

January 2020 | Initial Study/Mitigated Negative Declaration



SHENANDOAH ELEMENTARY SCHOOL

Comprehensive Modernization Project

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACMs	asbestos-containing materials
ADA	Americans with Disabilities Act
APM	Assessor Parcel Number
AQMP	air quality management plan
Bgs	below ground surface
BOE	[LAUSD] Board of Education
BMP	best management practices
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Cy	cubic yards
DMA	drainage management areas
DOE	Department of Energy
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
EEC	Early Education Center
EIR	Environmental Impact Report
ERP	Emergency Response Plan

Abbreviations and Acronyms

FCI	Facilities Condition Index
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
GHG	greenhouse gases
GP	General Plan
HCM	Historic Cultural Monument
HRA	health risk assessment
HRCC	historically recognized environmental condition
IDA	International Dark Sky Association
IES	Illuminating Engineering Society
IP	internet protocol
IPCC	Intergovernmental Panel on Climate Change
kWh	kilowatt hours
LACFD	County of Los Angeles Fire Department
LADBS	Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAPD	City of Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MLO	Model Lighting Ordinance
MND	mitigated negative declaration
MT	metric ton
MTCO _{2e}	metric ton of CO _{2e}
MRZ	mineral recovery zone
MW	megawatts

Abbreviations and Acronyms

MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PDF	project design features
PE	physical education
PEA-E	Preliminary Environmental Assessment - Equivalent
PF	Public Facilities
PM _{2.5}	fine inhalable particulate matter
PM ₁₀	coarse inhalable particulate matter
ppm	parts per million
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
RWQCB	regional water quality control board
SC	Standard Condition [of Approval]
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SoCAB	South Coast Air Basin
SoCal Gas	Southern California Gas Company
SRTS	Safe Routes to School
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TIA	Traffic Impact Assessment
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Shenandoah Elementary School (Shenandoah ES), 2450 Shenandoah Street in the City of Los Angeles. Comprehensive Modernization Projects are designed to address the most critical physical needs of the buildings and grounds at the Shenandoah Campus (Campus) through building replacement, renovation, modernization, and reconfiguration. The proposed Shenandoah ES Comprehensive Modernization Project (proposed Project) has approximately \$68 million in funding designated for the purpose of modernizing Shenandoah ES. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

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

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

On December 13, 2016, the BOE approved the project definition for 11 school sites, including Shenandoah ES, for the development of comprehensive modernization projects that would address the most critical physical conditions and essential safety issues (Board Report No. 205-16/17). These schools were identified based on need and were determined to have a multitude of critical physical conditions that may pose a health and safety

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

² LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.

³ LAUSD. LAUSD Board of Education Report- LAUSD Regular Meeting Stamped Order Of Business. Report. 15/16 ed. Vol. 159. Los Angeles, CA: LAUSD, 2015.

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risk or negatively impact a school's ability to deliver the instructional program and/or operate.⁴ On September 18, 2018, the BOE was informed that Facility Services Division had refined the scope for the 11 school sites, including Shenandoah ES.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.⁷

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,⁸ however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.⁹

1.4 ENVIRONMENTAL PROCESS

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

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

⁴ LAUSD. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.

⁵ California Public Resources Code, §21000 et seq (1970).

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

⁷ California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

⁸ California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

⁹ California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.



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

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

1.4.1 Initial Study

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

1.4.2 Mitigated Negative Declaration

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

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

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.¹⁰ LAUSD’s SUP Program EIR meets the criteria for a Program EIR

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

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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.¹¹ The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as “tiering.” Under CEQA Guidelines Sections 15152(a) and 15385, “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.¹²

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

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

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

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

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

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

¹³ Ibid, at 4-8.

¹⁴ Ibid, at 1-7.



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1.4.4 Project Plan and Building Design

The project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code)¹⁵, LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁶

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

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

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to

¹⁵ California Green Building Standards Code, Title 24, Part 11.

¹⁶ The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

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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 SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

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

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.¹⁷ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

1.5 IMPACT TERMINOLOGY

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

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.

¹⁷ CHPS criteria are summarized. The full requirement can be found at <http://www.chps.net/dev/Drupal/California>.



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

1.6 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

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

Appendices have data supporting the analysis or contents of this CEQA Initial Study.

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Arborist Report
- C. Historic Resource Evaluation Report
- D. Preliminary Soils Report
- E. Fault Study Evaluation
- F. Preliminary Environmental Assessment - Equivalent

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G. Noise Background and Modeling Data

H. Pedestrian and Safety Study



2. Environmental Setting

2.1 PROJECT LOCATION

The approximately 7.6-acre school site is located at 2450 Shenandoah Street (Assessor Parcel Number [APN] 4301-018-900) in the community of South Robertson in the City of Los Angeles in Los Angeles County. The Project site is bound by Cadillac Avenue to the north, South Halm Street to the east, Beverlywood Street to the south, and South Shenandoah Street to the west. The Project site is located approximately 0.2 mile north of Interstate 10. Figure 1, Regional Location, depicts the regional location of the Project site.

2.2 SURROUNDING LAND USES

The Project site is surrounded by residential land uses; Low-Medium Residential to the north and Low/Low I Residential to the east, south, and west. Sensitive receptors are located adjacent to the Project site to the north, east, south, and west. These sensitive receptors are single family homes that border and abut the proposed Project site, as shown in Figure 2, *Sensitive Receptors*. Additionally, commercial uses are located nearby on Robertson Boulevard, two blocks west of the school.

2.3 CAMPUS HISTORY

The earliest documentation of Shenandoah ES was on a Sanborn Fire Company map from 1927. None of the original buildings developed in the 1920s remain today. The oldest existing building on site dates back to the year 1940 and the other two permanent buildings on campus were built in the 1970s. The campus has been extensively redeveloped through the construction and demolition of numerous buildings, and currently contains three permanent and 23 portable buildings and structures. The history of the Campus and its current structures are documented in a Historical Resources Evaluation Report that LAUSD completed for the Campus. Although the campus was initially developed in the 1920s, it no longer retains any buildings from this early period and the oldest extant building dates to 1940. The campus also includes a number of buildings that were developed after World War II, but these buildings were constructed intermittently over a period of 40 years and are not representative of LAUSD design principles of the postwar era.

As part of the Historical Resources Evaluation Report, LAUSD found the campus ineligible for listing in the National Register of Historic Places, California Register of Historic Resources, and for local designation under any applicable criteria.

2.4 EXISTING CONDITIONS

The Project site serves students grades Kindergarten (K) through 5th. The campus served approximately 413 students for the 2017-2018 enrollment year. The Project site is comprised of 26 buildings, including 2 permanent and 21 portable buildings, with a total of 33 classrooms at the Project site (see Table 2-1,

2. Environmental Setting

Characteristics of Existing Buildings and Figure 2, *Existing Site Plan*). The Project site also includes hardscape playground areas, existing utilities, and bus drop off areas on South Shenandoah street, which is in front of the main entrance to the school. There is an Early Education Center (EEC) located on the southwest corner of the campus that will not be part of the Project site.

Table 2-1: Characteristics of Existing Buildings

Building ID	Building Number	Building Name	Year Built	Building Square Footage	Building Type
Buildings to Be Demolished/Removed					
N/A		Lunch Pavilion		2,065	Permanent
N/A		Lunch Shelter		900	Permanent
Portable Buildings to Be Removed					
3	X1486N	Two/Three Unit Portable (AA-1486)	1955	1,812	Portable
4	X1525N	Two/Three Unit Portable (AA-1525)	1956	1,812	Portable
5	X1161M	Two/Three Unit Portable (AA-1161)	1953	1,812	Portable
6	A0830W	Single Unit Portable (A-830)	1986	870	Portable
7	A0831W	Single Unit Portable (A-831)	1986	870	Portable
8	A1676X	Single Unit Portable (A-1676)	1991	960	Portable
9	A1677X	Single Unit Portable (A-1677)	1991	960	Portable
10	A1678X	Single Unit Portable (A-1678)	1991	960	Portable
11	A1679X	Single Unit Portable (A-1679)	1991	960	Portable
12	J0103L	Sanitary Portable (J-103)	1949	912	Portable
13	X0313L	Two/Three Unit Portable (AA-313)	1947	1,812	Portable
14	X0423L	Two/Three Unit Portable (AA-423)	1949	1,812	Portable
15	X0632L	Two/Three Unit Portable (AA-632)	1949	1,812	Portable
16	X0633L	Two/Three Unit Portable (AA-633)	1949	1,812	Portable
17	X0634L	Two/Three Unit Portable (AA-634)	1949	1,812	Portable
18	X0907M	Two/Three Unit Portable (AA-907)	1950	1,812	Portable
19	PREVIOUSLY REMOVED				
20	X3640Y	Double Unit Portable (AA-3640)	1997	1,444	Portable
21	PRVIOUSLY REMOVED				
22	X3642Y	Double Unit Portable (AA-3642)	1998	1,964	Portable
23	X3643Y	Double Unit Portable (AA-3643)	1998	1,964	Portable
24	M0947T	Storage Unit Portable (M-947)	1975	375	Portable
25	X0566L	Two/Three Unit Portable (AA-566)	1949	1,732	Portable



2. Environmental Setting

Building ID	Building Number	Building Name	Year Built	Building Square Footage	Building Type
Buildings to Remain¹					
1	A-38298	Administration Building	1975	21,214	Permanent
2	A-3150	North Classroom Building	1940	12,002	Permanent

NOTE:

1. These buildings would receive interior and exterior paint and finish upgrades, as well as seismic upgrades.

SOURCE:

Historic Resources Evaluation Report (see Appendix C).

Los Angeles Unified School District. July 17, 2018. *Shenandoah Elementary School Space Program (Preliminary)*. Project No. 10368165. Location Code: 6671.

LAUSD 2019.

2.5 GENERAL PLAN AND EXISTING ZONING

The existing zoning at the site is PF-1 (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools. The Project site has a General Plan Land use designation of Public and Semi-Public. Public and semi-public facilities and community-serving uses includes public buildings and campuses, schools, hospitals, cemeteries, and fairgrounds; airports and other major transportation facilities. As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.¹⁸

2.6 NECESSARY APPROVALS

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

Responsible Agencies

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

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles, Public Works Department. Permit for curb, gutter, and connections to offsite improvements (offsite improvements are not anticipated for the Project).

¹⁸ LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

2. Environmental Setting

- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Los Angeles, Department of Transportation. Approval of haul route.

Trustee Agencies

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

State

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

Regional

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

Local

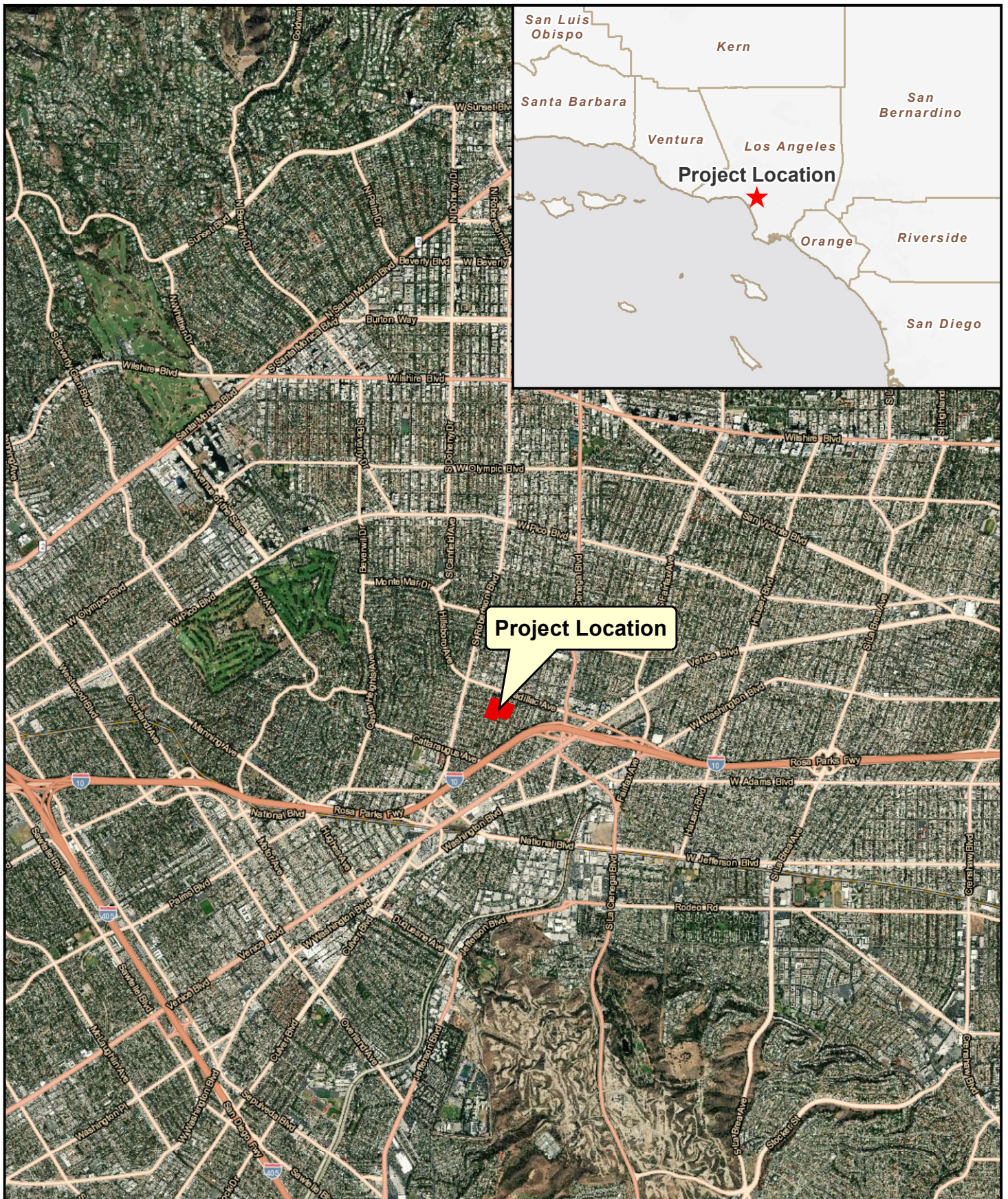
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|---|---|
| ■ City of Los Angeles Department of Planning | ■ City of Los Angeles Department of Recreation and Parks |
| ■ City of Los Angeles Police Department | |
| ■ City of Los Angeles Department of Water and Power | ■ City of Los Angeles Department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

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

One request for consultation on the proposed Project was received from Brandy Salas of the Gabrieleno Band of Mission Indians- Kizh Nation on January 9, 2019. The consultation meeting was held on May 21, 2019.

