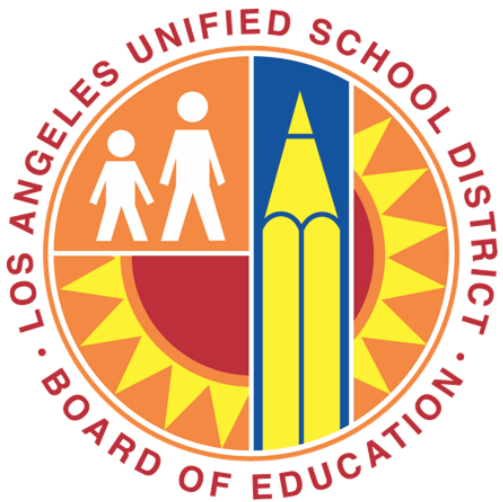


February 15, 2018 | Initial Study

BURROUGHS MIDDLE SCHOOL

Comprehensive Modernization Project



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Abbreviations and Acronyms

ACM	asbestos containing materials
BMP	best management practices
BOE	Board of Education
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CHPS	Collaborative for High Performance Schools
CNDDDB	California Natural Diversity Database
CO ₂	carbon dioxide
CH ₄	methane
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gases
HASP	Health and Safety Plan
HCP	Habitat Conservation Plan
HS	High School
HSO	Health and Safety Officer
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
MND	mitigated negative declaration
NCCP	Natural Communities Conservation Plan
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System



Abbreviations and Acronyms

NO _x	nitric oxides
OCP	organochlorine pesticide
OEHS	Office of Environmental Health and Safety
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PDF	project design features
PF	Public Facilities
PRC	Public Resources Code
RAW	Removal Action Workplan
RCRA	Resource Conservation and Recovery Act
RWQCB	regional water quality control board
SC	Standard Conditions
SCAQMD	South Coast Air Quality Management District
SCGC	Southern California Gas Company
SCS	sustainable communities strategy
SEA	Significant Ecological Area
SoCAB	South Coast Air Basin
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compounds

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 Burroughs Middle School (Burroughs MS), located at 600 South McCadden Place, Los Angeles, California 90005 (Project or proposed Project) (COLIN ID: 10366806). Burroughs MS is within Local District West. The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the campus while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program. A detailed description of the proposed Project's components and design is provided below. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides a preliminary evaluation of the potential environmental consequences associated with the 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 (EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.³

On March 10, 2015, LAUSD's Board approved pre-design and due diligence activities necessary to develop a Project definition for a Comprehensive Modernization Project at Burroughs MS.⁴ The Project is intended to provide facilities that are safe, secure, and aligned with the instructional program. On February 9, 2016, the

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

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

³ LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

⁴ LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

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Board approved the Project definition for Burroughs MS (Project Site or Campus).⁵ This approval authorizes LAUSD's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory processes including those required under the CEQA.

1.3 PROJECT NEED

The proposed Project has been developed under the LAUSD's SUP to improve student health, safety and education through the modernization of school facilities. Burroughs MS was identified as one of 11 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, these 11 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:⁶

- 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 underway and the improved conditions that will be provided.
- The seismic risk factor identified using the Federal Emergency Management Agency's (FEMA) 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.

Some of the buildings on the Project site, including the Administrative/Auditorium Building (Bldg. 1), Boy's Gymnasium (Bldg. 2), Classroom Building (Bldg. 7), and Shop Building (Bldg. 9), are 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). AB 300 identified 269 of the LAUSD's nearly 13,000 buildings for seismic evaluation. In 2006, upon further

⁵ LAUSD Board of Education Report. February 9, 2016. Report Number 246-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Three Comprehensive Modernization Projects.

⁶ Los Angeles Unified School District (LAUSD). 2015a. *Board of Education Report 373-14/15*. March.



1. Introduction

analysis by LAUSD staff, including site visits and field investigations, a total of 667 buildings were identified for seismic evaluation based upon AB 300 criteria and LAUSD's higher standards.⁷ Since that time, seismic evaluations have been performed on school buildings identified to be the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades.⁸

1.4 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA⁹ and the State CEQA Guidelines.¹⁰ 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 EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.¹¹

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,¹² 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.¹³

1.5 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:

⁷ LAUSD. AB-300 Criteria Building List. Web. <<http://www.laschools.org/new-site/ab300/LAUSD-AB300-CRITERIA-BUILDING-LIST.pdf>>

⁸ LAUSD. Seismic Safety of School Buildings. Web. <<http://www.laschools.org/new-site/ab300/?keyword=roosevelt&destination=ab300>>

⁹ California PRC Sections 21000 et seq.

¹⁰ CCR, Title 14, Sections 15000 et seq.

¹¹ 14 CCR Section 15063.

¹² 14 CCR Section 15064.

¹³ 14 CCR Section 15070.

1. Introduction

- 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.
- 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.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies (California Code of Regulations [CCR] Section 15378[a]).

The 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.

1.5.1 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 EIR is the appropriate level of environmental documentation for this project.

2.5.2 Environmental Impact Report

The EIR includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the EIR 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 EIR is provided in the Initial Study Checklist (Chapter 4).

Following consideration of any public comments on the Initial Study, the Draft EIR will be completed and then circulated to the public and affected agencies for review and comment. 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.



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Additionally, LAUSD is required to consider comments from the scoping process in the preparation of the Draft EIR and to respond to Draft EIR public comments in the Final EIR.

2.5.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR (Program EIR) that was certified by the LAUSD BOE on November 10, 2015.¹⁴ LAUSD's Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.¹⁵ 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.¹⁶

The Program EIR is applicable to all projects implemented under the SUP. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.¹⁷ 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:¹⁸

- 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

¹⁴ LAUSD. 2015. Program EIR for the SUP. Available at: <http://achieve.lausd.net/ceqa>.

¹⁵ LAUSD. 2015. Program EIR for the SUP. Available at: <http://achieve.lausd.net/ceqa>.

¹⁶ CEQA Guidelines Section 15152(a).

¹⁷ Ibid, at 4-8.

¹⁸ Ibid, at 1-7.

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impacts related to Type 2 and Type 3 projects, and the appropriate project design features (PDFs) 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 EIR 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 (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

2.5.4 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,¹⁹ LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.²⁰

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

¹⁹ California Green Building Standards Code, Title 24, Part 11, of the CCR.

²⁰ 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 criteria to the extent possible.



1. Introduction

Standard Conditions of Approval. LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were adopted by the LAUSD Board in November 2015.²¹ The SCs have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations and the LAUSD’s standard policies, practices and specifications. The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).²² For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every SC is not required.

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

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

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

The specific CHPS prerequisite criteria and SCs are identified in the tables under each CEQA topic.²³ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and LAUSD conditions are considered part of the project and are included in the environmental analysis.²⁴

1.6 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.

²¹ LAUSD. 2015. Program EIR for the SUP. Available at: <http://achieve.lausd.net/ceqa>. (see Table 4-1 and Appendix F of the Program EIR).

²² As of September 2016, an additional environmental topic has since been required by the State Office of Planning and Research (Tribal Cultural Resources). The LAUSD Environmental Checklist now has 19 topics.

²³ CHPS criteria are summarized. The full requirement can be found at <http://www.chps.net/dev/Drupal/California>.

²⁴ Where the LAUSD Standard Conditions of Approval identifies actions to be taken, it is understood that the Project proponent would implement all LAUSD actions for this Project.

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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.

1.7 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, background, and describes 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, SCs, 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. LAUSD Standard Conditions of Approval
- B. Tree Inventory and Location
- C. CDFW California Natural Diversity Database
- D. Comprehensive Geotechnical Report
- E. Preliminary Environmental Site Assessment Equivalent
- F. Phase I Environmental Site Assessment



2. Environmental Setting

2.1 PROJECT LOCATION

Burroughs MS is located approximately 5 miles west of downtown Los Angeles. Primary regional access is provided by Interstate 10 (I-10), approximately 2 miles to the south of the Project site and 10 miles east of the Pacific Ocean (**Figure 1**). Major arterials providing regional and sub-regional access to the project vicinity include Wilshire Boulevard, immediately south of the Project site, and South La Brea Avenue, approximately 0.5 miles west of the Project site (**Figure 2**). The Assessor's Parcel Number (APN) for the Project site is 5507-017-900. **Figure 3**, Existing Site Plan, shows the existing site plan and buildings. Various buildings and landscapes on the Project site are considered "character defining" as shown in **Figure 4**. The campus is located within the Hancock Park Historic Preservation Overlay Zone (HPOZ).

2.2 SURROUNDING LAND USES

The 10.53-acre campus is located at 600 South McCadden Place, within the Wilshire Community Plan Area of the City of Los Angeles. The campus is located within the neighborhood of Hancock Park, and is bordered by West 6th Street to the north, South McCadden Place to the west, Wilshire Boulevard to the south, and single-family residences that front South June Street to the east

2.3 CAMPUS HISTORY

The original plans for Burroughs Middle School were drawn in 1923 and were constructed shortly thereafter. The original school plant was constructed in the northwest corner of the school property, at the corner of Sixth Street and S. McCadden Place. By 1925, the school was officially named John Burroughs Junior High School. Additional buildings were added, renovated, and demolished from 1927 – 1987.²⁵ The original campus was composed of four unreinforced masonry (URM) buildings in the Italian Renaissance Revival style, all of which have been designated as a historic resource under CEQA and were structurally refurbished at different points in time after the 1933 Long Beach Earthquake. For the 2016-2017 school year, total enrollment at Burroughs MS was 1,786 students.²⁶ Burroughs MS is the home of the Magnet Center, a program that services 508 students.²⁷ The Magnet Center is an advanced academic program that focuses on mathematics, language arts,

²⁵ PCR Services Corporation, 2015. *Character Defining Features Memorandum (CDFM) for John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California, 90005*

²⁶ California Department of Education, 2017. 2016-17 Enrollment by Grade – John Burroughs Middle School Report (19-64733-6061410). Available at: <https://dq.cde.ca.gov/dataquest/dqcensus/enrgdlevels.aspx?agglevel=School&year=2016-17&cds=19647336061410/>. Accessed February 6th, 2018.

²⁷ Burroughs Middle School, 2018. *Magnet Program*. Available at: https://www.burroughsms.org/apps/pages/index.jsp?uREC_ID=379194&type=d&pREC_ID=859005. Accessed February 6th, 2018.

2. Environmental Setting

science, and social studies. The program is designed to meet the needs of students who require an academically demanding curriculum.

The campus has been assigned a California Historic Resources status code of “3S” and “3CS”, noting that the campus appears individually eligible for the National Register of Historic Places (NRHP) through survey evaluation and is eligible for the California Register (CR) as an individual property through survey evaluation. Figure 4 shows the campus and character-defining features that account for its eligibility as a historical resource.

2.4 EXISTING CONDITIONS

Burroughs MS is an operational middle school serving students in grades six through eight. The campus is comprised of 25 buildings and structures, including 14 portable buildings all over 30 years old. Buildings at the project site include: a two-story Administrative and Auditorium Building, various classroom buildings, Food Service/Lunch Shelter Building, Gymnasium, and portable buildings. The school is also developed with landscaped areas containing playfields and ornamental landscaping with trees, shrubs, and grass.

2.5 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan Land Use designation for the school property is ‘Public Facilities’. The land use element of the General Plan is comprised of 35 community plans; they are the official guide to the future development of the City of Los Angeles.

The zoning for the school property is [Q]PF-1XL-HPOZ. PF (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools. [Q] means additional restrictions on building design, landscape buffer, signs, etc.; ‘1’ is Height District No. 1; and ‘XL’ is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building or structure exceed 30 feet in height. A Historic Preservation Overlay Zone (HPOZ), is commonly known as a historic district, provides for review of proposed exterior alterations and additions to historic properties within designated districts.

LAUSD anticipates that it would comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project.





SOURCE: Los Angeles County GIS.

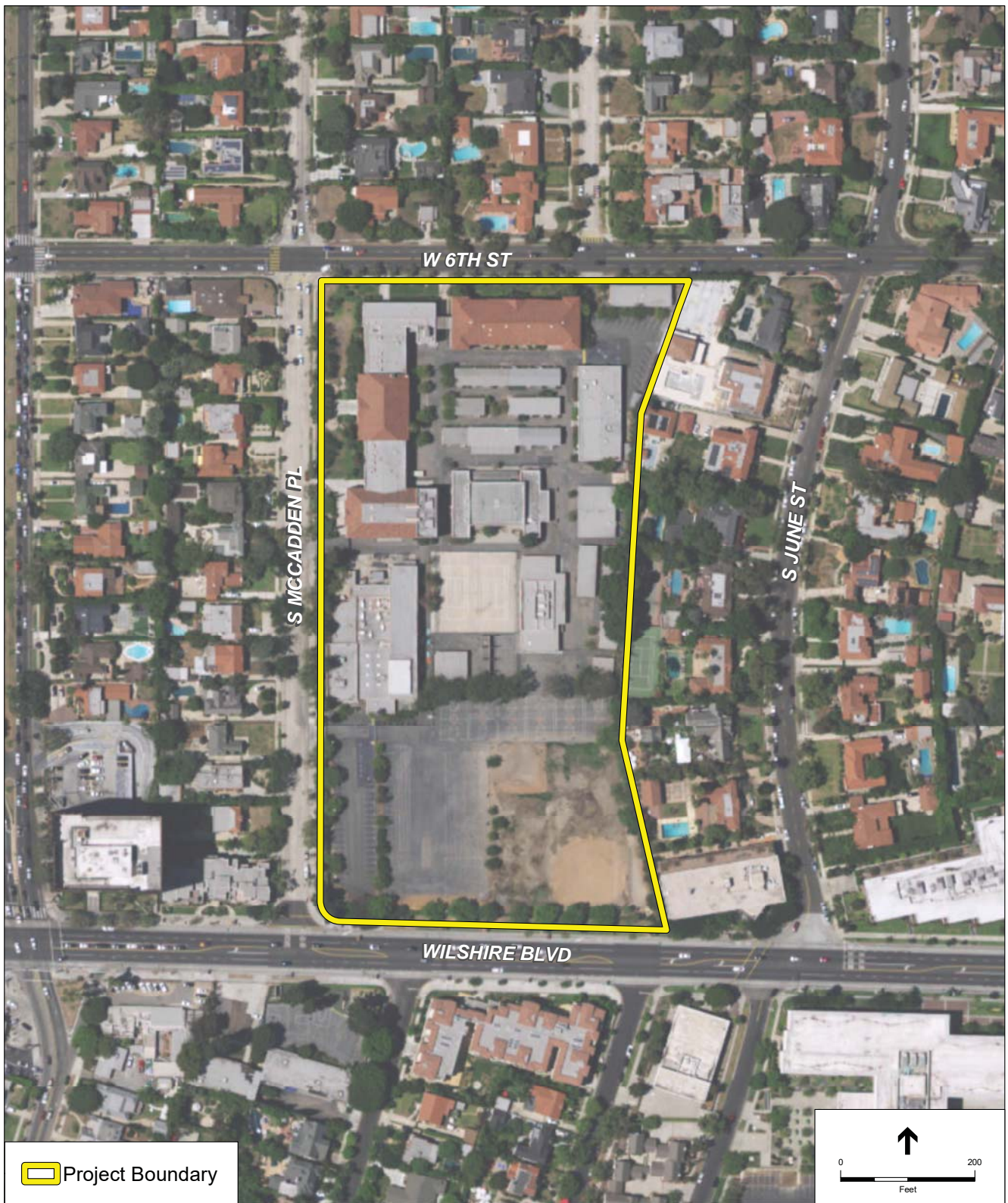
LAUSD Burroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 1
Project Vicinity

2. Environmental Setting

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SOURCE: Los Angeles County GIS.

