August 2017 | Initial Study

HUNTINGTON PARK HIGH SCHOOL COMPREHENSIVE MODERNIZATION

Prepared for:

Los Angeles Unified School District

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACCM	asbestos-containing construction materials
ACM	asbestos-containing materials
ADT	average daily trips
APN	Assessor's Parcel Number
AQMP	air quality management plan
bgs	below ground surface
BMP	best management practices
BOE	Board of Education (LAUSD)
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CHPS	Collaborative for High Performance Schools
СМР	Los Angeles County Congestion Management Program
CO	carbon monoxide
CO_2	carbon dioxide
DPM	diesel particulate matter
DPW	County of Los Angeles Department of Public Works
DSA	Division of the State Architect (under the California Department of General Services)
EIR	environmental impact report
EPA	US Environmental Protection Agency
ERP	Los Angeles County Operational Area Emergency Response Plan
FETU	Facilities Environmental Technical Unit
GHG	greenhouse gases
HPHS	Huntington Park High School
HPPD	Huntington Park Police Department
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change

Abbreviations and Acronyms

LACoFD	Los Angeles County Fire Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
O_3	ozone
PDF	project design features
PEA-E	Preliminary Environmental Assessment – Equivalent
PF	Public Facility
PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
RCP	reinforced concrete pipe
REC	recognized environmental condition
RWQCB	regional water quality control board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
UST	underground storage tank
VOC	volatile organic compounds

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Huntington Park High School (HPHS; Proposed Project), at 6020 Miles Avenue, Huntington Park, Los Angeles County, California. Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at the campus through building replacement, renovations, modernizations, and reconfiguration. The proposed HPHS 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 this project.

1.2 BACKGROUND

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

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.² Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a program environmental impact report (EIR).³ On November 10, 2015, the BOE certified the Final SUP Program EIR.⁴

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to develop a project definition for the HPHS Proposed Project.⁵ On December 8, 2015, the BOE approved the project definition for the HPHS Comprehensive Modernization Project. The Proposed Project is designed to address the most critical physical concerns of the building and grounds at the campus while upgrading, renovating,

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

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

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

⁴ 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).

⁵ 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.

modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.⁶

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA⁷ and the State CEQA Guidelines.⁸ 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.⁹

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;¹⁰ however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND or MND that incorporates mitigation measures into the project.¹¹

1.4 ENVIRONMENTAL PROCESS

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

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

⁶ LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

⁷ California Public Resources Code (PRC) Sections 21000 et seq.

⁸ California Code of Regulations (CCR), Title 14, Sections 15000 et seq.

⁹ 14 CCR Section 15063.

¹⁰ 14 CCR Section 15064.

¹¹ 14 CCR Section 15070.

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

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

1.4.1 Initial Study

This Initial Study has been prepared in accordance with the 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 negative declaration (ND); 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for 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.

1.4.2 Environmental Impact Report

The EIR will include information necessary for agencies to meet statutory responsibilities related to the Proposed Project. State and local agencies will need to 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).

After consideration of any public comments on the Initial Study, the Draft EIR will be completed and 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, and 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. 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.

1.4.3 Tiering

The HPHS Comprehensive Modernization project is one of many types of projects that were analyzed in the School Upgrade Program (SUP) Program EIR (Program EIR), certified by the LAUSD BOE on November 10, 2015.¹² LAUSD's SUP EIR meets the criteria of 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 certified Program EIR enables LAUSD to streamline future environmental compliance and reduce the need for repetitive environmental studies. It 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 from a broad EIR (such as one prepared for a program) and applying it to later EIRs and negative declarations on narrower projects, incorporating by reference the general discussion from the broad EIR and concentrating the later EIR or negative declaration solely on the issues specific to that project.

The Program EIR is applicable to all projects implemented under the SUP. The SUP Program EIR grouped potential projects into four categories based on project scope, type of construction, and location of projects. This project falls under the categories of Type 2, "New Construction on Existing Campus,"¹³ and Type 3, "Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation."

The Proposed Project is considered a site-specific project under the SUP and analyzed in the Program EIR; therefore, the EIR will be tiered from the 2015 SUP Program EIR. The Program EIR is available for review online at http://achieve.lausd.net/ceqa and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.4 Project Plans and Building Design

The project is subject to California Department of Education (CDE) criteria and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed HPHS Comprehensive Modernization project, as with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing

¹² LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

¹³ Type 2: Demolition and new building construction on existing campus (replace school building on same location); Installation of temporary structures. Type 3: Outdoor repair, modernization, replacement or upgrade of athletic fields, play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits; Repair and replacement of building systems such as flooring, windows, and roofing; Interior and exterior installation, repair, replacement and maintenance.

environmental impacts, such as the California Green Building Code (CALGreen),¹⁴ LAUSD Standard Conditions of Approval, and the Collaborative for High Performance Schools (CHPS) criteria.¹⁵

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. Under the current 2014 CA-CHPS criteria, the project would earn at least 250 points—110 prerequisite criteria points and 140 criteria credit points. The optional credit points would be determined during later site and architectural design phases, but all prerequisites are required.

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

Standard Conditions of Approval. LAUSD Standard Conditions of Approval are uniformly applied development standards and were adopted by the LAUSD BOE in November 2015.¹⁶ The Standard Conditions of Approval have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations, and the Los Angeles Unified School District's standard policies, practices, and specifications. The Standard Conditions of Approval were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The conditions are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).¹⁷ For each Standard Condition of Approval, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required.

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

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

¹⁴ CALGreen. California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

¹⁵ The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools, directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

¹⁶ LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: http://achieve.lausd.net/ceqa. (see Table 4-1 and Appendix F of the Program EIR).

¹⁷ The LAUSD Standard Conditions of Approval only covers 18 topics. However, as of September 2016 an additional environmental topic (Tribal Cultural Resources) has since been required by the State Office of Planning and Research. The LAUSD Environmental Checklist now has 19 topics.

- 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 be project specific and must further reduce significant environmental impacts by implementing requirements or efforts that exceed compliance with federal, state, and local laws and regulations; Project Design Features; and Standard Conditions of Approval and CHPS.

The specific CHPS prerequisite criteria and LAUSD Standard Conditions of Approval are identified in the tables under each CEQA topic.¹⁸ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; Project Design Features; and LAUSD conditions are considered part of the project and are included in the environmental analysis.

1.5 IMPACT TERMINOLOGY

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

- A finding of **no impact** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered **less than significant** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered **less than significant with mitigation incorporated** if the analysis concludes that the project may have a substantial adverse effect on the environment; however, with the inclusion of environmental commitments or other enforceable measures, those adverse effects would be reduced or avoided and the project would ultimately result in no substantial adverse change to the environment.
- 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, additional analysis and preparation of an EIR is required. The EIR need only include those potentially significant impacts identified in the Initial Study.

¹⁸ Collaborative for High Performance Schools (CHPS) criteria are summarized. The full list of criteria can be found at http://www.chps.net/dev/Drupal/California.

1.6 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The finding of this Initial Study is that the Proposed Project may have significant environmental impacts. This report contains the following sections:

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

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

Chapter 3, Project Description, identifies the location 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, and Standard Conditions of Approval 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 this Initial Study and technical studies.

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

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- D-2. Site Specific Ground Motion Hazard Analysis
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2.1 PROJECT LOCATION

The 22.5-acre HPHS is at 6020 Miles Avenue, Huntington Park, Los Angeles County, California (Assessor's Parcel Numbers [APNs] 6310-018-900 and 6310-019-904). The school is on the southeast corner of the Slauson Avenue and Miles Avenue intersection. Regional access to the school is from the Long Beach Freeway (Interstate 710) to Florence Avenue west (see Figure 1, Regional Location).

2.2 SURROUNDING LAND USE

The L-shaped HPHS campus is in an urbanized area surrounded by residential and commercial uses (see Figure 2, *Local Vicinity*, and Figure 3, *Existing Conditions*). The school is bordered by the following land uses:

- Northwest corner: Huntington Park municipal water reservoir, tower, and pumping station and a fast-food restaurant.
- North: Slauson Avenue, strip commercial, scrap iron and metal collection facility, truck driving school, large vacant building and parking lot, and a warehouse.
- South: Randolph Street and railroad tracks, residential, small neighborhood variety market (La Fortuna Discount), and a grocery market (La Pasadita).
- Southeast corner: Oak Avenue and Belgrave Avenue, and residential development.
- East: home improvement store (Home Depot) and strip commercial, Boyle Avenue, and a large trucking distribution center (Slauson Distribution Center).
- West: Miles Avenue, fast-food restaurant, residential development, a church.

The concrete-lined Los Angeles River flood control channel is approximately 1.5 miles north of the school. The Long Beach Freeway (Interstate 710 [I-710]) is approximately 3 miles east and the freeway interchange of the Santa Ana Freeway (I-5), Santa Monica Freeway (I-10), Hollywood Freeway (U.S. 101), and Pomona Freeway (SR-60) is approximately 3 miles north. The Harbor Freeway (I-110) is approximately 3.5 miles west.

2.3 CAMPUS HISTORY

Huntington Park High School was founded in 1909, but the earliest buildings on the campus were constructed in the 1920s.¹⁹ The early campus development encompassed much of the current-day campus property, with the exception of a section in the southeast corner along Oak Avenue. This was a residential property until the mid-1920s, when it was incorporated into the school campus.²⁰

Following the 6.4-magnitude 1933 Long Beach Earthquake, school buildings that either were destroyed or suffered major damage were removed and completely reconstructed, while a few buildings were only partially reconstructed. Buildings were reconstructed in a PWA Moderne style.²¹ HPHS was evaluated as part of a historic resources survey conducted by LAUSD in 2002.²² The campus was assigned a California Historical Resources Status Code of '3S', which indicates that the campus "appears eligible for the National Register of Historic Places or California Register of Historic Resources through survey evaluation."²³ See Section V, Cultural Resources, of this Initial Study for further discussion.

