the proposed site. Adherence to established state and federal requirements, and to SC-HAZ-4, will ensure that the proposed Project would not 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, and impacts would be less than significant. The impact 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 (c). The proposed Project is school related and would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste in accordance with the findings in the Program EIR. Hazardous materials expected at LAUSD schools 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.[55]

Additionally, contaminants that could become airborne during demolition and hauling—ACM, LBP—would be removed in accordance with LAUSD, DTSC, and SCAQMD requirements prior to demolition activities. Adherence to established state and federal requirement, and to SC-HAZ-4, will ensure that potential emissions impacts from the proposed Project to school sites within one-quarter mile would be less than significant.[56] The impact would be less than significant and no further analysis is required.

Schools within one-quarter mile of the proposed Project are presented below:

- Elementary Mainland Campus, 13330 Vaughn Street, Pacoima, CA 91340—proposed Project site.
- Middle School of International Studies and Technology, 12353-13247 Eustace Street, Pacoima, CA 91340, located in the southern portion of the Mainland Campus.

[53] LAUSD SUP Program EIR. *Hazards and Hazardous Materials, p. 5.8-44*. 2015.
[54] Vista Environmental Consulting. *Asbestos Engineering Assessment for Vaughn Next Century Project.* August 2019.
[55] LAUSD SUP Program EIR. *Hazards and Hazardous Materials, p. 5.8-44*. 2015.
[56] Ibid.

- Vaughn Street Children's Center, 11480 Herrick Avenue, Pacoima, CA 91331, contiguous to the southern portion of the Mainland Campus.
- Panda Land School Readiness Center, 13241 Vaughn Street, Pacoima, CA 91340, contiguous to the west corner of the Mainland Campus.
- Vaughn International Studies Academy High School, 11505 Herrick Avenue, Pacoima, CA 91331, adjacent to the southwest border of the Mainland Campus.

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 (d). The Mainland Campus is not listed on the Department of Toxic Substances Control (DTSC) Hazardous Waste and Substance Sites List.[57] If unreported releases of hazardous materials are found during grading or construction, application of SC-HAZ-4, and adherence to LAUSD Material Import/Export Testing 01-4524 would ensure potential impacts would be less than significant. The impact 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 for people residing or working in the Project area?

Less Than Significant Impact (e). The Whiteman public airport is located at 12653 Osborne Street, approximately 1.2 miles southeast of the Project. The Mainland Campus is located outside the airport's Safety Compatibility Zone 6—Traffic Pattern Zone,[58] and, therefore, is outside the airport's land use planning area. Implementation of the proposed Project would present a less than significant impact to Whiteman public airport land use plans. The impact would be less than significant 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 (f). Based on the Los Angeles County General Plan 2035 Disaster Routes Map, and the Los Angeles City Safety Element of the General Plan, the Project site is not located along a disaster route.[59,60] Disaster routes in the Project's vicinity include: Ronald Reagan Freeway State Route 118 (SR 118), approximately 0.17 miles southeast of the Project site; Glen Oaks Boulevard, approximately 0.13 miles northeast of the Project site; and San Fernando Road, approximately 0.55 miles southwest of the Project site.

[57] DTSC. *Envirostor, Hazardous Waste and Substance Sites.* Reviewed August 1, 2019.
[58] County of Los Angeles. Whiteman Airport Master Plan Final Report, February 2011.
[59] County of Los Angeles. *General Plan 2035, Figure 12.6: Disaster Routes Map*. May 2014.
[60] Los Angeles City General Plan. *Safety Element, Exhibit H.* November 1996.

Based on the Mainland Campus Safe School Plans, the proposed Project would not interfere with emergency vehicle access, located at De Garmo Avenue, nor school emergency plan procedures.[61]

Finally, the Project would provide 259 new permanent seats and 12 staff over 5 years to accommodate resident students who will continue at VNCLC as they move up in grade and would not introduce major new emission sources. Therefore, the proposed Project would not likely impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur and no further analysis is required.

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

Less Than Significant Impact (g). The Mainland Campus is in an urban area surrounded by development. The Project site is not located in or near State Responsibility Areas (SRAs) or lands classified as Very High Fire Hazard Severity Zones.[62,63] The nearest High Fire Zone is located over one-mile northeast of the Campus on the north side of the Interstate 210 Freeway. Therefore, less than significant impacts to people and structures involving wildfires would occur as a result of the proposed Project. The impact would be less than significant and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Hazards and Hazardous Materials are presented below:

LAUSD Standard Conditions of Approval—Hazards and Hazardous Materials	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).

[61] VNCLC. *Safe School Plan*. On file in Mainland Administration Building.
[62] City of Los Angeles Department of Planning and Zoning. *Zone Information and Map Access System (ZIMAS)*. ZIMAS website: http://zimas.lacity.org/.
[63] Los Angeles Fire Department. http://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map,

4.10 Hydrology and Water Quality

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

The section relies in part on a Site Hydrology Study and Report prepared by VCA Engineers (Appendix E).[64]

Would the project:

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

No Impact (a). The Project would include building replacement and upgrades to the play yard. Construction of the Project would involve grading which would create the potential for discharge into surface or groundwater. As part of the approval process, the Project would be subject to SC-HWQ-1, which requires the design and construction the Project meet or exceed current applicable stormwater

[64] VCA Engineers. Site Hydrology Study and Report, Vaughn Mainland Admin, Media/Literacy & Kitchen Building. December 2019.

guidelines; SC-HWQ-2, which requires a compliance checklist for stormwater requirements during construction; and SC-HWQ-3, which requires compliance with water quality programs and procedures to be implemented during construction and operation. Application of SCs would ensure that the proposed Project would not violate applicable water quality standards and/or waste discharge requirements during construction or operation. No impact would occur and no further analysis is required.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact (b). The proposed Project, as part of the Mainland Campus, would be connected to the city water system, would not employ groundwater wells, and would not increase water use at the Campus as the Project would not significantly increase student or faculty population. No impact would occur to regional groundwater capacity or production as a result of the proposed Project. No impact would occur 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 addition of impervious surfaces, in a manner which would:

(i) result in a substantial erosion or siltation on- or off site;
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
(iv) impede or redirect flood flows?