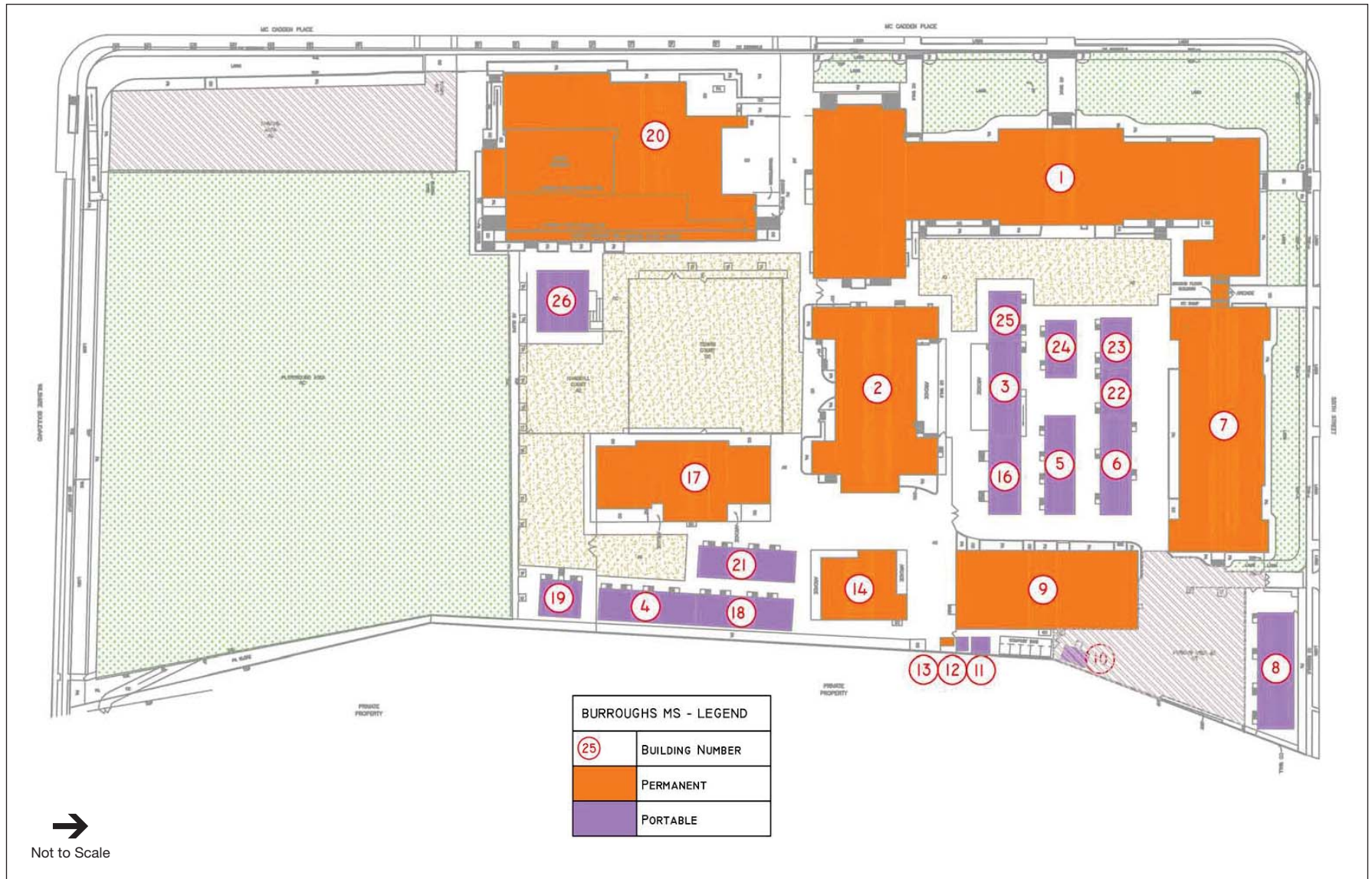
LAUSD Burroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 2
Project Location

2. Environmental Setting

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SOURCE: Los Angeles Unified School District, 2011

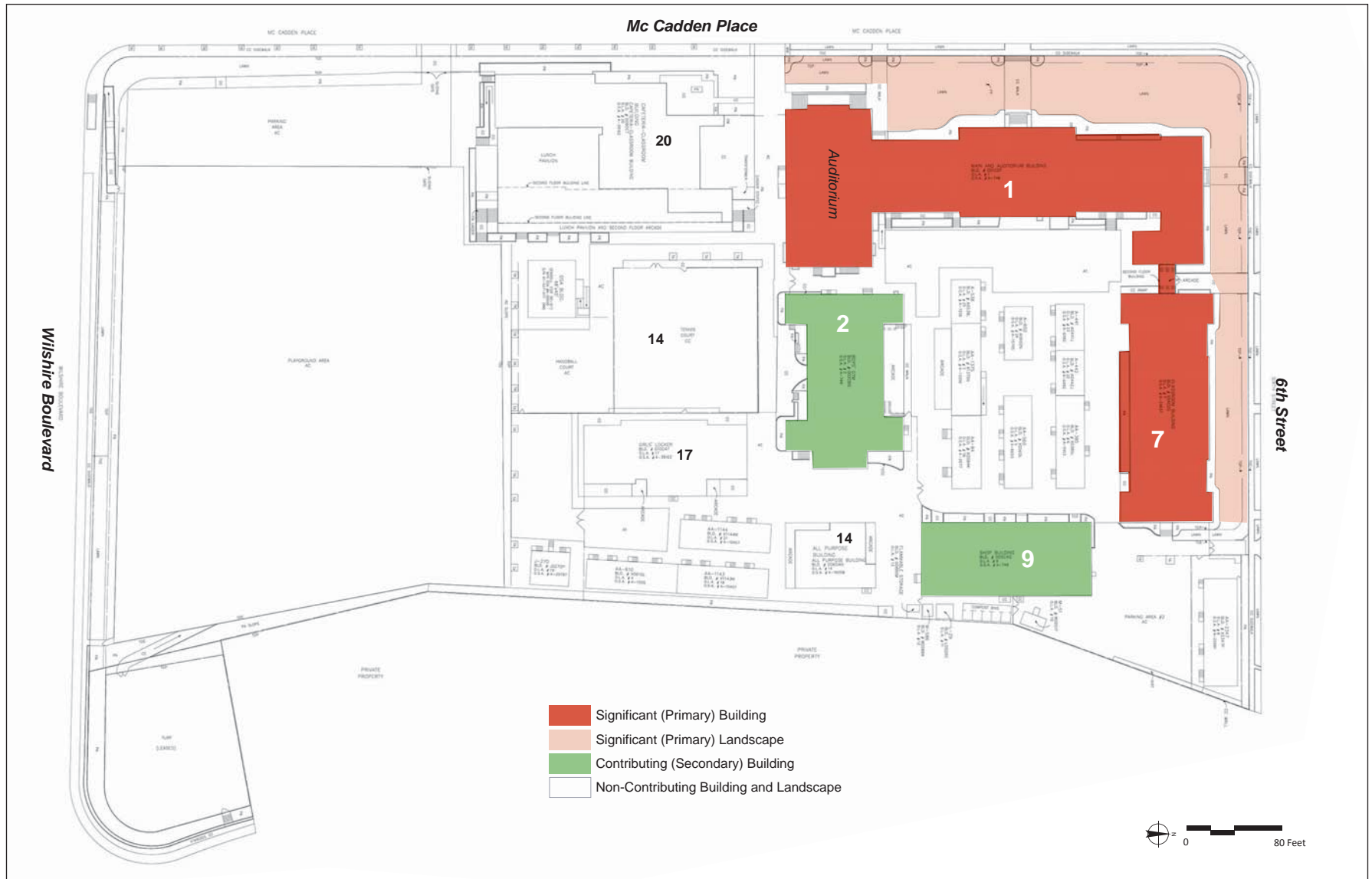
Burroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 3
Existing Site Plan

2. Environmental Setting

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SOURCE: Los Angeles Unified School District, 2015

Burroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 4
Character Defining Features

2. Environmental Setting

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2. Environmental Setting

2.6 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, the following:

Responsible Agencies

- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation
- City of Los Angeles, Department of Transportation. Approval of haul route

Reviewing Agencies

- South Coast Air Quality Management District (SCAQMD). Approval of Construction Emission/Dust Control Plan, architectural coatings
- Los Angeles Regional Water Quality Control Board (RWQCB). Approval of water quality management plan
- State Water Resources Control Board (SWRCB) Notice of Intent (NOI) to obtain permit coverage. General Construction Permit regulates stormwater and nonstormwater discharges associated with construction activities
- California Department of General Services, DSA. Approval of site-specific project construction drawings

2. Environmental Setting

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3. Project Description

The proposed Project would result in demolition of and/or modifications to existing buildings, potentially including historic buildings and resources. However, the project would be designed to preserve and enhance significant (primary) character-defining features associated with the campus (Figure 4). Additionally, the proposed Project would be designed and implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.²⁸

Upon completion of project construction, the Burroughs MS would have 71 classrooms including 6 existing classrooms, 31 remodeled classrooms, and 34 new classrooms. Approximately 8,000 sf of existing area is to remain (with minor renovations). **Table 1** and Figure 3 show details about the characteristics of the existing buildings to be demolished and/or renovated.

The Project would be designed to preserve and enhance significant (primary) character-defining features associated with the campus. Additionally, the proposed Project would be designed and implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.²⁹

As outlined in Table 1 and shown in **Figure 5**, the proposed Project would include demolition of the following facilities:

- Shop Building (Bldg. 9)
- Cafeteria-Classroom Building (Bldg.20)
- Flammable Storage Building (Bldg. 13)
- Girls' Locker Building (Bldg. 17)
- Approximately 18 standard and specialty classrooms located in 12 relocatable or portable buildings

The total demolition footprint of the proposed Project would be approximately 60,500 sf.

The proposed Project would include construction of the following facilities that would be designed, constructed, and furnished/equipped to current code requirements and District design standards:

- Two-Story Specialty Classroom Building (Bldg. A)
 - Approximately three specialty classrooms and support spaces³⁰ on the first floor
 - Approximately seven standard classrooms and support spaces on the second floor

²⁸ LAUSD. January 2015. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. Los Angeles, CA.

²⁹ LAUSD. January 2015. LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Los Angeles, CA.

³⁰ Support spaces include storage, custodian rooms, and boys' and girls' restrooms.

3. Project Description

- Three-Story Food Services + MPR/ Classroom/ Lockers (Bldg. B)
 - Approximately one student store, boys' and girls' lockers, food services, and indoor dining/MPR facilities on the first floor
 - Approximately 14 standard classrooms on the second floor
 - Approximately 2 standard classrooms and 8 science classrooms on the third floor
- Maintenance and Operation (Bldg. M+O)

The total construction footprint of the proposed Project would be approximately 88,000 sf.

Modernization and/or upgrades would be completed for the following buildings:

- Administrative/Library/Auditorium (Bldg. 1)
- Boy's Gymnasium Building (Bldg. 2)
- Classroom Building (Bldg. 7)
- AA-610 (Bldg. 4)
- Art Building (Bldg. 14)
- AA-1143 (Bldg. 18)

The proposed Project would modify and remodel 104,500 sf of building space (90,000 sf not including basement areas).

Figure 6 shows the proposed site plan and **Table 2** summarizes the changes to the campus. Upgrades to the Administrative/Library/Auditorium Building, Gymnasium Building, and Classroom Building would entail seismic retrofits. Seismic retrofitting would be completed in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, California Building Code, Division of State Architect, and California Department of Education.

Site upgrades that would be completed throughout the campus include:

- Site-wide infrastructure, including plumbing, electrical, and storm drain
- Site-wide upgrades to remove identified and prioritized barriers to program accessibility
- Landscape, hardscape, and exterior paint

The project would include improvements as required by the ADA, Division of the State Architect (DSA), CEQA, Office of the Independent Monitor (OIM) for ADA program accessibility, and any other required improvements or mitigations to ensure compliance with local, state, and/or federal facilities requirements.



3. Project Description

**TABLE 1
CHARACTERISTICS OF EXISTING BUILDINGS**

Building ID	Building DSA Number	Building Name	Year Built	Building Square Footage	Building Type
Buildings to be Demolished/Removed					
9	A749	Shop Building	1926	9,032	Permanent
17	A39162	Girls' Locker	1978	7,325	Permanent
20	A39162	Cafeteria-Classroom Building	1978	18,392	Permanent
Portable Buildings to be Removed					
23	A6582	Classroom Building	1935	912	Portable
22	A6492	Classroom Building	1935	912	Portable
6	A58913	Classroom Building	1948	1,824	Portable
24	A15745	Classroom Building	1957	1,056	Portable
5	A6655	Classroom Building	1949	1,824	Portable
25	A7256	Classroom Building	1949	864	Portable
3	A13356	Classroom Building	1955	1,824	Portable
16	A2677	Classroom Building	1940	1,440	Portable
8	A22091	Classroom Building	1962	2,520	Portable
21	A10407	Classroom Building	1953	1,824	Portable
10	M0051F (No DSA)	Storage	1920	200	Portable
26	X3865Y (No DSA Listed)	Classroom Building	2001	1,920	Portable
19	A20797	Sanitary Administrative Building	1962	896	Portable
11	L0029G	Tool Room	1925	168	Portable
12	M0586K (No DSA)	Storage	1941	80	Portable
Buildings to be Renovated					
1	A748	Main and Auditorium Building	1923	67,381	Permanent
2	A749	Boys' Gym	1935	11,868	Permanent
7	A24637	Classroom Building	1926	28,529	Permanent
Buildings to Remain¹					
4	A7055	AA-610	1949	1,824	Portable
14	AA16058	All Purpose Building	1958	3,252	Permanent
18	A10407	AA-1143	1952	1,824	Portable

NOTES:

1. These buildings will receive interior and exterior paint and finish upgrades.

SOURCE: LAUSD, 2016

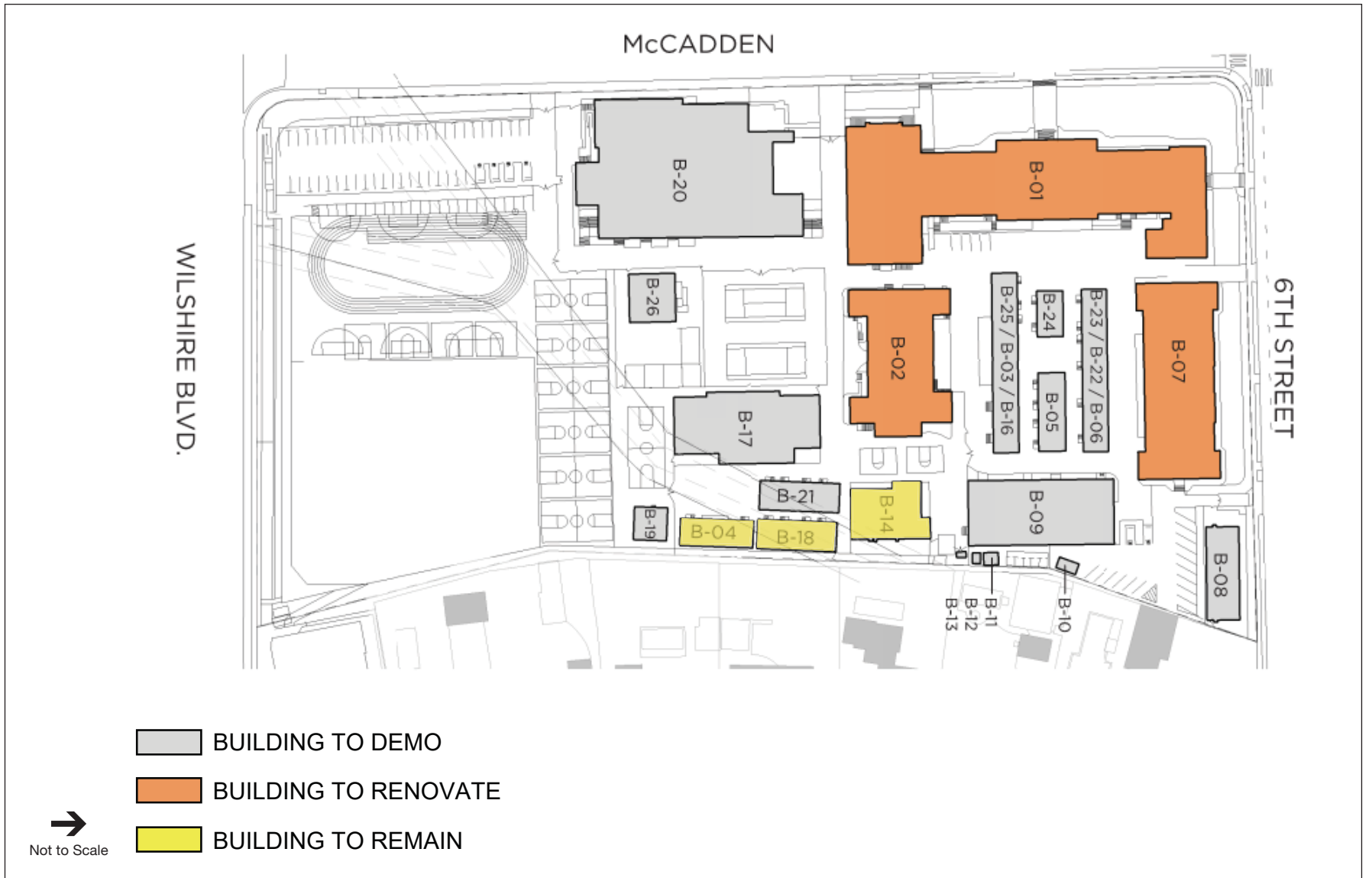
3. Project Description

**TABLE 2
 PROPOSED PROJECT (DEMOLITION, REMODEL, AND CONSTRUCTION)**

Bldg. ID*	Bldg. DSA No.	Building Name	Class-rooms	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Campus Total (sf)
1	A748	Main and Auditorium Building			67,381			
2	A749	Boys' Gym			11,868			
3	A13356	Classroom Building		1,824				
4	A7055	Classroom Building					1,824	
5	A6655	Classroom Building		1,824				
6	A58913	Classroom Building		1,824				
7	A24637	Classroom Building			28,529			
8	A22091	Classroom Building		2,520				
9	A749	Shop Building		9,032				
10	M0051F (No DSA)	Storage		200				
11	L0029G	Tool Room		168				
12	M0586K (No DSA)	Storage		80				
14	A16058	Home Making/Electric Shop					3,252	
16	A2677	Classroom Building		1,440				
17	A39162	Girls' Locker		7,325				
18	A10407	Classroom Building					1,824	
19	A20797	Sanitary Administrative Building		896				
20	A39162	Cafeteria-Classroom Building		18,392				
21	A10407	Classroom Building		1,824				
22	A6492	Classroom Building		912				
23	A6582	Classroom Building		912				
24	A15745	Classroom Building		1,056				
25	A7256	Classroom Building		864				
26	X3865Y (No DSA Listed)	Classroom Building		1,920				
A	-	Two-Story Specialty Classroom Building	10			20,080		
B	-	Three-Story Food Services; MPR/Classroom/Lockers	24			65,595		
M+O	-	Maintenance and Operations	-			2,276		
Approximate campus building space				60,500 sf	104,500	88,000		