2.4 EXISTING CONDITIONS

The Proposed Project would occur on and within the spaces that are exclusively the HPHS campus. Student enrollment fluctuates,²⁴ however the planned enrollment for the campus is 1,800 students. There are currently approximately 1,611 students enrolled in grades 9 through 12 at HPHS. The 22.5-acre site also shares space with the Huntington Park Adult School, City of Angels School, and San Antonio High School.^{25,26} Figure 3, *Existing Conditions*, shows the location of the other school facilities along with layout of the high school.

The core HPHS campus includes the Administrative Building (Building 1), Auditorium Building (Building 2), Cafeteria Building (Building 3), Home Economics & Classroom Building (Building 4), Annex Building (Building 8), Shop Building #1 (Building 9), Shop Building #2 (Building 2), Social Arts Building (Building 12), Gymnasium Building (Building 13), Music Building (Building 18), Classroom Building 1 (Building 25), and Science & Classroom Building (Building 30) and appurtenant buildings and facilities. The campus also contains relocatable buildings that are concentrated near the northern and southern portions of the campus with several dispersed throughout the campus. In addition to a collection of the relocatable buildings, the

¹⁹ PCR Services Corporation ("PCR") July 30, 2015. Character-Defining Features Memorandum (CDFM) for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255

²⁰ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

²¹ PWA Moderne is an architectural style of many buildings in the United States completed between 1933 and 1944, during and shortly after the Great Depression as part of relief projects sponsored by the Public Works Administration (PWA) and the Works Progress Administration (WPA).

²² PCR Services Corporation ("PCR") July 30, 2015. Character-Defining Features Memorandum (CDFM) for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

²³ Phase I Getty Survey conducted on March 15, 2002.

²⁴ Enrollment at the campus was approximately 1,890 students in the 2015-2016 school year and the current enrollment is approximately 1,611 students.

²⁵ http://www.laadulted.com/. Also referred to as Huntington Park Community Adult School or Belgrave Community Day/Adult School).

²⁶ https://schooldirectory.lausd.net/schooldirectory/SchoolPage?locationId=8702. Also referred to as San Antonio Continuation High.

northern portion of the campus contains a football field, softball field, tennis, basketball courts. All of the academic buildings and a collection of portable buildings are situated on the southern portion of the campus. The campus also contains several outdoor open space areas for students including lawns, a courtyard, a fountain area, and a palm tree lined open space area between the Cafeteria and Gymnasium.

The school campus elevation is between 177 feet above mean sea level.²⁷ The site and surrounding vicinity is relatively flat to gently sloping to the south.²⁸

2.4.1 Existing Facilities

Table 1 and Figure 4, *Existing Campus Plan*, show existing campus facilities. Figure 5, *Photo Location Key*, shows the location of site photographs and Figures 5a through 5d, *Site Photographs*, shows the existing conditions on the campus.

100.01		<u> </u>			
Building ID*	Building Number	Building Name	Building Square Footage	Building Type	Year Built
22869	1	Administrative Bldg	39,375	permanent	1936
21385	2	Auditorium Bldg	17,927	permanent	1937
21465	3	Cafeteria Bldg	17,949	permanent	1936
21379	4	Home Economics & Classroom Bldg	19,479	permanent	1924
20476	5	Central Plant (Power Plant/Boiler Vault Bldg 1)	2,807	permanent	1923
20494	6	Mechanical Drawing Bldg	2,506	permanent	1937
21038	8	Annex Building	20,946	permanent	1925
20797	9	Shop Bldg #1	14,749	permanent	1960
20771	11	Shop Bldg #2	15,328	permanent	1960
22394	12	Social Arts Bldg	1,722	permanent	1939
20526	13	Gymnasium Bldg	55,750	permanent	1923
22402	14	Sanitary Bldg	976	permanent	1958
20692	15	Announcers Booth	85	permanent	1958
22923	16	Bleachers 2 – South	3,015	permanent	1957
25774	17	Food Services Bldg 1	739	permanent	1963
22611	18	Music Building	3,468	permanent	1963
22922	19	Bleachers 1 – Southwest	3,015	permanent	1957
21441	20	Bleachers 3 – Southeast	3,015	permanent	1957
21538	21	Utility Bldg	112	permanent	1970
22921	22	Bleachers 4 – North	4,623	permanent	1969
26289	23	Food Services Bldg 2	182	permanent	1974

²⁷ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

²⁸ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

Table 1	Existin	g Facilities			
Building ID*	Building Number	Building Name	Building Square Footage	Building Type	Year Built
20675	25	Classroom Bldg 1	10,708	permanent	1957
30262	26	Gazebo	40	permanent	1974
21233	27	Storage Unit 1	360	permanent	1970
25966	28	Boiler Vault Bldg 2	411	permanent	1987
22889	30	Science & Classroom Bldg	50,496	permanent	1991
22920	31	Two-Story Relocatable	4,173	portable	1977
21991	32	Two-Story Relocatable	3,856	portable	1971
22225	33	Single-Unit Relocatable	854	portable	1950
20326	34	Single-Unit Relocatable	902	portable	1949
23135	35	Single-Unit Relocatable	902	portable	1948
22051	36	Sanitary Relocatable	901	portable	1950
20188	37	Single-Unit Relocatable	902	portable	1949
22608	38	Two/Three Unit Relocatable	1,712	portable	1949
20666	41	Two/Three Unit Relocatable	1,974	portable	1950
22723	42	Storage Unit Relocatable	1,344	portable	1975
Approximate total HPHS campus building space			307,303	_	—

2.4.2 Site Access and Circulation

As shown in Figure 3, the main entrance to the campus is along Miles Avenue. A second student entrance is on Oak Street. Student drop-off and pick-up takes place along two streets: Miles Avenue and Oak Street. No Stopping' and 'Passenger Loading' signs limit the location and amount of time cars are allowed to park alongside the curb. Student drop-off and pick-up from buses takes place along Miles Avenue south of the Administration (Building 1).

2.4.3 Parking

The school has 164 parking spaces in three onsite parking lots: 22 spaces along Randolph Street adjacent to the Classroom Building 1 (Building 25), 73 spaces adjacent to Science and Classroom Building (Building 30), and 69 spaces between the San Antonio High School and the Huntington Park Adult School. Curbside parking is available along the surrounding streets.

2.4.4 Operation

School Operations. HPHS is a two-semester, single-track school that serves 9th through 12th grades. Students attend classes from August through June. School hours are 8:00 AM to 3:00 PM.^{29,30,31}

²⁹ The regular school day ends at 2:47 PM, However, 3:00 PM was conservatively used for this report.

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

Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139) the campus is available for community use at selected times when not in use by LAUSD.³²

2.5 GENERAL PLAN AND EXISTING ZONING

The zoning for the school property is PF (Public Facilities), which is for the use and development of publicly owned land, including public schools.³³ The General Plan Land Use designation is assumed to be Public Facilities.³⁴

³⁰ Huntington Park Adult School and San Antonio High School generally operate during the same hours on the northeastern and southern most portions of the site respectively although Huntington Park Adult School offers courses throughout the day as well as evening courses that end as late as 9:00 PM. http://www.laadulted.com/. Also referred to as Huntington Park Community Adult School, Huntington Park-Bell Community Adult School, and/or Belgrave Community Day/Adult School).

³¹ https://schooldirectory.lausd.net/schooldirectory/SchoolPage?locationId=8702.

³² CA Education Code Sections 38130–38139.

³³ City of Huntington Park zoning map. http://www.hpca.gov/DocumentCenter/View/3772

³⁴ City of Huntington Park General Plan. 1991. http://www.hpca.gov/DocumentCenter/View/407.

Figure 1 - Regional Location 2. Environmental Setting



PlaceWorks

Figure 2 - Local Vicinity 2. Environmental Setting



Figure 3 - Existing Conditions 2. Environmental Setting



Source: Gonzalez Goodale Architects, 2017

Figure 4 - Existing Campus Plan 2. Environmental Setting



Source: Hibser Yamauchi Architects, Inc., 2011

Scale (Feet)

HUNTINGTON PARK HIGH SCHOOL COMPREHENSIVE MODERNIZATION INITIAL STUDY LOS ANGELES UNIFIED SCHOOL DISTRICT

> Figure 5 - Photo Location Key 2. Environmental Setting



Figure 5a - Site Photographs 2. Environmental Setting



Photo 1. View looking southeast toward Parent and Family Center (Building 12).



Photo 2. View looking northeast toward Annex (Building 8) from Music (Building 18).

Figure 5b - Site Photographs 2. Environmental Setting



Photo 3. View looking northeast toward Westover Hall (Auditorium), (Building 2) from sidewalk on Miles Avenue.



Photo 4. View looking northeast toward Administration (Building 1) from sidewalk on Miles Avenue.
Figure 5c - Site Photographs 2. Environmental Setting



Photo 5. View looking southeast toward Stockton Court from the Cafeteria (Building 3). Home Economics (Building 4) is on the left.



Photo 6. View looking northeast toward Stockton Court from corner of Administration (Building 1) shown on left. Cafeteria (Building 3) is in background center and Home Economics (Building 4) is on the right.

2. Environmental Setting

Figure 5d - Site Photographs 2. Environmental Setting



Photo 7. View looking north toward Gymnasium (Building 13) from Belgrave Palm Court.



Photo 8. View looking west toward Fountain Court from Portable Building #32.

2. Environmental Setting

3.1 PROPOSED PROJECT

The proposed comprehensive modernization project would occur on the Huntington Park High School (HPHS) campus which encompasses most of the 22.5-acre site located at 6020 Miles Avenue, Huntington Park, CA.