Less Than Significant Impact (c). The proposed Project, an existing school site since 1950 in an urban setting, would reduce impervious surfaces from 96% to 90% by adding planter areas, and would alter the existing topography of the Mainland Campus slightly to comply with ADA slope standards.[65]

(i) The proposed Project would avoid potential impacts resulting in substantial erosion or siltation on or off site by application of SC-HWQ-1, which requires the design and construction of the Project meet or exceed current applicable stormwater guidelines; SC-HWQ-2, which requires a compliance checklist for stormwater requirements during construction; and SC-HWQ-3, which requires compliance with water quality programs and procedures to be implemented during construction and operation.

(ii) (iii) The existing stormwater runoff is collected by surface sheet-flow and flows out through the existing concrete v-gutter on the southwest side of the site, then discharged to the curb and gutter on

[65] Ibid.

Herrick Avenue via curb drain. There is no storm drain line that runs along the surrounding street of the Project.[66] The proposed site will use the existing curb drain located on the western side of the Campus (see Appendix A, Figure 6—*Low Impact Development Plan*) to discharge the on-site stormwater runoff to the existing street gutter on Herrick Avenue.

The Mainland Campus site encompasses three major tributary areas: (1) the building stormwater from the roof which will downspout directly into the onsite storm-drain pipe and flow into a Maxwell-Drywell system to infiltrate into the underground soil. The system will be installed in the center-west portion of the play yard underneath a 30" bolted ring and grate imprinted with "Storm Water Only." (2) The trench drain and catch basin will capture the stormwater runoff from the landscape area and concrete pavement area to the east and south side of proposed building and will be conveyed to the Maxwell drywell system via hard pipe. (3) The hardscape areas to the west side of the proposed building will be captured by catch basin and sheet flow towards the Maxwell drywell system. The overflow inside the Maxwell will rise and discharge to the adjacent existing concrete v- gutter at the P3 area from the grate cover then curb drained out to Herrick Avenue. As demonstrated in the Hydrology Study for the proposed Project, the Maxwell drywell system is more than adequate to handle the volume required for treatment without flooding or backup.[67]

Also, the municipal stormwater program requires the preparation of Low Impact Development (LID) plans to address runoff pollution from post-development Projects. The goal of the proposed Project LID is to capture and mitigate the volume of runoff produced from an 85th percentile storm event.

The goal of the overall storm drain system design is to accommodate discharge from at least a 25 year storm event and a 24- hour rainfall event as outlined in the 2006 Los Angeles County Hydrology Manual. As demonstrated in the Hydrology Study for the proposed Project, the Maxwell drywell system has more than enough capacity to handle the volume required for treatment. The Hydrology Study also concludes and recommends that:

- The proposed storm drain system will be adequate to convey the peak flow from a 25-year, 24-hour rainfall event.
- The LID approach is achieved by use of one Maxwell drywell.
- Overall, all surface runoff from the site will be treated through proposed BMPs.[68] This ensures that the site has mitigated stormwater runoff and pollutants to the best of its capabilities.

(iv) The Project site is highly developed with buildings, asphalt, concrete, and landscaped areas. Surrounding areas are also densely developed with little to no native or undisturbed habitat, there are no waterbodies within or adjacent to the Project site, and there are no state or federally protected wetlands on or adjacent to the VNCLC Main Campus. Also, the Project site is in an area of minimal flood hazard (see "d" below).

[66] Ibid.
[67] Ibid.
[68] Ibid.

Finally, compliance with SC-HWQ-1, SC-HWQ-2, and SC-HWQ-3 during construction and operation would reduce potential impacts to site drainage to less than significant. The impact would be less than significant and no further analysis is required.

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

Less Than Significant Impact (d). The Mainland Campus is located on FEMA flood zone rate map panel number 06037C1075 in Flood Zone X—an area of minimal flood hazard—as shown on the FEMA Flood Map Service Center website.[69] In addition, the proposed Project will not substantially change the topography or site the Project in such a way as to increase risk to flood hazard. Further, the Mainland Campus is not located in a tsunami or seiche zone.[70]

However, a geotechnical analyses conducted in 2005 by Byer Geotechnical, Inc., the Campus is located approximately 4 miles south of the Pacoima Reservoir Dam, and is within the path of flooding in the event of a major failure or collapse of the dam.[71] The analysis concluded in the event of a complete rupture, the amount of flooding would not be significant as the dam maintains a storage capacity of 3,777 gallons. Byer Geotechnical estimated that the flooding at VNCLC would be less than one foot of water. VNVLC has prepared an emergency evacuation plan for students and staff in such an event. Therefore, impacts as a result of flood risk from the Pacoima Dam would be less than significant. The impact would be less than significant and no further analysis is required.