Notes:
 sf = Square footage





SOURCE: Los Angeles Unified School District, 2016

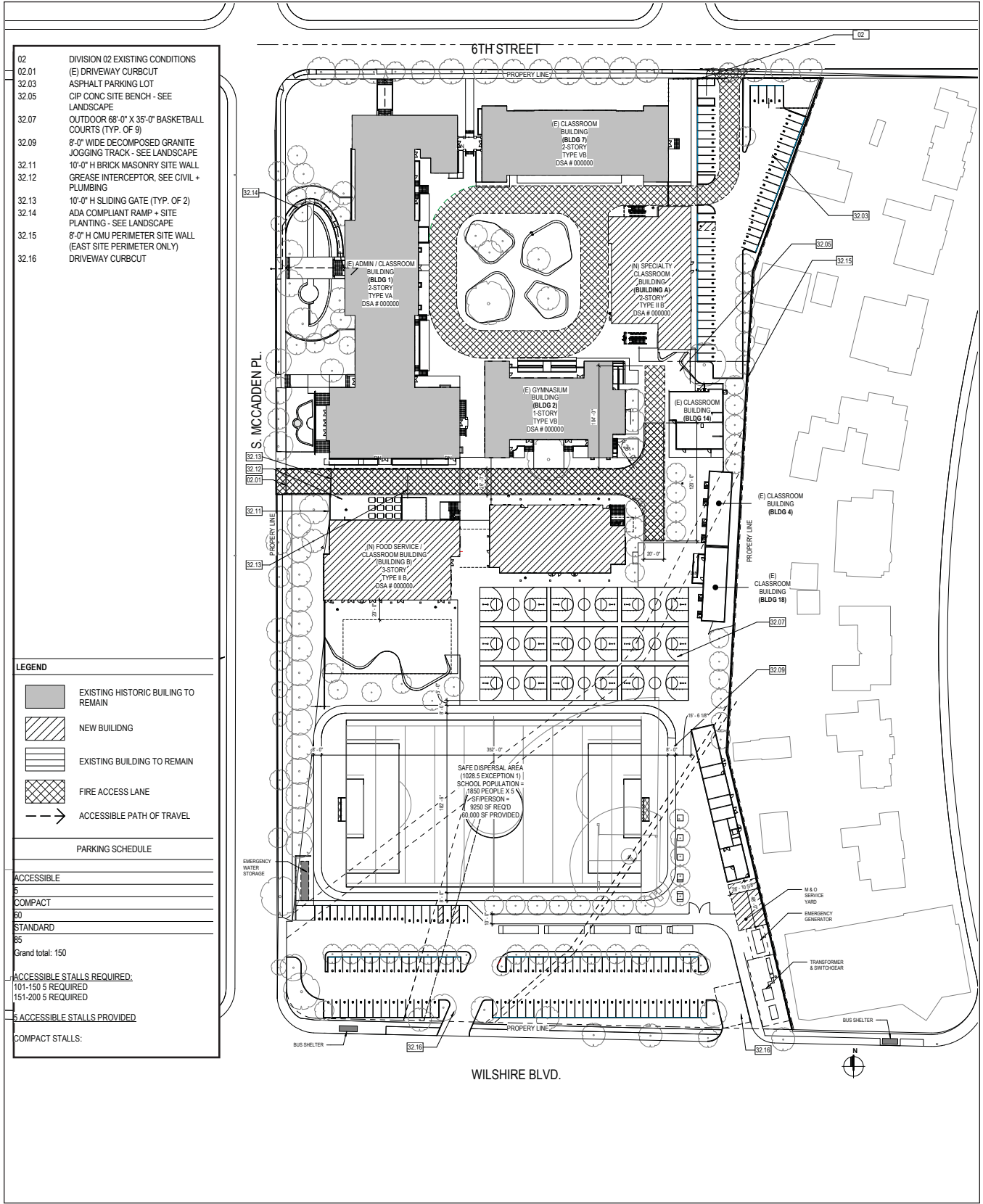
Burroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 5
Demolition Plan

3. Project Description

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SOURCE: Ehrlich Yanai Rhee Chaney Architects, 2017

Burrroughs Middle School Comprehensive Modernization Project . 211085.33

Figure 6
Site Plan

3. Project Description

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3. Project Description

3.1 CIRCULATION, ACCESS AND PARKING

Currently, the school's pedestrian main entrance is located off South McCadden Place. The proposed Project is designed to improve circulation, access (including the path of travel) and parking at the campus. The main access point to the campus would continue to be off South McCadden Place. The northern surface parking entrance will be repositioned on West 6th Street and the parking lot would be expanded. As part of the project, the southern surface parking lot along South McCadden Place and Wilshire Boulevard, would be reconfigured and ingress/egress driveways would be added on Wilshire Boulevard, in addition to access from McCadden. Bus drop-off /pickup would be relocated from its current location along McCadden Place to a designated bus loading zone within the Wilshire Boulevard parking lot. By moving the bus loading zone onsite, it is anticipated that traffic congestion in the surrounding neighborhood would be reduced during the student drop off and pick up times.

3.2 LANDSCAPE IMPROVEMENTS

The Burroughs MS campus is developed with: 1) buildings; 2) paved areas including parking lots, hardcourts, and walkways; and 3) landscaped areas including turf playfields (i.e., football field and baseball/softball field) and ornamental landscaping with trees, shrubs, and grass. There are currently 195 trees within and along the boundaries of the Project site. There are a total of two protected native coast live oaks on the campus and 37 City of Los Angeles-protected street trees along Wilshire Boulevard, South McCadden Place, and West 6th Street.

Landscape improvements may include repair or replacement of irrigation systems, including: lawn sprinklers and sprinkler controls; trees, shrubs, and other vegetation; landscaping plant material; utilitarian landscape components, such as sprinkler piping; and fencing and freestanding exterior walls. Historic landscaping (significant primary landscape, Figure 4) along the northwestern boundary of the Project site would be preserved.³¹ Any protected trees or significant trees that would be removed as part of the Project would be replaced in accordance with the requirements of the City of Los Angeles Tree Ordinance.

3.3 INFRASTRUCTURE

The Project site is currently served by existing utilities that are at the end of their service life and need replacement. Site-wide infrastructure improvements would be completed as part of the proposed Project for electrical, gas, sewer, water, and drainage.

³¹ PCR Services, Character Defining- Features Memorandum (CDFM) for John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California 90005, Prepared for Los Angeles Unified School District (LAUSD), July 28, 2015.

3. Project Description

3.4 UTILITY PROVIDERS

Los Angeles Department of Water and Power (LADWP) provides electric and potable water service to the Project site. The Southern California Gas Company (SCGC) provides natural gas to the Project site. The City of Los Angeles Bureau of Sanitation is the sewer service provider for the Project site.

3.5 SECURITY AND SAFETY FEATURES

With the exception of the northwest boundary of Burroughs MS along South McCadden Place and West 6th Street, the perimeter of the campus is surrounded by an 8-foot metal security fence. There is currently electronic access control at the school entrances and parking lots. The improvements to the Project site would include similar fencing and security features. Additionally, new internal fencing would be installed to allow for potential community use of athletic areas that can be accessed separately from the academic core of the campus. All new structures would be equipped with fire suppression sprinkler systems and lighting on the exterior walls. All entries would be illuminated to provide safe access. The new parking lots would have lighting that would be focused and shielded to reduce glare and light spillover. Lighting intensity from the new sources would be reduced to no more than 2 foot-candles onto adjacent residences. New sources of lighting would include hoods, filtering louvers, glare shields, and landscaping. Further, site lighting would be designed to have minimal offsite impact and contribution to sky glow by controlling the amount of uplight. Outdoor lighting of architecture and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior.

3.6 SUSTAINABILITY FEATURES

LAUSD is committed to sustainable construction principles, and has been a member of the Collaborative for High Performance Schools (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 energy efficient, material efficient, easy to maintain and operate, environmentally responsive, safe and secure, a community resource, and adaptable to changing needs.

School facilities seeking CHPS certification complete a scorecard and must achieve a certain number of points to be certified. Some of the sustainable design features that would be incorporated into the proposed Project include easy access to public transportation, provision of bicycle racks, 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. The proposed Project’s new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficient standards.



3. Project Description

3.7 REMOVAL ACTION WORKPLAN

Based on historic uses onsite, soils underneath pavement are affected by arsenic historically applied as an herbicide. LAUSD is currently overseeing preparation of the Removal Action Workplan (RAW) for the proposed Project. The RAW includes a description of the contamination, excavation dimensions for the proposed Project, methodology, transportation and disposal, confirmation sampling plan, methods to ensure worker and public health and safety, and cleanup goals. Further, community notices will be distributed in accordance with LAUSD policy. All cleanup activities under the RAW would adhere to applicable state and local policies and regulations regarding excavation, removal and disposal of affected materials. The volume of impact soil that is addressed by the soil removal action is estimated to be 160 cubic yards (cy).

3.8 CONSTRUCTION PHASING

The proposed Project would be developed in two 18-month phases following a 3-year construction phasing schedule. Construction activities would commence first quarter of 2020 and be completed first quarter of 2023. The construction schedule would have limited to no overlap between phases. All construction would occur during daytime hours, specifically 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. Saturdays.³²

³² No construction would occur during Sunday or Holidays per the City of Los Angeles regulations.

3. Project Description

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4. Environmental Checklist

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 checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use & Planning | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Utilities & Service Systems |
| <input type="checkbox"/> Geology & Soils | <input checked="" type="checkbox"/> Pedestrian Safety | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population & Housing | |

HAVE CALIFORNIA NATIVE AMERICAN TRIBES TRADITIONALLY AND CULTURALLY AFFILIATED WITH THE PROJECT AREA REQUESTED CONSULTATION PURSUANT TO PUBLIC RESOURCES CODE SECTION 21080.3.1?

No Native American tribes have requested notification or consultation through the Public Resources Code Section 21080.3.1 process.

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 Public Resources Code Section 21083.3.2). Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.³³

³³ Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form. 2016, September 29. The AB 52 regulations adopted by the California Natural Resources Agency were approved by the Office of Administrative Law, and will appear in the California Code of Regulations. Copies of the rulemaking materials can be found at: <http://resources.ca.gov/ceqa>.

4. Environmental Checklist

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.

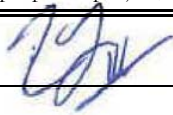
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

SIGNATURE



DATE

2/12/2019

Robert Laughton
PRINTED NAME

Director, Office of Environmental Health and Safety
TITLE

4. Environmental Checklist

The Burroughs MS Comprehensive Modernization Project would be constructed on an operating school campus that is eligible as a historic resource and is located in a residential urban neighborhood. As such, the District is primarily concerned about potential impacts to the following environmental factors, as documented in the CEQA Environmental Checklist (Appendix G of the CEQA Guidelines) and LAUSD's CEQA policies and practices: aesthetics; air quality (construction); cultural resources (construction); geology and soils (construction); hazards and hazardous materials (construction); noise (construction); pedestrian safety (construction); and traffic (construction). Detailed technical studies (with supporting appendices, where necessary) for these environmental factors will be implemented directly into the EIR.

The operational activities proposed at Burroughs MS would be consistent with the current operations. It is anticipated that campus operations would be more efficient or would be otherwise improved following implementation of the proposed project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed project are not additive to those operations analyzed in the Program EIR and would not be expected to result in substantial changes that have not previously been identified in the Program EIR. As such, the following environmental impact analysis focuses primarily on the potential impacts related to construction of the proposed project. Operational impacts, where evaluated, are provided as a supplementary or supporting discussion.

4. Environmental Checklist

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. 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, or other locally recognized desirable aesthetic natural feature within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.1.1 Discussion

The Program EIR includes Standard Conditions of Approval (SCs) for minimizing impacts to aesthetic resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided in **Table 3**.

**TABLE 3
 AESTHETIC RESOURCES STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
SC-AE-1	School Design Guide This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.
SC-AE-2	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 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-7	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.



4. Environmental Checklist

Applicable SCs	Description
SC-AE-8	<p>Design site lighting and select lighting styles and technologies to have minimal impact offsite and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.</p> <p>International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0 4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA IESNA Model establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used • Minimize glare by controlling the amount of light that tends to create glare • Minimize sky glow by controlling the amount of uplight
SC-CUL-1	<p>Design Build Team to Include Qualified Historic Architect</p> <p>For campuses with qualifying historical resources under CEQA, the Design-Build team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the <i>Secretary of the Interior's Standards</i> and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).</p> <p>For projects involving structural upgrades to historic resources, the Design-Build team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.</p>
SC-CUL-2	<p>Role of Historic Architect on Design-Build Team</p> <p>The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design-Builder throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. 3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases. 5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the project.

4. Environmental Checklist

Applicable SCs	Description
	<p>6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.</p> <p>7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or onsite storage. This shall include detailed instructions on maintaining and protecting in place relevant features.</p> <p>The Design-Builder and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</p>

4.1.2 Impact Analysis

Would the project:

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

No Impact. Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest. Based on the City of Los Angeles General Plan, the proposed Project is not considered a scenic vista.³⁴ The Project site is located in the Wilshire Community Plan Area, approximately 5 miles west of downtown Los Angeles. The Wilshire Community Plan Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major streets including Wilshire Boulevard.³⁵

The nearest scenic vista from the campus is the Santa Monica Mountains, located approximately 3.2 miles north of the campus. The proposed Project would not obstruct existing views of the Santa Monica Mountains. Therefore, the project would have no impact on scenic vistas. No mitigation or further study is required.

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

No Impact. The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from state highways. Table 5.1-1 of the SUP PEIR lists highways and corridors considered eligible for Scenic Highway Designation. The Project site is not located near a Scenic Highway, Byway, Route, or Corridor designated by the California Department of Transportation (Caltrans) or the Los Angeles County General Plan. The nearest eligible State Scenic Highway is State Route 1 (Pacific Coast Highway) located approximately 9.8 miles west of the Project site. The nearest officially designated State Scenic Highway is State Route 2 (SR-2) (Angeles Crest Highway) located approximately 12.6 miles northeast of the

³⁴ City of Los Angeles, 2001. *City of Los Angeles General Plan, Conservation Element*. September 26, 2001.

³⁵ City of Los Angeles, 2005. *Wilshire Community Plan*. Available at: <https://planning.lacity.org/complan/pdf/wilcptxt.pdf>, accessed August 10, 2017.



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Project site. The Project site is not observable from either of these highways. Impacts related to scenic resources within a state scenic highway would not occur and no further analysis will be included in the EIR.

c) **Substantially degrade the existing visual character or quality of the site and its surroundings?**

Potentially Significant Impact. Given the historic character of the campus, incompatible architecture associated with new building construction could have an adverse impact on the visual character or quality of the Project site. While the proposed Project would not substantially alter the main views of the existing campus, specifically the historic buildings and landscapes from the front of the campus (main entrance), construction of new buildings has the potential to conflict with the existing historic buildings by disrupting the existing views or context of the historic buildings (through changes to the landscape or the scale, architecture, or height of the new buildings) on the campus. Under the proposed Project, new and renovated buildings would be consistent with the general character of existing buildings on campus and the surrounding neighborhood in terms of architectural style, density, bulk, and setback. This consistency would be confirmed through incorporation of SC-CUL-1 and SC-CUL-2.

During project construction, there would be standard construction equipment on site, including small cranes, stockpiled materials, and construction-area barriers and fencing, that may introduce a potential impact to the existing visual character and quality of the Project site. However, these elements would be considered a temporary impact, as they would be removed from the site after completion of construction activities. Further, during construction, work areas would be screened from public view and from the students of Burroughs Middle School through the use of temporary barriers.

While the new three-story building would be the tallest structure on campus, it would be fully integrated with the campus in terms of scale, materials, and landscaping. Further, LAUSD adheres to a variety of design standards that apply to the project, which would ensure that the proposed Project is aesthetically compatible with the neighborhood in which it is located. The design standards include the incorporation of a set of Best Management Practices (BMPs) during design, construction, and operation.