3.1.1 Campus Improvements

The Proposed Project would modernize HPHS to facilitate a safe and secure campus that better aligns with the current instructional program. The Proposed Project consists of the demolition and removal of 4 buildings, removal of the Central Plant (Power Plant) and 8 portable buildings, renovations and improvements to 2 buildings, construction of 3 new buildings, and landscape and access improvements throughout the campus.

The HPHS campus includes relocatable buildings that are currently dedicated to other campus operations including: Huntington Park Adult School and San Antonio High School. No changes to the relocatable buildings used by these programs are anticipated as a part of the project.

Specifically, the Proposed Project would include the following changes to the campus, as shown in Table 2 and Figure 6, *Proposed Campus Improvements*.

Demolition and Removal

- Home Economics & Classroom (Building 4)³⁵
- 15 Classrooms in 8 Relocatable Buildings (31–36, 38, 41)
- Power Plant/Boiler Vault Building 1 (Building 5)
- Annex (Building 8)
- Gymnasium (Building 13)

Remodel and Modernization

- Administration (Building 1): Improvements in this building would include: a new HVAC system, security, improvements, seismic upgrades, voluntary programmatic access upgrades to comply with the Americans with Disabilities Act (ADA), and exterior painting.
- Science & Classroom (Building 30): Improvements in this building would include: a new HVAC system, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.

³⁵ Referred to as the "Home Economics Building."

New Construction

- Classroom Building 'A': This new 2-story building would have 15 classrooms. This building would be 26,292 square feet. Classroom Building 'A' would be slightly east of the site of the existing Annex Building (Building 8) so as to align with new Classroom Building 'B'.
- Specialty Classroom Building 'B': This new 1-story building would have 6 classrooms and support and specialty spaces, including culinary arts, video production and digital imaging classrooms. This 14,696-square-foot building would be on the site of the existing Home Economics Building (Building 4).
- Gymnasium Building: The 2-story, 45,638-square-foot Gymnasium Building would have competition
 and practice gymnasium floors, locker rooms (restrooms, showers, and dressing area), coaches'
 offices, and physical education support spaces along with support spaces for athletic storage and
 mechanical equipment. The weight room equipment would be relocated from Shop Building 1
 (Building 9) to the new Gymnasium Building. The gym would have bleacher seats. The Gymnasium
 Building would be constructed on the site of the existing Gymnasium Building. The Gymnasium
 Building would generally be constructed in a portion of the existing Gymnasium Building's footprint.
- Pool Support Building D: The 1-story 2,810 pool support building would be located immediately north of the new gym building. It would contain: field restrooms, pool equipment storage, chemical storage
- Outdoor pool: The 25-yard x 25-meter swimming pool would include decking, fencing, and bleacher seats.

HPHS Campus Upgrades

- Infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Voluntary programmatic access upgrades to comply with the ADA.
- Landscape, hardscape, and exterior paint.

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Bldg. ID*	Bldg. No.	Building Name	Class- rooms	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Campus Total (sf)
22869	1	Administrative Bldg	11	_	974	—	_	39,375
21385	2	Auditorium Bldg	0	—	—	—	17,927	17,927
21465	3	Cafeteria Bldg	0	—	—	—	17,949	17,949
21379	4	Home Economics & Classroom Bldg	-5	19,479	_	—	_	0
N/A	В	1-story Specialty Classroom Building B (replace Bldg. 4)	6	-	_	14,696	_	14,696
20476	5	Central Plant (Power Plant/Boiler Vault Bldg. 1)	0	2,807	_	_	_	0

 Table 2
 Proposed Project (Demolition, Remodel, and Construction)

	Dida		0	Demolition/	Demedal	New	Existing to	Campus
Blda. ID*	Bidg. No.	Building Name	rooms	Removal (sf)	(sf)	(sf)	(sf)	i otal (sf)
20494	6	Mechanical Drawing Bldg	2	_		_	2,506	2,506
20396	7	Flammable Storage Unit 2	0	_	_	_	90	
21038	8	Annex Building	-12	20,946	_	—	_	0
N/A	А	2-story Classroom Building A (replace Bldg 8)	15	_	_	26,292	_	26,292
20797	9	Shop Bldg #1	6	—	_	—	14,749	14,749
20771	11	Shop Bldg #2	5	—	—	_	15,328	15,328
22394	12	Social Arts Bldg	0	_	_	—	1,722	1,722
20526	13	Gymnasium Bldg	-3	55,750	_	_	_	0
N/A	С	Gymnasium Building C (replace Bldg. 13)	0	_	_	45,638	_	45,638
N/A	D	Pool Support Building D	0	_	—	2,810	—	2,810
22402	14	Sanitary Bldg	0	_	_	—	976	976
20692	15	Announcers Booth	0	_	—		85	85
22923	16	Bleachers 2 - South	0	—	—	_	3,015	3,015
25774	17	Food Services Bldg 1	0	_	—	_	739	739
22611	18	Music Building	2	_	_	_	3,468	3,468
22922	19	Bleachers 1 - Southwest	0	—	—	_	3,015	3,015
21441	20	Bleachers 3 - Southeast	0	—	—	_	3,015	3,015
21538	21	Utility Bldg	0	_	_	_	112	112
22921	22	Bleachers 4 - North	0	_	_	—	4,623	4,623
26289	23	Food Services Bldg 2	0	_	_	—	182	182
20675	25	Classroom Bldg 1	8	_	_	—	—	10,708
30262	26	Gazebo	0	—	_	—	40	40
21233	27	Storage Unit 1	0	_	_	_	360	360
25966	28	Boiler Vault Bldg 2	0	411	—	_	—	0
22889	30	Science & Classroom Bldg	21	_	_	_	_	50,496
22920	31	Two-Story Relocatable	-4	4,173	_	_	_	0
21991	32	Two-Story Relocatable	-4	3,856	_	_	_	0
22225	33	Single-Unit Relocatable	-1	854	—	_	—	0
20326	34	Single-Unit Relocatable	-1	902	—	_	—	0
23135	35	Single-Unit Relocatable	-1	902	—	_	—	0
22051	36	Sanitary Relocatable	0	901	—	_	—	0
20188	37	Single-Unit Relocatable	0	_	—	_	902	902
22608	38	Two/Three Unit Relocatable	-2	1,712	—	_	_	0
20666	41	Two/Three Unit Relocatable	-2	1,974	—	—	—	0
22723	42	Storage Unit Relocatable	0	—	—	—	1,344	1,344

Table 2 Proposed Project (Demolition, Remodel, and Construction)

Table 2		Proposed Project (Demo	lition, Re	model, and	Construc	tion)		
Bldg. ID*	Bldg. No.	Building Name	Class- rooms	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Campus Total (sf)
N/A	N/A	Outdoor Swimming Pool	0	_		25 yards x 25 meters (~12,884 new exterior space)	_	12,884
A	Approxim	ate total campus building space	-14	114,667	974	102,320*	92,147	295,046

Notes:

sf = Square footage

N/A = Not included in the total existing campus sf count

The new construction square footage includes 12,884 sf of new building and facility related construction including the pool. Up to 84,500 of the existing outdoor sf (containing tennis courts, basketball courts, a softball practice field, and 3,116 sf of existing pool related storage) would be reconfigured as a part of the project.

The comprehensive modernization project on the campus would entail construction of 102,320 square feet of new buildings and facilities. The Proposed Project would remove 35 of the existing 55 classrooms and construct 21 classrooms for a reduction of 14. The architectural style of the new classroom buildings and gymnasium would have elements of "PWA Moderne style" that would complement the original architecture of the campus (see Figure 7, *Conceptual Site Plan;* Figure 8, *Conceptual Illustration: Aerial View;* Figure 9, *Conceptual Illustration: Gymnasium;* Figure 10, *Conceptual Illustration: Classroom Building.* These illustrations show scale and mass. Security lighting would be provided using lighting fixtures that are designed to reduce glare, light trespass, and sky glow.

• Excavation and Off-Site Disposal³⁶

As a part of the construction activities, the District would implement a Removal Action Workplan (RAW) for the Proposed Project. Approximately 116.70 cubic yards of soil containing the chemicals of concern (COCs; specifically, arsenic, lead, chlordane) at levels that exceed the District's cleanup goals would be removed from areas located throughout the project site.³⁷ The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, and dump truck. Ancillary facilities (i.e., wastewater holding tank) would also be used during the removal action. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to the COCs. The depth of excavations may be limited due to physical constraints associated with the site. Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls.³⁸

³⁶ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

³⁷ Ibid.

³⁸ Ibid.

Excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader).³⁹ Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Truck loading would take place concurrently with excavation operations associated with the project. Clean, imported soil or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.⁴⁰ Construction contractors are required to comply with LAUSD standard specifications for proper packaging, transportation, and disposal of any discovered hazardous materials before building construction starts. Specifically, construction contractors are required comply with worker training, health and safety, hazardous material containment, and off-site transport and disposal of contaminated soil as detailed in the plans and procedures included in the Removal Action Workplan.⁴¹

As part of the project, 46 parking spaces would be added to the existing 164 spaces. A total of 210 spaces would be provided on campus.

The proposed modernization project would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-related events, or community use would occur as the result of this project. At project completion, campus access, traffic circulation, and drop-off and pick-up locations would remain the same as the existing campus.

3.2 CONSTRUCTION SCHEDULE

Pre-construction and design activities began in the fourth quarter of 2015 (Q4-2015) and are anticipated to be completed in Q3-2019 (including DSA review). Construction activities are anticipated to begin in Q1-2020 and be completed in Q1-2023.

Demolition, construction, and modernization activities are expected to take approximately 36 months. Because of active school operation during project implementation, less than five acres (contiguous) on campus is likely to be disturbed at any one time.

To complete the campuswide modernization while school is in session, the process must be broken into several phases so the school can continue operating, as summarized in Table 3.

³⁹ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

⁴⁰ Ibid.

⁴¹ Ibid.