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

No Impact (e). The proposed Project, as part of the Mainland Campus, would be connected to the city's water system, would not employ groundwater wells, would not release pollutants into the groundwater basin. Therefore, no impact would occur to a regional groundwater management plan as a result of the proposed Project. Additionally, application of SC-HWQ-1 through SC-HWQ-3 would ensure that the proposed Project would not violate applicable water quality standards and, therefore, would not impact an existing water quality plan. No impact would occur and no further analysis is required.

LAUSD SCs for minimizing impacts to hydrology and water quality are provided below:

LAUSD Standard Conditions of Approval—Hydrology and Water Quality	
SC-HWQ-1	LAUSD shall design and construct the Project to meet or exceed the current and applicable stormwater guidelines.

[69] FEMA. Panel #06037C1075. September 2008. Available at: https://msc.fema.gov/portal/search?AddressQuery=13330%20vaughn%20street%2C%20los%20angeles%2C%20ca%2091340

[70] Los Angeles City General Plan. *Safety Element, Exhibit H.* November 1996.

[71] VNCLC Memorandum. *School District Governing Board Determinations of Emergency Evacuation Plan in the Event of Flooding*. September 27, 2005.

LAUSD Standard Conditions of Approval—Hydrology and Water Quality	
	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. **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.
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable: • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the Project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.

4.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict withany land use plan, policy, or regulation adopted for thepurpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Would the project:

a) Physically divide an established community?

No Impact (a). The Campus and surrounding land are fully developed with residential and public facility uses. The Project would take place within the Campus boundaries and would not divide an established community. Therefore, no impact would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact (b). Implementation of the proposed Project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Mainland Campus is zoned Public Facilities (PF). Permitted uses in both the general plan land use designation and the zoning code include public elementary schools. Additionally, per Government Code Section 53094, the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations in February 2019.[72] Therefore, no impact to land use and planning would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

[72] Governing Board of the Los Angeles Unified School District. *Board of Education Report No. 256 – 18/19.* February 19, 2019.

4.12 Mineral Resources

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

Would the project:

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

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

No Impact (a, b). According to the Arleta-Pacoima Community Plan and City of Los Angeles General Plan Land Use Map,[73] the Mainland Campus is not located in or near a Mineral Resource Zone. Therefore, no impacts to known mineral resources or locally important mineral recovery sites as shown on a land use plan would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

[73] City of Los Angeles Planning Department. *Arleta-Pacoima Community Plan General Plan Land Use Map*. September 22, 2009.

4.13 Noise

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

Would the project result in:

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

Less Than Significant Impact (a). The proposed Project, with the implementation of SC-N-4, SC-N-8, and SC-N-9, would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established by the Los Angeles Municipal Code (LAMC)[74] or the LAUSD.

Construction—Offsite Impacts

The nearest sensitive receptors to the proposed Project are church and residential land uses located 65 feet north of the Administration Building on Vaughn Street (to be demolished). Sensitive receptors more distant are residences located 335 feet west of the existing administration building on Herrick Avenue; residences located 320 feet east on De Garmo Avenue; and school buildings located 600 feet south of the Administration Building off Eustace Street.

The anticipated construction equipment usage and projected noise levels were obtained using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM), a screening tool that can

[74] City of Los Angeles Municipal Code. *Chapter IV Public Welfare, Sec. 41.40*. Current through September 30, 2019.

be used for the prediction of construction noise during the various stages of Project development and construction.[75] L_{max} is the value for the loudest piece of equipment in use at a construction site. L_{eq} is a measure of the ambient noise, i.e., the normal or existing level of environmental noise at a given location—the composite of noise from the surrounding sources of noise. Using RCNM tool, the predicted noise levels at 60 feet (L_{max} and L_{eq}) from the proposed Project were calculated. The anticipated Project construction noise levels are presented in the table below:

Table 4. Construction Equipment Noise Levels

Equipment	Noise Level (L_{max}) at 60 feet to nearest receptor	Noise Level (L_{eq}) at 60 feet to nearest receptor
Dozer	80.1	76.1
Backhoe	76.0	72.0
Concrete Mixer Truck	77.2	73.2
Compactor (ground)	81.6	74.7
Dump Truck	74.9	70.9
Grader	83.4	79.4
Jackhammer	87.3	80.3
All Other Equipment > 5 HP	83.4	80.4
Auger Drill Rig	82.8	75.8
Paver	75.6	72.6
Front End Loader	77.5	73.5
Welder / Torch	72.4	68.4
Vibratory Concrete Mixer	78.4	71.4
Scraper	82.0	78.0
Concrete Saw	88.0	81.0
Vacuum Street Sweeper	80.0	70.0
Tractor	82.4	78.4
Roller	78.4	71.4
Drill Rig Truck	77.6	70.6
Crane	79.0	71.0
Construction dBA Average Total	**88.0**	**89.2**
Exceed FTA Threshold 90 dBA Lmax	**No**	**No**

Source: FHWA. August 2006. Construction Noise Handbook.
[a] L_{max} is value for the loudest piece of equipment (RNCM)

According to Section 41.40 of the Los Angeles Municipal Code (LAMC), construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 9:00 AM and 6:00 PM on Saturdays. Further, Section 112.05 of the LAMC specifies the maximum noise level for construction

[75] FWHA. *Roadway Construction Noise Model:* https://www.fhwa.dot.gov/Environment/noise/construction_noise/rcnm/index.cfm. Downloaded December 2019.

within 500 feet of residential uses as 75 dBA at a distance of 50 feet from the source. However, this noise limitation does not apply where compliance is technically infeasible.