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





Legend

■ Project Location



0 0.75 1.5
Miles

Figure 1
Shenandoah Elementary School
Regional Location Map

Name: 21119 Fig 1 Regional Location Map.Mxd
Print Date: 3/12/2019, Author: esimmons



2. Environmental Setting

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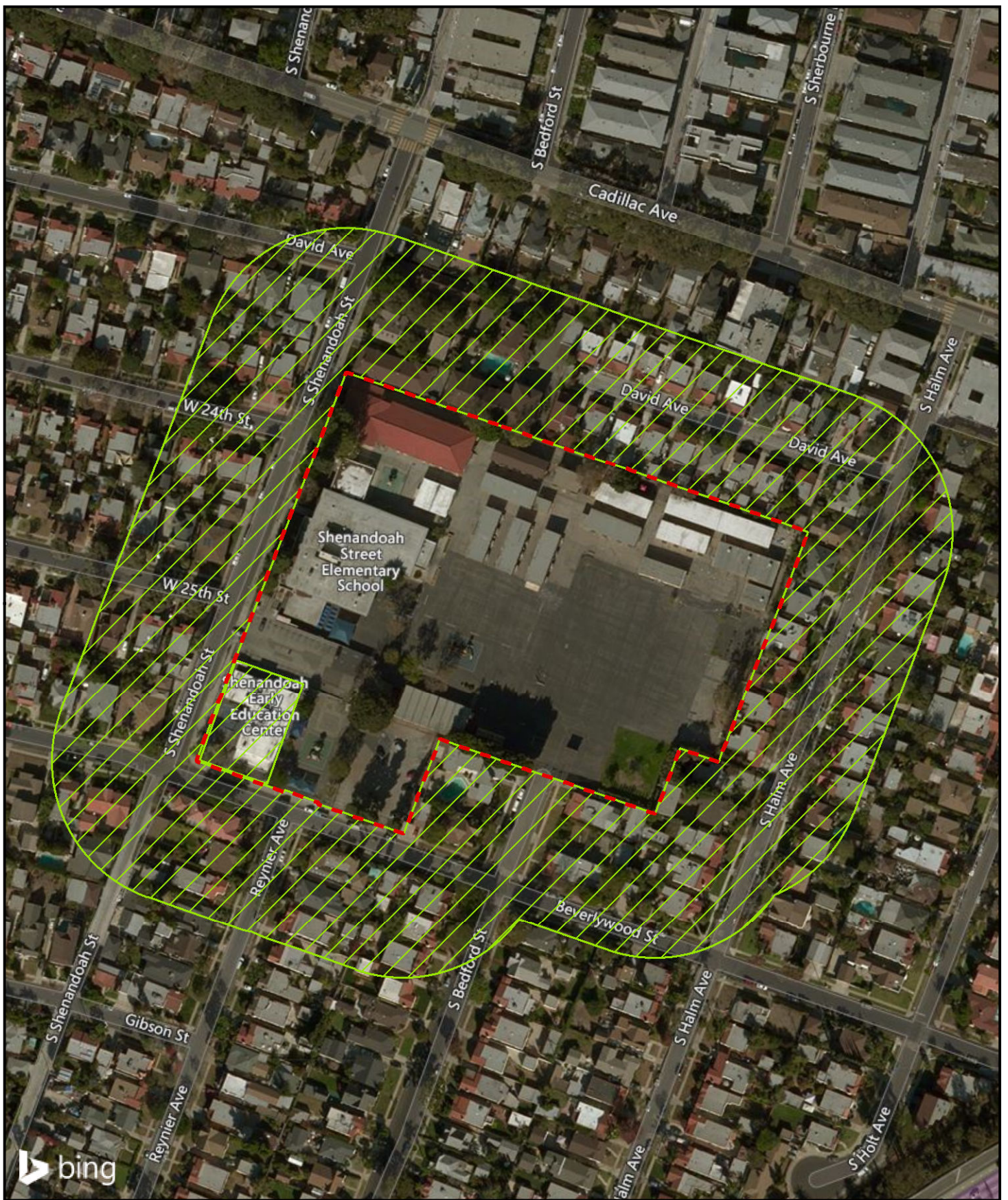


- 3- Two/Three Unit Relocatable
- 4- Two/Three Unit Relocatable
- 5- Two/Three Unit Relocatable
- 6- Single Unit Modular
- 7- Single Unit Modular
- 8- Single Unit Modular
- 9- Single Unit Modular
- 10- Single Unit Modular
- 11- Single Unit Modular
- 12- Sanitary Relocatable
- 13- Two/Three Unit Relocatable
- 14- Two/Three Unit Relocatable
- 15- Two/Three Unit Relocatable
- 16- Two/Three Unit Relocatable
- 17- Two/Three Unit Relocatable
- 18- Two/Three Unit Relocatable
- 19- Double Unit Modular
- 20- Double Unit Modular
- 21- Double Unit Modular
- 22- Double Unit Modular
- 23- Double Unit Modular
- 24- Single Unit Relocatable
- 25- Two/Three Unit Relocatable

2. Environmental Setting

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Legend

- Project Location
- /// Sensitive Receptors

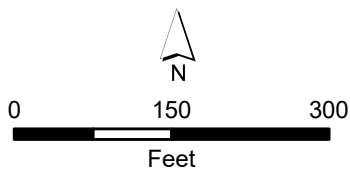


Figure 3
Shenandoah Elementary School
Sensitive Receptors

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

Purpose and Need for the Project. The proposed Project has been developed under the LAUSD's SUP to improve student health, safety and education through the modernization of school facilities. Shenandoah ES was identified as one of 22 schools in the District most in need of an upgrade due to the physical condition of the facilities. Based on an assessment of the following conditions, the 22 proposed school sites were identified as having a multitude of critical physical conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate:¹⁹

- The physical condition of a school's buildings and grounds/outdoor areas identified by the 10-year Facilities Condition Index (FCI), a comparative indicator of the relative condition of a school's facilities in relation to the current replacement value. Where applicable, the FCI score is adjusted to reflect projects under way and the improved conditions that would be provided.
- The seismic risk factor identified using the Federal Emergency Management Agency's (FEMA's) Hazus-MH model for determining the probability of failure based on the predicted earthquake magnitude generated by specific faults, year of construction, type of construction, number of stories, and code and construction quality at the time of construction.
- Size of food service facility, multi-purpose room/auditorium, and library determined by an assessment of the difference between the size of the core facility and the design standard for a new facility.
- Size of play space determined by an assessment of the difference between the size of a school's play area and the size recommended under the Rodriguez Consent Decree.
- Percentage of classrooms in portable buildings calculated based on the number of classrooms in portable buildings versus the number of classrooms in permanent buildings.
- Adequacy of controlled public access point based on an assessment of whether a campus has a secured single point of entry, an intercom/camera system that controls visitor access to the school site, or neither.
- Site density determined by an analysis of the amount of square footage per student at a school site.

Goals. Projects developed under LAUSD's 2015 SUP, which includes Comprehensive Modernization Projects, are intended to provide facilities that improve student health, safety, and educational quality. More specifically, the BOE approved SUP goals and principles are as follows:

¹⁹ LAUSD. December 13, 2016. Board Report No. 205-16/17.

3. Project Description

- Schools Should Be Physically Safe and Secure
- School Building Systems Should Be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

Furthermore, six core objectives/principles have been established for scoping of Comprehensive Modernization Projects undertaken under the SUP:²⁰

1. The buildings identified to be seismically vulnerable must be addressed.

The buildings will be retrofitted, modernized, and/or demolished and replaced depending on the level of effort required to address the seismic vulnerabilities, the historic context of the building/site, and the approach that best ensures compliance with DSA requirements.

2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do, or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate should be addressed.

The broken or failing systems, infrastructure, and/or components in these buildings will be repaired and/or replaced. The comprehensive modernization project will not significantly modernize and update the building as a whole, nor the project demolish and replace with a new building with a few exceptions. The exceptions to this principle are ancillary building such as, but not limited to, lunch shelters, storage units, M&O buildings, and outdated and inaccessible federal buildings.

3. The District school's reliance on relocatable buildings, especially for K–12 instruction, should be significantly reduced.
4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
5. The exterior conditions of the school site will be addressed to improve the visual appearance including landscape, hardscape, and painting.
6. The interior of classrooms and adjacent interior corridors that would otherwise not be addressed will be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatment/blinds and whiteboards.

As these goals and objectives are applied to the Shenandoah ES campus and community, the following Project-specific objectives have been developed:

1. Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.
2. Improve the overall functionality and utility of the campus.
3. Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members, and visitors.

²⁰ Ibid.



3. Project Description

4. Address compliance with Executive Order 12898: address Environmental Justice in minority populations and low-income populations.
5. Reduce the reliance on portable classrooms.
6. Maximize the use of limited bond funds to provide modern, permanent classroom facilities.
7. Reconstruct and modernize Shenandoah ES to provide an educational facility for students in the 21st century and beyond.
8. Replace buildings and infrastructure that have reached the end of their useful lives.
9. Reduce amount of stormwater runoff drainage and improve quality of runoff by increasing pervious surfaces on campus.
10. Improve campus access and circulation especially for emergency vehicles and personnel.
11. Provide upgrades throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the MCD, consistent with the District *Self-Evaluation and Transition Plan Under the Americans with Disabilities Act*.²¹
12. Decrease campus energy use by upgrading or replacing facilities and incorporating standards developed by the CHPS.

²¹ LAUSD, with the guidance of Irene Bowen, ADA One, LLG and Evan Terry Associates, LLC. October 10, 2017. Self-Evaluation and Transition Plan Under the Americans with Disabilities Act. Available at: <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/821/AAA%20Self-Evaluation%20and%20Transition%20Plan%20Under%20the%20ADA%20APPROVED%20101017.pdf>

3. Project Description

3.2 PROPOSED PROJECT

The proposed Project consists of the construction of new school facilities, improvements to existing school facilities, and the demolition of certain aging and deteriorated facilities. The Project scope also includes the placement of interim facilities, as necessary and subject to all relevant codes and regulations including CEQA, to replace facilities and associated functions lost during construction. The Campus improvements are summarized in Table 3-1, *Proposed Project (Demolition, Remodel, and Construction)*, and shown in Figure 4, *Proposed Project Site Plan*. The Project would include removal of 33 classrooms currently in portable buildings. In their place, a new two-story classroom building (Classroom Building 300) approximately 32,290 square feet in size with 19 general and kindergarten classrooms with instructional support spaces would be constructed. At completion, the proposed Project would provide the capacity for 400 students in 27 classrooms, which is a reduction of 18 classrooms from the current count of 45 classrooms. The Project would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-related events, or community use would occur as a result of the Project.

3.2.1 Campus Buildings

Specifically, the proposed Project would include the changes to the Campus Buildings shown in Table 3-1 and Figure 3.

Table 3-1: Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
1	Administration Building	--	21,214	--	--
2	North Classroom Building	--	12,002	--	--
3	Two/Three Unit Portable (AA-1486)	1,769	--	--	--
4	Two/Three Unit Portable (AA-1525)	1,870	--	--	--
5	Two/Three Unit Portable (AA-1161)	1,822	--	--	--
6	Single Unit Portable (A-830)	870	--	--	--
7	Single Unit Portable (A-831)	870	--	--	--
8	Single Unit Portable (A-1676)	941	--	--	--
9	Single Unit Portable (A-1677)	960	--	--	--
10	Single Unit Portable (A-1678)	956	--	--	--
11	Single Unit Portable (A-1679)	944	--	--	--
12	Sanitary Portable (J-103)	912	--	--	--
13	Two/Three Unit Portable (AA-313)	1,842	--	--	--
14	Two/Three Unit Portable (AA-423)	1,867	--	--	--
15	Two/Three Unit Portable (AA-632)	1,862	--	--	--
16	Two/Three Unit Portable (AA-633)	1,855	--	--	--
17	Two/Three Unit Portable (AA-634)	1,856	--	--	--



3. Project Description

Table 3-1: Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
18	Two/Three Unit Portable (AA-907)	1,822	--	--	--
20	Double Unit Portable (AA-3640)	1,444	--	--	--
22	Double Unit Portable (AA-3642)	1,964	--	--	--
23	Double Unit Portable (AA-3643)	1,972	--	--	--
24	Storage Unit Portable (M-947)	375	--	--	--
25	Two/Three Unit Portable (AA-566)	1,946	--	--	--
	Lunch Pavilion/ Shade Structure #5	2,965 SF	--	--	--
	Classroom Building 300		--	26,870 SF	--
	Campus Total* (does not include outdoor space)	33,684 SF	33,216 SF	26,870 SF	
<p>Note: All numbers are in square feet. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. Portables #19 and #21 were previously removed from the Project site.</p> <p>* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Shenandoah ES Comprehensive Modernization Project – Space Program. <i>August 14, 2018</i>.</p> <p>Current total square footage = Existing + Remodel + Demolition (66,900). After project square footage = Existing + Remodel + New (60,086). Decrease in campus square footage = 6,814 sq ft</p>					

Modernization and Renovation

The two existing permanent buildings at the northwest end of campus, Main Administration Building (Building 1) and North Classroom Building (Building 2), would receive significant upgrades. Upgrades for the Main Administration Building would include reconfiguration of the classroom and library area, Americans with Disabilities Act (ADA) upgrades, systems upgrades, Internet Protocol (IP) Convergence, and various exterior/interior finish upgrades.

The North Classroom Building was found to meet the criteria for listing on the Assembly Bill (AB) 300 (Corbett) Seismic Safety Inventory of California Public Schools, Department of General Services Building List. The AB 300 list identifies those school buildings that are of concrete tilt-up construction and those with non-wood frame walls that do not meet the minimum requirements of the 1976 Uniform Building Code (UBC). The Campus is located near the intersection of the Inglewood Fault and the West Pico Fault, which straddle the campus on the west and east, respectively. In addition to site-specific geotechnical recommendations, the North Classroom Building would be upgraded to comply with the seismic safety requirements of the Division of State Architect (DSA) and California Building Code (CBC). Compliance with DSA and CBC requirements would ensure that potential hazards from strong seismic ground shaking are addressed. Other upgrades to the building include renovation of the textbook storage room into a general classroom, ADA upgrades, system upgrades, IP Convergence, and various exterior/interior finish upgrades.

3. Project Description

The lunch shelter and lunch pavilion located to the south of Main Administration Building would be demolished, and a new lunch shelter area would be constructed. To the east of Classroom Building 300, a new Kindergarten Play Area will be constructed. In addition, the existing parking area in the southwest end of campus will be reconfigured, and will be constructed with 77 parking spaces along with an 8-foot high wall on the south property line.

The hardcourt play areas will be reconfigured to create Physical Education (P.E.) stations, a turf play area, and other site amenities per the current LAUSD design standards. These P.E. stations and outdoor amenities will include a turf playground area, a Kindergarten composite play structure, an Elementary composite play structure, basketball courts, volleyball courts, horizontal bars, miscellaneous striped games, tetherball courts, softball fields, handball fields, a painted perimeter walking track, and an outdoor classroom/garden.

Other Campus-wide upgrades include the following:

- Major site-wide infrastructure, including domestic water; irrigation; HVAC; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Programmatic access requirements to meet and address ADA
- Landscape and hardscape improvements (new parking and new playgrounds)
- Improvements to various safety conditions including site lighting, fencing/gates, and/or closed-circuit television (CCTV) systems as needed.
- Application of fresh exterior paint to provide a uniform appearance and enhanced curb appeal.

Preliminary Environmental Assessment Equivalent (PEA-E)

A Preliminary Environmental Assessment Equivalent (PEA-E) was conducted at the site in 2019 by Montrose Environmental (Appendix F, *Preliminary Environmental Assessment Equivalent*). The PEA-E is an in-depth site investigation to determine whether the environmental concerns and recognized environmental conditions (RECs) identified in the Phase I ESA have impacted soil, soil gas, and groundwater. The PEA-E includes a thorough field sampling and analysis program to identify hazardous substances that impacted the site, and assesses their potential human health and ecological risks. The PEA-E detected arsenic and lead in shallow soils below asphalt pavement at concentrations above environmental screening levels. Currently the asphalt pavement prevents any direct exposure to the arsenic and lead impacted soil. The estimated volume of soil impacted with arsenic and lead is approximately 5,000 cubic yards. The recommendation of the PEA-E is the completion of a Removal Action Workplan (RAW) to address the cleanup of the arsenic and impacted soil. The RAW will provide accurate impacted soil volumes, environmental cleanup goals, proposed remedial method (excavation and disposal), regulatory requirements, remediation costs and schedule, health and safety procedures, environmental monitoring, confirmation sampling, and site clearance. All cleanup activities under the RAW would adhere to applicable state and local policies and regulations regarding excavation, removal, and disposal of affected materials.



3. Project Description

3.2.2 Site Access, Circulation, and Parking

Site access, circulation, and school drop-off areas will remain the same as the current condition; however, the existing parking lot will be demolished and reconfigured. The major street used for drop-off is South Shenandoah Street, which is where the main entrance to the school is located. The primary area for drop-off is for cars traveling north along South Shenandoah Street to drop off on the east side of the street near the main entrance. An additional street that is used for drop-off is Beverlywood Street, for cars traveling west. Entrances to the existing parking lot are available from both South Shenandoah Street and Beverlywood Street. The width of the path-of-travel from the existing parking lot is not to code; therefore, the parking lot will be reconfigured. The reconfigured parking lot will be expanded and reconfigured to a “T”-shape (see Figure 4 Site Plan). Since the site is mostly a pedestrian campus, the Project will develop waiting areas on Shenandoah Street with landscaping and seating to facilitate student pickup.

3.2.3 Landscaping

New landscaping areas for the Project will be designed to be compatible with the Campus and incorporate, to the extent possible, native plants and vegetation that are appropriate for the campus and the Southern California setting. All plants and vegetation proposed for the campus will be selected from the District’s approved plant list or will be approved by the District prior to being placed on the Campus.

Up to 3 existing trees would be removed and replaced consistent with the LAUSD Tree Trimming and Removal Procedure (Figure 5, *Proposed Landscape Site Plan*).²² The existing trees deemed appropriate to save shall be protected in place throughout construction, with attempts made to preserve as many existing trees as possible. New canopy and accent trees would be installed to increase canopy coverage and provide shade and interest throughout the campus. Proposed trees would be climatically appropriate and located to enhance new buildings and site features. Planting areas would be amended accordingly per agronomist soils report in order to improve the soil quality, and water holding capacity. The planting areas would be covered with bark mulch to a 3-inch minimum depth.

3.2.4 Construction Phasing and Equipment

Construction is planned to start in third quarter of 2021 and be completed by third quarter of 2024 (36 months). While the phasing of the work has not yet been determined, the analysis assumes that there will be two 18-month phases. Due to active school operation during the construction phase, less than 50 percent of the school site (contiguous) would be disturbed at any one time. An average of 50 workers would be onsite when students are present and a maximum of 150 workers would be onsite during peak periods (i.e., during summer break).

To the extent feasible, construction related activities would be scheduled to occur during daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours, and during noise sensitive times as coordinated with the school administration. Consistent with the City of Los Angeles Municipal Code, all non-emergency construction activities would occur between 7:00 a.m. and 9:00

²² City of Los Angeles. 1982. Ordinance No. 177404. Available at:
https://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf

3. Project Description

p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. Construction would be prohibited on Sundays.