Table 3	Construction Phasing and Equipment
---------	------------------------------------

Construction Phase	Project Task	Schedule*	Equipment	Maximum Number per Day
Phase 1 -	Interim Housing Classrooms: Interim Housing	1.5 months	Excavator	1
Interim Housing	(Temporary Facilities): Clear, grade, and install		Grader	1
	utilities for portables. Relocate existing portables;		Rubber Tired Dozer	1
	facilities.		Tractors/Loaders/Backhoes	3
	Classes in temporary facilities would begin in		Crane	1
	March 2020.		Water Truck	1
	January 2020 – March 2020		Portable building haul trips	16
Phase 2 -	Administration Building Library Computer Lab	8 months	Forklift	1
Renovations	Renovation		Aerial Lift	1
	 Administration Building HVAC Replacement - Phased Administration Building Office/Entry Renovation - Summer Science Building HVAC Replacement - Summer 		Building debris haul trips; average 16 CY end-dump trucks	3
	January 2020 – August 2020			
Phase 3 -	Install Interim Housing Lockers - Summer	3 months	Concrete/Industrial Saw	1
Demolition	 Install Interim Culinary Arts - Summer 		Excavators	3
	Partial Demolition of Gym (Pool, Lockers,		Rubber Tired Dozers	2
	Practice Gym) - Summer		Crane	1
	Annex Building Demolition - Summer Home Economics Building Demolition -		Water Truck	1
	Central Plant Demolition		Building debris haul trips; average 16 CY end-dump trucks	7
	 Modify Main Gym Court for partial occupancy - Summer Relocate Softball Field – Summer 		Asphalt/Concrete debris haul trips; average 16 CY end-dump trucks	4
	 2-story Relocatable Demolition June 2020 – September 2020 		Portable building haul trips	4
Phase 4 -	Construct New Gym Complex	21 months	Crane	1
Building	Construct New Classroom Building A		Forklifts	3
Construction	 Construct New Classroom Building B 		Generator Set	1
	Renovate Bleachers for Accessibility - Summer		Tractors/Loaders/Backhoes	3
	Renovate Auditorium for Accessibility - Summer		Welders	1
	Renovate Parent Center for Accessibility - Summer August 2020 – May 2022		Air Compressor	1

Table 3 Construction Phasing and	Equipment
----------------------------------	-----------

Construction Phase	Project Task	Schedule*	Equipment	Maximum Number per Day
Phase 5 -	Occupy New Gym Complex - Winter Break Remove Interim Housing Lockers	Phased over	Cement and Mortar Mixers	2
Building		11 months	Paver	1
(Site Work)	Main Gym Court Demolition - Not Summer		Paving Equipment	2
(0.00 0.000)	Construct Pool Construct Pool		Rollers	2
	Construct Pool Building Construct Now BE Courts Summer		Tractor/Loader/Backhoe	1
	Construct New PE Courts - Summer Construct East Courtyard November 2021– October 2022		Crane	1
			Asphalt/Concrete Debris haul trips; average 16 CY end-dump trucks	10
			Portables haul trips	2
Phase 6 -	Occupy New Classroom Building A	Phased over 6	Crane	1
Occupancy Completion	 Occupy New Classroom Building B Occupy New Pool Remove Interim Housing Classrooms Remove Interim Culinary Arts Remove Original Portable Classrooms Install Batting Cages 	months	Portables haul trips	3
	September 2022 - February 2023			

* Approximate dates provide the most conservative schedule. These dates are subject to change at LAUSD's discretion or as a result of unforeseen circumstances. ** Interior upgrades would be completed over summer recess and when students are not on campus.





Source: Gonzalez Goodale Architects, 2017

250

Scale (Miles)

0

Figure 7 - Conceptual Site Plan 3. Project Description



Base Map Source: Gonzalez Goodale Architects, 2017

0

Scale (Feet)

Figure 8 - Conceptual Illustration: Aerial View 3. Project Description



Source: Gonzalez Goodale Architects, 2017

Figure 9 - Conceptual Illustration: Gymnasium **3. Project Description**



Source: Gonzalez Goodale Architects, 2017

HUNTINGTON PARK HIGH SCHOOL COMPREHENSIVE MODERNIZATION INITIAL STUDY LOS ANGELES UNIFIED SCHOOL DISTRICT

> Figure 10 - Conceptual Illustration: Classroom Building 3. Project Description



Source: Gonzalez Goodale Architects, 2017

Los Angeles Unified School District

Office of Environmental Health and Safety

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY CHECKLIST

LEAD AGENCY		DATE	
Los Angeles Unified School District, Office of Environmental Health : 333 S. Beaudry Avenue, 21st Floor, Los Angeles, CA 90017	April 2017		
LEAD AGENCY CONTACT	PHONE NUMBER		
Eimon Smith, CEQA Project Manager	(213) 241-4821		
SCHOOL SITE	SCHOOL SITE ADDRESS		
Huntington Park High School	6020 Miles Avenue, Huntington Park, CA 90255		
PROJECT TITLE	LAUSD LOCAL DISTRICT	LAUSD COLIN ID	
Huntington Park High School Comprehensive Modernization	East	10366800	

PROJECT DESCRIPTION

The Proposed Project consists of the comprehensive modernization of Huntington Park High School, including demolition, construction, and renovation activities. The project includes demolition and removal of 8 relocatable buildings and 4 permanent buildings: Home Economics (Building 4), Power Plant/Boiler Vault Building 1 (Building 5), Annex (Building 8), and Gymnasium (Building 13); construction of 2-story Classroom Building A, 1-story Specialty Classroom Building B, Gymnasium, and outdoor pool; remodel and modernization of Administration (Building 1); and minor improvements (e.g., exterior/interior paint as needed) for the remaining buildings including the Science & Classroom (Building 30) and Classroom Building 1 (Building 25). Other improvements include domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage; Americans with Disabilities Act (ADA) compliance; landscape, hardscape, and exterior paint.

ENVIRONMENTAL SETTING

HPHS currently has approximately 1,611 students in grades 9 through 12.⁴² The 22.5-acre site is surrounded by commercial, residential and industrial uses. The south half of the campus is comprised of the main campus buildings and relocatable buildings. The north half of the property has a gymnasium, hardcourts and athletic fields and relocatable buildings.

PROJECT LOCATION

The 22.5-acre HPHS is at 6020 Miles Avenue, Huntington Park, Los Angeles County, California (Assessor's Parcel Numbers 6310-018-900 and 6310-019-904).

EXISTING ZONING	EXISTING LAND USE DESIGNATION	☐ REQUIRES STATE FUNDING
PF (Public Facilities) ⁴³	Public Facilities ⁴⁴	

SURROUNDING LAND USES

The L-shaped HPHS campus is in an urbanized area surrounded by residential and commercial uses. The campus is bordered on the northwest corner by Huntington Park Municipal Water reservoir, tower, and pumping station and a fast-food restaurant. On the north, the campus is bound by Slauson Avenue and just north of Slauson Avenue is strip commercial, a scrap iron and metal collection facility, a truck driving school, a large vacant building and parking lot, and a warehouse. On the south, the campus is bound by Belgrave Avenue and North Randolph Street with railroad tracks, residential properties, a small neighborhood variety market (La Fortuna Discount), and a grocery market (La Pasadita) situated just south of North Randolph Street. On the southeast corner by Oak Avenue and Belgrave Avenue and residential development. On the east by home improvement store (Home Depot) and strip commercial. Boyle Avenue and a large trucking distribution center (Slauson Distribution Center) are located slightly further east of the campus. On the west, the campus is bound by Miles Avenue with a fast-food restaurant, residential development, and a church situated just across Miles Avenue.

OTHER PUBLIC AGENCY APPROVALS

Reviewing Agencies

- City of Huntington Park, Public Works Department. Permit for curb, gutter, and other offsite improvements, and approval of haul route
- City of Huntington Park Fire Department. Approval of plans for emergency access and emergency evacuation
- California Department of Toxic Substances Control (DTSC). Approval of Phase I Environmental Site Assessment (Phase I ESA); Preliminary Environmental Assessment Equivalent (PEA-E); and Removal Action Workplan (RAW)

⁴² Enrollment at the campus was approximately 1,890 students in the 2015-2016 school year and the current enrollment is approximately 1,611 students.

⁴³ City of Huntington Park zoning map. http://www.hpca.gov/DocumentCenter/View/3772

⁴⁴ City of Huntington Park General Plan. 1991. http://www.hpca.gov/DocumentCenter/View/407.

- California Department of General Services, Division of State Architect (DSA). Plan review and construction oversight, including structural safety, fire and life safety, and access compliance
- California Department of Education, School Facilities Planning Division (CDE). If LAUSD is
 requesting modernization funds from the State Allocation Board (SAB) they must have the plans
 reviewed and approved by the CDE (Education Code Section 17070.50) prior to submitting a funding
 request. Approval of design for educational appropriateness
- California Department of Transportation (Caltrans). Transportation permit for oversized vehicles on State highways
- California Office of Historic Preservation (OHP). Review of historic building preservation and renovation plans
- State Water Resources Control Board (SWRCB). Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP)
- Los Angeles Regional Water Quality Control Board (LARWQCB). Issue National Pollution Discharge Elimination System (NPDES) permit; Clean Water Act Section 401 Water Quality Certification

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 PRC 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 PRC Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.⁴⁵

⁴⁵ 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/.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

Aesthetics	Hazards & Hazardous Materials	Public Services
Agriculture & Forestry Resources	Hydrology & Water Quality	Recreation
Air Quality	Land Use & Planning	Transportation & Traffic
Biological Resources	Mineral Resources	Tribal Cultural Resources
🛛 Cultural Resources	□ Noise	Utilities & Service Systems
Geology & Soils	Pedestrian Safety	Mandatory Findings of
Greenhouse Gas Emissions	Population & Housing	Significance

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

Robert Laughton PRINTED NAME <u>8/16/2017</u> DATE

Director, OEHS TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

ENVIRONMENTAL IMPACTS

		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?				\boxtimes
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?				\boxtimes
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?			\boxtimes	
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			\boxtimes	

Explanation:

The SUP EIR included 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 the table below.