The Federal Transit Administration (FTA) recommends a noise level limit of 90 dBA Leq for residential receptors.[76] As shown in the table above, construction equipment noise levels would average between 68.4 and 81 dBA Leq at the nearest residences, and construction activity would not exceed the 90 dBA Leq during Project construction. Therefore, temporary offsite impacts to ambient noise levels from construction activity would be less than significant. The impact would be less than significant and no further analysis is required.

Construction—Onsite

The proposed Project, with the implementation of SC-N-4, SC-N-8, and SC-N-9, would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established by the Los Angeles Municipal Code (LAMC)[77] or the LAUSD. In accordance with SC-N-4, SC-N-8, and SC-N-9, and the LAMC Noise Ordinance, appropriate measures will be taken to reduce the noise impact to the property line and nearest sensitive receptors and onsite during construction. For example, per SC-N-9, semi-permanent noise barriers and noise curtains will be used to reduce construction noise activity when applicable. In addition, neither rock blasting nor pile driving will occur during demolition and construction of the proposed Project. Therefore, implementation of the Project would not result in temporary significant impacts to ambient noise levels in the vicinity of the Project during construction.[78]

SC-N-4 and SC-N-9 require construction equipment to be properly tuned and maintained to ensure excessive noise is not generated, and require discussions between the 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 LAUSD, 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 limit the exposure of students to 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. Therefore, proposed Project construction would not generate a substantial noise increase in excess of established standards—impacts would be less than significant. The impact would be less than significant and no further analysis is required.

[76] Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual, p. 179*. September 2018.
[77] City of Los Angeles Municipal Code. *Chapter IV Public Welfare, Sec. 41.40*. Current through September 30, 2019.
[78] Ibid.

Operation

During operation, noise levels would be similar to existing levels (or slightly reduced) at the Mainland Campus because there would be no increase in population on site, and the new building would meet the requirements of SC-N-1, SC-N-2, SC-N-3, and SC-N-8 to achieve classroom acoustical quality consistent with the current School Design Guide and CHPS standard of 45 dBA equivalent sound level (L_{eq}).

Interior (Classroom) Noise Exposure

CSDA Design Group (CSDA) conducted an Environmental Noise Study for the existing Administrative Building to address the intent of the exterior noise intrusion requirements in the LAUSD Building Acoustical Requirements, the California Collaborative for High Performance Schools (CHPS) 2014, and California Green Building Standards Code (CALGreen) Sections 5.507.4.1 & 5.507.4.2. [79]

Existing Noise Environment

CSDA visited the Project site on September 30, 2019, to conduct acoustical measurements at the exterior of the existing building. The purpose of the noise measurements was to document the existing acoustical conditions during a typical school day.

To document the noise levels at the site and calculate the noise reduction provided by the proposed exterior constructions, two simultaneous long-term (i.e., 72 hour) noise measurements (indicated as LT-1 and LT-2 in Figure 1 of Appendix F), were conducted at the Project site. In addition, the analysis includes noise data measured in May 2018 along Eustace Street (indicated as LT-3 in Figure 1 of Appendix F) and was used to quantify the contribution of noise from California State Route 118. Sound level meter LT-1 was mounted 12 feet above grade to a utility pole near the north property line of the Campus along Vaughn Street. Sound level meter LT-2 was mounted 12 feet above grade to a light pole near the west property line of the Campus along Herrick Avenue. Measurements commenced at 6:00 AM on September 30, 2019 and ended at 6:30 AM on October 3, 2019. A short-term (i.e., 15 minute) measurement was conducted within the school yard along the approximate location of the south facade of the proposed building to quantify the noise level at this location. The 15-minute short-term measurement was correlated with the 72 hour long-term exterior measurement to calculate the hourly average ($L_{eq(1hour)}$) at the south facade and was used to calculate the noise level at Project setbacks. Reported noise levels are presented below:

- LT-1, along Vaughn Street—67 dBA
- LT-2, along Herrick Avenue—67 dBA
- LT-3, along Eustace Street—68 dBA
- ST-1, south of existing administrative building—63 dBA

[79] CSDA Design Group. *Vaughn Next Century Learning Center Mainland DCAP Environmental Noise Study*. October 23, 2019.

According to the study, the noise environment is dominated by vehicular traffic on Vaughn Street as well as Herrick Avenue. Additionally, constant traffic noise can be heard from California State Route 118 to the south of the Mainland Campus. Minor noise sources include residential activity, periodic aircraft flyovers, birds, and outdoor student activity.

CSDA performed further acoustical analysis on the measured data by calculating the distance from the sound meter to the building facades. The calculated noise levels at the proposed building facades with the included sound reduction from the distance loss are presented below. The sound levels represent the expected noise exposure based on the measured data.

- North facade—64 dBA
- East facade—63 dBA
- South facade—63 dBA
- West facade—64 dBA

Based on the calculated sound levels to each facade, the exterior noise exposure at the new admin/classroom building is below the CALGreen threshold level of $L_{eq(1hour)}$ 65 dBA.