Burroughs MS campus was assigned California Historical Resource status codes of “3S” and “3CS,” which means it appears to be eligible for the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) as an individual property through survey evaluation.³⁶ As such, under CEQA, the entire campus meets the definition of a historical resource. Further, the Project site is located within the Hancock Park HPOZ. A historical resources study will be conducted for the proposed Project. The historical study and EIR will provide further analysis on historic structures and visual character. The proposed Project thus could potentially substantially degrade the existing visual character or quality of the site and its surroundings, which will be analyzed in the Draft EIR.

³⁶ Leslie J. Heumann, SAIC, *DPR Primary Record Form for Burroughs Middle School*, Prepared for LAUSD March 15, 2002.

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

Potentially Significant Impact.

4.1.2.1 LIGHT IMPACTS

The campus contains two primary sources of light: light emanating from building interiors that passes through windows and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Depending on the location of the light source and its proximity to adjacent light-sensitive use, light introduction can be a nuisance, affecting adjacent areas and further diminishing the view of the clear night sky in an urban setting like the Project site. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties.

The Project site is located within a commercial and residential area. Existing lighting conditions in the project area include light emanating from building interiors, security lights and the surrounding commercial and residential land uses, as well as nearby street lighting. There are residential uses located north, east, and west of the Project site. There are no additional sensitive land uses in the immediate vicinity of the proposed Project.

The perimeter of the proposed buildings would have new light fixtures attached to exterior walls. All entries would be illuminated to provide safe access. The new parking lot along the southern boundary and northeastern corner of the Project site would also have security lighting on poles, that would be focused and shielded downward to reduce glare and light spillover. The project's proposed landscaping, parking and security lighting is expected to contribute to ambient nighttime illumination in the project vicinity. Design features listed in SC-AE-7 and SC-AE-8 such as hoods and filtering louvers would be incorporated to ensure that these new sources would not create light spill-over greater than 2 foot-candles onto adjacent properties. Outdoor lighting of architectural and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior. Further, site lighting would be designed to have minimal offsite impact and contribution to sky glow. Implementation of SC-AE-7 and SC-AE-8 would ensure that site lighting would have minimal offsite impacts. No further analysis is required in the Draft EIR.

4.1.2.2 GLARE, SHADE AND SHADOW IMPACTS

Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The proposed facilities would be constructed with limited high-glare materials. As described previously, SC-AE-6 and SC-AE-7 provide measures and performance standards to reduce glare impacts to pedestrians, residences, drivers and sports teams.

Shading impacts are influenced by the height and bulk of a structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses, or receptors. Shading also affects the visual character and quality of a project relative to surrounding land uses. The consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during



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cooler weather and loss of natural light for landscaping and human activity. In order to determine whether shading impacts would have a significant impact on the physical environment, a shade and shadow study would be prepared that shows the adjacent offsite, shade-sensitive uses that would receive shadows and the nature of shading that would occur. In order to adequately address these conditions, this topic will be analyzed further in the Draft EIR.

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4.2 AGRICULTURE AND FORESTRY RESOURCES

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



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4.2.1 Impact Analysis

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?**

No Impact. The Project site is currently developed and is void of any agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles identified the Project site as urban and built-up land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Project site.³⁷ Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. This issue will not be further addressed in the Draft EIR.

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

No Impact. A Williamson Act Contract requires private landowners to voluntarily restrict their land to agriculture and compatible open-space uses. The Project site is void of agricultural uses and does not include land enrolled in a Williamson Act Contract.³⁸ Therefore, no impact would occur regarding conversion of existing agricultural uses or Williamson Act contracts. This issue will not be further addressed in the Draft EIR.

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

No Impact. The proposed Project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The project area is currently zoned as [Q] PF-1XL-HPOZ. The proposed Project does not involve any changes to current General Plan land use or zoning designations for forest land, or timberland. Additionally, there are no timberland zoned production areas within the Project site or surrounding areas. Therefore, no impact to forest land or timberland would occur, and this issue will not be further addressed in the Draft EIR.

³⁷ California Department of Conservation (CDC), 2017. California Important Farmland Finder. Available at: <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed August 10, 2017.

³⁸ CDC, 2016. *Los Angeles County Williamson Act FY 2016/2016 Map*. 2016.

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

No Impact. The Project site and surrounding areas contain no forest land. Thus, implementation of the proposed Project would result in no impacts related to the loss or conversion of forest land to non-forest use. This issue will not be further addressed in the Draft EIR.

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. The Project site is developed with school facilities and impervious surfaces. No changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur, and this issue will not be further discussed in the Draft EIR.



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4.3 AIR Quality

	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. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.3.1 Discussion

The Program EIR includes SCs for reducing impacts to air quality in areas where future projects would be implemented under the SUP. Applicable SCs related to project air quality impacts are provided in **Table 4**, below.

**TABLE 4
AIR QUALITY STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
SC-AQ-2	LAUSD's 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	LAUSD's construction contractor shall: <ul style="list-style-type: none"> • Maintain slow speeds 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 transportation trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.

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	<ul style="list-style-type: none">• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.• Place stockpiled soil on polyethylene sheeting and cover with similar material.• Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment:</p> <p>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none">• Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).• Consolidate truck deliveries and/or limit the number of haul trips per day.• Route construction trucks off congested streets.• Employ high pressure fuel injection systems or engine timing retardation.• Utilize 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 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.• Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.• Utilize electric or alternatively fueled equipment, if feasible.• Utilize construction equipment with the minimum practical engine size.• Utilize low-emission on-road construction fleet vehicles.<ul style="list-style-type: none">• Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p>Fugitive Dust</p> <ul style="list-style-type: none">• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten 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 construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.• Pave all construction access roads for at least 100 feet from the main road to the project site.• Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.• Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content.• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).



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-
- Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.
 - Limit traffic speeds on unpaved road to 15 mph or less.
 - Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
 - Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
 - Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

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

4.3.2 Impact Analysis

Would the project:

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

Potentially Significant Impact. The Project site is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east.

Therefore, SCAQMD's 2016 AQMP³⁹ is the applicable air quality plan for the proposed Project. The proposed Project may generate air emissions which could conflict with or obstruct implementation of the AQMP. The Draft EIR will provide a more in depth consistency analysis related to the City's General Plan and applicable air quality plans and will describe potential effects associated with any inconsistencies.

b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

³⁹ SCAQMD, 2016. *Final Air Quality Management Plan*. Available at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, accessed August 10, 2017.

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Potentially Significant Impact. The proposed Project may violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Draft EIR will thus analyze this impact and will identify applicable air quality standards and the federal and state attainment status for pollutants within the SCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, and will also include an analysis of cumulative impacts associated with emissions of criteria pollutants.

- c) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Potentially Significant Impact. A significant impact would occur if implementation of the proposed Project resulted in a cumulative net increase in any criteria pollutant above the SCAQMD significance threshold. The SCAQMD's approach for assessing cumulative air quality impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. The Draft EIR will identify applicable air quality standards and the federal and state attainment status for pollutants within the SCAB and will analyze this impact. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, and will also include an analysis of cumulative impacts associated with emissions of criteria pollutants.

- d) **Expose sensitive receptors to substantial pollutant concentrations?**

Potentially Significant Impact. Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The Project site is an active school site surrounded by residential uses. The proposed Project could potentially expose sensitive receptors to substantial pollutant concentrations. Mitigation measures for diesel equipment and dust control that are recommended by SCAQMD will be evaluated as part of the Draft EIR to avoid or reduce the impacts to construction workers and occupants of nearby residents, if necessary.

- e) **Create objectionable odors affecting a substantial number of people?**

Less Than Significant Impact. Potential sources that may emit odors during 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 would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SC-AQ-2 through SC-AQ-4, and SCAQMD Rules 402 and 1113.15. Therefore, the proposed Project would result in less-than-significant impacts associated with odor nuisance.

According to the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing



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plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.⁴⁰The proposed Project would not include any of these odor-producing uses; odors associated with project operation will be limited to onsite waste generation and disposal and minor odors generated during food preparation activities for the onsite food service operations. Furthermore, all trash receptacles would be covered and properly maintained to minimize odors and would be emptied on a regular basis. Therefore, implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required in the EIR.

4.4 BIOLOGICAL RESOURCES

	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 Game 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 the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴⁰ SCAQMD, 2014. *CEQA Air Quality Handbook*. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>, accessed August 10, 2017.

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4.4.1 Discussion

The analysis below is based in part on the Arborist Report⁴¹ prepared for the proposed Project (Appendix B).

The Program EIR includes SCs for minimizing impacts to biological resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to biological resource impacts associated with the proposed Project are provided in **Table 5**.

TABLE 5
BIOLOGICAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-BIO-1	<p>LAUSD qualified biologist shall identify sensitive species and their habitat within or near proposed project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:</p> <ul style="list-style-type: none"> • USFWS • National Marine Fisheries Services (NMFS) • CDFW • California Native Plant Society (CNPS) <ul style="list-style-type: none"> • County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases. • CNDDDB • CNPS Rare Plant Inventory • Local Audubon Society • Los Angeles County Department of Regional Planning for information on Significant Ecological Areas • California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with project sites. <p><u>Biological Resources Report</u></p> <p>If the LAUSD qualified biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.</p> <ul style="list-style-type: none"> • Information on regional setting that is critical to the assessment of rare or unique resources • A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The <i>Manual of California Vegetation</i> (Sawyer <i>et al.</i>) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

⁴¹ Jan C. Scow, *Tree Inventory and Protected Tree Report for Renovation of Burroughs Middle School 600 S. McCadden Place, Los Angeles, CA 90005*, June 7, 2017.



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- A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.
- Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:
 - location of the mitigation site
 - plant species to be used, container sizes, and seeding rates
 - schematic depicting the mitigation area
 - planting schedule
 - irrigation method
 - measures to control exotic vegetation
 - specific success criteria
 - detailed monitoring program
 - contingency measures should the success criteria not be met
 - identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.

LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation.

SC-BIO-2	LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.
SC-BIO-3	<p>LAUSD shall comply with the following:</p> <ul style="list-style-type: none"> • Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of avian breeding season to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in

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suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed 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 inside boundary of the 300- or 500-foot buffer between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

- If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer.
- No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction.
- A biological monitor 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 biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

SC-BIO-4

LAUSD shall comply with the following:

- Mitigation shall not include translocation of rare plants. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.
- **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.
- **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.
- **Creation of oak woodlands.** Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.
 - All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.
 - Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period.
 - Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical



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	<p>drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings.</p> <p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p>
SC-BIO-5	<p>LAUSD shall comply with CDFW recommendations as listed below:⁴²</p> <ul style="list-style-type: none"> • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in “no net loss” of either wetland habitat values or acreage. • All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. • A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition. <p>Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.</p>

4.4.1.1 DESCRIPTION OF BASELINE CONDITIONS

The Project site is an active middle school campus that has been previously disturbed, cleared of native vegetation, and currently contains school buildings, facilities, and scattered landscaped vegetation. An arborist survey was completed for the proposed Project.⁴³ The survey inventoried 156 trees and noted two protected native coast live oak (*Quercus agrifolia*) (which are protected by the City of Los Angeles) in the Project site and 37 City of Los Angeles-protected street trees on the three streets that border the campus.

The trees (and buildings and structures) on the campus have the potential to serve as nesting sites for birds and bats; however, the Project site is located in a highly urbanized area of the City of Los Angeles. The campus has been fully developed and does not contain any habitat to support candidate, sensitive, or special-status species; riparian habitat; or other natural habitats such as wetlands. Special-status plant and wildlife species are those that are candidates, proposed, or listed as threatened or endangered by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW), and plant species that are considered sensitive by the California Native Plant Society (CNPS). According to a CDFW California Natural Diversity Database (CNDDB) search of the Hollywood, California United States Geologic Survey (USGS) 7.5-minute topographic quadrangle map, and surrounding 8 quadrangle maps, there are 27 species in the vicinity of the Project site that are considered special status by local, state, and federal agencies (Appendix B). However, the Project site does not contain suitable habitat necessary to support special-status wildlife species.⁴⁴ To manage the preservation of these species, and the more than 180 species identified as threatened or endangered by the City of Los Angeles General Plan, Significant Ecological Areas (SEAs) have been identified throughout the City on the basis of existing known habitats of sensitive or endangered species. The Project site is not located near or within an SEA and the nearest SEA is Griffith Park and is located approximately 4.5 miles north of the Project site.⁴⁵

⁴² Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.

⁴³ Ibid.

⁴⁴ California Department of Fish and Wildlife (CDFW), California Natural Diversity Database. July 30, 2017.

⁴⁵ Los Angeles County Department of Regional Planning, 2017. Planning and Zoning Information, GIS-Net 3. SEA Layer. Available at : http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed August 10, 2017.

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4.4.2 Impact Analysis

Would the project:

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

No Impact. The Project site is located on an active middle school campus that contains no native vegetation capable of supporting any special-status plant or wildlife species. The Project site is entirely developed and surrounded by residential development in all directions. The Project site and surrounding area are not mapped within a SEA. The Project site does not contain any species that are identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by the CDFW or USFWS (Appendix B).⁴⁶ The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Project site is extremely low. Therefore, the project would have no impact on special-status species and this issue will not be further discussed in the EIR.

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

No Impact. The Project site does not contain any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. The Project site is entirely developed and does not contain any natural drainages or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. Therefore, there would be no impact and no further analysis is required in the EIR.

- c) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. Generally, the entire school campus is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including playfields. The Project site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal etc.). Additionally, no wetlands protected by CDFW and/or the Regional Water Quality Control Board (RWQCB) occur on the Project site. The Project site is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. Therefore, no impact to wetlands would occur through direct removal, filling, hydrological interruption, or other means. This issue will not be further discussed in the EIR.

⁴⁶ California Department of Fish and Wildlife (CDFW), California Natural Diversity Database. July 30, 2017.



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- 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 does not contain any water courses or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. The nearest identified habitat linkage occurs in the Santa Monica Mountains 3 miles north of the Project site, well outside the potential impact area for the proposed Project. Therefore, the proposed Project would have no impact on the movement of any wildlife species or impede the use of migratory wildlife corridors.

Tree removal and building demolition may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season (February 1 through August 31). Construction related noise and vibration also have the potential to disrupt birds during the avian breeding season. Additionally, the Project site contains buildings that may be used by bats as nursery sites during the bat maternity roosting season of March through August. Therefore, construction activities (including demolition) have the potential to impact nesting birds or maternity roosting bats. However, the proposed Project would implement SC-BIO-3 as necessary. Following the completion of a pre-construction clearance survey, the implementation of measures provided in SC-BIO-3 would reduce impacts to less than significant. These measures include commencing tree removal and demolition activities outside of avian nesting season and bat maternity roosting season. Therefore, impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant Impact. The Project site is located within an entirely developed area surrounded by residential and commercial development within the City of Los Angeles and is not located within any SEA protecting biological resources.⁴⁷ The Project site contains trees for landscape fronting Wilshire Boulevard, South McCadden Place, and West 6th Street that are considered significant character defining features of the Project site. Additionally, the Project site contains two Coast live oak (*Quercus agrifolia*) trees that are considered protected under the City of Los Angeles Municipal Code Sections 46.00 et seq.

Construction of the proposed Project may require the removal of street trees and trees onsite. The Project would include a landscape plan to offset the loss of trees on the Project site. All recommendations contained in the project-specific Arborist Protected Tree Report are incorporated into the proposed Project during construction. Replacement trees will be planted at the appropriate size at maturity for the space, and will be selected from the LAUSD Approved Plant List.⁴⁸ In accordance with the City of Los Angeles' Protected Tree Ordinance and District Tree Guidelines, LAUSD will complete the City's tree removal permit process, as

⁴⁷ Ibid.

⁴⁸ LAUSD, LAUSD Approved Plants List, 2012, http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf

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appropriate. Therefore, impacts conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant and no further analysis is required in the EIR.

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

No Impact. The Project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan.⁴⁹ The Project site is not located within or proximate to any SEA, Land Trust, or Conservation Plan. Therefore, no impact resulting from a conflict with an adopted conservation plan would occur and this issue will not be further analyzed in the EIR.

⁴⁹ CDFW, 2017. California Regional Conservation Plans. Available at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 10, 2017.



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4.5 CULTURAL RESOURCES

	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 significance of a historical resource as defined in State CEQA §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.5.1 Impact Analysis

Would the project:

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

Potentially Significant Impact. During the Phase I Survey conducted on March 15, 2002, Burroughs MS was assigned a California Historical Resource Status Code of 3S and 3CS, which means the campus appears eligible for National Register and California Register through survey evaluation.⁵⁰ A historic resources technical report and cultural resources analysis will be prepared as part of the Draft EIR, which will identify any historic resources within the Project site and surrounding area. The Draft EIR will also evaluate the potential for implementation of the project to substantially change the significance of an identified historical resource and will include mitigation measures to reduce impacts to historical resources, if necessary.