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

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Site preparation and construction of the proposed Project would be in accordance with all federal, state, and local regulations including the California Green Building Code and work hours established in the City of Los Angeles Municipal Code (LAMC). Each phase of construction would require 75 to 100 construction workers, in one shift per day. Construction workers would park on nearby city streets.

This analysis assumes that 10 to 15 delivery and construction trucks (15–20 tons each) would be required on an as-needed basis for earthwork to import and export soils and remove debris. Approximately 15,000 to 18,000 cubic yards of import/export would be hauled. Equipment utilized during construction activities would include earthwork equipment (excavators, backhoes, loaders, compactors, etc.), concrete trucks, mobile all-terrain cranes, and forklifts.

Table 3-2, *Anticipated Construction Equipment*, summarizes the proposed construction activities and schedule anticipated to be used for implementation of the Project.

Table 3-2: Anticipated Construction Equipment

Phase 1 & 2	Schedule	Equipment	Number
Demolition/Interior Housing/Modernization (i.e., Building Interiors)	3 months	Excavators w/breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips; average 10 CY end-dump trucks	10
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers/Air Compressor	2
Site Prep/Modernization	3 months	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1



3. Project Description

Table 3-2: Anticipated Construction Equipment

Phase 1 & 2	Schedule	Equipment	Number
		Water Truck	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95% soil compaction)	2
		Trencher / Excavator	1
Building Construction/ Modernization	12 months	Concrete Trucks	5
		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Fork Lifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Water Truck	1
Asphalt Paving and Off-Site Street Work	3 months	Skip Loaders	2
		Roller	1
		Paver	1
		Asphalt Trucks	8
		Water Truck	1

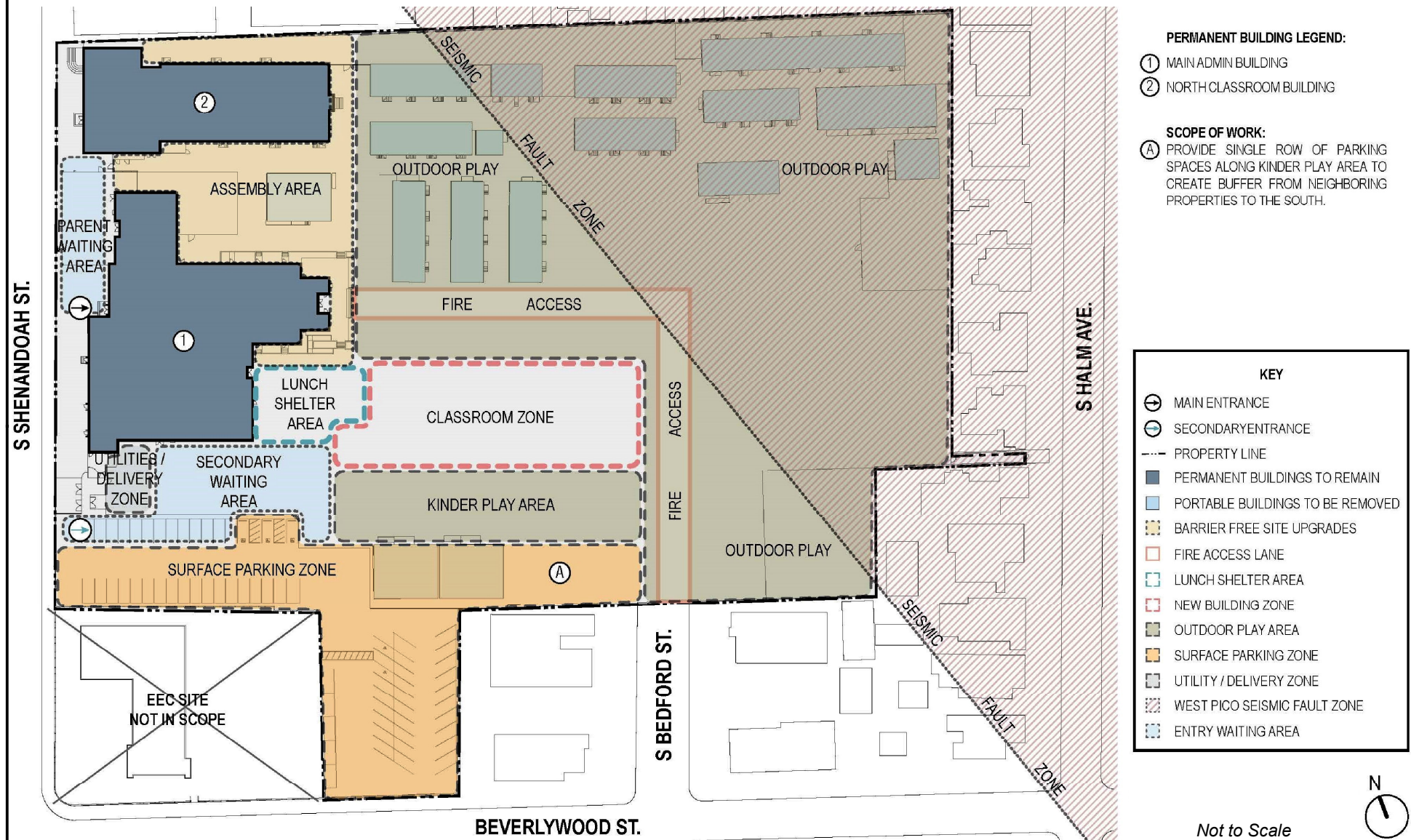


Figure 4
Shenandoah Elementary School
Proposed Project Site Plan

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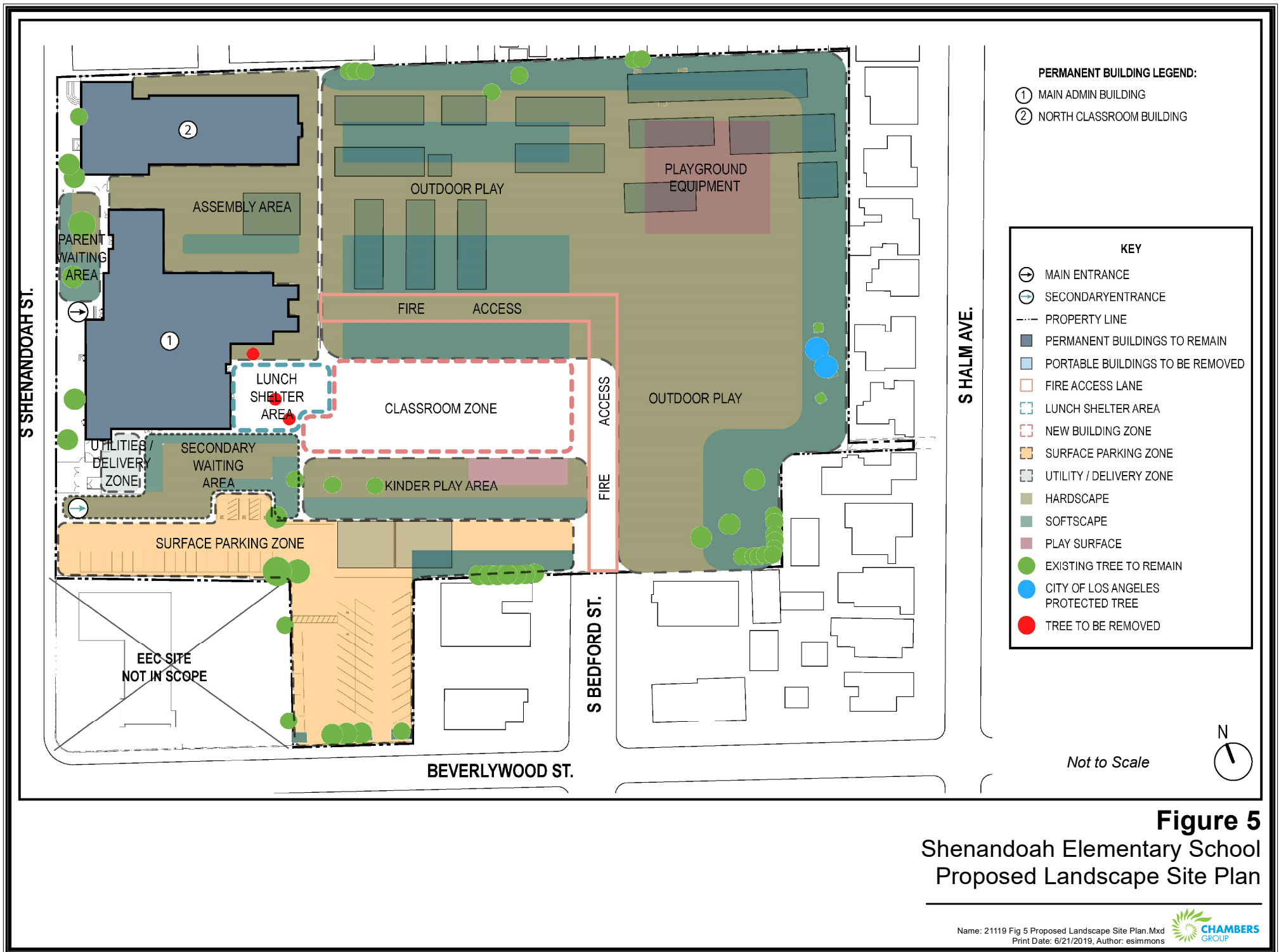


Figure 5
Shenandoah Elementary School
Proposed Landscape Site Plan

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Legend

- Inbound Circulation
- - - Outbound Circulation

Figure 6
Shenandoah Elementary School
Circulation Patterns

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4. Environmental Checklist and Analysis

4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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



4. Environmental Checklist and Analysis

Signature

Carlos A. Torres

Printed Name

Date

CEQA Officer for LAUSD

Title



4. Environmental Checklist and Analysis

EVALUATION OF ENVIRONMENTAL IMPACTS:

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



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ENVIRONMENTAL IMPACTS

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

Explanation:

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

LAUSD Standard Conditions of Approval	
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 a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to 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



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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.

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance.²³ Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.²⁴ The Project site and surrounding area are flat and developed with urban land uses. Views from the campus are limited to the surrounding residences and I-10. Additionally, Project development would not obscure these views. The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas.²⁵ No impact to scenic vistas would occur.

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

No Impact. The nearest designated state scenic highway to the site is State Route 1 (SR-1; Pacific Coast Highway) about 5.9 miles to the west.²⁶ The proposed structures associated with the Project would not be visible from any designated state scenic highway. Project development would not result in impacts to scenic resources within a designated state scenic highway. No impact to scenic resources would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly

²³ *LA CEQA Thresholds Guide, Chapter A.* Report. 2006. [http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf](http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf).

²⁴ *LA CEQA Thresholds Guide, Chapter A.* Report. 2006. [http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf](http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf).

²⁵ *LA CEQA Thresholds Guide, Chapter A.* Report. 2006. [http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf](http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf).

²⁶ California Scenic Highway Mapping System. September 7, 2011. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

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accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The campus is surrounded by residential land uses; Low-Medium Residential to the north and Low/Low I Residential to the east, south, and west. Sensitive receptors are located adjacent to the Project site to the north, east, south, and west; views from the campus are limited to the surrounding residences and I-10. The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide and SC-AE-3 into site-specific project design for the protection of character and quality of site surroundings.^{27,28}

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the project vicinity are limited to the residential uses adjacent to the southern, eastern, western and northern site boundaries. Impacts from shadows would be different from existing conditions due to the new classroom building being two stories in height; however, due to its location on the Project site, it would not be expected to cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. There would be no new shade impacts to sensitive uses on the northern side of the site, across from the existing main entrance. No significant impacts from shadows would occur as a result of the Project.

With implementation of SC-AE-3, impacts to the visual character or quality of the site and its surroundings would be less than significant. No mitigation measures or further evaluation are required.

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

Less than Significant Impact. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

The Project site is in an urban setting and is fully developed. The current uses generate nighttime light from security and parking lot lights and exterior building lights. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and exterior building security lights.

Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. Adherence to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses; therefore, implementation of the project improvements would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the Project area.

²⁷ School Upgrade Program EIR. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ccqa>.

²⁸ School Upgrade Program EIR. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ccqa>.



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Additionally, the exterior of the new building would be constructed of non-reflective building materials so vehicle headlights would not reflect glare for drivers.

With respect to all SUP projects, the Program EIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and SCs AE-5 and AE-6 to ensure that site lighting would have minimal off-site impacts.^{29,30}

The Project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the Project would have no impact on nighttime views. With implementation of the required measures from the LAUSD School Design Guide and SCs AE-5 and AE-6, light and glare impacts would be less than significant. No mitigation measures or further evaluation are required.

²⁹ *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ccqa>.

³⁰ *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ccqa>.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no agriculture and forestry resources LAUSD SCs that apply to this 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?**

No Impact. The Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the Project site; therefore, no Project-related farmland conversion would occur. The campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.³¹ No impact would occur.

³¹ California Department of Conservation. Farmland Mapping and Monitoring Program. Los Angeles County Important Farmland 2016.



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

No Impact. The Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is PF-1 (Public Facilities).³² The site is not zoned for agricultural use, and Project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”³³ Timberland is defined as “land....which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”³⁴ The Project site is zoned for commercial and residential uses and is not zoned for forest land or timberland use. No impact would occur.

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

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

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

No Impact. There is no mapped important farmland or forest land on or near the Project site, and Project development would not indirectly cause conversion of such land to non-agricultural or non-forest use. No impact would occur.

³² City of Los Angeles. Zoning Map. <http://zimas.lacity.org/>

³³ California PRC Section 12220(g).

³⁴ California PRC Section 4526.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?		<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

An Air Quality and Greenhouse Gas Memo Report was prepared for the Project and is included as Appendix A. LAUSD has SCs for minimizing impacts to air quality. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: <ul style="list-style-type: none"> • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • 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



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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 emissions reduction protocols include, but are not limited to, the following:

Exhaust Emissions

- 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) emissions 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.

Fugitive Dust

- Apply non-toxic soil stabilizers to manufacturer's specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Replace ground cover in disturbed areas as quickly as possible.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for a 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 manufacturer's specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
- Limit traffic speeds on unpaved roads to 15 mph or less.
- Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

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	<ul style="list-style-type: none"> • 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.
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The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.³⁵

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

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

Less than Significant Impact. CEQA requires a discussion of any inconsistencies between a proposed Project and applicable general plans (GP) and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the SCAQMD AQMP. Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed Project would interfere with the region's ability to comply with federal and state air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed Project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

³⁵ Area Designations Maps / State and National. August 22, 2014. Accessed October 01, 2018.
<http://www.arb.ca.gov/design/adm/adm.htm>.



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- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

1.6.1.1 CRITERION 1 - INCREASE IN THE FREQUENCY OR SEVERITY OF VIOLATIONS?

Based on the air quality modeling analysis contained in this Air Analysis, it was determined that short-term construction impacts and long-term operations impacts would not result in significant impacts based on the SCAQMD regional, local, and toxic air contaminant thresholds of significance.

Therefore, the proposed Project is not expected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

1.6.1.2 CRITERION 2 - EXCEED ASSUMPTIONS IN THE AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to insure that the analyses conducted for the proposed Project are based on the same forecasts as the AQMP. The Regional Comprehensive Plan and Guide consist of three sections: Core Chapters, Ancillary Chapters, and Bridge Chapters. The Growth Management, Regional Mobility, Air Quality, Water Quality, and Hazardous Waste Management chapters constitute the Core Chapters of the document. These chapters currently respond directly to federal and state requirements placed on the Southern California Association of Governments (SCAG). Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the City of Los Angeles General Plan define the assumptions that are represented in the AQMP.

The proposed Project consists of removal or demolition of the 33 portables and approximately 265,000 square feet of pavement area, site preparation activities that would require up to 18,000 cubic yards of dirt to be either imported or exported from the Project site, building construction of Classroom Building 300 and the proposed lunch shelter, and finally onsite paving and offsite street work. The Project site is designated as Public Facilities (PF) in the General Plan and is zoned Public Facilities 1 (PF-1). The proposed Project is consistent with the current land use designations and would not require a General Plan Amendment or zone change. In addition, development of the proposed Project would not result in an increase in employee or student capacity at the School. Project construction would be required to comply with SCAQMD Rules and Regulations, including Rules 402 and 403 that controls the emissions of air contaminants, odors and fugitive dust. Therefore, based on the above, the proposed Project is not anticipated to exceed the AQMP assumptions for the proposed Project site and is found to be consistent with the AQMP for the second criterion.

Based on the discussion above, the proposed Project will not result in an inconsistency with the SCAQMD AQMP. Accordingly, the proposed Project would not 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?**

Less than Significant Impact. The proposed Project area is designated as a federal and/or state nonattainment area for ozone, PM10 and PM2.5. To estimate if the proposed Project may adversely affect the

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air quality in the region, the SCAQMD has prepared CEQA Air Quality Handbook (SCAQMD 1993) to provide guidance to those who analyze the air quality impacts of proposed projects. The SCAQMD CEQA Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table 4-1.