Based on the analysis of the composite exterior facades for the planned interior architectural finishes, the LAUSD and CHPS background interior noise criterion of 45 dBA and the CALGreen criterion of 50 dBA would be satisfied in the classrooms of the proposed Project building.[80] Therefore, the proposed Project would not result in a significant impact to interior classroom noise quality. The impact would be less than significant and no further analysis is required.

b) Generation of excessive ground-borne vibration or ground-borne noise levels?

Less Than Significant Impact (b). The FTA offers Construction Vibration Damage Criteria (Table 5):

Table 5. Construction Vibration Damage Criteria

Building/Structural Category	PPV, in/sec
Ii. Reinforced concrete, steel or timber (no plaster)	0.5
Ii Engineered concrete and masonry (no plaster)	0.3
Iii Non-engineered timber and masonry buildings	0.2
Iv Buildings extremely susceptible to vibration damage	0.12

Source: FTA Transit Noise and Vibration Impact Assessment Manual Table 7-5

[80] Ibid.

Rock blasting and pile diving are not required for this Project. Nearby offsite structures are assumed to be non-engineered timber structures and masonry buildings, engineered concrete and masonry, and reinforced-concrete, steel or timber; therefore, the vibration impact threshold for the offsite structures is 0.2 in/sec PPV at 25 feet to 0.5 PPV at 25 feet from source. The equipment planned for use during construction would emit vibration levels between 0.003 in/sec peak particle velocity (PPV) at 25 feet from the source (a small bulldozer) to 0.21 PPV at 25 feet from the source (a vibratory roller). The closest offsite structures are institutional use (church) buildings across Vaughn Street approximately 65 feet north of the site. Therefore, no piece of equipment at the Project site would exceed the FTA Construction Vibration Damage Criteria.[81]

Additionally, compliance with SC-N-4, SC-N-8, and SC-N-9 during construction would reduce potential impacts from ground-borne vibration or noise levels to less than significant. The impact would be less than significant 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?

Less Than Significant Impact (c). The proposed Project site is located within two miles of a private airstrip or an airport land use plan.

The Whiteman public airport is located at 12653 Osborne Street, approximately 1.2 miles southeast of the Project . However, the Whiteman Airport Master Plan CNEL Noise Contour map shows that the 65 CNEL noise contour generally does not extend outside the airport footprint.[82] Therefore, it would be unlikely that excessive noise emanating from the airport would be experienced at the Project site. Also, given the results of the CSDA noise study cited above, noise from the Whiteman Airport would not result in significant noise impacts to Mainland Campus classroom occupants. The impact would be less than significant and no further analysis is required.

LAUSD Standard Conditions of Approval for Noise are presented below:

LAUSD Standard Conditions of Approval—Noise	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA Leq.
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA Leq with a target of 40 dBA Leq (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or

[81] Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual, p. 186*. September 2018.
[82] County of Los Angeles. *Whiteman Airport Master Plan Final Report*. February 2011.

LAUSD Standard Conditions of Approval—Noise	
	classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA Leq. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA Leq • Modernization of existing facilities and/or HVAC replacement Projects should improve the sound performance of the HVAC system over the existing system. • The 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 Leq inside classrooms should be modified.
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the cons reduce school and other noise sensitive land use disruptions.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible Project specific noise reduction measures are needed. 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: <u>Source Controls</u> • 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.

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

LAUSD Standard Conditions of Approval—Noise	
	construction bid contracts include the following receptor controls: Receptor Controls • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. • Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity

4.14 Pedestrian Safety

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

Would the project:

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

Less Than Significant Impact (a). The Project site is generally bounded by Vaughn Street on the north, De Garma Avenue to the east, Herrick Avenue to the west, and Eustace Street to the south. Also, there is adequate parking for staff, parents, and guests—parking availability for the Mainland Campus includes:

- Staff parking lot—13330 Vaughn Street (corner of Vaughn and Herrick)—45 parking spaces and 8 accessible parking spaces.
- Parent/Guest parking—13400 Vaughn Street (corner of Vaughn and Herrick)—24 parking spaces.
- Additional staff parking—13254, Cornelius Street (corner of De Garmo and Cornelius)—24 parking spaces
- Parent/Guest parking—Zion Baptist Church (corner of Herrick and Del Sur)—50 parking spaces (Vaughn pays rental to Church).

No changes would be made to the existing sidewalks or to driveway locations around the Campus.

The proposed Project would demolish and replace the existing administration building and renovate the play yard area and cafeteria. The Project would not make changes to the adjacent roadways. Although there may be temporary blockage of sidewalks or streets during construction, SC-T-4 would require a worksite traffic control plan to ensure that there is safe movement around the Project site. Construction and staging areas will be entirely fenced off to ensure safety and security of students and staff, in accordance to LAUSD safety standards and LAUSD Inspector approval. Also, application of SC-PED-1 through SC-PED-5 would ensure the Project would have a less than significant impact with respect to vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses. The impact 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 (b). The proposed Project would not affect the existing routes to school for student walking from local neighborhoods. Existing traffic safety for the Mainland Campus for morning arrival and afternoon dismissal includes:

- Two crossing guides at corner of Vaughn Street and Herrick Avenue.
- One crossing guide at corner of Vaughn Street and De Garmo Avenue.
- One crossing guide at corner of Vaughn Street and Glenoaks Boulevard.
- Coned valet drop off in front of 13330 Vaughn Street.
- Coned drop off (with security aid) in front of side gate on De Garmo Avenue.