LAUSD Sta	indard Conditions of Approval
SC-AE-1	Comply with School Design Guide* This document requires the consideration of architectural appearance and 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-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.
SC-AE-8	The Project encompasses most of the HPHS campus and consists of the comprehensive modernization of the campus, including demolition, construction, and renovation activities. The Project includes demolition and removal of 8 relocatable buildings and 4 permanent buildings: 1) Home Economics & Classroom, 2) Power Plant/Boiler Vault Building 1, 3) Annex, and 4) Gymnasium; construction of a new classroom building, a new specialty classroom building, Gymnasium (and outdoor pool); and remodel and modernization of the existing Administration, Science & Classroom, and Classroom Building 1. Other improvements include campus-wide infrastructure, including domestic water, fire, irrigation, gas, sewer, low voltage (e.g., fire, telephone, data), electrical and storm drainage, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, and exterior paint.
SC-CUL- 1	The Project encompasses most of the HPHS campus and consists of the comprehensive modernization of the campus, including demolition, construction, and renovation activities. The Project includes demolition and removal of 8 relocatable buildings and 4 permanent buildings: 1) Home Economics & Classroom, 2) Power Plant/Boiler Vault Building 1, 3) Annex, and 4) Gymnasium; construction of a new classroom building, a new specialty classroom building, Gymnasium (and outdoor pool); and remodel and modernization of the existing Administration, Science & Classroom, and Classroom Building 1. Other improvements include campus-wide infrastructure, including domestic water, fire, irrigation, gas, sewer, low voltage (e.g., fire, telephone, data), electrical and storm drainage, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, and exterior paint.

LAUSD Standard Conditions of Approval

SC-CUL-	Role of Historic Architect on Design Team		
2			
	Th 1.	e tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following: The Historic Architect shall work with the Design team 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 team 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 team and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.	
	3.	For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.	
	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.	
	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.	
	7.	The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features.	
	8.	The Design team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.	
Notes: Text in	italics	s shows specific requirements identified in the criteria or condition.	

* LAUSD School Design Guide is updated annually. http://www.laschools.org/new-site/asset-management/school-design-guide.

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.⁴⁶

The school campus and surrounding area are flat and developed with urban land uses, including residential, commercial, and industrial uses. The school campus has numerous one- and two-story buildings, surface parking, play fields, hardcourts, student gathering areas, and ornamental trees and landscaping. Although the project would include new buildings, there are no protected or designated scenic vistas or views on the

⁴⁶ City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.

http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf

campus or within the vicinity of the campus, and project development would not obscure any views. Therefore, no impact to scenic vistas would occur.

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

No Impact. The only officially designated state scenic highway in Los Angeles County is State Route 2 (SR-2) (Angeles Crest Highway) which is located approximately 14 miles north of the school.⁴⁷ The proposed structures associated with the project would not be visible from any designated scenic highway. Project development would not result in impacts to scenic resources within a designated state scenic highway. No impact would occur.

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

Less Than Significant Impact. The school campus is in an urbanized area and is surrounded by residential, commercial, and industrial uses. The project includes demolition of one- and two-story buildings, removal of portable buildings, and construction of one- and two-story buildings, along with other improvements. Views of the school from the surrounding neighborhoods would not significantly change because most of the new buildings are near the center of the campus. The new gymnasium would be built on the site of the existing gymnasium, fronting Miles Avenue on the west side of the campus. The new gymnasium would be similar in height to the existing gymnasium and would be designed in a style that is compatible with the Administrative Building and the other remaining buildings on campus. The HPHS campus was evaluated and assigned a California Historical Resources Status Code of '3S', which indicates that the campus appears eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) through survey evaluation. Incorporation of LAUSD Standard Conditions of Approval SC-CUL-1 and SC-CUL-2 would ensure that the appearance of the new and modernized buildings is compatible with the general character, massing, and color of existing buildings (including the primary contributing buildings and landscape) on campus and the surrounding neighborhood in terms of architectural style, density, height, bulk, and setback. LAUSD Standard Conditions of Approval SC-CUL-1 and SC-CUL-2 would further ensure the proposed modernization of primary contributors and the design of new buildings would conform to the Secretary of the Interior's Standards, specifically Standards 9 and 10 for new construction, and LAUSD requirements and guidelines for the treatment of historical resources under the guidance of a qualified historic architect. Therefore, the project component would not substantially degrade the existing visual character or quality of the site and its surroundings.

Additionally, as outlined in LAUSD Standard Condition of Approval SC-AE-1, the new buildings would be designed with consideration for architectural appearance and consistency with the other buildings on campus. Therefore, impacts to the visual character and quality of the school campus and surrounding uses would be less than significant. No mitigation measures or further study are required.

⁴⁷ California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

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

Less Than Significant Impact. The school campus is in an urban setting and is fully developed. The existing school generates nighttime light from field lights, security and parking lot lights, and building lights (interior and exterior). Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and building lights. The two major causes of light pollution in this setting are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface.

The Proposed Project would not significantly increase nighttime lighting on the campus. The gymnasium building would be on the west side of the campus, and the other proposed buildings would be in the campus interior. The Proposed Project would be consistent with the existing lighting on the campus which provides lighting throughout the campus. Any new security and/or path lights (including those surrounding the pool) would be focused and directional to reduce spill light and glare off the campus. Implementation of LAUSD SC-AE-7 and SC-AE-8 would further ensure that site lighting would have minimal undesired offsite impacts.

Consistent with CHPS SS 12.0, lighting for the Proposed Project would not introduce lights at substantially greater intensities than existing lights on and near the school, and the project would have no impact on nighttime views. Light and glare impacts would be less than significant. No mitigation measures or further study are required.

	Less Thar	1	
Potentia	illy Significan	t Less Than	
Significa	int with Mitigat	ion Significant	No
Impac	t Incorporate	ed Impact	Impact

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
b.	Conflict with existing zoning for agricultural use, or a Williamson Act Contract?		\square
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?		
d.	Result in the loss of forest land or conversion of forest land to non- forest use?		\square
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?		\boxtimes

Explanation:

The SUP EIR did not require Standard Conditions of Approval (SCs) for minimizing impacts to agriculture and forestry resources where future projects would be implemented under the SUP. Likewise, there are no applicable or required SCs related to agriculture and forestry resources associated with the Proposed 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 Proposed Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the campus; therefore, no project-related farmland conversion

would occur. The campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.^{48,49} No impact would occur.

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

No Impact. The Proposed Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is PF (Public Facilities).⁵⁰ The site is not zoned for agricultural use, and project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."⁵¹ Timberland is defined as "land....which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."⁵² The campus is zoned for school use as a public facility and is not zoned for forest land or timberland use.⁵³ No impact would occur.

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

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

⁴⁸ Division of Land Resource Protection (DLRP). 2017, March 24. California Important Farmland Finder. http://maps.conservation.ca.gov/ciff/ciff.html.

⁴⁹ Most of urbanized Los Angeles County, including the HPHS campus, is not mapped on the California Important Farmland Finder.

⁵⁰ City of Huntington Park. 2015, March 3. Zoning Map. http://www.hpca.gov/DocumentCenter/View/3772.

⁵¹ California PRC Section 12220(g).

⁵² California PRC Section 4526.

⁵³ City of Huntington Park. 2015, March 3. Zoning Map. http://www.hpca.gov/DocumentCenter/View/3772.

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

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

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

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to air quality resulting from future projects would be implemented under the SUP. Applicable SCs related to air quality impacts associated with the Proposed Project are provided in the table below.

LAUSD Standard Conditions of Approval		
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: 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. 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. 	
SC-AQ-4	 Prace stockplied soli in areas shelded from prevaiing winds. LAUSD shall prepare an air quality assessment. If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following: 	
Exhaust Emissions

- Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).
- Consolidate truck deliveries and/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.
- Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

Fugitive Dust

- 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).
- · 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.

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

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate

matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.⁵⁴

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

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

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

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

Less Than Significant Impact.

Short-Term Air Quality

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

Construction activities would occur on approximately 5 acres of the 22.5-acre project site and would involve demolition; construction of the new proposed school facility buildings; renovation of several existing school facility buildings; installation and removal of temporary (portable) buildings; construction of a swimming pool; and paving. Construction activities would start in Q1-2020 and would take approximately 36 months to complete. Construction emissions were estimated using the California Emissions Estimator Model

⁵⁴ California Air Resources Board (CARB). 2016. Area Designations Maps/State and National. http://www.arb.ca.gov/desig/adm/adm.htm.

(CalEEMod), version 2016.3.1, based on the project's preliminary construction schedule, phasing, and equipment list provided by LAUSD and include the LAUSD 2014 CHPS prerequisites and implementation of LAUSD Standards Conditions of Approval (specifically SC-AQ-2 through SC-AQ-4, as applicable). The construction schedule and equipment mix were based on preliminary designs and are subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 4. As shown, air pollutant emissions from construction-related activities would be less than SCAQMD regional thresholds, and therefore, less than significant. No mitigation measures or further study are required.