Table 4-1– SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance

	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

Source: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

Project-related construction and operational air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided Final Localized Significance Threshold Methodology (LST Methodology), July 2008, which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO₂, CO, PM10, and PM2.5.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The proposed Project would disturb approximately 6.3 acres, however less than 50 percent of the school site would be disturbed at any one time. Since the Look-Up Tables provide (1-acre, 2-acre, and 5-acre project sizes), the 5-acre project site was utilized, since it is the closest size available to the proposed area to be disturbed. As detailed above, the Project site is located in Air Monitoring Area 2, which covers northwest coastal Los Angeles County. The nearest sensitive receptors to the project site are single-family homes located adjacent to the south and east sides of the project site and multi-family homes located adjacent to the north side of the project site. According to the LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25 meter thresholds, which have been utilized to calculate the local thresholds. Table 4-2 below shows the NOx, CO, PM10, and PM2.5 for both construction and operational activities.

Table 4-2 – SCAQMD Local Air Quality Thresholds of Significance

Activity	Allowable Emissions ¹ (pounds/day)			
	NOx	CO	PM10	PM2.5
Construction	221	1,861	13	6
Operation	221	1,861	3	2

Notes:

¹ The nearest sensitive receptors are homes located adjacent to the project site. According to SCAQMD Methodology, all receptors closer than 25 meters are based on the 25 meter threshold.

Source: Calculated from SCAQMD's Mass Rate Look-up Tables for five acres in Air Monitoring Area 2, Northwest Coastal Los Angeles County.



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1.6.1.3 CONSTRUCTION EMISSIONS

Construction of the proposed Project would create air emissions primarily from equipment exhaust and fugitive dust. The air emissions from the Proposed Project were analyzed through use of the CalEEMod model (the CalEEMod Printouts are attached to this Letter). Construction activities for the proposed Project are anticipated to start in the third quarter of 2021 and would be completed in 36 months. The first phase of construction is anticipated to occur over three months and would consist of either removal or demolition of 33 classrooms currently in portables and demolition of approximately 265,000 square feet of pavement. The second phase of construction is anticipated to occur over three months and would consist of site preparation that would require up to 5,000 cubic yards of contaminated soil to be exported and up to 18,000 cubic yards of non-contaminated soil to be either imported or exported from the Project site, which may result in up to 23,000 cubic yards of soil to be exported from the Project site.. Building construction activities would occur after the completion of the site preparation phase and is anticipated to occur over 12 months and would consist of construction of Classroom Building 300 that is approximately 32,290 square feet in size as well as the proposed lunch shelter that is approximately 4,000 square feet. Since architectural coatings would be applied throughout the duration of the building construction phase, an architectural coating phase was also analyzed that would occur concurrently with the building construction phase. The final phase would consist of the onsite asphalt paving and off-site street work, which is anticipated to occur over three months. The construction equipment utilized in the CalEEMod model for each phase of construction activities was obtained from Table 3-2 provided in the Project Description for the proposed Project.

Construction-Related Regional Impacts

The CalEEMod model has been utilized to calculate the construction-related regional emissions from the proposed Project. The worst-case summer or winter daily construction-related criteria pollutant emissions from the proposed Project for each phase of construction activities are shown below in Table 4-3 and in Appendix A.

Table 4-3 – Construction-Related Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day) ¹					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Demolition						
Onsite	1.74	14.59	15.45	0.03	1.89	0.89
Offsite	0.19	3.86	1.51	0.01	0.43	0.12
Total of Onsite and Offsite	1.93	18.45	16.96	0.04	2.32	1.01
Site Preparation						
Onsite	1.40	13.56	13.55	0.02	8.92	5.15
Offsite	0.46	11.93	3.73	0.04	1.06	0.31
Total of Onsite and Offsite	1.86	25.49	17.28	0.06	9.98	5.46
Combined Building Construction/Architectural Coatings						
Onsite	3.21	17.93	18.38	0.03	0.93	0.87
Offsite	0.58	3.53	4.82	0.02	1.43	0.39
Total of Onsite and Offsite	3.79	21.46	23.20	0.05	2.36	1.26
Onsite Asphalt Paving and Off-Site Street Work						
Onsite	0.81	6.56	9.20	0.01	0.33	0.30

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Activity	Pollutant Emissions (pounds/day) ¹					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Offsite	0.08	1.29	0.74	0.01	0.23	0.07
Total of Onsite and Offsite	0.89	7.85	9.94	0.02	0.56	0.37
Maximum Daily Emissions	3.79	25.49	23.20	0.06	9.98	5.46
SCQAMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

¹ Based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

² Onsite emissions from equipment not operated on public roads.

³ Offsite emissions from vehicles operating on public roads.

Source: CalEEMod Version 2016.3.2.

Table 4-3 shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during any of the construction phases for the proposed Project. Therefore, a less than significant regional air quality impact would occur from construction of the proposed Project.

Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from construction were analyzed through utilizing the methodology described in *Localized Significance Threshold Methodology* (LST Methodology), prepared by SCAQMD, revised October 2009. The LST Methodology found the primary criteria pollutant emissions of concern are NOx, CO, PM10, and PM2.5. In order to determine if any of these pollutants require a detailed analysis of the local air quality impacts, each phase of construction was screened using the SCAQMD's Mass Rate LST Look-up Tables. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily onsite emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. Table 4-4 shows the onsite emissions from the CalEEMod model for the different construction phases and the calculated emissions thresholds that have been detailed above.

Table 4-4 – Construction-Related Local Criteria Pollutant Emissions

Construction Phase	Onsite Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Demolition	14.59	15.45	1.89	0.89
Site Preparation	13.56	13.55	8.92	5.15
Combined Building Construction/Architectural Coatings	17.93	18.38	0.93	0.87
Onsite Asphalt Paving and Off-Site Street Work	6.56	9.20	0.33	0.30
Maximum Onsite Daily Emissions	17.93	18.38	8.92	5.15
SCAQMD Thresholds²	221	1,861	13	6
Exceeds Threshold?	No	No	No	No

Notes:

¹ Based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

² The nearest sensitive receptors are homes located adjacent to the project site. According to SCAQMD Methodology, all receptors closer than 25 meters are based on the 25 meter threshold.



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Construction Phase	Onsite Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5

Source: Calculated from SCAQMD's Mass Rate Look-up Tables for five acres in Air Monitoring Area 2, Northwest Coastal Los Angeles County.

The data provided in Table 4-4 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds during any of the construction phases for the proposed Project. Therefore a less than significant local air quality impact would occur from construction of the proposed Project.

1.6.1.4 OPERATIONAL EMISSIONS

The proposed Project consists of removal or demolition of the 33 portables and approximately 265,000 square feet of pavement area, site preparation activities that would require up to 18,000 cubic yards of dirt to be either imported or exported from the project site, building construction of Classroom Building 300 and the proposed lunch shelter, and finally onsite paving and offsite street work. Development of the proposed Project would not result in an increase in employee or student capacity at the School or would create any additional vehicle trips. Operational emissions associated with the proposed Project would likely be slightly less than the emissions currently occurring within the existing school due to a decrease in energy usage associated with the new building that will be designed and built to meet the most current Title 24 building energy standards that would result in a much more energy efficient structure than the existing portables that would be removed as part of the proposed project. Therefore, operation of the proposed Project would result in a slight decrease in air emissions within the Air Basin. As such, operation of the proposed Project would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Operational impacts would be less than significant.

Accordingly, the proposed Project would not result in a cumulative considerable net increase of any criteria pollutant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The nearest sensitive receptors to the Project site are single-family homes located adjacent to the south and east sides of the Project site and multi-family homes located adjacent to the north side of the Project site. In addition, onsite students, teachers and other school staff would also be in close proximity to construction activities associated with the proposed Project. As discussed above, the local concentrations of criteria pollutant emissions have been calculated for construction activities and the operational activities were found to create less emissions than what are created from existing conditions. The analysis above found that less than significant criteria pollutant concentrations would occur during construction and operation of the proposed Project.

In addition, to the criteria pollutant emissions impacts analyzed above, construction activities have the potential to expose nearby sensitive receptors to toxic air contaminants (TACs), which would be created from the operation of diesel-powered equipment in the form of diesel particulate matter (DPM). According to SCAQMD methodology, health effects from TACs are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction

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equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment and by January 2023 no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed Project.

Therefore, implementation of the proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

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

Less than Significant Impact.

Construction Phase

Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project site. Development of the proposed Project would utilize typical construction techniques, and the odors will be typical of most construction sites. Additionally, the odors would be temporary, and construction activity will be required to comply with SC-AQ-2 through SC-AQ-4 (listed above), and SCAQMD Rules 402 and 1113³⁶.

A less than significant impact related to odor nuisance would occur during construction associated with the proposed Project.

Operational Phase

Land uses primarily associated with odorous emissions include waste transfer and recycling stations, wastewater treatment plants, landfills, composting operations, petroleum operations, food and byproduct processes, factories, and agricultural activities, such as livestock operations. The proposed Project does not include any of these types of land uses. In addition, the proposed Project would not be sited near any of these recognized sources of odors. Therefore, operation of the proposed Project would have no impact with respect to odors. As a result, no impact would occur.

³⁶ SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The purpose of SCAQMD Rule 1113 is to limit the VOC content of architectural coatings used in the SCAQMD.



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

Explanation:

An Arborist Report was prepared for the Project and is included as Appendix B. LAUSD has SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-BIO-3	<p>LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of nesting season to avoid take of birds, bats, or their eggs.</p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat

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that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.

- If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project Activities shall be delayed until there is a final determination.
- If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.
- If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.
- A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

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

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

Bat Surveys

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



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

No Impact. The Project site is fully developed, with most of the site consisting of buildings, asphalt, and concrete. Vegetation onsite is limited to a few ornamental trees and shrubs. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site. No impact would occur.

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

No Impact. No locally designated natural communities or riparian habitats exist on or adjacent to the site. The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan and is neither within nor proximate to any significant ecological area, land trust, or conservation plan.³⁷ No sensitive natural community impact would occur.

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

No Impact. The site is fully developed and there are no protected wetlands within or adjacent to the Project site.³⁸ The Project would not impact any protected wetland areas. No impact would occur.

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

Less Than Significant Impact. The Project site is surrounded by fencing and is developed with buildings, asphalt, concrete surfaces, and decomposed granite play field. The site does not have any native habitat and is not available for overland animal movement as a wildlife corridor. However, scattered trees on and near the site may provide nesting sites for resident or migratory birds. Project construction near trees and structures may result in disturbances to birds during nesting season. Migratory nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibits the take of all birds and their active nests, including raptors and other migratory nongame birds.

Project construction would comply with the California Fish and Game Code and would implement SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting birds. With implementation of these laws, regulations, and the standard condition, impacts to nesting birds would be less than significant.

³⁷ City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

³⁸ US Fish and Wildlife Service (USFWS). 2019, National Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>

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

Less Than Significant Impact. The Arborist Report prepared for the Project (Appendix B) provides an inventory of trees on the campus as well as an indication of which trees are protected. The Project site has trees of various species, sizes, and maturity. In total, there are 39 trees within the existing campus and areas immediately adjacent to the campus. Implementation of the Project would require removal of three trees; however, these trees are not protected under any tree protection ordinance³⁹. The remaining 36 trees will remain in place. The Project includes a landscape plan that identifies areas to be vegetated. Vegetation would be planted at the appropriate size at maturity for the space, and selected from LAUSD's Approved Plant List.⁴⁰ Landscaping would consist of drought-tolerant plants and a water-efficient irrigation system.

LAUSD Tree Trimming and Removal Procedure requires completion of a Tree Inventory Report by a qualified arborist that documents trees to be protected (tree species are the same as those found in both County and City of Los Angeles Protected Tree Code).⁴¹ The procedures also outline requirements for tree trimming or removal during avian breeding and nesting season. The Project would comply with local policies and/or ordinances protecting biological resources, such as a tree preservation policy or ordinance. This impact would be less than significant.

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

No Impact. The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.⁴² No impact would occur.

³⁹ Arborist Report for Shenandoah Elementary School Comprehensive Modernization Project. Appendix B

⁴⁰ LAUSD Approved Plant List. http://www.laschools.org/documents/file?file_id=310944045.

⁴¹ LAUSD Tree Trimming and Removal Procedure.

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

⁴² California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.



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

Explanation:

A Historical Resources Evaluation Report was prepared for the Project and is included as Appendix C and a Preliminary Soils Report was prepared for the Project and is included as Appendix D. LAUSD has SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval

SC-CUL-6	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	<p>The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39). The archaeologist must have knowledge of both prehistoric and historical archaeology. The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> Extent and duration of the monitoring based on the grading plans At what soil depths monitoring of earthmoving activities shall be required Location of areas to be monitored Types of artifacts anticipated Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration

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

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

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

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

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

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



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

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

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

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

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

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

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

The Shenandoah Elementary School Campus was initially developed in the 1920s; however, as described in the Historical Resources Evaluation Report it no longer retains any buildings from this early period and the oldest extant building dates to 1940. This building does not exhibit any of the character-defining features identified in Los Angeles Unified School District Historic Context Statement, 1870 to 1969 for schools constructed between 1933 and 1945, such as unified site design, indoor-outdoor integration, plentiful windows of varying sizes and configurations, or a stylistically modern design.⁴³ The campus also includes a number of buildings that were developed after World War II, but these buildings were constructed intermittently over a period of 40 years and are not representative of LAUSD design principles of the postwar era. The campus does not appear eligible

⁴³ Sapphos Environmental, Inc. Los Angeles Unified School District Historic Context Statement, 1870 to 1969 (Los Angeles Unified School District Office of Environmental Health and Safety, March 2014).

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for federal, state, or local designation under any applicable criteria and is not considered a historical resource for the purposes of CEQA. This impact is less than significant.

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

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

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

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

The southern California region is rich with prehistoric and historic archaeological resources, and resources have been identified within the Beverly Hills Quadrangle – in which the Project site is located—in the archaeological records search conducted for the City of Los Angeles Citywide General Plan Framework EIR.⁴⁴

As documented in the Preliminary Soils Report, the Project site is underlain by fill soils placed during previous site grading operations and natural alluvial soils that reach a maximum depth of 51.5 feet below ground surface (bgs). The fill encountered consists primarily of silty sand, sand, silty clay, and clay. The alluvial soil deposits below the fill primarily consist of silty sand, sand, sandy/clayey silt, sandy/silty clay, and clay.

Soil onsite was previously heavily disturbed by construction of existing and previous development. As part of the Project, SC-CUL-7 through SC-CUL10 require that if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

⁴⁴ Fowler Museum of Cultural History, UCLA Institute of Archaeology. 1993, August 17. Archaeological Records Search for the City of Los Angeles.
http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_AppC.pdf.



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

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

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

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

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

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

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-4	<p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel-driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). Consolidate truck deliveries and limit the number of haul trips per day. Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. Employ high pressure fuel injection systems or engine timing retardation. Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. Use electrical power rather than internal combustion engine power generators. Use electric or alternatively fueled equipment, as feasible. Use construction equipment with the minimum practical engine size. Use low-emission on-road construction fleet vehicles. Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).



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	<ul style="list-style-type: none"> • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume 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. <p><u>General Construction</u></p> <ul style="list-style-type: none"> • 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.
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide.</p> <p>Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management.</p> <p>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</p>

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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.

Existing Conditions

Electricity Supply

The Los Angeles Department of Water and Power (LADWP) provides electricity service to the Project site. The LADWP is the nation's largest municipal electric utility and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The Power System supplies more than a 26 million megawatt-hours (MWh) of electricity a year for the City of Los Angeles' 1.5 million residential and business customers.⁴³ Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within the LADWP Metropolitan Planning District.

In total, LADWP operates 21 receiving stations, 160 distribution stations, and 10 switching stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 34% from natural gas, 29% from renewable able energy, 19% from coal, 9% from nuclear, 3% from large hydroelectric, and 6% from unspecified purchased power. Typical residential energy use per customer is about 500 kilowatt-hours (kWh) per month. Business and industry consume about 70% of the electricity in Los Angeles, but residents constitute the largest number of customers⁴⁵. Projected future demand growth for LADWP is less than 1 percent per year.

LADWP has a maximum plant capacity of 7200 megawatts (MW). Historically, Los Angeles peak demand was 6,502 MW reached on August 31, 2017.

Power lines are located across the streets surrounding the Project site, including S. Shenandoah Street and Beverlywood Street. The proposed Project would receive power by connecting to the existing easements and power lines surrounding the site.

Natural Gas

Natural gas is provided and distributed to residents and businesses in the City of Los Angeles by the Southern California Gas Company (SoCalGas). According to the 2018 California Gas Report, SoCalGas is expected to provide an average of 2,519,000 thousand British Thermal Unit (kBtu) per day by 2022⁴⁶. In addition, due to modest economic growth, energy efficiency standards and programs, renewable electricity goals and the decline in commercial and industrial demand, starting in 2018 and continuing through 2035, natural gas demands are projected to decline at an annual rate of 0.74 percent throughout the SoCalGas service area.

⁴⁵ LADWP. Power Strategic Long-Term Resource Plan. Report. 2017.