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

Potentially Significant Impact. While the project is disturbed due to prior development, demolition, and redevelopment, ground-disturbing activities associated with construction of the project could result in the inadvertent discovery of unknown archaeological resources. A cultural resources analysis, including a records search, will be prepared as part of the Draft EIR. The Draft EIR will identify any known archaeological resources within the Project site or within the surrounding area as well as evaluate potential impacts to these resources from development of the project, if any. If significant impacts to archeological resources are

⁵⁰ Leslie J. Heumann, SAIC, *DPR Primary Record Form for Burroughs Middle School*, Prepared for LAUSD March 15, 2002.

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identified, the Draft EIR will include mitigation measures, if necessary, to reduce these impacts to extent feasible.

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

Potentially Significant Impact. Ground-disturbing activities, such as excavation or trenching, during construction of the project could have the potential to encounter the undisturbed alluvium soils, which have the potential to contain unknown paleontological resources. The Draft EIR will describe in greater detail the paleontological setting of the project area as well as evaluate the potential for impacts to paleontological resources associated with construction of the project. Further, if necessary, mitigation measures will be developed to reduce impacts to a level of less than significant

d) Disturb any human remains, including those interred outside of dedicated cemeteries.

Less than Significant Impact. No known cemeteries or other burial places are known to exist within the Project site and the proposed Project is unlikely to disturb human remains. However, because the proposed Project would involve ground-disturbing activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. In the event that human remains are encountered, the District would comply with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, construction excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission shall be consulted to designate a Most Likely Descendant who shall recommend appropriate measures to the landowner regarding the treatment of the remains. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic in an EIR is required and no mitigation measures are required.



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4.6 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential 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), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.6.1 Discussion

The following evaluation of geology and soils is based, in part, on the Preliminary Geotechnical Hazards Evaluation prepared for the Project site in August 2015⁵¹ and the Supplemental Consultation letter prepared for the Project site in August 2017.⁵² The Preliminary Geotechnical Hazards Evaluation assessed geologic and soil conditions at and in the immediate vicinity of the proposed Project site.

⁵¹ Amec Foster Wheeler, 2015. Report of Preliminary Geotechnical Investigation Proposed Modernization, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California. August 10, 2015.

⁵² Amec Foster Wheeler, 2016. *Supplemental Consultation Proposed Modernization, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California.* August 30, 2016.

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The Program EIR includes SCs for minimizing impacts to geology and soils of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided in **Table 6**.

**TABLE 6
 GEOLOGY AND SOILS STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
SC-GEO-1	OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LAUSD geohazard assessments.
SC-HWQ-1	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). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	Compliance Checklist for Storm Water Requirements at Construction Sites. This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

4.6.2 Impact Analysis

Would the project:

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i **)Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)**

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. There are no active faults crossing the Project site, and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone.⁵³ The closest historically active surface faults are the Hollywood Fault, located approximately 2.8 miles north of the Project site, and the Newport-Inglewood Fault Zone, located approximately 3.6 miles southwest of the

⁵³ Amec Foster Wheeler, 2015. Report of Preliminary Geotechnical Investigation Proposed Modernization, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California. August 10, 2015.



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Project site.⁵⁴ Therefore, there would be no impact associated with rupture of a known earthquake fault. This issue will not be analyzed further in the Draft EIR.

ii) Strong seismic ground shaking?

Less than Significant Impact. The Project site is located in a seismically active region. The City, as with all of Southern California, is subject to strong ground shaking. The closest historically active surface faults are the Hollywood Fault located approximately 2.8 miles north of the Project site and the Newport-Inglewood Fault Zone located approximately 3.6 miles southwest of the Project site. These faults could have the potential to generate strong seismic ground shaking at the Project site during an earthquake event.⁵⁵ The proposed Project would be required to comply with the geotechnical and seismic design requirements of the most recent version of the California Building Code (CBC) (Title 24), which requires structural design that can accommodate ground accelerations expected from known active faults. In addition, implementation of the proposed Project would seismically retrofit the administrative and auditorium building (including the library), classroom building, and the practice gym. Seismic retrofitting would be in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, CBC, Division of State Architect, California Department of Education, and recommendations contained in the Preliminary Geotechnical Investigation.⁵⁶ The retrofitting activities would include, but would not be limited to bracing and construction and reinforcing of walls. Therefore, implementation of the proposed Project would result in less-than-significant impacts associated with strong seismic ground shaking. No further analysis is required in the Draft EIR.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a seismic phenomenon where unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The geotechnical evaluation for the proposed Project determined that the site is not within an area zoned by the state as being susceptible to liquefaction.⁵⁷ In addition, the historic high groundwater is deeper than 50 to 70 feet below grade, keeping the potential for soil saturation low. Therefore, no impacts associated with liquefaction would occur and no further analysis of this issue will be included in the Draft EIR.

iv) Landslides?

No Impact. The Project site is not located within an earthquake-induced landslide potential zone.⁵⁸ Further, LAUSD policy dictates that schools will not be constructed in areas that are prone to landslides. LAUSD has conducted a comprehensive site-specific geotechnical investigation, which also includes an assessment of existing landslide potential on and next to the Project site, as well as the potential for the project to increase landslide hazards on or adjacent to the site. Implementation of the project would not expose people or

⁵⁴ Ibid.

⁵⁵ Ibid.

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.

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structures to substantial adverse hazards due to landslides, and there would be no impact in this regard. This issue will not be further analyzed in the Draft EIR.

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

Less than Significant Impact The proposed Project would include grading and earthmoving activities at the Project site that could expose soils to erosion from heavy winds, rainfall, or runoff. Because project construction would disturb more than 1 acre of soil, the project would be required to comply with SC-GEO-1 Geohazard Assessment Scope of Work, including the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In compliance with this permit and SC-HWQ-1 and SC-HWQ-2, a Storm Water Pollution Prevention Program (SWPPP) would be prepared and implemented, which would require erosion control, sediment control, and BMPs to minimize loss of topsoil or substantial erosion. Construction contractors are responsible for implementation of the SWPPP, which includes maintenance, inspection, and repair of erosion and sediment control measures and water quality BMPs throughout the construction period. Once constructed, disturbed areas would be protected by coverings such as structures, pavement, concrete, or vegetation, and the potential for long-term erosion or loss of topsoil would be reduced to less than significant. Therefore, with implementation of these requirements and associated BMPs, erosion related to construction activities and operation of the proposed Project would be less than significant and no mitigation is required. This issue will not be further analyzed in the Draft EIR.

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. As stated above, the Project site is developed with generally flat topography. With the exception of the area in the immediate vicinity of the existing cafeteria-classroom building and the adjacent lunch shelter, records documenting the placement and compaction of the existing fill soils are not available; therefore, the existing fill soils are not considered suitable for support of new structures on conventional spread/continuous footings. Therefore, project development may result in potentially significant impacts regarding unstable soils. However, DSA would require the preparation of a project-specific, design-level Geotechnical Investigation Report to supplement the Preliminary Geotechnical Report (Appendix C) and would further require that all recommendations contained in the project-specific geotechnical report be incorporated into proposed Project design and implemented during construction. The investigation shall include recommendations applicable to foundation design, earthwork, shoring and site preparation that will minimize the effects of anticipated ground shaking and any other identified geologic hazards. Such recommendations may include but not be limited to removal and replacement of existing unsuitable fill and loose native soils with properly compacted engineered fill, or placement of soils for foundations and pads. The analyses shall be prepared in accordance with applicable City ordinances and policies and consistent with the most recent version of the California Building Code (CBC) and Seismic Hazards Mapping Act, which requires structural design that can mitigate potential risks from geologic or seismic hazards. Implementation of these features, and those contained in the geotechnical report will use proven methods, generally accepted by registered engineers, to reduce the risk for geologic hazards, such as those from unsuitable soils.



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Potential impacts associated with unstable soils would be less than significant; therefore, this issue will not be further analyzed in the EIR.

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

Less than Significant Impact. Expansive soils are predominantly comprised of clays, which expand in volume when water is absorbed and shrink when the soil dries. Expansion is measured by shrink-swell potential, which is the volume change in soil with a gain in moisture. Soils with a moderate to high shrink-swell potential can cause damage to buildings and infrastructure. The upper clayey soils (both fill and natural) are expansive, and will shrink and swell with fluctuations in moisture content.⁵⁹ Future facilities within the project area may be exposed to potential significant impacts regarding expansive soils. However, as stated above in impact c), DSA would require the preparation of a project-specific, design-level Geotechnical Investigation Report to supplement the Preliminary Geotechnical Report (Appendix C) and would further require that all recommendations contained in the project-specific geotechnical report be incorporated into proposed Project design and implemented during construction. The investigation shall include recommendations applicable to foundation design, earthwork, shoring and site preparation that will minimize the effects of anticipated ground shaking and any other identified geologic hazards. Such recommendations may include but not be limited to removal and replacement of existing unsuitable fill and loose native soils with properly compacted engineered fill, or placement of soils for foundations and pads. The analyses shall be prepared in accordance with applicable City ordinances and policies and consistent with the most recent version of the California Building Code (CBC) and Seismic Hazards Mapping Act, which requires structural design that can mitigate potential risks from geologic or seismic hazards. Implementation of these features, and those contained in the geotechnical report will use proven methods, generally accepted by registered engineers, to reduce the risk for geologic hazards, such as those from unsuitable soils. Potential impacts associated with unstable soils would be less than significant; therefore, this issue will not be further analyzed in the EIR.

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

No Impact. The proposed Project would not include the installation or use of septic tanks or alternative wastewater disposal systems. The proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact related to alternative wastewater disposal systems would occur and no further analysis is warranted in the EIR.

⁵⁹ Ibid.

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4.7 GREENHOUSE GAS EMISSIONS

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

VII. GREENHOUSE GAS EMISSIONS. Would the project:

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

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

4.7.1 Discussion

The PEIR includes SCs for minimizing impacts related to greenhouse gas (GHG) emissions in areas where future projects would be implemented under the SUP. Applicable SCs related to GHG emissions impacts associated with the proposed Project are provided in **Table 7**.

**TABLE 7
 GREENHOUSE GAS EMISSIONS STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
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 time dependent valued energy of the proposed Project design is at least 10 percent, with a goal of 20 percent 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.



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4.7.2 Impact Analysis

Would the project:

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

Less Than Significant Impact. As described in the SUP PEIR, modernization projects are anticipated to reduced operational emissions due to increased energy efficiency. In addition, the proposed project would not increase the number of students or faculty at the school and therefore, would not increase GHG emissions associated operations. With respect to all SUP projects, implementation of SCs GHG-1 through GHG-5 would ensure that the proposed Project would not indirectly or directly result in a significant impact on the environment. Therefore, with project implementation and adherence to SCs GHG-1 through GHG-5, the project would not indirectly or directly result in a significant impact on the environment. Therefore, impacts would be less than significant and no further analysis is required in the EIR.

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

Less than Significant Impact. As described in the SUP PEIR, implementation of the SUP would be consistent with plans adopted for the purpose of reducing GHG emissions, such as the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), California Assembly Bill 32, California Air Resources Board Scoping Plan, and other statewide strategies to reduce GHG emissions.⁶⁰ Development of the proposed Project would replace and modernize facilities at Burroughs MS, but it would not increase the number of students or faculty at the school and therefore, would not increase GHG emissions. As such, the project would not conflict with the goals of the RTP/SCS.

Additionally, SUP-related projects, including the proposed Project, would comply with the District's GHG emission reduction measures. LAUSD's School Design Guide requires construction contractors to reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction, as materials recovery would minimize the need to produce and transport new materials, thereby reducing emissions from mobile sources and energy use.⁶¹ With respect to all SUP projects, implementation of SCs GHG-1 through GHG-5 would ensure that the proposed Project would not conflict with any plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, with project implementation and adherence to SCs GHG-1 through GHG-5 and compliance with Title 24, the project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant and no further analysis is required in the EIR.

⁶⁰ LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. Pg. 5.7-18 to 5.7-19.

⁶¹ Ibid.

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4.8 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS.				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code; or a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Be located within one-fourth of a mile of any facilities which might be reasonably anticipated to emit hazardous or acutely hazardous substances or waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k. Be located on a site where the property line is less than the following distance from the edge of respective power line easements? 100 feet of a 50-133 kV line, 150 feet of a 220-230 kV line, or 350 feet of a 500-550 kV line.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. Be located on a site that is within 1,500 feet of a railroad track easement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n. Be located on a site that is near a reservoir, water storage tanks, or high-pressure water pipelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o. Be located within 1,500 feet of a pipeline that may pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
p. Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
q. Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and playfields that cannot be safely supervised?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
r. Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
s. Be located on a site with a traffic pattern for school buses that can pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
t. Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.8.1 Discussion

The following evaluation of hazards and hazardous materials is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project site in May 2016.⁶² The Phase I ESA, which is included as Appendix D of this IS, provides an assessment of environmental conditions as they exist on the Burroughs MS property.

4.8.2 Impact Analysis

Would the project:

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

Less than Significant Impact. Proposed project construction activities would involve transport, use, and disposal of hazardous materials such as solvents, oils, grease, and cleaning fluids. In addition, hazardous materials may be needed for fueling and servicing construction equipment on the Project site. The use of these materials during project construction would be short-term in nature, and would occur in accordance with standard construction practices. All transport, handling, use, and disposal of substances such as petroleum products related to construction would comply with all federal, state, and local laws regulating the management and use of hazardous materials. These laws include but are not limited to: the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), federal Clean Air Act that regulates asbestos as a hazardous air pollutant and the Occupational Safety and Health Administration (OSHA) that regulates asbestos as a potential worker safety hazard. Construction activities that involve hazardous materials would be governed by several agencies, including the California Environmental Protection Agency (CalEPA), Caltrans, California Division of Occupational Safety and Health (Cal/OSHA), Department of Toxic Substances Control (DTSC), and the Los Angeles Fire Department. BMPs would be in place to ensure the lawful and proper storage and use of these materials and thus potential impacts would be less than significant. As discussed in the Program EIR, the types and amounts of hazardous materials that are now handled by LAUSD are not expected to substantially change upon construction of individual projects or upon completion of the SUP in its entirety. The amounts of hazardous materials handled at a given campus would remain relatively small and would be subject to federal, state, and local health and safety requirements. LAUSD would continue to implement its existing programs, practices, and procedures for handling hazardous materials, which would be extended to all new facilities. Proposed Project impacts from

⁶² WorleyParsons, 2016. *Phase I Environmental Site Assessment, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, CA.* May 18, 2016.



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construction activities would thus be less than significant. No further analysis of these impacts is required in the Draft EIR.

An important component of the SUP is to eliminate hazards associated with asbestos and lead-based paint in existing buildings to be demolished, as would be the case with the proposed Project. With respect to asbestos-containing materials (ACM), the PEIR provides a complete protocol for the handling of ACM, including required procedures whenever ACM would be disturbed, in compliance with federal and state regulations.

The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763) requires local education agencies to inspect school buildings for asbestos-containing building materials, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU).

The Phase I ESA for the proposed Project indicated that based on the age of the existing buildings, it is possible that ACM are present in building materials.⁶³ All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using specific handling procedures. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance" during any project where ACM may be disturbed. Compliance with federal and state regulations and the District guidelines and procedures would ensure the reduced risk of release of hazardous building materials into the environment. Therefore, impacts associated with the handling and disposal of ACM would be less than significant. No further analysis of these impacts is required in the Draft EIR.

The Phase I ESA for the proposed Project indicated that based on the age of the existing site buildings, it is possible that LBP has been applied to the exterior finishes of the buildings. Therefore, it is possible that LBP residue is present in soils around the perimeters of the existing and former buildings.⁶⁴ 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 impact to lead-based materials, written approval by the District's environmental representative of the abatement work plan, and transportation of lead-related waste under a Uniform Hazardous Waste Manifest. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work" during any project where lead-containing materials may be disturbed. Compliance with federal and state regulations and the District guidelines and procedures would ensure that impacts associated with the handling and disposal of LBP would be less than significant. Long-term operation of the proposed Project would involve very little transport, storage, use, or disposal of hazardous materials and substances. LAUSD's OEHS developed and implemented

⁶³ WorleyParsons, 2016. *Phase I Environmental Site Assessment, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, C.A.* May 18, 2016.

⁶⁴ Ibid.

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a Chemical Hygiene Plan to minimize employee and student exposure to hazardous chemicals in schools with laboratories. Site administrators are required to appoint a chemical safety coordinator to implement the Chemical Hygiene Plan and to assist the site administrator in complying with hazardous material management, conducting employee trainings, and established laboratory safety protocols. The types of hazardous materials associated with operation of a school would generally be limited to those associated with janitorial, maintenance, and repair activities, such as commercial cleansers, paints, aerosol cans, lubricants, and automotive supplies (by-products), etc. 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. Such requirements would be incorporated into the design and operation of the project, such as providing for and maintaining safety data sheets, appropriate storage areas for hazardous materials, and installing or affixing appropriate warning signs and labels. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No further analysis of these impacts is required in the Draft EIR.