The proposed Project would not affect the existing routes to school for students walking from local neighborhoods as SC-T-4 would require a worksite traffic control plan to ensure that there is safe movement around the Project site during construction. In addition, the security provided by crossing guides, valets, and the application of SC-PED-1 through SC-PED-5 would ensure the Project would have a less than significant impact to safe school routes for students walking from local neighborhoods. The impact would be less than significant and no further analysis is required.

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

No Impact (c). The proposed Project would not change existing operations at the Campus. The Campus would continue to house existing programs and would continue to serve the local student population. The Campus is located roughly within 0.25 mile of California State Route 118. Student routes to Campus would not change. The Project would not pose a safety hazard related to major arterial roadways or freeways, and no impacts would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

LAUSD Standard Conditions of Approval for Pedestrian Safety are presented below:

LAUSD Standard Conditions of Approval—Pedestrian Safety	
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.
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school Projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed

LAUSD Standard Conditions of Approval—Pedestrian Safety	
	school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. • Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the Project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **School Traffic Safety Reference Guide REF- 4492.1.** This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

4.14 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Would the 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)?

Less Than Significant Impact (a). The Project would provide 259 new permanent seats and 12 staff over 5 years to accommodate resident students who will continue at VNCLC as they move up in grade. Although the Project would increase student enrollment and student capacity, the Project would alleviate overcrowding experienced at the VNCLC school sites. The Project includes no design features, such as development of homes, businesses, or infrastructure, that would induce population growth in the area. Additionally, according to the Program EIR, new classroom seats under the SUP would meet the existing and future school housing needs of the District and would accommodate students that are currently attending District schools. Therefore, impacts to area population growth would be less than significant. The impact would be less than significant and no further analysis is required.

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

No Impact (b). The proposed Project involves new construction, modernization, replacement, upgrade, remodeling, and installation on the existing Campus. All construction would be limited to the existing Campus and would not displace any housing. No impacts to housing would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

4.15 Pubic Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Would the project:

a) 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, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire protection?
- Police protection?
- Schools?
- Parks?
- Other public facilities?

Less Than Significant Impact (a)—Fire Protection. The proposed Project would increase the total building footprint at the Mainland Campus, providing 259 new permanent seats and 12 staff. The Project, by expanding the building footprint, could generate some increase in demands for fire protection; however, prior to Project approval, the Project site plans would be reviewed by the City of Los Angeles Fire Department to ensure safety and access as outlined in SC-PS-1. Also, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2. Furthermore, the Project would be required to comply with fire department and department of building and safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize any threat of a fire. Finally, the proposed Project would comply with standard design requirements in accordance with the California Building Code (CBC), California Fire Code (CFC), and City of Los Angeles Fire Department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures. Therefore, the proposed Project would not generate significantly increased demand for fire protection and emergency services that would 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, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. Implementation of the Project would result in less than significant impacts to fire protection and emergency services. The impact would be less than significant and no further analysis is required.

Less Than Significant Impact (a). Police Protection, Schools, Parks, and Other Public Facilities. As concluded in the Program EIR, demand for police protection, schools, parks, and public facilities is generated more by the number of people in a service area than by numbers of buildings or total building area. The proposed Project would not significantly increase the Mainland Campus enrollment or the number of people in its relevant service area. Therefore, implementation of the Project would not generate increased demands for police services for schools, parks, and other public facilities due to an increase in people on the Mainland Campus. The impact would be less than significant and no further analysis is required.

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

4.16 Recreation Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Would the project:

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

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 (a, b). The proposed Project satisfies existing demand at VNCLC by providing 259 new permanent seats and 12 staff over 5 years to accommodate resident students who will continue at VNCLC as they move up in grade the Project would not generate additional demand for parks and other recreational facilities within the City or the region. Also, no additional recreational facilities are included in the proposed Project. Consequently, no impacts to recreation facilities would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

4.17 Transportation

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

Would the project:

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

No Impact (a). The proposed Project would provide 259 new permanent seats and 12 staff. All VNCLC students live in the immediate neighborhood within the designated school boundary, and most students walk to school. Therefore, the Project would not have a significant impact on 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 pedestrian or vehicle circulation around the Campus. During construction, LAUSD and VNCLC shall require its Construction Contractor 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. Therefore, compliance with SC-T-1 through SC-T-4 would ensure that the proposed Project operation and construction would not conflict with programs, plans, ordinances or policies addressing the transit, roadway, bicycle, and pedestrian facilities; and no impacts to a program, plan, ordinance or policy addressing the circulation system would occur as result of the proposed Project. No impact would occur and no further analysis is required.

b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)—criteria for analyzing traffic impacts?

No Impact (b). Guidelines §15064.3, subdivision (b) describes specific considerations for evaluating a Project's transportation impacts. Generally, vehicle miles traveled (previously referred to as VMT) is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles

traveled" refers to the amount and distance of automobile travel attributable to a Project. Other relevant considerations may include the effects of the Project on transit and non-motorized travel.

The proposed Project would alleviate overcrowding at the VNVLC, and would not significantly increase enrollment or traffic associated with increased enrollment. In addition, all VNCLC students live in the immediate neighborhood within the designated school boundary—most students walk to school. Therefore, impacts to traffic impact evaluation considerations would not occur as a result of the proposed Project. No impact would occur and no further analysis is required.

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

No Impact (c). 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. A 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 proposed Project does not include design features, such as new roads or driveways, that would result in increased hazards due to a geometric design feature. In addition, compliance with SC-T-1 through SC-T-4, as applicable, would ensure that hazards would not increase as a result of Project design features. No impact would occur and no further analysis is required.

d) Result in inadequate emergency access?