⁴⁶ California Gas Report. 2018 California Gas Report. Report. 2018.

https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf



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SoCalGas purchases gas supplies on a daily, monthly, and longer-term basis from producers and marketers in California, Canada, the Rockies, and elsewhere in the U.S. Southwest. In 2012, natural gas was used in California to produce electricity (45 percent), in residential uses (21 percent), in industrial uses (25 percent), and in commercial uses (9%). The total natural gas demand in California in 2012 was 2,313 billion cubic feet per year⁴⁷.

Petroleum Based Fuel

According to the California Energy Commission, transportation accounts for nearly 37 percent of California's total energy consumption. In 2018, it is estimated that 15.59 billion gallons of gasoline (non-diesel)⁴⁸ and 3.07 billion gallons of diesel fuel⁴⁹ were sold statewide. The estimated 2018 gasoline sales for Los Angeles County were approximately 3.64 billion gallons, and 253 million gallons of diesel fuel⁵⁰.

The existing Shenandoah ES Campus generates transportation energy demand from vehicles traveling to and from the Site. Transportation fuels, primarily gasoline and diesel, would be provided by local, or regional, suppliers and vendors. According to the California Air Resources Board on-road vehicle emissions factor (EMFAC2014) model, the average fuel economy for the fleet-wide mix of vehicles operating in the South Coast Air Basin region is approximately 20.17 miles per gallon for gasoline-fueled vehicles and approximately 7.81 miles per gallon for diesel-fueled vehicles. Gasoline-fueled vehicles account for approximately 96 percent of the total vehicles and diesel-fueled vehicles account for approximately 3.6 percent of the total vehicles. Electric vehicles account for approximately 0.3 percent of the total vehicles.

The vehicles miles traveled (VMT) for the school was not estimated as part of the air quality and greenhouse gas (GHG) assessment conducted for the Project because the existing vehicle miles traveled would not change with the upgrade and modernization of the Campus.

Explanation:

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

Less than Significant Impact. Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use. Due to the large number of materials and manufacturers involved in the production of construction materials

⁴⁷ California Energy Commission. Supply and Demand of Natural Gas in California. Website 2019. https://ww2.energy.ca.gov/almanac/naturalgas_data/overview.html

⁴⁸ California Department of Tax and Fee Administration (CDTFA). Net Taxable Gasoline Gallons. Web. 2019. <https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm>.

⁴⁹ CDTFA. Taxable Diesel Gallons 10 Year Report. Web. 2018. <https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm>.

⁵⁰ California Energy Commission. California Annual Retail Fuel Outlet Report Results (CEC-A15) Spreadsheets. Web. 2019.

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(including manufacturers in other states and countries), upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. Furthermore, neither the City nor the District has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The proposed Project would result in less than significant impacts during construction regarding wasteful, inefficient or unnecessary consumption of energy resources. Construction of the proposed Project would consume energy from off-road construction vehicles and equipment, as well as on-road vehicles used for construction worker travel to and from the site and delivery and haul trips. Energy consumed during construction would also be required to produce and convey the water needed for dust control. The construction equipment and haul trucks that are needed for construction are described in the project description. During construction, electricity for water supply and petroleum fuels used for on- and off-site construction equipment would be consumed. All construction vehicles and equipment would be in compliance with fuel efficiency standards, equipment tier standards and SC-AQ-2, SC-AQ-4, SC-GHG-1, SC-GHG-2, SC-GHG-3, SC-GHG-4, SC-GHG-5, and SC-USS-1, thus ensuring the impacts on energy use and GHG emissions and would be less than significant. In addition, construction activities would be temporary. Therefore, there would be no long-term energy impacts associated with the construction of the proposed Project.

The operations of the proposed Project would result in no impacts during operations regarding wasteful, inefficient or unnecessary consumption of energy resources because it would involve the replacement of 21 less energy-efficient buildings (constructed between the 1940's and 1970's) with a new building that would comply with the more energy-efficient provisions of the current California Building Standards Code (Title 24, California Code of Regulations [CCR]), SC-GHG-5, CHPS criteria, and applicable California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) mandatory measures⁵¹. With the installation of low water use fixtures compliant with the 2016 California Plumbing Code, an energy-efficient LED lighting fixture and daylighting lighting system with daylight and occupancy sensors consistent with 2019 LAUSD School Design Guidelines⁵², and implementation of SC-GHG-5 for energy efficiency, the new buildings would be more energy-efficient than the existing condition, consistent with the City of LA IRP goals and LAUSD design goals for energy efficiency. Energy used during the operation of the proposed Project would be consumed by the street lights, pedestrian lighting, and the supply of water for interior water use and landscaping, as well as for the existing and buildings on campus. The new building would be provided with a super-efficient 480-120/208V, 3P 4W copper winding transformer, 115 degree rise 2016 Department of Energy (DOE) compliant for power applications. The two existing buildings that would remain (constructed between 1940s and 1970s) would be re-fed from a new main distribution switchboard with new underground feeders sized appropriately for demand load. The new building would be installed with a main distribution switchboard sized for the electrical load and future expansion. Therefore, the proposed Project would conform with CHPS criteria for

⁵¹ California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: <https://codes.iccsafe.org/content/document/658>

⁵² LAUSD, Facilities Services Division. May 21, 2019. 2019 School Design Guide. Available at: https://www.laschools.org/documents/file?file_id=321392934



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energy performance, energy management system, advanced energy management and submetering, and natural ventilation and energy conservation standards.

The proposed Project would be more energy-efficient than the existing conditions and provide opportunities for future energy efficiencies. As the proposed Project would not increase the capacity of the school, no new vehicles trips would be generated during operations, and there would be no increase in major new emission sources during operations.

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

No Impact. The proposed Project would result in no impact in relation to conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency, as it has been designed in conformance with applicable State and District Standards.

The proposed Project would replace existing buildings on an elementary school campus with a new, more energy-efficient modernized buildings. The proposed Project would involve the replacement of 21 less energy-efficient buildings (constructed between the 1940s and 1970s) with a new building that would comply with the more energy-efficient provisions of the current California Building Standards Code (Title 24, California Code of Regulations [CCR]), SC-GHG-5, CHPS criteria, and applicable California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) mandatory measures⁵³. Implementation of SC-GHG-5 would be required.

The proposed Project would comply with Sections 110.10(b) through 110.10(d) of the California Energy Code, which requires buildings to be solar ready (CCR, Title 24, Part 6).⁵⁴ The proposed Project design would be consistent with California Energy Code goals by providing energy-efficient buildings (meeting new code requirements by replacing older buildings), carbon and climate leadership (reduced GHG emissions – see Greenhouse Gas Emissions section of this document), and mobility and transit (Project site is located less than one-half mile from a LA Metro Expo Line station)⁵⁶. Therefore, the proposed Project would result in no impacts regarding conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency. No mitigation or further study is required.

⁵³ California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: <https://codes.iccsafe.org/content/document/658>

⁵⁴ Los Angeles Housing+Community Investment Department. n.d. Building Codes and Standards. Available at: <https://hcidla.lacity.org/Property-Standards> Accessed August 5, 2019.

⁵⁵ Los Angeles Municipal Code, Chapter IX, Building Regulations. Article 9, Green Building Code.

⁵⁶ City of Los Angeles April 2015. Sustainable City pLAN. Available at: <https://www.dropbox.com/s/e768n31r3k379w7/theplan.pdf?dl=0>

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

Explanation:

A Preliminary Soils Report was prepared for the Project and is included as Appendix D and a Fault Study Evaluation was prepared for the Project and is included as Appendix E.

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

LAUSD Standard Conditions of Approval	
SC- GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC- HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to



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

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

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. There are several known faults in the Los Angeles region. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Project site is located on and within an Alquist-Priolo Earthquake Fault Zone Boundary designated for the nearby West Pico Fault⁵⁷. The building footprint of the new Building 300 was moved outside of the Fault Zone Boundary in order to minimize impacts; however, additional measures are being incorporated into the building design to minimize and mitigate hazards associated with nearby faulting. These measures include strengthened foundations and floor slabs, seismic engineering design, flexible utility connections, automatic gas shut-off, and other appropriate design measures. With incorporation of these design measures, impacts would be less than significant.

- ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project would not increase exposure of people or structures to earthquake impacts, as renovation and new building construction would occur within an existing utilized

⁵⁷ Converse Consultants. Cone Penetration Test Fault Study Evaluation – Shenandoah Elementary School. April 2019.

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campus. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region; and the Project site is located on and within an Alquist-Priolo Earthquake Fault Zone Boundary designated for the nearby West Pico Fault⁵⁸. The next nearest mapped faults to the Project site are the Newport-Inglewood Fault, approximately 0.7 mile to the west, and the Hollywood Fault, approximately 3.3 miles to the northwest.⁵⁹ Moderate to strong ground shaking can be anticipated. Because of the proximity to known faults and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults. The building footprint of the new Building 300 was moved outside of the Fault Zone Boundary in order to minimize impacts; however, additional measures are being incorporated into the building design to minimize and mitigate hazards associated with nearby faulting.

The new building would be designed in compliance with the California Building Code guidelines for evaluating and mitigating seismic hazards in California. The proposed Project also requires approval from the California Department of General Services, Division of the State Architect (DSA). The DSA provides design and construction oversight for schools and develops and maintains accessibility standards and codes. The District, with oversight from DSA, would comply with these requirements in the design and construction of school buildings. Due to compliance with the California Building Code, and required approval from the DSA, the Project would result in less than significant impacts associated with seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

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

The potential for liquefaction decreases with increasing clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where the groundwater level and loose sands occur within 50 feet of the ground surface. As detailed in the Preliminary Soils Report⁶⁰ for the Project, the liquefaction analyses prepared for the Project site indicated the soils are not susceptible to liquefaction and seismically-induced settlement is considered to be negligible. Ground failure and/or liquefaction impacts would be less than significant.

iv. Landslides?

Less Than Significant Impact. Landslide is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend

⁵⁸ Converse Consultants. Cone Penetration Test Fault Study Evaluation – Shenandoah Elementary School. April 2019.

⁵⁹ Converse Consultants. Preliminary Soils Report - Shenandoah Elementary School. 2017

⁶⁰ Ibid.



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on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

The Project site is gently sloping to relatively flat. In the absence of significant ground slopes, the potential for seismically induced landslides to affect the Project site is considered to be very low.⁶¹ Landslide impacts are less than significant.

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

Less Than Significant Impact.

Construction Phase

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the Project site; therefore, redevelopment of the site would not result in the loss of topsoil.

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

Operational Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate SC-HWQ-1, which would be consistent with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works in February 2014.⁶²

⁶¹ Converse Consultants. Preliminary Soils Report - Shenandoah Elementary School. 2017

⁶² Adopted by the City of Los Angeles, Board of Public Works on May 9, 2016. http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

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The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁶³ Operational phase soil erosion impacts would be less than significant.

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

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

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The Preliminary Soils Report assessed the potential for liquefaction on site and determined it to be low.⁶⁴ Therefore, the Project would not expose people or the new school building to adverse effects associated with lateral spreading. Impacts would be less than significant.

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. Although groundwater was discovered during soil borings at a depth of 44 bgs,⁶⁵ the Project would not increase withdraw of groundwater. Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant.

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

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. Based on field exploration, soil classification, and density results, onsite soils are considered to have “very low” expansion potential.⁶⁶ The Project would not expose people or the new school building to significant adverse effects associated with expansive soils. Impacts would be less than significant.

⁶³ US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development.

<https://www.epa.gov/nps/urban-runoff-low-impact-development>.

⁶⁴ Converse Consultants. Preliminary Soils Report - Shenandoah Elementary School. 2017

⁶⁵ Ibid.

⁶⁶ Ibid.



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

No Impact. The existing school does not use septic tanks or other alternative wastewater disposal systems, and implementation of the Project would not require the use of septic tanks or alternative waste water disposal systems. No impact would occur.

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

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

Los Angeles County is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles County has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological sensitivity. Much of Los Angeles has some sensitivity for paleontological resources, depending on soil structure and depth of excavation.⁶⁷

There were four localities identified in the Hollywood Quadrangle, where the Project site is located, in the paleontological records search conducted for the City of Los Angeles Citywide General Plan Framework EIR.⁶⁸ Excavation would be required and would disturb native soils that may yield evidence of paleontological resources; therefore, the Project site is considered sensitive for paleontological resources.

As part of the Project implementation, SC-CUL-11 require that a paleontological monitoring program be prepared and implemented for earthwork activities. A paleontological monitor will be onsite for all ground disturbing activities below 8 feet. As a result, impacts to paleontological resources would be less than significant.

⁶⁷ City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources.
http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf

⁶⁸ Ibid

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

Explanation:

An Air Quality and Greenhouse Gas Analysis Memo Report was prepared for the Project and is included as Appendix A.

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

LAUSD Standard Conditions of Approval	
SC-GHG-1	During school 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.

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

Less than Significant Impact. Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. In September 2016, AB 197 and SB 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15.

CARB is the state agency charged with monitoring and regulating sources of emissions of GHGs in California that contribute to global warming in order to reduce emissions of GHGs. The CARB Governing Board approved the 1990 GHG emissions level of 427 million tons of CO₂ equivalent (MtCO₂e) on December 6,



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2007. Therefore, in 2020, annual emissions in California are required to be at or below 427 MtCO_{2e}. The CARB Board approved the Climate Change Scoping Plan (Scoping Plan) in December 2008, the First Update to the Scoping Plan in May 2014, and California's 2017 Climate Change Scoping Plan in November 2017. The Scoping Plans define a range of programs and activities that will be implemented primarily by state agencies but also include actions by local government agencies. Primary strategies addressed in the Scoping Plans include new industrial and emission control technologies; alternative energy generation technologies; advanced energy conservation in lighting, heating, cooling, and ventilation; reduced-carbon fuels; hybrid and electric vehicles; and other methods of improving vehicle mileage. Local government will have a part in implementing some of these strategies. The Scoping Plans also call for reductions in vehicle-associated GHG emissions through smart growth that will result in reductions in vehicle miles traveled (CARB 2008, 2014, 2017)⁶⁹⁷⁰⁷¹.

The CalEEMod model used above to calculate the criteria pollutant emissions was also utilized to calculate the GHG emissions associated with construction and operation of the proposed project (see attached CalEEMod printouts). The CalEEMod model calculated GHG emissions generated from construction activities for the proposed project that include removal or demolition of the 33 portables and approximately 265,000 square feet of pavement area, site preparation activities that would require up to 5,000 cubic yards of contaminated soil to be exported and up to 18,000 cubic yards of non-contaminated soil to be either imported or exported from the Project site, building construction of Classroom Building 300 and the proposed lunch shelter, and finally onsite paving and offsite street work. Per the analysis methodology presented in the SCAQMD Working Group meetings, the construction emissions were amortized over 30 years. Development of the proposed project would not result in an increase in employee or student capacity at the School or would create any additional vehicle trips. Operational GHG emissions associated with the proposed Project would likely be slightly less than the emissions currently occurring within the existing school due to a decrease in energy usage associated with the new building that will be designed and built to meet the most current Title 24 building energy standards that would result in a much more energy efficient structure than the existing portables that would be removed as part of the proposed project. A summary of the GHG emissions created from construction of the proposed project is shown below in Table 4-5. As detailed above, operation of the proposed project would not create any additional GHG emissions and as such, operational emissions have not been included in Table 4-5.

Table 4-5– Construction Related Greenhouse Gas Emissions

Construction Phase	Greenhouse Gas Emissions (Metric Tons)			
	CO ₂	CH ₄	N ₂ O	CO _{2e}
Demolition	121.11	0.02	0.00	121.56
Site Preparation	184.55	0.03	0.00	185.28
2022 Combined Building Construction/Architectural Coatings	496.81	0.08	0.00	498.94
2023 Combined Building Construction/Architectural Coatings	162.74	0.03	0.00	163.44
Onsite Asphalt Paving and Off-Site Street Work	55.53	0.01	0.00	55.86
Total Construction Emissions	1,020.74	0.17	0.00	1,025.08
Amortized Total Construction Emissions (30 years)¹	34.02	0.01	0.00	34.17
SCAQMD Draft Threshold of Significance				3,000

⁶⁹ Climate Change Scoping Plan. Online URL: https://ww3.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf

⁷⁰ First Update to the Climate Change Scoping Plan. URL: https://ww3.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

⁷¹ The 2017 Climate Change Scoping Plan. Online URL: <https://www.arb.ca.gov/cc/scopingplan/revised2017spu.pdf>

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Notes:

¹ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2016.3.2.

The data provided in Table 4-5 above shows that the proposed Project would create a total of 1,025.08 MTCO₂e or 34.17 MTCO₂e per year, when amortized over a 30 year period. According to the SCAQMD draft threshold of significance detailed above, a cumulative global climate change impact would occur if the GHG emissions created from a proposed project would exceed 3,000 MTCO₂e per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from implementation of the proposed Project. Impacts would be less than significant.

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

Less than Significant Impact. The California State Legislature adopted AB 32 in 2006, that requires the State's GHG emissions by 2020 to meet the GHG emissions level created in 1990 and adopted AB 197 and SB 32 in 2016, that requires the State's GHG emissions to be 40 percent below 1990 levels by 2030.