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

Potentially Significant Impact. A significant impact would occur if the proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. According to the Phase I ESA, electrical transformers, compressed gas cylinders, an idle emergency generator, and historical uses of gas fueling stations and one incinerator are or were present on site.⁶⁵ Therefore, there is the potential for various hazardous materials to be located in soils and building materials at the Project site and to cause a significant impact. Further site assessment is in progress and this issue will be further evaluated in the Draft EIR.

The Project site is located in an area designated by the City of Los Angeles Department of Building and Safety (LADBS) as a Methane Zone due to known deposits of petroleum tar and naturally-occurring oil field gases in the geologic formations in the site vicinity. Oil field gases are typically comprised of significant concentrations of methane, which is flammable and would represent a fire hazard if allowed to seep into an enclosed space. Oil field gases may also contain trace amounts of various sulfide compounds, including hydrogen sulfide, which though acutely toxic, is readily detectable at non-hazardous concentrations by its distinct ‘rotten egg’ odor. Although no incidents of noticeable oil field gas seepage have been reported in the immediate vicinity of the site, a fire due to gas seepage did occur in 1985 in the area of 3rd and Fairfax, approximately 1.5 miles west-northwest of the site. Conceivably gas seepage could occur at the site if geologic conditions were to change due to seismic activity or gas pathways were to open up as a result of construction activities in the vicinity of the site.

As a precautionary measure, all new buildings and paved areas planned at the site will incorporate provisions for gas mitigation equivalent to those set forth in the Los Angeles Building Code, Division 71, and the Methane

⁶⁵ Ibid.



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Mitigation Standards established by the LADBS. Implementation of appropriate gas mitigation measures will reduce the potential risk to students, staff, and visitors from oil field gas seepage. This topic will be evaluated further in the EIR.

The Draft EIR will analyze the potential for the release of hazardous materials and the risk of exposing persons to any hazardous materials. The Draft EIR will identify any potentially significant impacts associated with the proposed Project and recommend mitigation measures, as necessary.

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

Potentially Significant Impact. The proposed Project would be implemented on a school site surrounded by residential uses. Further, the Wilshire Private School is located across Wilshire Boulevard to the south of the Project site. The proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations, as well as with any applicable District standards. Compliance with regulatory requirements would ensure that the proposed Project would not result in hazardous emissions, materials or substances within 0.25 miles of an existing school. The Draft EIR will further analyze the potential for the release of hazardous materials and the risk of exposing persons to any hazardous materials. The Draft EIR will identify any potentially significant impacts associated with the proposed Project and recommend mitigation measures, as necessary.

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. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992, and information regarding the Cortese List is now compiled on the websites of DTSC, the State Water Board, and CalEPA. DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as removal action) or extensive investigations are planned or have occurred. Review of the EnviroStor database showed that the Project site is not identified on any of the above database lists. According to both the EnviroStor⁶⁶ and GeoTracker⁶⁷ databases, there are no documented hazardous materials at the Project site. The proposed Project would not be located on a site that is included on a list of hazardous materials sites pursuant

⁶⁶ DTSC, 2017. EnviroStor Database. Available at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed August 16, 2017.

⁶⁷ SWRCB, 2017. GeoTracker Map. Available at: <https://geotracker.waterboards.ca.gov/>, accessed August 16, 2017.

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to Government Code Section 65962.5, and therefore no impact would occur. No further analysis will be included in the Draft EIR.

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

No Impact. The nearest airport to the Project site is the Santa Monica Airport, located approximately 6.8 miles southwest of the Project site. The proposed Project is not located within the Santa Monica Land Use Plan Airport Influence Area. Therefore, the proposed Project would not create a safety hazard from proximity to a public airport. No impact would occur and this issue will not be discussed further in the Draft EIR.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. The Project site is not located within two miles of an operating airport. There are 54 private-use heliports within the City of Los Angeles.⁶⁸ The Project site does not include a private-use heliport. The nearest private heliport, the Beverly Center Heliport is located approximately 2.5 miles northwest of the Project site. Demolition and new construction at the existing school site would not create any new safety hazards associated with a private airstrip or heliport operations. Therefore, the proposed Project would not create a safety hazard from proximity to a private airstrip. No impact would occur, and this issue will not be further discussed in the Draft EIR.

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

Less than Significant Impact. The Project site is an existing school campus that would adhere to LAUSD's emergency response plans. During construction, emergency response procedures would be governed by the District's emergency response protocol and the contractor's emergency response plan. Construction of the proposed Project would involve the transport of equipment and materials on public roadways. Other than delivery of materials and supplies to the Project site and the hauling of debris and soil from the Project site, construction of the proposed Project would be confined within the campus boundaries.

Upon completion of the proposed Project, District-wide emergency response plans, policies, and guidance developed by LAUSD would be extended to the new facilities. In addition, LAUSD developed a district-wide Emergency Operations Plan (EOP) that assigns responsibilities and provides a framework for coordination of response and recovery efforts in the event of an emergency. District schools are also required to comply with California Code Sections 32281-32289, dealing with the preparation of Safe School Plans (SSPs), which must be reviewed and updated every year. As noted in the PEIR, the proposed Project would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan(s); for the City of Los Angeles, these plans include but are not limited to: the City's Emergency Operations Master Plan, Local

⁶⁸ Airnav.com. 2017. Airports in Los Angeles. Available at: <http://www.airnav.com/airports/get>, accessed August 11, 2017.



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Hazard Mitigation Plan, the Los Angeles County Operational Area Emergency Response Plan, and the County All-Hazards Mitigation Plan. All construction, modernization, and repair work would not impede emergency access into the surrounding community.

Public schools are considered critical community facilities and are often used as evacuation centers during disasters. Project construction would be completed in phases which would allow partial use of the campus in the event of an emergency. Implementation of the proposed Project includes seismic retrofits to the Administrative/Library/Auditorium Building, Gymnasium Building, and Classroom Building, which would benefit emergency response by making improvements that would comply with current seismic standards and constructing buildings that could be used as evacuation points in the event of a disaster. Therefore, impacts related to interference with adopted emergency evacuation and response plans would be less than significant, and this issue will not be discussed further in the Draft EIR.

h) Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?

No Impact. The Project site is located within a highly urbanized area of the City and does not contain dense vegetation (flammable brush) considered to be wildlands. In addition, the Project site is not located within or adjacent to a California Department of Forestry and Fire (CalFire) Fire Hazard Severity Zone.⁶⁹ Therefore, the risk for wildland fire is low and implementation of the proposed Project would not expose people or structures to a significant risk involving wildland fires. No impact would occur, and this issue will not be further discussed in the Draft EIR.

i) Be located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code; or a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?

No Impact. The Project site has operated as a middle school campus since 1923. According to both EnviroStor⁷⁰ and GeoTracker⁷¹ databases and the Phase I ESA, the Project site is not located on any documented current or former hazardous waste disposal site or solid waste disposal site. The proposed Project location is also not listed as a hazardous substance release site as identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter

⁶⁹ California Department of Forestry and Fire (CalFire). 2011. Very High Fire Hazard Severity Zones: Los Angeles.

⁷⁰ DTSC, 2017. EnviroStor Database. Available at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed August 16, 2017.

⁷¹ SWRCB, 2017. GeoTracker Map. Available at: <https://geotracker.waterboards.ca.gov/>, accessed August 16, 2017.

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6.8 of Division 20 of the Health and Safety Code. Based on the National Pipeline Mapping System data, there are no pipelines near the Project site.⁷² No impact is anticipated to occur as a result of the proposed Project and this issue will not be further discussed in the Draft EIR.

- j) Be located within one-fourth of a mile of any facilities which might be reasonably anticipated to emit hazardous or acutely hazardous substances or waste?**

No Impact. According to the EnviroStor and GeoTracker databases and the Phase I ESA prepared for the Project site⁷³, the Project site is not located within 0.25 miles of a facility that might emit hazardous or acutely hazardous substances or waste. Therefore, no impact would occur and this issue will not be further discussed in the Draft EIR.

- k) Be located on a site where the property line is less than the following distance from the edge of respective power line easements? 100 feet of a 50-133 kV line, 150 feet of a 220-230 kV line, or 350 feet of a 500-550 kV line.**

No Impact. Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall not be the following minimum distances from the edge of a high-voltage power line easement: 100 feet for 50-133 kV lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. No high-voltage power transmission lines are located within the vicinity of the campus. No 50-133 kV lines, 220-230 kV lines, or 500-550 kV lines were observed within 100, 150, or 350 feet of the campus.⁷⁴ The new facilities would be constructed within the existing campus and would not place any new buildings or structures closer to existing utility lines. No impact would occur and this issue will not be further discussed in the Draft EIR.

- l) Be located on a site that is within 1,500 feet of a railroad track easement?**

No Impact. The Los Angeles County Metro railroad tracks are located approximately 1.5 miles (over 8,000 feet) east of the Project site. Therefore, because the Project site is not located within 1,500 feet of a railroad track, no impact would occur, and this issue will not be further discussed in the Draft EIR.

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

Potentially Significant Impact. The I-110 freeway is located approximately 2.5 miles northeast of the Project site, and the I-10 freeway is located approximately 1.9 miles south of the Project site. The campus frontage is located on South McCadden Place (a two-lane local street), Wilshire Boulevard, and West 6th Street (four-lane arterial roadways). There are sidewalks on each street adjacent to the Project site. The intersection of South McCadden and West 6th Street is signalized, with pedestrian crossing signals and crosswalk pavement markings.

⁷² National Pipeline Mapping System (NPMS). NPMS Public Map Viewer. Available at <https://www.npms.phmsa.dot.gov/default.aspx>. Accessed August 11, 2017.

⁷³ WorleyParsons, 2016. *Phase I Environmental Site Assessment, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, C.A.* May 18, 2016.

⁷⁴ Ibid.



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The proposed Project's location near these major arterial roadways may pose a safety hazard. Pedestrian safety impacts will be further discussed in the Draft EIR.

n, o) Be located on a site that is near a reservoir, water storage tanks, or high-pressure water pipelines? Be located within 1,500 feet of a pipeline that may pose a safety hazard.

Less Than Significant Impact. According to the Phase I ESA⁷⁵ conducted for the proposed Project, no infrastructure, including water storage tanks, high-pressure water lines, and/or hazardous pipelines are located near the Project site. Further, the nearest reservoir to the Project site is the Hollywood Reservoir, located approximately 3.6 miles north of the Project site. Therefore, impacts related to proximity to reservoirs, water storage tanks, high-pressure water pipelines and hazardous pipelines would be less than significant and this issue will not be further analyzed in the Draft EIR.

p) Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?

Less than Significant Impact. No propane tanks are known to be present within the Project site. However, propane tanks could be located at residential properties to the north, east, south across Wilshire Boulevard and west of the Project site. Local regulations pertaining to the storage, transportation, and use of propane would require proper storage, transportation and use of propane tanks. Compliance with existing regulations would reduce the potential safety hazards to individuals on the Project site. Impacts would be less than significant and this issue will not be further analyzed in the Draft EIR.

q) Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and playfields that cannot be safely supervised?

No Impact. The Project site is an existing school campus with adequate length-to-width ratio to accommodate the building layout, parking, and playfields that can be safely supervised. No impacts would occur, and this issue will not be further analyzed in the Draft EIR.

r) Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?

No Impact. The Project site is located within an existing school campus. The Project site is surrounded primarily by residential and commercial designations, which are not considered incompatible with schools. Because the campus is currently in operation and the proposed Project would not include any offsite modifications, the surrounding land uses would not generate or create any additional health or safety risks to students. No impacts would occur and this issue will not be further analyzed in the Draft EIR.

⁷⁵ Ibid.

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s) **Be located on a site with a traffic pattern for school buses that can pose a safety hazard?**

Potentially Significant Impact. The proposed Project would include new driveways for bus ingress/egress along Wilshire Boulevard. Drop-off and pick-up operational changes would occur onsite. Potential impacts regarding unsafe traffic patterns could thus occur and will be further analyzed in the Draft EIR.

t) **Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?**

No Impact. The Project site is located within an existing operating school campus. Surrounding land uses include residential and commercial land uses. According to a search of DTSC Hazardous Waste and Substances Site (Cortese List), the Project site is not within 2,000 feet of a significant disposal of hazardous waste.⁷⁶ Therefore, no impact would occur, and this issue will not be analyzed further in the Draft EIR.

⁷⁶ DTSC, Hazardous Waste and Substances Site List (Cortese List), http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&status=ACT%2CBKLG%2CCOM&reporttitle=HAZARDOUS%20WASTE%20AND%20SUBSTANCE%20SITE%20LIST, accessed August 11, 2017/



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4.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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4.9.1 Discussion

The Program EIR includes SCs for minimizing impacts related to hydrology and water quality of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided in **Table 8**.

TABLE 8
HYDROLOGY AND WATER QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-HWQ-1	<p>Stormwater Technical Manual</p> <p>This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.</p>
SC-HWQ-2	<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>

4.9.2 Impact Analysis

Would the project:

a) **Violate any water quality standards or waste discharge requirements?**

Less than Significant Impact. The Project site is located within a dense urban area of the City of Los Angeles, and is currently connected to the City’s network of stormwater drainage facilities, which ultimately convey surface water runoff to the Pacific Ocean. Construction of the proposed Project would include site grading. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities; hydrocarbons from leaks or spills of fuels, oils, and other fluids associated with construction equipment; and paints, concrete slurries, asphalt materials, and other hazardous materials. Stormwater and non-stormwater runoff could potentially carry these pollutants off site and into the City’s drainage system. However, all earthwork activities would be completed in accordance with LAUSD standards and applicable regulations pertaining to stormwater runoff. The SUP PEIR requires all new SUP construction projects to comply with regulatory requirements if they would disturb greater than 1 acre, as would occur for the proposed Project. LAUSD would implement SC-HWQ-1 and SC-HWQ-2, which requires compliance with LAUSD’s Stormwater Technical Manual and the District’s General Construction Activity Permit. All new construction projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by the SWRCB to comply with a Construction General Permit, including development of a SWPPP, as a required by the RWQCB’s NPDES The SWPPP would identify site-



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specific BMPs to control erosion, sediment, and other potential construction-related pollutants, including, but not limited to, the following:

- Proper storage, use, and disposal of construction materials;
- Removal of sediment from surface runoff before it leaves the Project site by silt fences or other similar devices around the site perimeter;
- Protection of all storm drain inlets on site or downstream of the Project site to eliminate entry of sediment;
- Prevention of tracking soil off site through use of a gravel strip or wash facilities at exits from the Project site;
- Protection or stabilization of stockpiled soils.

LAUSD developed a program-wide SWPPP in 2005, with updates completed in 2007 and 2009. LAUSD's construction contracting protocol for new and existing sites that would undergo land disturbance provides BMPs designed to prevent or minimize stormwater pollution, including submission of a SWPPP.

Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Construction General Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Construction General Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, construction-related impacts to water quality would be less than significant. This issue will not be further discussed in the EIR.

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

Less than Significant Impact. LADWP supplies water to the Project site. According to its Urban Water Management Plan (UWMP), LADWP's three main sources of water are the Los Angeles Aqueducts, local groundwater, and imported supplemental water purchased from the Metropolitan Water District of Southern California (MWD). In 2009/2010, the City relied on approximately 75,000 acre-feet of groundwater, meeting approximately 14 percent of the City's total annual demand.⁷⁷

Although overall square footage of buildings would decrease and the new facilities would be more efficient, it is assumed that water demand would remain the same as the existing conditions due to landscaping and associated irrigation systems. Therefore, there would be no net deficit in aquifer volume or lowering of the groundwater table near the Project site as the proposed Project would result in water demand similar to existing conditions. SUP-related projects would not result any substantial changes in the quantity of groundwater

⁷⁷ LADWP. 2015. *Urban Water Management Plan*. April, 27, 2016.

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supplies. Furthermore, no groundwater extraction activities would occur under the proposed Project, nor would any wells be constructed. The proposed Project would replace existing impervious surfaces with other impervious surfaces. Therefore, compliance with applicable laws, regulations, and LAUSD standards during project construction and operation would ensure impacts associated with groundwater supply and groundwater recharge would be less than significant. This issue will not be further discussed in the EIR.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on or off-site?

Less than Significant Impact. Construction of the proposed Project would temporarily alter the localized drainage pattern at the Project site due to ground-disturbing activities, such as grading and excavation, construction of new building foundations, and trenching for utility improvements. Such alterations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. However, compliance with the NPDES Construction General Permit, which requires the development of a SWPPP, would minimize the potential for erosion or siltation and flooding through the implementation of BMPs. Therefore, impacts associated with substantial erosion or siltation and temporary drainage alterations during construction would be less than significant.

The Project site is located within a dense urban area within the City of Los Angeles with an existing network of stormwater drainage facilities, which ultimately convey surface water to the Pacific Ocean. Currently, the Project site is developed with buildings, landscaping, and paved parking areas. Implementation of the proposed Project would not significantly change surface drainage at the Project site, as similar uses would be constructed compared to existing uses.