· · ·	Criteria Air Pollutants (Ibs/day) ^{1,2,3,4}				-	
Source	VOC	NOx	со	SO ₂	PM ₁₀	PM _{2.5}
2019						
Phase 1 – Interim Housing	3	35	20	<1	5	3
Phase 1 – Interim Housing + Temporary Portables Installation	3	37	20	<1	5	3
Phase 1 – Interim Housing + Temporary Portables Installation + Existing Portables Relocation	3	38	20	<1	5	3
Phase 2 – Renovation + Building Demo Debris Haul	1	7	7	<1	2	1
2020						<u>.</u>
Phase 2 – Renovation + Building Demo Debris Haul	1	6	7	<1	1	<1
Phase 2 – Renovation + Building Demo Debris Haul + Phase 3 – Demolition + Temporary Portables Installation + Building Demo Debris Haul	5	48	32	<1	4	2
Phase 2 – Renovation + Building Demo Debris Haul + Phase 3 – Demolition + Building Demo Debris Haul	5	47	32	<1	4	2
Phase 2 – Renovation + Building Demo Debris Haul + Phase 3 – Demolition + Building Demo Debris Haul + Asphalt Demo Debris Haul	5	48	32	<1	5	2
Phase 3 – Demolition + Temporary Portables Installation + Building Demo Debris Haul	4	42	25	<1	3	2
Phase 3 – Demolition + Building Demo Debris Haul	4	41	25	<1	3	2
Phase 3 – Demolition + Building Demo Debris Haul + Asphalt Demo Debris Haul	4	42	25	<1	3	2
Phase 4 – Building Construction	3	23	21	<1	2	1
2021		-	-	-	-	-
Phase 4 – Building Construction	2	21	20	<1	2	1
Phase 4 – Building Construction + Architectural Coating	15	22	23	<1	2	1
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction	16	38	38	<1	3	2

Table 4	Maximum Dail	Regional Construction E	mission
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Table 4	Maximum Daily Regional Construction Emissions
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	Criteria Air Pollutants (Ibs/day) ^{1,2,3,4}					
Source	VOC	NOx	со	SO ₂	PM ₁₀	PM _{2.5}
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction + Temporary Portables Removal	16	39	38	<1	3	2
2022		-	-		-	-
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction	16	34	37	<1	3	2
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction + Asphalt Demo Debris Haul	16	36	38	<1	4	2
Phase 5 – Site Work Construction	1	14	15	<1	1	1
Phase 5 – Site Work Construction & Phase 6 – Occupancy/Completion + Temporary Portables Removal	2	19	17	<1	1	1
Maximum Daily Emissions	16	48	38	<1	5	3
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.1.

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

¹ The construction schedule is based on information provided by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

² Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and consistent with LAUSD Standard Conditions of Approval SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

³ The proposed school would incorporate SC-AQ-2, SC-AQ-3, and SC-AQ-4, which include requiring using construction equipment that meets the United States Environmental Protection Agency-Certified Tier 3 or Tier 4 off-road emissions standards for engines between 50 and 750 horsepower and watering the disturbed areas of the active construction site at least three times per day. These requirements would further reduce the criteria air pollutant emissions during construction.

⁴ The paints and coatings used for the Proposed Project would be consistent with EQ 7.0.

Long-Term Air Quality

Long-term air pollutant emissions are typically generated by area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with new buildings. The Proposed Project would demolish several existing school facility buildings and construct new facility buildings in their place (see Chapter 3, *Project Description*, for further details). Following the campus comprehensive modernization project, the campus would have approximately 295,046 square feet of school building space and result in 12,257 square feet less building space compared to existing conditions. Also, the new buildings would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient. In addition, the primary source of long-term criteria air pollutant emissions is from mobile sources. Because the project would not increase the number of students or the capacity of the school, it would not introduce new vehicle trips. Thus, the Proposed Project would not result in an increase in long-term criteria air pollutant emissions. Therefore, regional operation-phase air quality impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead under the National AAQS.⁵⁵ According to SCAQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact.⁵⁶ As discussed in Section III(b), operational activities would not result in emissions in excess of SCAQMD's significant thresholds. Therefore, the project would not result in a cumulatively considerable net increase in criteria pollutants and impacts would be less than significant. No mitigation measures or further study are required.

d) Expose sensitive receptors to substantial pollutant concentrations?

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

Construction Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area. The nearest onsite receptors are the students that would be on campus during portions of the construction activities and the nearest offsite receptors proximate to the Proposed Project site are the adjacent single-family residences surrounding the school, which are located approximately 82 feet from the project site.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 5 shows the Proposed Project's maximum daily construction emissions (pounds per day) generated during construction activities compared with the SCAQMD's screening-level construction LSTs. As shown, the maximum daily NO_x, CO, PM₁₀, and PM_{2.5} construction emissions generated from onsite construction-related activities would be less than SCAQMD screening-level construction LSTs. Therefore, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutants and localized construction air quality impacts would be less than significant. No mitigation measures or further study are required.

⁵⁵ California Air Resources Board (CARB). 2016. Area Designations Maps/State and National. http://www.arb.ca.gov/desig/adm/ adm.htm.

⁵⁶ South Coast Air Quality Management District (SCAQMD). 1993. California Environmental Quality Act Air Quality Handbook.

Table 5 Localized Construction Emissions

		Pollutants	s(lbs/day) ^{2,3}	
Source (based on acres disturbed) ¹	NOx	CO	PM ₁₀	PM _{2.5}
Phase 2 – Renovation + Building Demo Debris Haul	2	2	0.36	0.15
Phase 2 – Renovation + Building Demo Debris Haul	2	2	0.34	0.14
Phase 3 – Demolition + Temporary Portables Installation + Building Demo Debris Haul	39	24	2.51	1.84
Phase 2 – Renovation + Building Demo Debris Haul & Phase 3 – Demolition + Temporary Portables Installation + Building Demo Debris Haul	41	26	2.85	1.98
Phase 3 – Demolition + Building Demo Debris Haul	39	24	2.51	1.84
Phase 2 – Renovation + Building Demo Debris Haul & Phase 3 – Demolition + Building Demo Debris Haul	41	26	2.85	1.98
Phase 3 – Demolition + Building Demo Debris Haul + Asphalt Demo Debris Haul	39	24	2.84	1.89
Phase 2 – Renovation + Building Demo Debris Haul & Phase 3 – Demolition + Building Demo Debris Haul + Asphalt Demo Debris Haul	41	26	3.18	2.03
Phase 5 – Site Work Construction	14	14	0.66	0.61
Phase 5 – Site Work Construction & Phase 6 – Occupancy/Completion + Temporary Portables Removal	18	16	0.84	0.77
SCAQMD ≤1.00-acre LST ^{4,5}	46	231	4.00	3.00
Exceeds LST?	No	No	No	No
Phase 4 – Building Construction	19	17	1.12	1.05
Phase 4 – Building Construction	17	17	0.96	0.90
Phase 4 – Building Construction + Architectural Coating	19	18	1.05	1.00
SCAQMD 1.31-acre LST ^{3,4}	52	267	4.94	3.31
Exceeds LST?	No	No	No	No
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction	35	33	1.83	1.71
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction + Temporary Portables Removal	35	33	1.83	1.71
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction	31	32	1.55	1.45
Phase 4 – Building Construction + Architectural Coating & Phase 5 – Site Work Construction + Asphalt Demo Debris Haul	31	32	2.40	1.58
SCAQMD 1.81-acre LST ^{4,5}	61	324	6.43	3.81
Exceeds LST?	No	No	No	No
Phase 1 – Interim Housing	34	19	4.45	2.96
Phase 1 – Interim Housing + Temporary Portables Installation	34	19	4.45	2.96
Phase 1 – Interim Housing + Temporary Portables Installation + Existing Portables Relocation	34	19	4.45	2.96
SCAQMD 2.50-acre LST ^{4,5}	71	393	8.00	4.50
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.1.

Notes: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the Proposed Project site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the Proposed Project site in Source Receptor Area (SRA) 12.

¹ See Table 3 for details of project phasing.

Table 5 Localized Construction Emissions

	Pollutants(lbs/day) ^{2,3}			
Source (based on acres disturbed) ¹	NOx	CO	PM ₁₀	PM _{2.5}
² The construction schedule is based on information provided by the District. Where specific information regarding project-related construction activities was not				

The construction schedule is based on information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

³ Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and consistent with LAUSD Standard Condition of Approval SC-AQ-3, which involves watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

⁴ The LST Methodology uses lookup tables based on site acreage to determine the significance of emissions for CEQA purposes. The acreage disturbed is the maximum daily disturbed acreage determined using the equipment mix for the different construction activities for this project.

⁵ South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf.

Construction Emission Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015 the Office of Environmental Health Hazards Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments. OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The Proposed Project would be constructed over approximately 36 months, which would limit the exposure to receptors. Additionally, construction activities would not exceed the screening-level LST significance thresholds. Therefore, construction health impacts would be less than significant. No mitigation measures or further study are required.

Operational Localized Significance Thresholds

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

Carbon Monoxide Hotspots

The SoCAB has been designated "attainment" for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or

horizontal mixing is substantially limited—in order to generate a significant CO "hotspot" impact.⁵⁷ The Proposed Project would not increase the number of students and would not result in generation of additional vehicle trips compared to existing conditions. Thus, the Proposed Project would not increase CO hotspots at intersections in the vicinity of the school. Localized air quality impacts related to mobile-source emissions would be less than significant. No mitigation measures or further study are required.

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

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

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Operation of the new school buildings and other campus improvements would not include these or comparable uses and therefore would not create an odor nuisance. Construction of the Proposed Project would include emissions from diesel construction equipment and VOCs from architectural coatings and paving activities, which may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial number of people. Therefore, odor impacts would be less than significant. No mitigation measures or further study are required.

⁵⁷ Bay Area Air Quality Management District (BAAQMD). 2011, Revised. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts, but SCAQMD does not.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U Fish and Wildlife Service?	.S.			
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish ar Wildlife or U.S. Fish and Wildlife Service?	nd			
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 versal pool coastal atc.) through direct removal	5			
filling, hydrological interruption, or other means?	,			\boxtimes
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?			\boxtimes	
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?				

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to biological resources where future projects would be implemented under the SUP. Applicable SCs related to biological resource impacts associated with the Proposed Project are provided in the table below.