In order to achieve the target provided in AB 32, the SCAQMD developed a Working Group that developed a tiered approach in order to determine if proposed land use projects would contribute to an exceedance of the GHG emissions targets detailed in AB 32. As shown above, the proposed Project would generate 34.17 MTCO₂e per year from construction of the proposed Project and operation of the proposed Project is not anticipated to generate any GHG emissions, since development of the proposed Project would not result in an increase in employee or student capacity at the School or would create any additional vehicle trips and would also result in a more efficient building than the existing structures. The GHG emissions generated from the proposed Project would be within the "Tier 3" quantitative threshold of 3,000 MTCO₂e per year for all land use projects as recommended by the SCAQMD.

The SCAQMD has not yet updated its "Tier 3" quantitative threshold to address AB 197 and SB 32. However, it is anticipated that the "Tier 3" thresholds would be reduced around 40 percent, which is equivalent to how much more stringent AB 197 and SB 32 are over AB 32. Since the proposed Project's GHG emissions are 99 percent below the "Tier 3" threshold, it is anticipated that the proposed Project's GHG emissions would remain less than significant under any future thresholds developed to address AB 197 and SB 32. Therefore, the proposed Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. A less than significant impact would occur.



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

Explanation:

A Preliminary Environmental Analysis Equivalent (PEA-E) report was prepared for the Project and is included as Appendix F.

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

LAUSD Standard Conditions of Approval

SC- HAZ-4	<p>The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):</p> <ul style="list-style-type: none"> District Specification Section 01 4524, Environmental Import / Export Materials Testing. Removal Action Workplan or Remedial Activities Workplan. California Air Resources Board Rule 1466. Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. <p>Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).</p>
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SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide.</p> <p>Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management.</p> <p>This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>
SC-PS-1	<p>If necessary, LAUSD shall:</p> <ol style="list-style-type: none"> 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 2. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	<p>LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.</p>

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

Less Than Significant Impact. As a school site, the Project would not involve the production or use of a significant amount of hazardous chemicals. During construction, hazardous materials that would be used (e.g., petroleum-based products, paints, solvents, sealers, oils, grease, and cleaning fluids) would be transported, used, stored, and disposed. The use of these materials would be short term in nature and would occur in accordance with standard construction practices.

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

The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, State, and local health and safety requirements. All transport, handling, storage, use, and disposal of substances would comply with all federal, State, and local laws and regulations for the management and use of hazardous material, including but are not limited to: the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), federal Clean Air Act, California Environmental Protection Agency (CalEPA), Caltrans, California Division of Occupational Safety and Health (Cal/OSHA), California Department of Toxic Substances Control



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(DTSC), and the Los Angeles Fire Department.⁷² Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

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

Less Than Significant Impact.

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” A historically recognized environmental condition (HREC) is “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.”

As required by SC-HAZ-4, the RECs were identified in the Phase I ESA and thoroughly investigated in the PEA-E. An approximate volume of 5,000 cubic of shallow soil affected by arsenic and lead was identified during the PEA. A Removal Action Workplan (RAW) would be completed for the arsenic and lead impacted soil at the site. Implementation of the RAW would ensure that the proposed removal action and modernization Project would be closely monitored and would occur in accordance with local, state and federal requirements. Construction contractors would be required to comply with specific procedures regarding worker training, health and safety, hazardous material containment, and offsite transport and disposal of contaminated soil in accordance with LAUSD Section 13614, Abatement of Hazardous Materials.⁷³

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

Asbestos-Containing Material

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁷⁴ Beginning in the early 1970s, a series of bans on the use of certain asbestos-

⁷² The Los Angeles Fire Department is the Certified Unified Program Agency (CUPA) for the City of Los Angeles; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.

⁷³ LAUSD Section 13614: Abatement of Hazardous Materials (July 7, 2003).

⁷⁴ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms.http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

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containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.⁷⁵ Buildings on the site were constructed between the 1940s and 1970s, with additional construction in 1977 and therefore may contain asbestos.

During renovation of permanent buildings, asbestos may be removed, contained, and disposed. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACM. OSHA also regulates asbestos as a potential worker safety hazard. The buildings would be inspected for presence of potential ACMs prior to renovation, and materials that are suspect would be tested. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified personnel using specific handling procedures. In addition, construction contractors are required to comply with asbestos abatement procedures.

Lead-Containing Material

The buildings would be inspected for the presence of lead-based paint prior to demolition. As required by the District, specific procedures for handling building materials that may contain lead include, but are not limited to, lead abatement performed by contractors certified by the California Department of Public Health, review of assessment reports addressing the disturbance of lead-based materials, and transportation of lead-related waste under a Uniform Hazardous Waste Manifest.

Therefore, through compliance with regulatory requirements and implementation of applicable standard conditions, the Project would have a less than significant impact with respect to creating a significant hazard involving the release of hazardous materials into the environment. Impacts 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. The Project site is an existing elementary school campus. There are no other schools located within 0.25-mile of the Project site; however, Alexander Hamilton High School 0.35-mile west of the Project site. Potential construction related impacts to the school are discussed in section b) above.

With regard to school operations, compliance with the previously discussed regulatory requirements is already standard practice at the school, including training school staff to safely contain and clean up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies onsite; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Therefore, impacts from reasonably foreseeable upset and accident conditions would be less than significant.

⁷⁵ US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos.
<https://www.epa.gov/asbestos/us-federal-bans-asbestos>.



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

No Impact. California Government Code Section 65962.5 requires that lists of hazardous materials sites be compiled and available to the public. These lists include:

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

The Project site is not located on a hazardous materials site pursuant to Government Code Section 65962.5.^{76;77} No impact would occur.

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

No Impact. The nearest airport to the school is Santa Monica Municipal Airport in the City of Santa Monica, approximately four miles west of the Project site. The site is not within the airport influence area of the airport.⁷⁸ Project development would not result in a new use that would interfere with air traffic patterns, or increase traffic levels or change traffic patterns. New building would be two stories in height, but of similar height to the existing buildings, and would not create a safety hazard or excessive noise. No impact would occur.

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

No Impact. The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.⁷⁹ The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses.

⁷⁶ Stet Water Resources Control Board. GeoTracker Database. <https://geotracker.waterboards.ca.gov/>

⁷⁷ Department of Toxic Substances Control. EnviroStor Database. <https://www.envirostor.dtsca.gov/public/>

⁷⁸ Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.

⁷⁹ 2012 Los Angeles County Operational Area Emergency Response Plan. <http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

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The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.⁸⁰ Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.⁸¹ Additionally, the Project would comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires preparation of an Emergency Preparedness Plan for the school with emergency preparedness and response procedures. No impact would occur.

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

No Impact. The site is in an urban area, and there is no wildland susceptible to wildfire on or near the site.⁸² The Project would not place people or structures at risk from wildfire. No impact would occur.

⁸⁰ City of Los Angeles Municipal Code Appendix D Section D102.1.

⁸¹ California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

⁸² California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer.
http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps



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

Explanation:

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

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

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water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

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

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

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

The existing Shenandoah Elementary Project site can be divided into 3 drainage management areas (DMA's). The three DMAs are described below:

1. **DMA 1:** approximately 5.17 acres and is the largest DMA on-site. It contains roof runoff from approximately two-thirds of the Main Administration Building and roof runoff from one-half of the North Classroom Building 200. DMA 1 sheet flows towards the Eastern property line where runoff eventually leaves the site by way of cross-lot drainage onto the adjacent residential lots. Based on the Los Angeles Department of Building and Safety (LADBS) information bulletin "Drainage Across Lot/Property Line," Document Number: P/BC 2017-057, remediation of this area is not required as long as the existing condition is not altered.
2. **DMA 2:** approximately 0.73 acre and includes approximately half of the staff parking lot and a portion of the lunch pavilion. Runoff from DMA 2 sheet flows south towards a retaining wall between the Main Administration Building 100 and Early Education Center where runoff is collected and discharged through a pipe that eventually discharges to the curb face on Beverlywood Street. Through conversations with service maintenance personnel and site inspection, this area experiences ponding due to debris and trash collecting at the surface and blocking the outlet pipe. This condition will require correction during the construction phase. The final condition will depend on the final building layout, but will not affect placement of the new building.
3. **DMA 3:** approximately 0.78 acre and contains roof runoff from the western side of the Main Administration Building 100 and the North Classroom Building 200. Runoff from DMA 3 sheet flows towards the curb and gutter on Shenandoah Street.

All stormwater will be directed towards and collected by existing stormwater catch basins.



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Construction Phase

Construction projects of one acre or more are regulated under the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Final Order No. R4-2012-0175 as amended by R4-2012-0175-A01 issued by the Los Angeles Regional Water Quality Control Board.⁸³

Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The Project would disturb more than one acre. Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. With compliance with the Statewide Construction General Permit and implementation of the SWPPP, construction phase soil erosion impacts would be less than significant.

Operation Phase

After completion of the Project, ground surfaces at the Campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off-site. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁸⁴ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4- 2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board.

The LID Standards Manual was developed as part of the municipal stormwater program to address stormwater pollution from new developments and redevelopment projects.⁸⁵ LID stormwater management would be incorporated into the Project design. LID principles are described further in Section VII(b), Geology and Soils, of this Initial Study. LAUSD would comply with existing regulations and SC-HWQ-1. Operational phase soil erosion impacts would be less than significant.

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

No Impact. The Project does not include new groundwater wells that would extract groundwater from an aquifer. Construction and operation of the Project would not lower the groundwater table or deplete

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

⁸⁴ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at
<https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>

⁸⁵ County of Los Angeles DPW. 2014, February, LID Standards Manual.
<https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>

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groundwater supplies. Furthermore, the Project site does not provide intentional groundwater recharge. Therefore, the Project would not interfere with groundwater recharge. Impacts would be less than significant.

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

i) Result in substantial on- or offsite erosion or siltation;

Less Than Significant Impact.

Construction Phase

During construction, erosion and siltation from the disturbed areas may occur. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction sediment may enter storm drains. The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP, described in Section VII(b), Geology and Soils. This requirement is also identified in SC-HWQ2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion and pollution control measures to ensure water quality in stormwater runoff. Impacts would be less than significant.

Operation Phase

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

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

No Impact. The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance the drainage system would



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discharge a net decrease in runoff to municipal storm drains.⁸⁶ Thus, Project development would not result in flooding on- or off-site, and no impacts would occur.

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

Less Than Significant Impact. The drainage pattern of the completed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance⁸⁷ the Campus drainage system would discharge a net decrease in runoff to municipal storm drains. Implementation of SC-HWQ-1 (BMPs specified in the SWPPP) and LID principles and practices described above to retain and treat storm water on site, the Project would not cause substantial water pollution. Runoff water impacts would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The Project site is not within a special flood hazard area or within a 100-year flood zones mapped by the Federal Emergency Management Agency.⁸⁸ The Project buildings would not impede or redirect flood flows. No impact would occur.

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

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

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The campus, which is about 6 miles east from the Pacific Ocean and not within a Tsunami zone. Therefore, because the campus is not at risk of flooding, the Project would not release pollutants during these flooding events. No impact would occur.

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

No Impact. The Project would not Conflict with or obstruct implementation of a water quality control plan. Construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP (as identified in SC-HWQ-2). After completion of the Project, ground surfaces would

⁸⁶ California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.

⁸⁷ California Code of Regulations. Title 23. Waters. Division 2. Department of Water Resources. Chapter 2.7. Model Water Efficient Landscape Ordinance.

⁸⁸ Federal Emergency Management Agency (FEMA). 2017, October. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.28472445322258,33.93018828110084,-118.20164034677735,33.96578848287957>

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be either hardscape or maintained landscaping. The Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁸⁹ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board. The Project would comply with existing regulations and SC-HWQ-1 and SC-HWQ-2. The Project would not obstruct implementation of a water quality control plan. Additionally, the Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan. No impact would occur.

⁸⁹ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Regional Water Quality Control Board; the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by County of Los Angeles Department of Public Works (DPW) in February 2014 available at <https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>



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

Explanation:

There are no land use and planning LAUSD SCs that apply to this Project.

a) Physically divide an established community?

No Impact. The Project site and surrounding land is fully developed with established land uses. The Project would take place within the campus boundaries and would not divide an established community. No impact would occur.

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

No Impact. The General Plan Land Use designation for the Project site is 'Public Facilities. New construction on the campus would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. The school would continue to operate as it does currently. No impacts would occur.

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

Explanation:

There are no mineral resource LAUSD SCs that apply to this Project.

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

No Impact. The campus is located within a Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is in an area where significant mineral deposits are known to be absent, or where there is considered to be little likelihood for the presence of such deposits.⁹⁰ No active mines are mapped within several miles of the Campus.⁹¹

Neither the campus nor the surrounding community is available for mining. The Project would not cause a loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur.

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

No Impact. The Project area is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field.⁹² Therefore, development of the Project would not cause a loss of availability of a mining site, and no impact would occur.

⁹⁰ California Geological Survey. 2010. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf

⁹¹ Office of Mine Reclamation (OMR). 2017, March 27. Mines Online. <http://maps.conservation.ca.gov/mol/index.html>

⁹² 5 City of Los Angeles. 2001. City of Los Angeles Conservation Element. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.



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

Explanation:

A Noise Memo Report was prepared for the Project and is included as Appendix G. LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA Leq.
SC-N-2	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.
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses, and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other sensitive land use disruptions.
SC-N-8	<p>Projects within 500 feet of a non-LAUSDS sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> Time Constraints – prohibiting work during sensitive nighttime hours. Scheduling – performing noise work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classroom has ended; residential only between 7:00 AM and 7:00 PM).

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	<ul style="list-style-type: none"> • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well-maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually adjustable or ambient sensitive types. <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noise activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialogue 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. This 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	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary. Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • 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. • Scheduling – performing noise 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). <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually adjustable or ambient sensitive types.

The primary sources of noise within the study area consists of vehicle traffic on local roads and Interstate 10 that is located as near as 650 feet to the southeast of the Project site, aircraft overflights, and from onsite



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activities that include children playing outside. In order to quantify the existing noise environment as well as to quantify noise sources that may be altered as part of the proposed Project, five noise measurements were taken in the vicinity of the Project site. All noise measurements were taken for a period of 10 minutes and the results of the noise level measurements are presented in Table 4-6. The noise measurement printouts are provided in Appendix G, which also has a figure that depicts the locations of the noise measurements and a photo index showing the locations of the noise measurements.

Table 4-6 - Existing (Ambient) Noise Level Measurements

Site No.	Description	Primary Noise Source	Start Time of Measurement	Noise Level (dBA Leq/L _{max})
1	Located on the northeast corner of the south parking lot.	AC Units on portables and classroom noise	11:18 a.m.	53.5/63.6
2	Located on the south side of the west parking lot	Parking lot activities and Interstate 10	11:30 a.m.	52.7/59.7
3	Located near the southeast corner of the lunch waiting area shade shelter, approximately 10 feet from kids waiting lines and 50 feet from nearest lunch table	Kids waiting in line and eating lunch	11:47 a.m.	69.4/77.1
4	Located approximately 5 feet north of the kindergarten play area on the northwest side of the campus	Kindergarten kids playing	11:59 a.m.	69.8/82.0
5	Located approximately 5 feet south of the campus and kids playing during lunch in front yard of 2510 Bedford Street	Older kids playing	12:15 p.m.	68.1/87.3

Source: Noise measurements taken with a Larson Davis Model 831 Type 1 precision sound level meter on Wednesday, September 18, 2019.

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

Less than Significant Impact. The proposed Project would not generate 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 other agencies. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed Project and compares the noise levels to the LAUSD and City standards.

Construction-Related Noise

The first phase of construction is anticipated to occur over three months and would consist of either removal or demolition of 33 classrooms currently in portables and demolition of approximately 265,000 square feet of pavement. The second phase of construction is anticipated to occur over three months and would consist of site preparation (grading) the portion of the Project site to be improved. Building construction activities would occur after the completion of the site preparation phase and is anticipated to occur over 12 months and would consist of construction of Classroom Building 300 as well as the proposed lunch shelter. The final phase would consist of the onsite asphalt paving and off-site street work, which is anticipated to occur over three months.

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Noise impacts from construction activities associated with the proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the Project site are single-family homes located adjacent to the south and east sides of the Project site and multi-family homes located adjacent to the north side of the Project site.

Construction activities for the proposed Project would be required to adhere to LAUSD Standard Conditions SC-N-8 that would limit construction noise impacts to the nearby residents and SC-N-9 that would limit construction noise impacts to the nearby classrooms while the classrooms are occupied. In addition, Section 41.40(a) of the City of Los Angeles Municipal Code exempts construction activities from the City's noise standards provided construction activities do not take place between the hours of 9:00 p.m. and 7:00 a.m. However, neither the LAUSD nor the City construction noise standards provide any limits to the noise levels that may be created from construction activities when construction activities are allowed. As such, even with adherence to the LAUSD and City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents.

In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria thresholds have been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 90 dBA Leq hourly at any of the nearby homes .