No Impact (d). The proposed Project would not result in inadequate emergency access during construction and operation. Site access and circulation would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All Project access features are subject to and must satisfy Los Angeles City Fire Department design requirements. Therefore, compliance with applicable laws and policies would ensure that no impacts would occur to emergency access as a result of the proposed Project. No impact would occur and no further analysis is required.

LAUSD Standard Conditions of Approval—Transportation	
SC-T-1	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **Traffic and Pedestrian Safety Requirements for New Schools** Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks: • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks,

LAUSD Standard Conditions of Approval—Transportation	
	crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the Project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction related trucks to off-peak commute periods.

4.19 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?	☒ Yes	☐ No		
a) Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The analysis in this section is based in part on the *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*, prepared by ECORP Consulting, Inc.[83]

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

i) 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

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

[83] ECORP. *Cultural Resources Literature Review and Records Search for the Vaughn Next Century Project*. December 10, 2019.

Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact (a-i). The proposed Project is not 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). Therefore, a less than significant impact to historical resources as defined in Public Resources Code section 5020.1(k) would occur as a result of the proposed Project.[84] The impact would be less than significant and no further analysis is required.

Less Than Significant Impact With Mitigation Incorporated (a-ii). The provisions of Public Resources Code §21074 were established pursuant to Assembly Bill 52 (AB 52). AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074. AB 52 applies to all development projects that have a notice of preparation (NOP) or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. Accordingly, the Project is subject to the provisions of AB 52. As part of the AB 52 consultation processes, LAUSD has sent notification of the proposed Project to Native American tribes with possible traditional or cultural affiliation to the area.

In accordance with AB 52, a tribe must submit a written request to the relevant lead agency if it wishes to be notified of Projects within its traditionally and culturally affiliated area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a Project application is complete or deciding to undertake a Project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

As part of their cultural resources records search discussed earlier, ECORP contacted the California Native American Heritage Commission (NAHC) on October 22, 2019, to request a search of the Sacred Lands File for the project area (Appendix C).[85] The search was requested to determine whether or not Sacred Lands have been recorded by California Native American tribes within the project area, because the Sacred Lands File is populated by members of the Native American community who have knowledge about the locations of tribal resources.

The results of the Sacred Lands File by the NAHC was received on November 4, 2019 and indicated the presence of Sacred Land within or within the near vicinity of the project area.

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project areas of the District's proposed Projects. Request for consultation

[84] Ibid.

was received from the Gabrieleño Band of Mission Indians - Kizh Nation and the Fernandeño Tataviam Band of Mission Indians.

The Gabrieleño Band of Mission Indians - Kizh Nation contacted LAUSD on September 9, 2019 via email requesting formal consultation regarding the proposed Project. Consultation with the Gabrieleño Band of Mission Indians - Kizh Nation occurred on October 10, 2019. As a result of this consultation, the Gabrieleño Band of Mission Indians - Kizh Nation determined that this Project is outside of their tribal area and suggested referring to the Fernandeño Tataviam Band of Mission Indians for tribal consultation.

The Fernandeño Tataviam Band of Mission Indians contacted LAUSD on September 16, 2019 via email requesting formal consultation regarding the proposed Project. As a result of this consultation, LAUSD has decided to include SC-TCR-1 and SC-TCR-2 and incorporate language from the suggested mitigation measures (MM) from the Fernandeño Tataviam Band of Mission Indians, consistent with LAUSD's SCs, as follows:

- **MM-TCR-1:** In the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted to consult if any such find occurs. The archaeologist shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the applicant, Lead Agency, and FTBMI.
- **MM-TCR-2:** The Lead Agency, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during the Project grading.
- **MM-TCR-3:** If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human remains are determined to be Native American in origin by the County coroner, the applicant shall immediately notify the Lead Agency, the Fernandeño Tataviam Band of Mission Indians, and consulting Tribes.

If Tribal Cultural Resources are found to occur at the Project site, SC-TCR-1, SC-TCR-2, SC-CUL-7 (which will require the construction contractor to complete a worker's environmental sensitivity training) and MM-TCR-1 through MM-TCR-3 would protect potential unanticipated discoveries. With implementation of the SCs and MMs, the impacts of the proposed Project pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1 would be less than significant with mitigation incorporated. The impact would be less than significant with mitigation incorporated and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Tribal Cultural Resources are presented below:

LAUSD Standard Conditions of Approval—Tribal Cultural Resources	
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, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native

LAUSD Standard Conditions of Approval—Tribal Cultural Resources	
	American Monitor shall be approved by the District and must have at least one or more of the following qualifications: • 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. Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the Project (as applicable). Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources. 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.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any Project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the Project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o Location of areas to be monitored o Types of artifacts anticipated o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around

LAUSD Standard Conditions of Approval—Tribal Cultural Resources	
	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.

4.18 Utilities and Services Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded 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?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the 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?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Would the project:

a) Require or result in the relocation or construction of new or expanded 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 (a). The Campus is completely developed, is currently using utilities, and is surrounded by development. The proposed Project would serve existing and future students living in the region and would not increase the student population or utility demands. While on-site utilities would be expanded and altered to accommodate the addition of a substantially larger building on the existing campus, the Project would not require the relocation or construction of new facilities for water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and no impact would occur to existing facilities. No impact would occur and 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?