LAUSD Sta	andard Conditions of Approval
SC-BIO-3	LAUSD shall comply with the following:
	 Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of avian breading 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 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) 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

LAUSD Standard Conditions of Approval

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 by impacted 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.

The information in this section is based partly on the "Arborist/Site Tree Survey" prepared by Gonzalez Goodale Architects, dated June 23, 2016. A complete copy of this report is included as Appendix B to this Initial Study.

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 school campus is fully developed, with most of the site consisting of buildings, asphalt, and concrete. Vegetation onsite is limited to ornamental trees, shrubs, and turf. There is no native habitat and no suitable habitat for threatened, endangered, or rare species onsite. No impact would occur.

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

No Impact. No locally designated natural communities or riparian habitats exist on the school campus. The school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. The school is neither within nor proximate to any significant ecological area, land trust, or conservation plan.⁵⁸ No impact would occur.

⁵⁸ Los Angeles County Department of Regional Planning, Significant Ecological Area Update Study 2000. Figure 1 Significant Ecological Areas Update Study 200 Existing Boundaries. http://planning.lacounty.gov/sea/faqs.

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. The school campus is fully developed, and there are no protected wetlands onsite. The Proposed Project would be confined to the school campus and would not have the potential to impact any offsite protected wetland areas. No impact would occur.

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

Less Than Significant Impact. The campus is developed with buildings, asphalt, and concrete surfaces as well as turf playfields and other landscaped areas. The school campus does not have any natural native habitat or wildlife corridors and is not available for overland wildlife movement. However, 195 trees of various species, sizes, and maturity are spread throughout the school campus and may provide nesting sites for resident or migratory birds.⁵⁹ Some of the trees next to the buildings to be demolished would require removal. Additionally, project construction near vegetation and structures has the potential to result in disturbances to birds during nesting season (February 1 through August 31 and as early as January 1 for some raptors).

Migratory nongame native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Additionally, the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibit the take of all birds and their active nests, including raptor and other migratory nongame birds.

The District would comply with the MBTA and California Fish and Game Code and would implement LAUSD SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting birds. With implementation of these laws, regulations, and conditions, impacts to nesting birds would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The school has 195 trees of various species, sizes, and maturity that are spread throughout the school campus. An arborist survey classified the following trees on campus as "significant trees" based on size or age or dedication plaque:⁶⁰

• Trees at three corners of the Annex Building are *Podocarpus gracilior*. The trees at the southeast and southwest corners appear to be at least 75 years old (probably planted with construction of original building). These trees would be removed as a part of the Proposed Project.

⁵⁹ Gonzalez Goodale Architects. 2016, June 23. Arborist / Site Tree Survey of Huntington Park High School.

⁶⁰ Gonzalez Goodale Architects. 2016, June 23. Arborist / Site Tree Survey of Huntington Park High School.

- Three western sycamores (*Platanus racemose*) are located east of the Music Building. The roof eave of the portable building has been notched to accommodate one of the sycamore trees. The arborist survey noted that there are some insect bores in the trunk of this tree. This tree would likely be removed as a part of the Proposed Project.
- Three trees have plaques dedicating the tree to a former student or teacher.
 - Podocarpus gracilior on the northwest corner of the Annex Building requires removal.
 - *Ficus benjamina* near Fountain Court; roots have damaged adjacent pavement and may be in the footprint of the new Classroom Building A, and requires removal.
 - Jacaranda mimosifolia at the center of Stockton Court. This tree may be removed for the Proposed Project.

The City of Huntington Park Municipal Code Section 7.5-204 states that removing or destroying trees, shrubs, or plants on City property, including streets and parkways, is prohibited except under permit from the director of field services.⁶¹ The trees that would be removed are located on the campus which is District property. No trees that are located on City property would require removal as a part of the project. However, the District's design for the campus includes offsetting the removal of trees by planting replacement trees (and plants) that would be appropriate sizes at maturity for the space planted and that are included in the LAUSD Approved Plant List. The City does not have any additional ordinances that requires property owners or project applicants to "protect trees" or other biological resources. Given that there are no trees on campus that are protected by local ordinance, a less than significant impact would occur. No mitigation measures or further study are required.

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

No Impact. The school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.⁶² No impact would occur.

⁶¹ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

⁶² US Geological Survey (USGS). 2015, November 30. Region 8 Habitat Conservation Plans (data layer in USGS National Map). Accessed March 21, 2017.

https://viewer.nationalmap.gov/viewer/?q=ags%3Ahttps%3A%2F%2Fwww.sciencebase.gov%2Farcgis%2Frest%2Fservices%2FCatalog%2F521fdafbe4b08e3fb9959e41%2FMapServer.

		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 CEQA Guidelines Section 15064.5?	\boxtimes			
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?			\boxtimes	
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			\boxtimes	
d.	Disturb any human remains, including those interred outside of dedicated cemeteries?			\boxtimes	

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to cultural resources where future projects would be implemented under the SUP. Applicable SCs related to cultural resource impacts associated with the Proposed Project are provided in the table below.

LAUSD Stan	LAUSD Standard Conditions of Approval					
SC-CUL-1	Design Team to Include Qualified Historic Architect					
	For campuses with qualifying historical resources under CEQA, the Design team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the Secretary of the Interior's Standards and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).					
	For projects involving structural upgrades to historic resources, the Design team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.					
	The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.					
SC-CUL-2	Role of Historic Architect on Design Team					
	The tasks of the Historic Architect on the Design team shall include (but not necessarily be limited to) the following:					
	The Historic Architect shall work with the Design team 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 team throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.					
	For new construction, the Historic Architect shall work with the Design team and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.					

LAUSD Standard Conditions of Approval

	For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.
	The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases.
	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.
	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.
	The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features.
	The Design team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-3	School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools
	LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design-Builder and Historic Architect shall apply these guidelines, which include the LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and upgrade/modernization projects. In keeping with the district's adopted policies and goals, LAUSD shall re-use rather than destroy historical resources where feasible.
	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include: • Retain and preserve the historic character of buildings, structures, landscapes, and site features that are historically significant.
	• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance.
	 Avoid removing, obscuring, or destroying character-defining features and materials. Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. Undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid sandblasting and chemical treatments.
SC-CUL-4	Prior to demolition or mothballing activities, LAUSD shall retain a professional architectural photographer and a historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards to prepare HABS-like documentation for the historical resources slated for demolition.
	The HABS-like package will document in photographs and descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon primary- and secondary-source research and available studies previously prepared for the project. Measured drawings shall not be required for the project.
	The specifications for the HABS-like package follow:
	Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior

LAUSD Standard Conditions of Approval					
	details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.				
	Descriptive and Historic Narrative : The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.				
	Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.				
	Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the Los Angeles Public Library (Central Library), Los Angeles Historical Society, and the South Central Coastal Information Center, to make available to researchers.				
SC-CUL-5	LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.				
SC-CUL-6	LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.				
SC-CUL-7	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39).				
SC-CUL-8	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.				
SC-CUL-10	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.				
SC-CUL-11	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.				
SC-CUL-12	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.				

LAUSD Standard Conditions of Approval				
SC-CUL-13	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.			
SC-CUL-14	LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.			
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.			

The information in this section is based partly on the Character-Defining Features Memorandum (CDFM) for Huntington Park High School, prepared by PCR Services Corporation, dated July 30, 2015. A complete copy of this report is included as Appendix C to this Initial Study.

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

Potentially Significant Impact. The HPHS campus site appears to have been vacant prior to its development as the Huntington Park Union High School.⁶³ The high school was founded in 1909, but earliest buildings on the campus were constructed in the 1920s. Following the 6.4-magnitude 1933 Long Beach Earthquake, school buildings that either were destroyed or suffered major damage were removed and completely reconstructed or only partially reconstructed in some cases.

The HPHS campus was evaluated and assigned a California Historical Resources Status Code of '3S', which indicates that the campus appears eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) through survey evaluation.⁶⁴

Four buildings on campus were identified as significant (primary) contributors to the status of the campus as a historic district: the Administration (Building 1), Auditorium (Building 2), Home Economics and Classroom (Building 4), and the Annex (Building 8; see Figure 11, *Historical Buildings and Landscapes*). Other buildings identified as contributing to the historic significance of the school are the Cafeteria (Building 3), Social Arts (Building 12), and the Gymnasium (Building 13).

The Proposed Project includes demolition of the Home Economics and Classroom (Building 4), the Annex (Building 8), and the Gymnasium (Building 13). Project impacts on historical resources would be potentially significant and will be analyzed in the EIR.

⁶³ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

⁶⁴ PCR Services Corporation. July 30, 2015. Character-Defining Features Memorandum (CDFM) for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

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

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

- ... 'unique archaeological resources' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
- (1) Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Soil on the campus was previously disturbed by construction of existing and previous buildings. Therefore, earthwork or soil disturbance during construction of the Proposed Project would not be expected to encounter buried archaeological resources. It is further anticipated that excavations for construction of the Proposed Project would occur in the location of the existing excavations for previous construction onsite.

Proposed two-story Classroom Building A would replace the two-story Annex (Building 8); proposed onestory Classroom Building B would replace the one-story Home Economics and Classroom (Building 4); and the proposed Gymnasium Building would replace the existing Gymnasium (Building 13).

Site preparation for the Proposed Project would include removal of existing soils to a depth of five feet below the elevations of proposed building pads. The site is underlain by artificial fill to depths of up to six feet below ground surface (bgs) overlying Holocene age alluvial sediments generally consisting of unconsolidated sand, silt, clay, and gravel.⁶⁵

Excavations for construction of the Proposed Project are not expected to extend substantially deeper than excavations for previous construction on the sites of the proposed buildings. However, Classroom Building A and the new Gymnasium would not conform to the exact building foundation of the existing buildings; therefore, excavation has the potential for unanticipated discoveries. Additionally, because of the age of the campus, earthwork activities may yield previously undiscovered buried archaeological resources left during construction of the school.