Construction noise impacts to the nearest homes to each construction phase have been calculated through use of the FHWA's Roadway Construction Noise Model (RCNM) Version 1.1. The construction equipment utilized in the RCNM model for each phase of construction activities was obtained from Table 3-2 provided in the Project Description for the proposed Project. For each phase of construction, the equipment was placed at the distance to nearest home and then each subsequent piece of equipment was placed an additional 50 feet away. The results are shown below in Table 4-7 and the RCNM printouts are provided in Appendix G.

Table 4-7 - Construction Noise Levels at the Nearest Homes

Construction Phase	Distance to Nearest Home (feet)	Noise Level at Nearest Homes (dBA Leq)
Demolition	10	85
Site Preparation	10	86
Building Construction and Painting	65	72
Paving	10	83
FTA Construction Noise Threshold		90
Exceed Threshold?		No

Source: RCNM Version 1.1, Federal Highway Administration, 2018

Table 4-7 shows that the greatest noise impacts would occur during the site preparation phase of construction, with a noise level as high as 86 dBA Leq at the nearest homes. Table 4-7 also shows that none of the construction phases would exceed the FTA construction noise standard of 90 dBA for residential uses. Therefore, through implementation of LAUSD Standard Conditions SC-N-8 that would limit construction noise impacts to the nearby residents and SC-N-9 that would limit construction noise impacts to the nearby



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classrooms while the classrooms are occupied as well as adherence to allowable construction times provided in Section 41.40(a) of the City of Los Angeles Municipal Code, the construction activities for the proposed Project would not create a substantial temporary increase in ambient noise levels that are in excess of applicable noise standards. Impacts would be less than significant.

Operational-Related Noise

The proposed Project would consist of implementation and operation of various modernization features at the campus. Development of the proposed Project would not result in an increase in employee or student capacity at the School. As such, this operational noise analysis has been limited to potential noise impacts to the proposed school buildings and potential noise impacts from reconfiguration of onsite campus activities.

Operational Noise Impacts to Proposed School Buildings

The proposed Project would include construction of a new classroom building (Classroom Building 300) and a new lunch shelter. LAUSD Standard Condition SC-N-1 requires that new campus buildings be designed to include features such as sound walls to attenuate the exterior noise level to 67 dBA Leq or less and Standard Condition SC-N-2 requires that the interior of new campus buildings (unoccupied) be limited to 45 dBA Leq or less.

Since the campus is located in a residential neighborhood and the noise measurements taken on the Project site (see Table 4-6 above) show that the existing noise level is as low as 52.7 dBA on the Project site (when away from children activities), the proposed Project site is in conformance with Standard Condition SC-N-1 that requires the noise level to be 67 dBA Leq or less at the exterior of new campus buildings. It should be noted that standard construction methods provide a minimum of 25 dB of exterior to interior noise reduction or attenuation. This would result in an interior noise level created by the outside environment of 27.7 dBA Leq, and the proposed Classroom Building 300 would be in compliance of Standard Condition SC-N-2 that requires the interior noise level to be 45 dBA Leq or less for new unoccupied buildings. Therefore, no operational noise impacts are anticipated to the proposed school buildings. No impact would occur.

Operational Noise Impacts to Nearby Residents

Potential operational noise impacts to the nearby residents from implementation of the proposed Project may be created from relocation of the lunch shelter, relocation of the kindergarten play area, and reconfiguration and new delivery area and secondary waiting area. LAUSD Standard Condition SC-N-3 requires that new noise generating facilities on LAUSD campuses be designed to either meet the local jurisdictions noise standards or be limited to a 3 dB or less noise increase over ambient (existing) conditions. Since the local jurisdiction (City of Los Angeles) does not provide any noise standards for noise created by children on school property, this analysis has been limited to the LAUSD noise standard of a 3 dB increase over existing conditions.

In order to determine the operational noise impacts that may be created by implementation of the proposed Project, the existing noise measurements shown in Table 4-6 along with the standard noise drop-off rate of 6 dB per doubling distance has been utilized to calculate the noise created from the new lunch shelter, new kindergarten play area, and new delivery and secondary waiting area. Table 4-8 shows the anticipated noise level from each source at the nearest off-site receptors.

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Table 4-8 - Operational Noise Levels at the Nearest Homes

New Noise Source	Distance - Noise Source to Nearest Home (feet)	Existing Noise Level ¹ (dBA Leq)	With Project Noise Level ¹ (dBA Leq)	Project Noise Increase
New Lunch Shelter ²	150	53.5	45.9	-7.6 dB
New Kindergarten Play Area ³	45	53.5	50.7	-2.8 dB
New Delivery and Secondary Waiting Area ⁴	60	49.4	31.1	-18.3 dB
LAUSD Noise Standard				+3 dB
Exceed LAUSD Noise Standard?				No

Notes:

¹ The noise levels were calculated through use of geometric spreading of noise from a point source with a drop-off rate of 6 dB for each doubling of the distance between the source and receiver. Does not account for noise attenuation associated with the existing walls at nearby homes.

² The nearest home to the relocated lunch shelter is at 2509 Bedford Street. Noise Measurement Site 1 captured the existing noise level adjacent to the northwest corner of the home with a noise level of 53.5 dBA. Noise Measurement Site 3 captured the existing lunch area noise level of 69.4 dBA at 10 feet from activities.

³ The nearest home to the new kindergarten play area is at 2509 Bedford Street. Noise Measurement Site 1 captured the existing noise level adjacent to the northwest corner of the home with a noise level of 53.5 dBA. Noise Measurement Site 4 captured an existing kindergarten play area noise level of 69.8 dBA at 5 feet from activities.

⁴ The nearest home to the new delivery and secondary waiting area is at 8901 25th Street. Since no noise measurement was taken at the home, the noise created from the existing lunch shelter that is currently located at this proposed use was utilized for the existing noise level. Noise Measurement Site 2 captured the noise from the existing parking lot where delivery trucks currently park.

Table 4-8 shows that the noise levels created from the new lunch shelter, new kindergarten play area, and new delivery and secondary waiting area, would all be below the existing noise levels at the nearest homes. As such, the proposed Project would be in compliance of Standard Condition SC-N-3 that requires new noise generating facilities on LAUSD campuses be designed to either meet the local jurisdictions noise standards or be limited to a 3 dB or less noise increase over ambient (existing) conditions. Therefore, no operational noise impacts are anticipated to nearby homes. No impact would occur.

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

Less than Significant Impact with Mitigation. The proposed Project would not expose persons to or generation of excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the proposed Project.

Construction-Related Vibration Impacts

The first phase of construction is anticipated to occur over three months and would consist of either removal or demolition of 33 classrooms currently in portables and demolition of approximately 265,000 square feet of pavement. The second phase of construction is anticipated to occur over three months and would consist of site preparation. Building construction activities would occur after the completion of the site preparation phase and is anticipated to occur over 12 months and would consist of construction of Classroom Building 300 as well as the proposed lunch shelter. The final phase would consist of the onsite asphalt paving and off-site street work, which is anticipated to occur over three months. Vibration impacts from construction activities associated with the proposed Project would typically be created from the operation of heavy off-road equipment. The nearest sensitive receptors to the Project site are single-family homes located adjacent to the



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south and east sides of the Project site and multi-family homes located adjacent to the north side of the Project site.

LAUSD Standard Condition SC-N-4 requires the construction contractor to consult with the school and nearby land uses prior to performing construction activities that have the potential to create high noise or vibration levels. However, neither LAUSD nor the City of Los Angeles provides a quantifiable vibration threshold level for construction activities, Caltrans guidance has been utilized⁹³, which defines the threshold of perception from transient sources at 0.25 inch-per-second peak particle velocity (PPV). Table 4-9 gives approximate vibration levels for particular construction activities. The data in Table 4-9 provides a reasonable estimate for a wide range of soil conditions.

Table 4-9 - Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second)	Approximate Vibration Level (L_v) at 25 feet
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Federal Transit Administration, 2018.

From the list of equipment shown in Table 4-9, a vibratory roller would create the highest vibration levels during construction of the proposed Project with a vibration level of 0.210 inch-per-second PPV. Based on typical propagation rates, the vibration level at the nearest offsite residential structure (10 feet away) would be as high as 0.58 inch-per-second PPV. The vibration level at the nearest offsite residential structure would exceed the 0.25 inch-per-second PPV threshold detailed above. This would be considered a significant impact.

The following Mitigation Measure NOI-1 has been included in this analysis that would restrict the operation of vibratory rollers within 25 feet of any residential structure. As shown above in Table 4-9, at 25 feet a vibratory roller would create a vibration level of 0.21 inch-per-second PPV and would be within the 0.25 inch-per-second PPV threshold detailed above. Therefore, through implementation of Mitigation Measure NOI-1, construction-related vibration impacts would be reduced to a less than significant level.

Mitigation Measure NOI-1

The Project applicant shall require that all construction contractors for the proposed Project restrict the use of vibratory rollers within 25 feet of a residential structure (garages and storage sheds are exempt from this measure).

Operations-Related Vibration Impacts

⁹³ From *Transportation and Construction Vibration Guidance Manual*, prepared by Caltrans, September 2013.

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The on-going operation of the proposed Project would not include the operation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the proposed Project.

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

No Impact. The proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airport is the Santa Monica Airport, located approximately 3.7 miles southwest of the Project site. The Project site is located outside of the 60 dBA CNEL noise contours of Santa Monica Airport. No impacts would occur from aircraft noise.

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

Explanation:

The analysis in this section is based in part on the “Pedestrian and Safety Study for Shenandoah Street Elementary School Comprehensive Modernization Project, City of Los Angeles”, prepared by LLG, Engineers dated November 5, 2019. A complete copy of this report is included as Appendix H to this Initial Study⁹⁴

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

LAUSD Standard Conditions of Approval

SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>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.</p>

⁹⁴ Pedestrian and Safety Study for Shenandoah Street Elementary School Comprehensive Modernization Project, City of Los Angeles. Linscott, Law & Grenspan, Engineers. 2019.

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SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p>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.</p>
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>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.</p>

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

Less Than Significant Impact. The Project does not involve any improvements to the circulation network or pedestrian mobility network. Additionally, there will be no change to zoning or land use on-site. Operation of the Project would be substantially similar to the existing operational conditions; however, the Project does include path of travel improvements and ADA upgrades. Installation of path of travel improvements and ADA upgrades would improve pedestrian safety within the Project site.

Construction of the Project may require temporary closures to sidewalks and/or roadways. In order to avoid conflicts between construction activities and students; any temporary (interim) student classrooms in portable buildings would be placed as far as possible from construction zones, and construction staging areas (i.e., storage of equipment and materials) would be fenced as required by SC-T-4.

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

Additionally, the District would implement SC-PED-2, SC-PED-4, and SC-PED-5. These require compliance with the requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program (SC-PED-2), compliance with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide (SC-PED-4), and compliance with the School Design Guidelines associated with new student drop-off, pick-up, bus loading areas, and parking areas.



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Compliance with the identified Standard Conditions of Approval would reduce any potential impacts associated with vehicles, pedestrians, and bicycles to less than significant.



Legend

- Recommended Crossing
- Stop Sign
- Traffic Signal
- Crossing Guard
- Flashing Warning Light
- Stairs or Walkway
- Pedestrian Bridge
- Pedestrian Tunnel
- Parks

Figure 7
Shenandoah Elementary School
Pedestrian Routes



0 300 600 1,200
Feet

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

Less Than Significant Impact. Based on the pedestrian routes recommended for Project site (Figure 7), a crossing guard would be stationed and present at the Halm Avenue/Cadillac Avenue intersection. The District encourage that guardians and students follow the circulation pattern and utilize the loading zone for those who choose to conduct drop-off/pick-up activities along the Shenandoah Street frontage. Guardians who choose to park along the west side of Shenandoah Street or other residential streets in the area and walk their child(ren) to the gates on the east side of Shenandoah Street should be informed by the School that they must accompany the child(ren) and cross within the designated crosswalk at the Shenandoah Street/24th Street intersection. School-related pedestrians will be directed to the campus by crossing at designated crosswalks at intersections (i.e., at Shenandoah Street/Cadillac Avenue and Shenandoah Street/24th Street). Standard Condition Measure SC-PED-2 identifies the OEHS Traffic and Pedestrian Safety Program which includes measures (i.e., sidewalks, crossing guards, crosswalks, warning signs, etc.) to ensure separation between pedestrians and vehicles along pedestrian routes. Compliance with SC-PED-2 would reduce any potential impacts associated with pedestrian safety to less than significant.

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

Less Than Significant Impact. The nearest major arterial roadway or freeway is I-10, approximately 0.15 mile north of the campus. The Project would not change existing operations of the campus, nor would implementation of the Project result in a zoning change. The Project area would continue to house existing programs and would continue to serve the local student population. Student routes to campus would not change. The Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant.



4. Environmental Checklist and Analysis

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

Explanation:

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

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

No Impact. The Project would make physical changes to an existing elementary school campus and would not increase the enrollment or student capacity. New roads, expanded utility lines, and housing that could induce population growth would not be constructed or be required as part of the Project. No impacts related to population growth would occur.

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

No Impact. The Project would modernize an existing elementary school campus and would not displace existing people or housing. No replacement housing would be required; therefore, no housing impacts would occur.

4. Environmental Checklist and Analysis

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

Explanation:

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

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

a) Fire protection?

Less Than Significant Impact. The County of Los Angeles Fire Department (LACFD) currently provides fire protection and emergency medical services to the Project site. The LACFD fire station assigned to the area is Station 58 at 1556 S Robertson Blvd., about 1 mile north of the campus. The Project would not make any programmatic changes and would not increase students; therefore, it would not increase the need for fire protection services. LAUSD is required to coordinate with LACFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with SC-PS-1. Additionally, the Project would not require construction of new or expanded fire stations. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) is responsible for providing police protection services to the Project site and creating safe passages for students, staff, and the



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community.⁹⁵ The campus is in Beat 304 of the LASPD's West Division.⁹⁶ The West Division is operated from 13000 Venice Blvd, approximately 4.5 southwest of the Project site. The Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism; however, active construction areas would be fenced. It should be noted that the campus would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. General activities during operation of the elementary school are under the supervision of the campus administrators and staff. The Project would not increase student population or demand and would not result in new adverse impacts on existing police service. Impacts would be less than significant.

c) Schools?

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

d) Parks?

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

e) Other public facilities?

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

⁹⁵ Los Angeles School Police Department (LASPD). 2018, November 5. About LASPD. <http://achieve.lausd.net/Page/8851>.

⁹⁶ Los Angeles School Police Department (LASPD). 2015. Local District East with Los Angeles School Police Beats. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/596/Div%203%20West_Beats.pdf

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

Explanation:

There are no recreation LAUSD SCs that apply to this Project.

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

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

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

No Impact. The Project includes construction of a new playground and play areas. The environmental effects of the construction and operation of the Project is considered throughout the environmental analysis in this Initial Study. The Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. No impacts related to recreational facilities would occur.



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

Explanation:

The analysis in this section is based in part on the “Pedestrian and Safety Study for Shenandoah Street Elementary School Comprehensive Modernization Project, City of Los Angeles”, prepared by LLG, Engineers dated November 5, 2019. A complete copy of this report is included as Appendix H to this Initial Study.⁹⁷

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

LAUSD Standard Conditions of Approval	
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-4	<p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>OEHS Traffic and Pedestrian Safety Program</p>

⁹⁷ Pedestrian and Safety Study for Shenandoah Street Elementary School Comprehensive Modernization Project, City of Los Angeles. Linscott, Law & Greenspan, Engineers. 2019.

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	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-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p>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.</p>
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>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.</p>

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

Less Than Significant Impact. The Project does not propose any changes to land use on-site or increase in student capacity or enrollment; therefore, it is assumed that the Project would not result in an increase in average daily trips or peak hour trips associated with implementation of the Project.

Existing Site Conditions

The existing Shenandoah Street ES campus is located at 2450 South Shenandoah Street in the West Adams-Baldwin Hills-Leimert Community Plan Area of the City of Los Angeles, California. The school campus is bounded by existing residential uses to the north, Beverlywood Street to the south, existing single family residential uses to the east, and Shenandoah Street to the west.

The current bell schedule for the School is 8:05 AM to 2:27 PM for regular school days and 8:05 AM to 12:45 PM during minimum days. The main pick-up/drop-off loading zones are located along the west side of the Project site: 1) along the east side of Shenandoah Street between 24th Street and 25th Street; and 2) along the east side of Shenandoah Street between 25th Street and Beverlywood Street. These zones are designated for drop-off/pick-up loading activities before and after school (i.e., between 6:30 AM and 9:00 AM and 1:30 PM and 4:00 PM) during school days only (Mondays through Fridays). Time-restricted (i.e., two-hour) parking is permitted between 9:00 AM and 1:30 PM. The School also operates two school buses with bus loading/unloading activities also occurring along the campus frontage on the east side of Shenandoah Street. It should be noted that the Early Education Children's Center at the northeast corner of Shenandoah Street and Beverlywood Street is not part of the Project site.