Less Than Significant Impact (b). The Campus currently serves students living in the region—the proposed Project. Water would be used on site during construction for dust suppression and similar activities. The amount of water that would be used for the Project construction and operation would not result in the need for new or expanded water entitlements. The installation of building, landscape, and irrigation

improvements that would occur as part of the Project would comply with SC-USS-2 and SC-GHG-1, SC-GHG-2, and SC-GHG-3 for water conservation. Therefore, the proposed Project would not result in a significant increase in water demands for landscaping or for potable uses. The impact would be less than significant and and no further analysis is required.

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

No Impact (c). The Mainland 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. No impact to wastewater treatment capacity would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

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

Less Than Significant Impact (d). The proposed Project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. The proposed Project would comply with SC-USS-1, which states that VNCLC must be consistent with current LAUSD requirements for recycling construction and demolition waste. Furthermore, the School Design Guide (as part of SC-USS-1) establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. The Construction & Demolition Waste Management program 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 reuse and to minimize disposal in landfills. Implementation of the proposed Project would comply with all city, county, and state solid waste diversion, reduction, and recycling mandates, including compliance with the City of Los Angeles Annual Report, Countywide Integrated Waste Management Plan (CIWMP), the Los Angeles Municipal Code, and LAUSD BMPs. Therefore, a less than significant impact would occur as a result of the Project. The impact 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 (e). Implementation of the proposed Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste, including the Los Angeles Municipal Code and LAUSD BMPs. For the construction phase, the site would comply with SC-USS-1 standards. For the operation and maintenance phase, the site would comply with SC-USS-3 standards. Consequently, no conflict with federal, state, and local management and reduction statutes and regulations related to solid waste would occur as a result of the construction and operation of the proposed Project. No impact would occur and no further analysis is required.

Applicable LAUSD Standard Conditions of Approval for Utilities and Service Systems are presented below:

LAUSD Standard Conditions of Approval—Utilities and Service Systems	
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide.** Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. **Construction & Demolition Waste Management.** This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG-1	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.

4.19 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result ofrunoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Would the project:

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

No Impact (a). Based on the Los Angeles County General Plan 2035 Disaster Routes Map and the Los Angeles City Safety Element of the General Plan, the Project site is not located along a disaster route.[86],[87] Disaster routes in the Project's vicinity include: Ronald Reagan Freeway 118, approximately 0.17 miles southeast of the Project site; Glen Oaks Boulevard, approximately 0.13 miles northeast of the Project site; and San Fernando Road, approximately 0.55 miles southwest of the Project site.

The Project site is not located in or near State Responsibility Areas (SRAs) or lands classified as Very High Fire Hazard Severity Zones.[88,89] The nearest High Fire Zone is located over one-mile northeast of the Campus on the north side of the Interstate 210 Freeway. In addition, the proposed Project would comply with applicable building and fire code requirements, and, consequently, would not impair adopted

[86] County of Los Angeles. *General Plan 2035, Figure 12.6: Disaster Routes Map*. May 2014.
[87] Los Angeles City General Plan. *Safety Element, Exhibit H.* November 1996.
[88] City of Los Angeles Department of Planning and Zoning. *Zone Information and Map Access System (ZIMAS)*. ZIMAS website: http://zimas.lacity.org/./
[89] Los Angeles Fire Department. http://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, reviewed July 31, 2109.

emergency response plans or emergency evacuation plans. Therefore, implementation of the proposed Project would result in no impact to adopted emergency response or emergency evacuation plans. No impact would occur and no further analysis is required.

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

No Impact (b). Implementation of the proposed Project provides updated classroom, play yard, administrative, and cafeteria space, and would not significantly increase student enrollment or faculty at the Mainland Campus—the Project would not exacerbate or increase wildfire risks to Project occupants. Therefore, the proposed Project would not result in impacts to occupants by exacerbating wildfire risks at the Mainland Campus. No impact would occur and no further analysis is required.

c) Require the installation or maintenance 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 (c). The Mainland Campus is located in a highly developed residential neighborhood in the City of Los Angeles and is not within or near state responsibility areas or lands classified as high fire hazard severity zones. The Campus improvements would not require the installation of new infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impact would occur as a result of the proposed Project. 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 (d). The Mainland Campus is surrounded by development with flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. The Project would not result in runoff, post-fire slope instability, or drainage changes. No impact to people or structures caused by runoff, post-fire slope instability, or drainage changes would occur as a result of the proposed Project. No impact would occur and no further analysis is required.

4.20 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

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

No Impact (a). As outlined in the discussions for biological and cultural resources, the construction and occupancy of the proposed Project would not have the potential to significantly affect fish or wildlife habitat, or eliminate important examples of the major periods of California history or prehistory.

b) Does the Project have impacts that are individually limited, but cumulatively considerable?

Less Than Significant Impact (b). All Project impacts were either “no impact,” “less than significant,” or “less than significant impact with mitigation incorporated.” There would be no significant impacts after mitigation. The proposed Project will not result in significant impacts in any issue area. Therefore, the Project does not present impacts that are cumulatively considerable.

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

No Impact (c). The proposed Project would not result in significant impacts; therefore, the Project does not have environmental effects that will cause substantial adverse effects on human beings.

5. List of Preparers

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

Christy Wong, Assistant CEQA Project Manager—Contract Professional
Eimon Smith, CEQA Project Manager—Contract Professional
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PROJECT APPLICANT
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