The proposed Project would employ CHPS criteria, which are intended to avoid water quality impacts and velocity increases where possible. Implementation of the CHPS criteria and LAUSD standard BMPs requiring the collection of surface runoff in stormwater collection system designed for 25-year peak runoff rates, would reduce siltation or erosion impacts to a less-than-significant level. SUP projects, including the proposed Project, would employ features outlined in the LAUSD Technical Manual to reduce the impacts of erosion and siltation, including incorporation of CHPS standards and BMPs relating to the use of native and drought-tolerant landscaping.

Compliance with applicable laws, regulations, and LAUSD SC-HWQ-2 during project construction and operation would ensure that impacts associated with drainage, temporary drainage alterations and erosion are less than significant. This issue will not be further discussed in the EIR.



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- d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?**

Less than Significant Impact. As stated in Response IX (c) above, the proposed Project would not substantially alter the local drainage pattern. The proposed Project would use minimal water during construction and operation and would thereby not generate a large amount of runoff as a result of site activities. No stream or river traverses the Project site. BMPs discussed above would control drainage on site, thereby reducing its potential to cause flooding from occurring onsite or offsite. Therefore, flooding impacts resulting from drainage pattern alteration would be less than significant. This issue will not be further discussed in the EIR.

- 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?**

Less than Significant Impact. Construction of the proposed Project would temporarily alter flow at the Project site due to ground-disturbing activities, such as grading and excavation, construction of new building foundations, and trenching for new utilities. However, compliance with the NPDES Construction General Permit, which requires development of a SWPPP, would minimize the potential for onsite and offsite flooding as the result of changes to the existing drainage patterns through implementation of BMPs. Therefore, impacts associated with onsite and offsite flooding due to temporary drainage alterations during construction would be less than significant.

The Project vicinity is mostly developed with drainage flows over the street network into an urban drainage system that collects rain run-off in the Project vicinity. Rainwater enters gutters in the nearby roadway system and into the storm drain system. The Project would not alter the street networks in the Project vicinity nor their existing offsite drainage systems. The Project would include a new athletic field, which would be larger than the existing field, new landscaped areas, including the central courtyard and a landscaped buffer along McCadden Place, which would increase the amount of pervious surface area. In addition, in accordance with NPDES requirements, the proposed Project would be required to control the rate of surface runoff, and ensure that runoff would not exceed the capacity of the existing or planned stormwater drainage system on site. The proposed drainage system would reduce the overall expected runoff created by the new development. The proposed Project condition is expected to produce 16.892 cubic feet per second (cfs). The proposed Project would include LID compliance with a drainage system that would collect stormwater from area drains, roof drains and convey it to a storage tank. All the stormwater runoff would be treated by hydrodynamic separation unit that serves as a method of pre-treatment prior to be stored in the underground tank. The cleaned water would be stored and pumped out for irrigation purposes. Overflow would be discharged to the curb and gutter on the street via sidewalk culvert. Thus, no long-term runoff would be created that would exceed the capacity of the existing and planned stormwater drainage system and impacts would be less than significant. This issue will not be further discussed in the EIR.

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f) **Otherwise substantially degrade water quality?**

Less than Significant Impact. Refer to Response IX (a) above. Construction of the proposed Project would include site grading and excavation. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities. Stormwater and non-stormwater runoff could potentially carry these pollutants offsite and into the City's drainage system. However, all earthwork activities would be completed in accordance with LAUSD standards and applicable regulations pertaining to stormwater runoff, such as SC-HWQ-1, which requires compliance with LAUSD's Stormwater Technical Manual and LAUSD's General Construction Activity Permit. All new construction projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by the State Water Resources Control Board to comply with a Construction General Permit, including development of a SWPPP, as required by the RWQCB NPDES. Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Construction General Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Construction General Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards. Construction impacts with regard to water quality would be less than significant, and this issue will not be discussed further in the EIR.

g) **Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. No housing would be developed as part of the proposed Project. According to the project-specific geotechnical evaluation, the Project site is not located within a Federal Emergency Management Agency (FEMA) mapped flood hazard zone.⁷⁸ The Project site is located within Zone X, which is defined by FEMA as areas determined to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures in a 100-year flood hazard area. Thus, no impacts to housing from flooding would occur, and this issue will not be discussed further in the EIR.

⁷⁸ FEMA, 2008. Flood Insurance Rate Map (FIRM) Los Angeles County, CA Panel 06037C of 1605F, <http://fema.maps.arcgis.com/home/webmap/viewer.html?webmap=cbe088e7c8704464aa0fc34eb99e7f30&extent=-118.35691102661187,34.05765775515707,118.31536897338812,34.069389850579796>, accessed August 11, 2017.



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h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed in the Response IX (g) above, the proposed Project is not located within a Federal Emergency Management Agency (FEMA) mapped flood hazard zone. The Project site is located within Zone X, which is defined by FEMA as areas determined to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures within 100-year flood hazard areas that would impede or redirect flood flows. Thus, no impacts to structures from flooding would occur and this issue will not be discussed further in the EIR.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than Significant Impact. Earthquake-induced flooding is inundation caused by failure of old dams or other water-retaining structures due to earthquakes. According to the project-specific geotechnical evaluation, the site is located within a potential inundation area for an earthquake-induced dam failure from the Hollywood Reservoir, which is located approximately 3.5 miles to the north.⁷⁹ However, this dam, as well as others in California, is continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Therefore, the potential for inundation at the site as a result of an earthquake-induced dam failure is considered low. Potential impacts related to flooding, including failure of a levee or dam, would be less than significant. This issue will not be further discussed in the EIR.

j) Inundation by seiche, tsunami, or mudflow?

Less than Significant Impact. Seiches are seismically or wind induced tidal phenomena that occur in enclosed bodies of water. The Project site is not located adjacent to or near a standing body of water. The nearest body of water is the Hollywood Reservoir, which is located approximately 3.5 miles north of the Project site. Due to its distance from the reservoir, the proposed Project is not expected to expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche. Therefore, less than significant impacts from inundation by seiche would occur.

A tsunami is a sea wave of local or distant origin that results from large-scale seafloor displacements associated with earthquakes, major submarine landslides, or exploding volcanic islands. Tsunamis generally affect coastal communities and low-lying river valleys. According to the Project-specific geotechnical evaluation, the Project site is located 10 miles east of the Pacific Ocean and is not within a tsunami inundation zone.⁸⁰ No impact would occur.

⁷⁹ Amec Foster Wheeler, 2015. Report of Preliminary Geotechnical Investigation Proposed Modernization, John Burroughs Middle School, 600 South McCadden Place, Los Angeles, California. August 10, 2015.

⁸⁰ Ibid.

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Mudflows occur on steep slopes where vegetation is not sufficient to prevent rapid erosion, or on gentle slopes if other conditions are met such as large sudden rainfall events. Mudflows contain large amounts of water, silt, sand, boulders, organic material, and other debris. The Project site and immediate surrounding area are relatively flat and do not contain major hills or steep slopes. Therefore, the Project site is not at risk for mudflows. No impact from tsunamis and mudflows would occur. Further, inundation involving a seiche from the Hollywood Reservoir is not expected. Impacts would be less than significant and this issue will not be further discussed in the EIR.



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4.10 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. 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. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.10.1 Discussion

Projects implemented under the SUP are anticipated to have less than significant impacts to land use and planning within the LAUSD service area. The project-specific analysis provided below determined that implementation of the proposed Project would have no impacts to land use and planning in the project area.

4.10.2 Impact Analysis

Would the project:

a) Physically divide an established community?

No Impact. The proposed Project does not include any action that could divide an established community. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The proposed Project lies entirely on an existing campus within an established LAUSD school boundary. The project area is designated as public facilities and would not result in any zoning changes or changes in usage.⁸¹ Because the proposed Project would be constructed on an established school campus, no physical division of an established community would occur. No further analysis in the EIR is required.

⁸¹ City of Los Angeles. ZIMAS, Planning and Zoning Map. Available at: <http://zimas.lacity.org/>, accessed August 11, 2017.

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

No Impact. As described in the Program EIR, the proposed Project would be consistent with the Regional Transportation Plan/Sustainable Communities Strategy. The proposed Project's consistency with the SCAQMD's air quality management plan will be assessed in the Air Quality section of the Draft EIR.

Further, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, LAUSD will comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project. Following a two-thirds vote of the Board of Education, LAUSD can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the City of Los Angeles with notice of this action.

Even if it were not exempt, the City of Los Angeles General Plan use designation for the Project site is "Public Facilities". The City of Los Angeles Municipal Code Zoning Plan has designated the proposed Project as "PF: Public Facilities," a zone for the use and development of publicly owned land, including public elementary and secondary schools. Therefore, the proposed Project would be consistent with all applicable land use plans.⁸² No impacts would occur and this issue will not be further analyzed in the EIR.

- c) **Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. No habitat reserves established under the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) are located within the District, and no other habitat conservation plans are in the District. Therefore, the Project site would not be located in or conflict with a HCP/NCCP and no impacts would occur. This issue will not be discussed further in the EIR.

⁸² American Legal Publishing Corporation. City of Los Angeles Zoning Code, Section 12.04.09, PF Public Facilities Zone. Available at : http://library.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:la_all_mc, accessed August 11, 2017.



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4.11 MINERAL RESOURCES

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

4.11.1 Discussion

Projects implemented under the SUP are anticipated to have less than significant impacts to mineral resources within the LAUSD service area. The project-specific analysis provided below determined that implementation of the proposed Project would have no impacts to mineral resources in the project area.

4.11.2 Impact Analysis

Would the project:

- a) and b) 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? 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. There are no known mineral resources within the Project site, and no known operational mineral resource recovery sites at the Project site or in the vicinity.⁸³ The proposed Project is located on an existing school campus. Further, the surrounding area has been developed with residential and commercial uses. The proposed Project is zoned as PF and the nearest mineral resources recovery site is more than 4.5 miles east of the campus.⁸⁴ The proposed Project would not result in any impacts to mineral resources since it would not result in the loss of identified mineral resources that would be of value to the region or the state. Therefore, no impacts related to mineral resources would occur and no further analysis will be provided in the EIR.

⁸³ CGS, 1994. Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, CA, Part II. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf, accessed August 11, 2017.

⁸⁴ City of Los Angeles, 2002. General Plan, Conservation Element. Available at: <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>, accessed August 11, 2017..

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4.12 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project 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"/>
f. For a project within the vicinity of a private airstrip, 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"/>

4.12.1 Impact Analysis

Would the project:

- a) **Result in exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Impact. Construction and operational activities associated with the project development have the potential to create noise impacts that may adversely affect surrounding residential and commercial uses. Noise levels from mobile and stationary sources may increase where construction of new buildings and other facilities are proposed. Therefore, it is recommended that relevant noise standards and temporary and periodic noise levels associated with project construction be further evaluated within the Draft EIR.



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- b) **Exposure of people to generation or excessive groundborne vibration or groundborne noise levels?**

Potentially Significant Impact. Groundborne vibration and groundborne noise could occur during the construction phase of the proposed Project. Therefore, it is recommended that relevant vibration standards and temporary and vibration levels which could occur during construction and operation of the project be further evaluated within the Draft EIR.

- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. Implementation of the proposed Project has the potential to create stationary and mobile noise impacts that could adversely affect surrounding residential uses. These increases will occur as development occurs within the project area. The Draft EIR will evaluate potential long-term noise impacts associated with the proposed Project.

- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. Construction activities associated with the proposed Project have the potential to create temporary increases in noise levels. The EIR will evaluate potential construction noise impacts associated with the proposed Project.

- 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 expose people residing or working in the project area to excessive noise levels?**

No Impact. The nearest airport to the project area is the Santa Monica Airport, located approximately 6.8 miles southwest of Burroughs MS. The proposed Project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur, and this issue will not be further discussed in the Draft EIR.

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project area is not located within the vicinity of a private airstrip. No impacts would occur, and this issue will not be further discussed in the Draft EIR.

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4.13 PEDESTRIAN SAFETY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create unsafe routes to schools for students walking from local neighborhoods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.13.1 Impact Analysis

Would the project:

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

Potentially Significant Impact. The proposed Project would use the existing network of regional and local roadways that serve the project area. The Project area is mainly a residential community with various commercial properties. New vehicular/bus ingress/egress driveways will be located along Wilshire Boulevard. The bus driveway would allow for drop-off and pick-up. The vehicular ingress/egress points would only allow for parking rather than drop-off and pick-up. Project-related impacts to vehicle and pedestrian safety will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The proposed Project would be implemented at an existing school site, which is bound by Wilshire Boulevard., South McCadden, and West 6th Street. The proximity of Wilshire Boulevard and West 6th Street, each of which is a 4-lane roadway, could pose a safety hazard to students and staff accessing the Project site. A project-specific traffic / pedestrian safety study that includes analysis of existing roadway hazards will be prepared for the proposed Project. This topic will be analyzed further in the Draft EIR.



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4.14 POPULATION AND HOUSING

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

4.14.1 Impact Analysis

a- c) No Impact. The proposed Project site is currently an operational middle school serving students in grades 6 through 8. The proposed Project would not be designed or intended to increase the student population; rather, the proposed Project is intended to provide the appropriate facilities within the current capacity. No direct or indirect population growth in the area is anticipated. There are no residents on the Project site, and the proposed Project would not result in population or housing displacement of the surrounding community. Students that are displaced by classroom demolition during construction would be relocated/housed in temporary onsite (interim relocatable) classrooms while the new facilities are being constructed. Therefore, no impacts related to population and housing would occur. This issue will not be further discussed in the EIR.

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4.15 PUBLIC SERVICES

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

4.15.1 Impact Analysis

XV. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than Significant Impact. Fire protection services would be provided by the LAFD. Fire Station 61, located 0.65 mile from the Project site at 5821 West 3rd Street Los Angeles, CA 90036, which would be the primary responder.⁸⁵

Construction of the proposed Project may result in a temporary increase in demand for fire protection and emergency medical services. However, the proposed Project would not result in an increase in student capacity at Burroughs MS. Implementation of the proposed Project would not generate increased demand for fire protection and emergency services due to a significant increase in people on the campus. Response times would not be affected by the proposed Project because LAFD is already serving the Project site. The proposed Project would not generate the need for a new fire station, as the project is growth accommodating, not growth inducing, since it would accommodate existing and expected students that already reside within the enrollment boundaries of the school. In addition, the

⁸⁵ LAFD, Official Website, Station Finder. Available at: <http://www.lafd.org/fire-stations/station-results?st=581&address=600%20south%20mccadden%20place>, accessed August 11, 2017.



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project would be required to comply with LAFD and City of Los Angeles Department of Building and Safety regulations for water availability, fire hydrant pressure, and accessibility for firefighting equipment. Compliance with applicable state, City and District requirements, including installation of fire sprinklers, fire alarm devices, emergency access, and evacuation procedures, would also ensure that impacts to fire protection services would remain less than significant. Therefore, no new or expanded fire protection services or facilities would be required, and impacts related to fire protection would be less than significant. This issue will not be further discussed in the EIR.

b) Police protection?

Less than Significant Impact. LAUSD operates its own police department, the Los Angeles School Police Department (LASPD), which provides security for the schools and centers within its jurisdiction. The Project site lies within the West Division of the LASPD. The City of Los Angeles Police Department (LAPD) would be the secondary provider of police protection within the proposed Project area. The Wilshire Community Police Station located at 4861 Venice Boulevard, in Los Angeles, approximately 1.1 miles from the Project site, would supplement police protection along with the LASPD.⁸⁶

Demand for police protection is generally created by an increase in the population within a service area. The proposed Project would not increase student capacity at Burroughs MS. Implementation of the proposed Project would not generate increased demand for police services, because the project is growth accommodating, not growth inducing, since it would accommodate existing and expected students that already reside within the enrollment boundaries of the school. During construction, the proposed Project has the potential to result in temporary demand for police services during construction from possible trespass, theft, or vandalism. However, the construction areas would be fenced and would remain secured during non-work hours. Any increase in police demand would be temporary and would not require construction of new or expanded police facilities. Further, the project would comply with LAUSD standards regarding emergency response procedures and school safety, as required. Therefore, the proposed Project would not result in an increase of student capacity nor would it result in new operations requiring additional police protection. This issue will not be further discussed in the EIR.

c) Schools?

Less than Significant Impact. The proposed Project would not increase the student population nor would it displace the current student population to offsite locations. Students temporarily displaced by construction activities would be placed in interim classrooms onsite. No other LAUSD campuses or

⁸⁶ LAPD, official website, http://www.lapdonline.org/wilshire_community_police_station, accessed August 11, 2017.
LASPD, official website, <http://www.laspd.com/about.html>, accessed August 11, 2017..
LAUSD, official website, <http://achieve.lausd.net/Page/2649>, accessed August 11, 2017.

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facilities outside of Burroughs MS would be impacted by the proposed Project. Therefore, impacts would be less than significant and this issue will not be discussed further in the Draft EIR.

d) Parks?

No Impact. The proposed Project would not interfere with or have adverse impacts related to parks. The proposed Project would not involve new housing or long-term employment opportunities that would increase the population or lead to an increase in the need for new or altered parks. The proposed Project would enhance the existing recreational facilities in the area. The recreational facilities on the campus are available to the community for use pursuant to the Civic Center Act (CA Ed. Code Sections 38130 – 38139). No park-related impacts would occur and no further analysis in the Draft EIR is required.

e) Other public facilities?