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Vehicular access to the on-site parking area is provided via a single driveway on Shenandoah Street (for access to the on-site surface parking lot). Another gated access is provided via the northerly terminus of Bedford Street near the southeastern portion of the campus. All of the on-site parking spaces are currently utilized by only the staff/administration for the School.

Existing Traffic Counts

Manual counts of vehicular turning movements were conducted at five intersections in the vicinity of the Project site during the weekday morning (AM) and afternoon (PM) school peak periods to determine the peak hour traffic volumes. The traffic counts were conducted from 7:00 AM to 9:00 AM to determine the weekday school AM peak hour, and from 1:30 PM to 3:30 PM to determine the weekday school PM peak hour. In conjunction with the manual turning movement vehicle counts, a count of bicycle and pedestrian volumes were also collected during the peak periods. It is noted that all of the traffic counts were conducted on Wednesday, April 3, 2018 during a typical regular mid-week school day. The traffic counts were taken at the following intersections:

- Shenandoah Street/Cadillac Avenue
- Shenandoah Street/24th Street
- Shenandoah Street/25th Street
- Shenandoah Street/Beverlywood Street
- Halm Avenue/Cadillac Avenue

The locations of the intersection and the traffic counts are shown in Figure 8.

Construction Traffic

Based on information provided by the District, an average of 50 workers would be on-site when students are present and a maximum of 150 workers would be on-site during peak periods (i.e., during summer break). No summer school sessions are currently held or planned to be held during the summer months. It is anticipated that construction worker parking would generally be accommodated on-site in the staging area during all phases of construction. Construction workers would not be permitted to park on local streets and would therefore not affect the current usage of street parking.

To the extent feasible, construction-related activities would be scheduled to occur during daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours, and during noise sensitive times as coordinated with the School administration. The City's Noise Ordinance currently limits construction hours on Mondays through Fridays to no earlier than 7:00 AM and no later than 9:00 PM. On Saturdays, construction hours are limited to no earlier than 8:00 AM and no later than 6:00 PM. No construction is permitted on Sundays.



Legend

XX(X) = AM(PM) Peak Hour Volumes

Figure 8
Shenandoah Elementary School
Existing Traffic Volumes

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It has been determined that the most intensive period of overall construction activity and construction truck traffic generation is expected to occur during the Site Preparation/Modernization sub-phase for an approximate three-month period. Other phases of construction are expected to be less intensive in terms of overall construction truck traffic generation. The most intensive period in terms of the other miscellaneous delivery trucks would occur during the Building Construction/Modernization sub-phase for an approximate 12-month period. While it is recognized that these two sub-phases are not expected to overlap (i.e., Site Preparation/Modernization and Building Construction/Modernization), they were assumed to be concurrent in order to provide a conservative analysis and to provide greater flexibility as the actual phasing of the work has not yet been determined.

Peak Construction Trip Traffic Generation

Haul Trips

The most intensive period of overall construction activity and construction truck traffic generation is expected to occur during the Site Preparation/Modernization phase for an approximate three-month period. During the peak, up to 82 trucks per day⁹⁸ (i.e., 41 inbound trucks and 41 outbound trucks) are anticipated. Assuming a total of eight hours of hauling activities each day, it is estimated that approximately six truck loads (i.e., resulting in six inbound trucks and six outbound trucks) would occur per hour. When accounting for the application of a passenger car equivalency (PCE) factor of 2.5 to account for the heavier weight and larger size haul trucks, a total of 15 inbound truck PCE trips and 15 outbound truck PCE trips could potentially occur during the weekday AM and PM peak hours.

Equipment and Delivery Trucks

In addition to construction haul trucks, additional trips may be generated by miscellaneous trucks traveling to and from the Project site. These trucks may consist of trucks delivering equipment and/or construction materials to the Project site. In addition, smaller pick-up trucks or four-wheel drive vehicles used by construction supervisors and/or City inspectors are expected to be generated to and from the site. During the peak phase for deliveries (i.e., Building Construction/Modernization), up to 12 delivery trucks are anticipated for this phase. It is estimated that if these deliveries all occur on a single day of that phase, up to 24 trucks per day (i.e., 12 inbound trucks and 12 outbound trucks) would be generated to and from the site. To conservatively estimate the equivalent number of passenger vehicles associated with the trucks, a PCE factor of 2.0 was utilized based on standard traffic engineering practice. Therefore, assuming 24 daily trucks per day, it is estimated that the trucks would generate approximately 48 daily PCE vehicle trips (i.e., 24 inbound PCE trips and 24 outbound PCE trips). It is also estimated that approximately eight PCE vehicle trips (4 inbound PCE trips and 4 outbound PCE trips) could occur during each of the weekday AM and PM peak hours.

Construction Worker Trips

The most intensive period in terms of the number of construction workers would occur during the summer months with up to a maximum of 150 workers during the peak periods. Based on confirmation from School representatives, summer school classes are not held at this campus and would not overlap with the 150 workers which are anticipated to be on-site during the summer months. During the overlap with concurrent School

⁹⁸ Trip Generation Manual, Institute of Transportation Engineers, 10th Edition, 2017.



4. Environmental Checklist and Analysis

operations, it is anticipated that an average of 50 workers would be on-site. For purposes of this review, the number of construction workers were reviewed during the concurrent operation of the School when students are present onsite. Construction workers are expected to arrive at the Project site before 7:00 AM. Since the construction work day would commence by 7:00 AM, these trips would occur outside of the weekday commute AM peak hour, but could occur during the weekday PM peak hour. Assuming the typical work day ends at 3:30 PM, fifty percent (50%) of the workers are assumed to leave the site between 3:30 PM and 4:00 PM, twenty-five percent (25%) between 4:00 PM and 4:30 PM, and the remaining twenty-five percent (25%) after 4:30 PM (including supervisors). Thus, while these construction worker trips would generally occur outside of the commute PM peak hour of adjacent street traffic, fifty-percent (50%) of the work force (i.e., 25 workers) has been assumed to overlap with the weekday commute PM peak hour (i.e., between 5:00 PM and 6:00 PM) in order to provide a conservative forecast of construction worker traffic generation. The construction worker arrival and departure times are expected to occur outside of the peak hour of student pick-up/drop-off operations as well (i.e., before 7:00 AM and after 3:30 PM).

It is anticipated that construction workers would primarily remain on-site throughout the day. The number of construction worker vehicles is estimated using an average vehicle ridership (AVR) factor of 1.135 persons per vehicle (as provided in the South Coast Air Quality Management District in its CEQA Air Quality Handbook). Therefore, it is estimated that approximately 88 vehicle trips (44 inbound trips and 44 outbound trips) on a daily basis would be generated to/from the site by the construction workers during the peak period when a total of 50 construction workers are expected to be on-site. With 50% of the workers conservatively assumed to overlap with the weekday PM peak hour, this would result in 22 outbound construction worker vehicle trips.

Total Construction Traffic Generation

The construction haul trucks, miscellaneous delivery vehicles, and construction worker vehicles are forecast to generate up to 38 weekday AM peak hour PCE vehicle trips (i.e., 19 inbound PCE trips and 19 outbound PCE trips). During the PM peak hour, the construction traffic generation is expected to total 60 PCE vehicle trips (i.e., 19 inbound PCE trips and 41 outbound PCE trips). Over a 24-hour period, the construction traffic generation is forecast to generate an increase of 342 daily PCE trip ends during a typical weekday (171 inbound PCE trips and 171 outbound PCE trips).

Pursuant to Standard Condition Measure SC-T-4, the construction contractor will be required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to the start of construction activities. Given the number of pedestrians (i.e., guardians and children) walking to/from the campus, it is recommended that certain lanes/sidewalks along Shenandoah Street and Cadillac Avenue remain open during construction. Should the closure of any lanes/sidewalks be determined to be necessary, appropriate pedestrian detours will be required to be established along with the appropriate advance warning signage directing pedestrians to other available sidewalks and crosswalks/crossings.

For comparison purposes, traffic generation for the existing school campus was estimated based on the trip generation rates published in the ITE Trip Generation Manual for Land Use Code 520 (Elementary School) and applied to the number of students. When compared to the traffic generated by the operations of the School (i.e., 452 AM peak hour vehicle trips, 115 PM peak hour vehicle trips, and 1,276 daily vehicle trips), the short-term construction traffic anticipated during the peak construction activities are anticipated to be significantly

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less than the daily operations of the Project site; therefore, the increased traffic associated with construction of the Project would not result in a new traffic impact. This impact is less than significant.

Congestion Management Program Traffic Impact Assessment

The Congestion Management Program (CMP) was previously a state-mandated program that was enacted by the California State Legislature with the passage of Proposition 111 in 1990 that primarily utilized a level of service (LOS) performance metric. Senate Bill 743 contains amendments to current congestion management law that allows counties to opt out of the LOS standards that would otherwise apply in areas where CMPs are utilized. Pursuant to California Government Code §65088.3, local jurisdictions may opt out of the CMP requirement without penalty if a majority of the local jurisdictions representing a majority of the County's population formally adopt resolutions requesting to opt out of the program. As of October 2019, the majority of local agencies representing the majority of the County's population have adopted resolutions to opt out of the program. Therefore, the CMP is no longer applicable in Los Angeles County

.As described above, operation of the Project would not result in additional traffic to the Project site; however, temporary construction impacts would occur. Implementation of SC-T-4 would reduce construction related traffic impacts to less than significant. Additionally, as described in Section XIV, Impact (a), implementation of SC-PED-2, SC-PED-4, and SC-PED-5 would reduce potential impacts associated with pedestrians and other forms of transportation to less than significant.

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

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

As the Project would not involve a change in land use or an increase in student enrollment or capacity, VMT associated with the Project would remain substantially similar to the existing condition; thus, no impact would occur.

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

Less Than Significant Impact. Please see response to Section XIV Impact (a). This impact is less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. During the construction of the Project, it is expected that emergency vehicles will continue to utilize the surrounding street system even though some travel lanes along certain portions of some roadways may be temporarily used for construction staging and/or material delivery. If required, drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes to pass

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through crowded intersections or streets. Thus, the respect entitled to emergency vehicles and driver training allow emergency vehicles to negotiate typical street conditions in urban areas including areas near any temporary travel lane closure(s). Construction the Project may result in temporary construction impacts to local road network; however, emergency access to and from the Project site will remain the same as the existing condition. This impact is less than significant.

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Potentially
Significant
Impact

Less Than
Significant
with Mitigation
Incorporated

Less Than
Significant
Impact

No
Impact

XIX. TRIBAL CULTURAL RESOURCES.

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

☒ Yes

☐ No

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

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

Explanation:

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

LAUSD Standard Conditions of Approval

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



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	The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.
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a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. As described in the Cultural Resources section above, The Shenandoah Elementary School Campus was initially developed in the 1920s; however, as described in the Historical Resources Evaluation Report it no longer retains any buildings from this early period and the oldest extant building dates to 1940. This building does not exhibit any of the character-defining features identified in Los Angeles Unified School District Historic Context Statement, 1870 to 1969 for schools constructed between 1933 and 1945, such as unified site design, indoor-outdoor integration, plentiful windows of varying sizes and configurations, or a stylistically modern design.⁹⁹ The campus also includes a number of buildings that were developed after World War II, but these buildings were constructed intermittently over a period of 40 years and are not representative of LAUSD design principles of the postwar era. The campus does not appear eligible for federal, state, or local designation under any applicable criteria and is not considered a historical resource for the purposes of CEQA.

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

Less than Significant Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.¹⁰⁰

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

LAUSD distributed a notification letter on January 8, 2019 soliciting consultation from Tribes with a cultural affiliation to the proposed Project. Request for consultation was received from the Gabrieleno Band of Mission

⁹⁹ Sapphos Environmental, Inc. Los Angeles Unified School District Historic Context Statement, 1870 to 1969 (Los Angeles Unified School District Office of Environmental Health and Safety, March 2014).

¹⁰⁰ California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

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Indians - Kizh Nation on January 9, 2019. Two consultation dates were set for March 21, 2019 and May 21, 2019.

In order to comply with CEQA and reduce any potential significant impacts associated with Tribal Cultural Resources, LAUSD would implement SC-TCR-1 and SC-TCR-2. Under LAUSD's SC-TCR-1, if evidence of Native American resources is uncovered, all work shall stop within a 30-foot radius of the discovery. In the event that Tribal Cultural Resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. If Tribal Cultural Resources are discovered during construction, LAUSD shall implement SCs for evaluating and appropriately treating such resources (SC-TCR-2), which is consistent with the Gabrieleno Band of Mission Indians - Kizh Nation's suggested mitigation measures.

As the Lead Agency, LAUSD has determined that it has not been sufficiently demonstrated that the proposed Project has Tribal Cultural Resources as defined by Public Resources Code (PRC) 21074. LAUSD further concludes that the inclusion of SC-TCR-1 and SC-TCR-2 for the proposed Project would ensure that any potential impacts to Tribal Cultural Resources are less than significant.



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

Explanation:

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

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

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

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

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

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

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

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

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

- 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. The Project would not increase the student population and thus would not increase solid waste generation. Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) hazardous, or RCRA hazardous waste. The Project may require haul and disposal of contaminated soil and material. Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous



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construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the Project would adhere to these established standards. Therefore, construction and demolition waste generated during construction of the Project would not adversely impact such landfills. Impacts would be less than significant.

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

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

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

Explanation:

There are no wildfire LAUSD SCs that apply to this Project.

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

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.¹⁰¹ CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from

¹⁰¹ California Department of Forestry and Fire Prevention (CAL FIRE). Frequently Asked Questions.
http://www.fire.ca.gov/firepreventionfee/sra_faqs



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flammable vegetation in the urban area. The LACFD currently provides fire protection and emergency medical services to the Project area

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The nearest FHSZ in an SRA is approximately 10 miles northwest in the Santa Monica Mountains; the nearest FHSZ in the LRA is 1.25 miles east in the Ladera Heights and the Kenneth Hahn Recreation Area.¹⁰² Land between the edge of the nearest FHSZ and the Project site is dense urban development, along with the I-10 (Santa Monica Freeway).

The Project site is not located in or near state responsibility areas or lands classified as high fire hazard severity zones.¹⁰³

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

No Impact. As described in Section IX, the emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Master Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.¹⁰⁴ The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. Fire access roads must be asphalt, concrete, or other approved driving surface and capable of supporting at least 75,000 pounds.¹⁰⁵ Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of the building.¹⁰⁶ Additionally, the Project would comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires preparation of an Emergency Preparedness Plan for the school with emergency preparedness and response procedures. No impact would occur.

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

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

¹⁰² California Department of Forestry and Fire Prevention (CAL FIRE). The Fire and Resource Assessment Program (FRAP). Very High Fire Hazard Severity Zones (FHSZ) in SRA and LRA. FHSZ Viewer.
http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps

¹⁰³ Ibid.

¹⁰⁴ 2012 Los Angeles County Operational Area Emergency Response Plan.
<http://file.lacounty.gov/SDSInter/bos/supdocs/69205.pdf>

¹⁰⁵ City of Los Angeles Municipal Code Appendix D Section D102.1.

¹⁰⁶ California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Section 503. The current 2016 CFC took effect January 1, 2017.

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

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

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

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

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

Explanation:

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

Less than Significant Impact. As discussed in Section IV, Biological Resources, the proposed Project would not significantly impact any known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats. Further, because the site and surrounding area is already developed, implementation of the Project would not impact the habitat or population of the Project site and the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in Section V, Cultural Resources, the proposed Project would not impact historical resources and potential impacts related archaeological and paleontological resources would be less than significant following the implementation of the regulatory compliance measures, and SC-CUL-6, SC-CUL-9, and SC-CUL-10.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable**

4. Environmental Checklist and Analysis

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. Based on the preceding discussion, with implementation of the SCs, the mitigation measures included in this Initial Study, and compliance with existing regulations, the proposed Project would not result in any significant adverse impacts which could contribute to a cumulatively considerable impact.

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

Less than Significant Impact. As discussed in the above analyses for the Project, with implementation of the SCs, the mitigation measures included in this Initial Study, and compliance with existing regulations, the proposed Project would not result in any unmitigated significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effect on human beings.

5. List of Preparers

5.1 LEAD AGENCY

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

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5.2 CEQA CONSULTANT

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Meghan Gibson, Project Manager/Senior Environmental Planner
Corinne Lytle Bonine, Director of Environmental Planner/Senior Project Manager
Thomas Strand, Staff Environmental Planner

Vista Environmental (Air Quality, GHG, Noise Analysis)

Greg Tonkovich, Senior Analyst

Linscott, Law, and Greenspan Engineers (LLG) (Pedestrian & Safety Analysis)

Chin Taing, Transportation Planner III
Clare Look-Jaeger, Principal

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Appendix

Appendices are on CD

- A. Air Quality and Greenhouse Gas Emissions Memo
- B. Arborist Report
- C. Historic Resource Evaluation Report
- D. Preliminary Soils Report
- E. Fault Study Evaluation
- F. Preliminary Environmental Assessment - Equivalent
- G. Noise Memo
- H. Pedestrian and Safety Study



Appendix

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