No Impact. The proposed Project would not result in substantial adverse impacts associated with the need for new or physically altered public facilities and/or services. The project would not involve the construction of homes or result in an increase in population. The surrounding residential area would not be affected by the proposed Project, and therefore, no impact would occur. This issue will not be further discussed in the Draft EIR.



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4.16 RECREATION

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

4.16.1 Impact Analysis

Would the project:

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

No Impact. The proposed Project would include active and passive areas located throughout the project site, including play fields, a courtyard, and several other landscaped areas. As a result, the recreational facilities in the area would be enhanced by providing improved recreational spaces that would be accessible to the community. The proposed Project would not increase the number of students enrolled at the campus and is not growth inducing. Therefore, the project would not increase the use of regional facilities such that substantial physical deterioration of the facility would occur. No impacts would occur, and this issue will not be further discussed in the EIR.

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

Less than Significant Impact. The proposed Project includes recreational facilities; however, it would not require the construction or expansion of recreational facilities outside existing LAUSD-owned property. The proposed Project would include upgrades to athletic facilities on the Burroughs MS campus, which would be accessible to the community and would therefore be an enhancement of recreational facilities available to the community. Potential environmental impacts associated with the proposed Project (which includes improvements to the recreational facilities) are analyzed in this IS and the forthcoming EIR. No significant adverse physical effect on the environment is expected as a result of the proposed Project. Therefore, environmental impacts related to community recreational facilities would be less than significant.

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4.17 TRANSPORTATION AND CIRCULATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION & CIRCULATION.				
Would the project:				
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.17.1 Impact Analysis

Would the project:

- a) **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Potentially Significant Impact. Project implementation would not increase the number of students attending the school or staff required to operate the school, and therefore would not generate new (permanent) traffic to the study area. Project-related construction activities would temporarily increase vehicle trips throughout the



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project area and on surrounding roadways. A project-specific traffic/pedestrian safety study will be prepared for the proposed Project, and the methodology, findings, and conclusions of the analysis (including consultation with / input from the Los Angeles Department of Transportation) will be provided in the EIR.

- b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

No Impact. Level of service standards established by jurisdictions/agencies are intended to regulate long-term (permanent) traffic increases associated with new development and do not apply to short-term (temporary) traffic increases that occur during construction. Potential impacts associated with the proposed Project would be limited to construction activity; i.e., increased vehicle trips generated by the project would cease when construction is completed. Project implementation would not result in any long-term ongoing effects related to traffic and congestion. No impacts would occur, and this issue will not be further discussed in the EIR.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?**

No Impact. The nearest airport (Santa Monica Airport) is located approximately 6.8 miles southwest from the Project site. Project construction would not change air traffic patterns. In addition, the proposed Project would not involve the installation of structures that could interfere with air space. No impact would occur, and this issue will not be further discussed in the EIR.

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

Potentially Significant Impact. The proposed Project would use the existing network of regional and local roadways that serve the project area. In addition, vehicular drop-off and pickup zones would be located in the curb lane adjacent to the campus on South McCadden Place, and new vehicular/bus ingress/egress driveways would be located along Wilshire Boulevard. The bus driveway would allow for drop-off and pick-up. The vehicular ingress/egress points would only allow for parking rather than drop-off and pick-up. While the student drop-off and pickup operations have been planned to minimize vehicular queuing in traffic lanes on the local street system (and to reduce queuing that currently occurs), the design could cause a permanent alteration to the local vehicular circulation patterns. Traffic generated during construction activity would be compatible with the mix of vehicle types (autos and trucks) currently using regional and local roadways. Analysis of potential increased traffic safety hazards will be analyzed in the Draft EIR.

- e) Result in inadequate emergency access?**

Potentially Significant Impact. The roadway network serving the Project site currently accommodates the movements of emergency vehicles that travel in the area. The proposed Project is not anticipated to interfere with local emergency response. However, implementation of the proposed Project would result in the construction of buildings that may require additional trucks and other vehicles to access the project area. As

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such, the potential exists for construction truck traffic to impede adequate emergency access along adjacent roadways. These potential impacts will be analyzed further in the Draft EIR.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The Project site vicinity is served by the County of Los Angeles Metropolitan Transit Authority (Metro), with a bus stop for Route 20 located on Wilshire Boulevard at South McCadden Place. In general, adopted policies, plans, and programs pertaining to public transit, bicycle, and pedestrian travel are intended to be used for long-term planning purposes and do not apply to construction activities. Project implementation would not directly or indirectly eliminate alternative modes of transportation, transportation corridors, or facilities. Further, the proposed Project would not prevent the use of any roads on which public transit routes operate (e.g., the existing Route 20 and a proposed Commuter Bus Lane on Wilshire Boulevard). There would be no increase in the number of students attending the school or staff required to operate the school, and therefore there would not be any new (permanent) traffic generated on roads used as public transit routes. Project-related construction activities, however, would temporarily increase vehicle trips throughout the project area and on surrounding roadways, which could affect the performance or safety of alternative modes of travel. Impacts related to alternative transportation will be analyzed further in the EIR.



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4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.18.1 Discussion

The SUP PEIR includes SCs for minimizing impacts related to tribal cultural resources within the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided in **Table 9**.

TABLE 9
TRIBAL CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-TCR-1	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

4.18.2 Impact Analysis

Would the project:

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

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

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No Impact. To date the District has not received any tribal requests to be notified about projects in the District. However, in the unlikely event that construction-related ground disturbance results in the discovery of potential resources, SC-TCR-1 would be implemented to avoid potential impacts to Tribal resources. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in Public Resources Code Section 21074. This impact will not be further discussed in the Draft EIR.

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

No Impact. To date, LAUSD has not received any requests for notification or consultation from California Native American Tribes regarding resources defined by Public Resources Code Section 21074. No Tribal cultural resources were identified in the Project site and there is no substantial evidence that Tribal cultural resources have the likelihood of being discovered on the campus. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in Public Resources Code Section 21074.



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4.19 UTILITIES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.19.1 Discussion

The Program EIR includes SCs for minimizing impacts to utilities and service system in the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to project-specific impacts to utilities and service systems associated with the proposed Project are provided in **Table 10**.

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TABLE 10
UTILITIES AND SERVICE SYSTEMS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-USS-1	<p>School Design Guide.</p> <p>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.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.</p> <p>This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated onsite, reuse or recycling onsite, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>
SC-USS-2	<p>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.</p>

4.19.2 Impact Analysis

Would the project:

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Less than Significant Impact. The LADWP provides wastewater services for the Project site. The Project site is located within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP). The HTP is designed to treat 450 million gallons per day (mgd), but it experiences a lower average dry-weather water flow, resulting in available treatment capacity.⁸⁷

Construction of the proposed Project would generate a minimal volume of wastewater and would nominally increase wastewater generation. Implementation and operation of the proposed Project would not change the existing uses or introduce new uses that would exceed the wastewater treatment requirements of the Los Angeles RWQCB. As discussed previously in Section 3.9, *Hydrology and Water Quality*, the proposed Project would be required to prepare a SWPPP outlining the BMPs to be implemented to avoid or minimize runoff discharges. The SWPPP would include erosion control BMPs to control and minimize erosion and sedimentation discharged from the Project site. Additionally, any wastewater discharge from the proposed Project site would be required to comply with the NPDES permit requirements. Therefore, compliance with

⁸⁷ LACSD. Hyperion Water Reclamation Plant. Available at : https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_afzLoop=12007486421795403&_afzWindowMode=0&_afzWindowId=null#!%40%40%3F_afzWindowId%3Dnull%26_afzLoop%3D12007486421795403%26_afzWindowMode%3D0%26_adf.ctrl-state%3Duriakjnp6_243, accessed August 11, 2017.



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these existing regulations would ensure impacts related to wastewater treatment requirements would be less than significant. This impact will not be further discussed in the Draft EIR.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

Less than Significant Impact. The proposed Project would be constructed in two 18-month phases, with construction work anticipated to begin in 2020 and be completed by 2023. The proposed Project is estimated to require on average approximately 150 construction personnel per day for the heaviest period of construction. During construction, water would be required for activities such as dust control; however, these activities would be limited and temporary and would not consume large amounts of water. While wastewater at the Project site would be primarily generated by construction activities and construction workers, due to the temporary nature of the construction activities and the minimal number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, impacts associated with project construction would be less than significant. This impact will not be further discussed in the Draft EIR.

The proposed Project would not result in increased enrollment or capacity. Therefore, implementation of the proposed Project would not increase total water consumption within the District, and would not require construction of new or expanded water treatment facilities. Impacts related to project operation would be less than significant and will not be further discussed in the Draft EIR.

c) Require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. As discussed previously in Section 3.9, *Hydrology and Water Quality*, construction of the proposed Project would require implementation of a SWPPP, which would outline construction BMPs for site drainage and implement an appropriate combination of monitoring and resource impact avoidance. Operation of the proposed Project would decrease imperviousness on the Project site when compared to the existing condition. As discussed in 3.9, *Hydrology and Water Quality*, the post-development drainage areas would still drain to the same storm drain system. However, the Project would include a system that serves as a method of pretreatment for the collected site runoff. Implementation of the Project would treat and reduce the amount of water that is currently flowing across the Project site and into the nearby storm water drainage system. The Project design features would comply with all applicable regulatory requirements. Further, the project would not alter drainage patterns. The proposed Project would not require or result in construction or expansion of stormwater drainage facilities offsite. The proposed Project site is located in a developed area of the City of Los Angeles, which contains an existing stormwater collection and conveyance system. The Project site is an existing school campus, and the proposed Project would include PDFs that would increase the pervious surfaces and landscaping features that would reduce stormwater runoff from the Project site. Compliance with NPDES permit requirements, applicable laws, regulations, and standard PDFs and practices during construction and operation would ensure that impacts associated with runoff would not exceed the capacities of existing stormwater drainage systems. Incorporation of LAUSD SC-USS-1 and SC-USS-2 would ensure that

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impacts would be less than significant. Therefore, the proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, and impacts would be less than significant. No further analysis of these impacts will be included in the EIR.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Less than Significant Impact. Construction of the proposed Project would require water use for construction activities, such as dust control measures. However, these activities would be limited and temporary and thus would not consume large quantities of water such that additional supplies would be required. Therefore, short-term impacts associated with requiring additional water supply would be less than significant. These impacts will not be further discussed in the Draft EIR.

Although overall square footage of buildings would increase and efficiencies may reduce the amount of water used in the building, it is assumed that water demand would remain the same as the existing conditions due to the addition of landscaped areas and associated irrigation systems. Therefore, the demand for non/potable water supply would be accommodated by existing supplies. Therefore, the long-term impact to non/potable water supply would be less than significant. No further analysis will be included in the EIR.

- e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less than Significant Impact. During construction of the proposed Project, wastewater at the Project site would be primarily generated by construction activities and construction workers. However, due to the temporary nature of the construction activities and the limited number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, short-term impacts associated with wastewater treatment would be less than significant. No further analysis will be included in the EIR.

Although overall square footage of permanent buildings would increase, it is assumed that wastewater treatment demand would remain the same as existing conditions. The proposed Project would not increase student capacity. Therefore, demand for wastewater treatment would be accommodated by existing capacities. Therefore, the long-term impact to wastewater treatment capacity would be less than significant. No further analysis will be included in the EIR.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Less than Significant Impact. Excavated soil would be either directly loaded into staged trucks or temporarily stockpiled on plastic liners next to the excavation areas until it could be loaded out for offsite disposal. The soil would then be transported offsite to an appropriate licensed facility for disposal, based on previous waste profile characterization results.



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The excavated soil would be segregated and managed as non-hazardous, non-RCRA hazardous, or RCRA hazardous waste.

Non-hazardous soils would be transported to an approved Class 3 landfill for disposal or use as daily cover. Non-RCRA and RCRA hazardous soils would be transported to a licensed and properly permitted Class 1 disposal facility or an out-of-state facility permitted to accept hazardous waste. The Class 1 disposal facility that accepts the RCRA hazardous soil may require that the soil be treated prior to disposal pursuant to the land ban restrictions found at Title 40, CCR, Part 376.

All non-RCRA hazardous or RCRA hazardous wastes would be disposed of at a California Class I land disposal facility or an out-of-state landfill permitted to accept such wastes. The waste management facilities listed below may be selected for this Project:

- Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman, California 93239, Phone: (559) 386-9711
- Clean Harbors Buttonwillow, LLC, 2500 West Lokern Road, Buttonwillow, California, 93206, Phone: (661) 762-6200

The Kettleman Hills Facility has a remaining capacity of 500,000 cy⁸⁸ and the Clean Harbors Buttonwillow Facility has a remaining capacity of 4,900,000 cy.⁸⁹ The total combined permitted remaining capacities for Class I land disposal facilities is more than 5,000,000 cy. The disposal of up to 160 cy of soil would represent less than 1 percent of the combined permitted remaining capacities, and the Project would not exceed or significantly reduce the available landfill capacities.

Prior to project construction, demolition of buildings would occur, totaling approximately 52,000 square feet. Demolition of 52,000 square feet would generate up to 2,000 tons of debris. The Project site is served by the Los Angeles County Sanitation District (LACSD), which includes sanitary landfills, recycle centers, materials recovery/transfer facilities, and energy recovery facilities. The nearest such facility, the Puente Hills Materials Recovery Facility (MRF) accepts construction/demolition waste. The Puente Hills MRF is permitted to receive up to 4,400 tons per day and accepts on average approximately 2,760 tons per day.⁹⁰ The proposed Project would generate less than 3,000 tons per day. Thus, it is anticipated that the Puente Hills MRF would have sufficient capacity to accept the project-related debris and would be able to accommodate the proposed Project's solid waste disposal needs during construction. Therefore, the short-term impact associated with construction would be less than significant. This impact will not be further discussed in the Draft EIR.

Because the proposed Project would not increase the number of students or staff who access the school, operation of the proposed Project is expected to generate similar quantities of solid waste compared to existing conditions. Compliance with all applicable regulations related to reducing solid waste would ensure proper

⁸⁸ Chemical Waste Management, Inc., Remaining Landfill Capacity:

https://www.wmsolutions.com/pdf/brochures/CWM_Kettleman_Hills_Brochure.pdf

⁸⁹ Nielsen, David, Clean Harbors Buttonwillow, telephone conversation on March 31, 2016.

⁹⁰ LACSD. Puente Hills Materials Recovery Facility. Available at:

<http://www.lacsd.org/solidwaste/swfacilities/mrts/phmrf/phmrfactsheet.asp>, accessed August 11, 2017.

4. Environmental Checklist

handling and disposal of solid waste associated with operation of the proposed Project. Additionally, all solid waste facilities serving the project area have remaining intake capacity. Compliance with existing regulations would ensure that operation of the proposed Project would result in a less than significant impact. No further analysis will be included in the EIR.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. The proposed Project would comply with all applicable federal, state, and local statutes and regulations related to the handling and disposal of solid waste materials. Construction debris would be handled and disposed of according to District Specification 01 4524, LAUSD's SCs (including but not limited to: SC-USS-1), and the applicable local and regional standards. As discussed previously in Response XIX (g), operation of the proposed Project would generate similar quantities of solid waste compared to existing conditions, and would require disposal within a landfill. Compliance with all applicable regulations related to reducing solid waste would ensure proper handling and disposal of solid waste associated with the proposed Project. The proposed Project would comply with the recycling requirement in AB 341, as well as the construction and demolition (C&D) waste recycling/reuse requirement in California Green Building Standards Code Section 5.408. LAUSD's School Design Guide & Specification 01340, Construction and Demolition Waste Management, further requires the collection and separation of all C&D waste materials generated on site for 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 75 percent of the C&D waste generated. Therefore, impacts would be less than significant and no further analysis is required in the EIR.



4. Environmental Checklist

4.20 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 an individual 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.20.1 Impact Analysis

Does the project:

- a) **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?**

Potentially Significant Impact. As discussed in Section 3.4, *Biological Resources*, the proposed Project would not impact any endangered fauna or flora. Further, because of the developed, residential nature of the project vicinity, construction and operation of the proposed 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 or endangered plant or animal. This impact will not be further discussed in the Draft EIR.

As discussed in Section 3.5, *Cultural Resources*, as excavation occurs, cultural resources may be impacted. The EIR will address the project’s potential impact on cultural resources, and mitigation measures will be recommended, if necessary.

4. Environmental Checklist

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

Potentially Significant Impact. Implementation of the proposed Project could contribute considerably to cumulative impacts. Each of the issues identified above as potentially significant will be evaluated for cumulative impacts within the EIR. Mitigation measures will be provided, if necessary.

- c) **Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?**

Potentially Significant Impact. Implementation of the proposed Project could result in significant impacts that may result in substantial adverse effects on human beings. These potential effects will be addressed in the EIR, and mitigation measures will be recommended, if necessary.



5. List of Preparers

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5. List of Preparers

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