As part of the project and in compliance with Standard Conditions of Approval SC-CUL-8, SC-CUL-10, and SC-CUL-13, if historical or unique archaeological resources are discovered during construction activities, all

⁶⁵ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

As part of the archaeological monitoring program required under LAUSD Standard Conditions of Approval SC-CUL-12 scheduling details for participation by a Native American monitor, if required, would be included. If archaeological or Native American resources are discovered, SC-CUL-8, SC-CUL-10, SC-CUL-13 and SC-TCR-1 would be implemented for handling and recovery. Archaeological impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation. The site is underlain by artificial fill to depths of up to six feet bgs.⁶⁶ Below the fill is Holocene-age alluvial sediments generally consisting of unconsolidated sand, silt, clay, and gravel.⁶⁷ The Los Angeles Basin is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles County has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological sensitivity. However, Holocene epoch alluvium deposits are too young to contain fossils and have low paleontological sensitivity.^{68,69} The school campus is underlain by Holocene epoch alluvium deposits.⁷⁰ Additionally, neither the school nor the surrounding area has been identified as having a high paleontological sensitivity.⁷¹ In the unlikely event that unanticipated buried resources are discovered, LAUSD shall implement SC-CUL-14. Impacts to paleontological resources are considered less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. In the unlikely event that human remains are uncovered during project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no

⁶⁶ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁶⁷ Ibid.

⁶⁸ Paleontological Assessment and Technical Report, Water Replenishment District, Groundwater, Reliability Improvement Program, County of Los Angeles, California http://www.wrd.org/AppendixG_PaleoAssessmt.pdf.

⁶⁹ City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources

http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_AppC. pdf.

⁷⁰ Gorian and Associates, Inc. October 21, 2016. Geotechnical Evaluation To Assist Design Team Schematic Development, Sherman Oaks Center For Enriched Studies, 18605 Erwin Street, Tarzana, California.

⁷¹ City of Los Angeles. Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Chapter 2.15 - Cultural Resources. http://cityplanning.lacity.org/HousingInitiatives/HousingElement/ FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf.

further excavation or disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death; and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC.

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

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Figure 11 - Historical Buildings and Landscapes 4. Environmental Checklist and Analysis

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V	I. 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.				
	ii. Strong seismic ground shaking?			\boxtimes	
	iii. Seismic-related ground failure, including liquefaction?			\boxtimes	
	iv. Landslides?				\bowtie
b.	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
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?				
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?			\boxtimes	
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?				

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to geology and soils 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 the table below.

LAUSD Standard Conditions of Approval				
SC-GEO-1*	Compliance with 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				
	in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, and the post-construction element of the NPDES program requirements.			

LAUSD Standard Conditions of Approval				
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.			

* The District has already complied with this project-related standard condition; see Geotechnical Evaluation in Appendix D of this Initial Study.

The information in this section is based partly on the following reports:

- "Preliminary Geotechnical Investigation and Geologic Seismic Hazard Report. Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California," prepared by Geocon West, Inc., July 14, 2015 (Attached as Appendix D-1).
- "Site Specific Ground Motion Hazard Analysis: Proposed Campus Improvements Huntington Park High School, 6020 Miles Avenue, Huntington Park, California," prepared by Geocon West, Inc., August 25, 2015 (Attached as Appendix D-2).
- "Geotechnical Investigation. Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California," prepared by Geocon West, Inc., December 28, 2016 (Attached as Appendix D-3).
- 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.

Less Than Significant Impact. The Proposed Project would not expose people or structures to potential substantial hazards from surface rupture of a known fault. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The site is not within or immediately adjacent to (i.e., within a few hundred feet) an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is approximately 5.8 miles southwest of the school on the Newport-Inglewood Fault Zone.⁷² Based on a review of readily available geologic literature, there are no known active faults or geologically hazardous areas on or immediately adjacent to the site. Fault rupture impacts would be less than significant. No mitigation measures or further study are required.

⁷² California Geological Survey (CGS). 1986, July 1. Special Studies Zones Map, Inglewood Quadrangle. http://gmw.consrv.ca.gov/shmp/download/quad/INGLEWOOD/maps/INGLEWOOD.PDF.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Proposed Project would not increase exposure of people or structures to earthquake impacts. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region. The closest historically active surface fault is the Newport-Inglewood Fault Zone, about six miles to the southwest. Other nearby active faults are the Raymond Fault, the Hollywood Fault, the Whittier Fault and the Verdugo Fault Zone located 9 miles north, 9 miles north, 10.5 miles east, and 11 miles north of the site, respectively.

Because of the proximity to known faults, and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults.

The proposed new school buildings would be designed in accordance with the California Building Code, the California Geological Survey "Guidelines for Evaluating and Mitigating Seismic Hazards in California,"⁷³ and "Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings."⁷⁴ The Proposed Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and construction of the new school buildings. Seismic ground shaking impacts would be less than significant. No mitigation measures or further study are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age);⁷⁵ 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. The school campus is in a Zone of Required Investigation for liquefaction mapped by the California Geological Survey.

The school sits atop artificial fill to depths of six feet bgs overlying Holocene-age alluvial sediments that generally consist of unconsolidated sand, silt, clay, and gravel. These alluvial deposits are characterized as

⁷³ Published in 1997 by the California Department of Mines and Geology (DMG) as Special Publication 117 (SP117), and revised and readopted September 11, 2008, and published by the California Department of, California Conservation, California Geological Survey (formerly known as DMG).

⁷⁴ California Geological Survey. October 2013. http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/Documents/Note_48.pdf

⁷⁵ The Holocene epoch began 12,000 to 11,500 years ago.

slightly moist to moist, soft to hard, and very loose to very dense, and generally become more dense with increased depth.⁷⁶

The entire southern California region is considered seismically active. The depth to groundwater under the site is over 100 feet bgs.⁷⁷ The State of California Seismic Hazard Zone Map for the South Gate Quadrangle indicates that the site is located in an area designated as "liquefiable." However, according to the City of Huntington Park General Plan (1991) and the Los Angeles County Safety Element (1990), the site is not located within an area identified as having a potential for liquefaction. Additionally, without the presence of shallow groundwater, the site soils would not be prone to liquefaction.⁷⁸ Project development would not subject people or structures to substantial hazards arising from liquefaction, and impacts would be less than significant. No mitigation measures or further study are required.

iv. Landslides?

No Impact. Landsliding is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

The school and vicinity are relatively flat and are not in a zone of required investigation for earthquakeinduced landslides as mapped by the California Geological Survey. The project would not expose people or the new school buildings to adverse effects from landslides.⁷⁹

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

Less Than Significant Impact.

Construction Phase

The Proposed Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the school campus; therefore, redevelopment of the school campus would not result in the loss of topsoil.⁸⁰ Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and

⁷⁶ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁷⁷ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁷⁸ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁷⁹ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁸⁰ Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem.

depositing silt, sand, or mud in roads and tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life. Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 6. The school campus is 22.5 acres and the project would occur on approximately 10 acres; thus, project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under the LAUSD Standard Condition of Approval SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant. No mitigation measures or further study are required.

Category	Purpose	Examples			
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind.	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales.			
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping.			
Tracking Controls	Minimize the tracking of soil off-site by vehicles.	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.			
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.			
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.			
Source: California Stormwater Quality Association (CASQA). 2003, January. Stormwater Best Management Practice Handbook: Construction.					

Table 6Construction BMPs

Operational Phase

After completion of the Proposed Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Proposed Project would incorporate LAUSD Standard Condition of Approval SC-HWQ-1, which requires compliance with the Low Impact Development Standards Manual (LID Standards Manual) issued by the

County of Los Angeles Department of Public Works (DPW) in February 2014.⁸¹ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁸² LAUSD would comply with existing regulations and applicable Standard Conditions of Approval SC-HWQ-1. Operational phase soil erosion impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. Hazards arising from liquefaction and landslides would be less than significant, as discussed above in Sections VIa.(v) and (vi). No mitigation measures or further study are required.

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The project site is not prone to lateral spreading, as near-surface site sediments are not prone to liquefaction (see Section VIa. (iii) above).

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. As previously noted, the depth to groundwater under the site is over 100 feet bgs⁸³ and the Proposed Project would not withdraw groundwater. Soils that are particularly subject to subsidence include those with high silt or clay content. The school is not in an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site.⁸⁴ Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant.

⁸¹ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

⁸² US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. https://www.epa.gov/nps/urban-runoff-low-impact-development.

⁸³ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁸⁴ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands, in contrast to liquefaction which occurs in saturated sand or gravel. Alluvial soils onsite reach a depth of 50 feet bgs, and differential settlement is expected to be less than 0.25 inch over a distance of 30 feet. The geotechnical investigation report includes recommendations for foundation design to minimize hazards to people and structures arising from seismically induced settlement.⁸⁵ Project development would not pose substantial hazards to people or structures arising from seismically induced settlement, and impacts would be less than significant.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The upper five feet of fill soils are not considered suitable for supporting the proposed new buildings. The project geotechnical investigation recommends removal of existing soils under proposed building pads to a depth of five feet; debris such as wood, roots, asphalt, and concrete removed from the soils; and then the soils returned to the building pad sites, moistened, and compacted.⁸⁶ As part of the DSA review process, LAUSD is required to show how the project complies with a final engineering-level geotechnical report. This report includes, but is not limited to: identification of building setbacks, site preparation, specific locations and methods for fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of any deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review.

The project design and development would incorporate all recommended measures outlined in the final engineering-level geotechnical report to ensure that safety is not compromised as required by existing regulations. Compliance with recommendations of the geotechnical investigation would minimize hazards from collapsible soils, and impacts would be less than significant.

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

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. The upper five feet of site soils are considered non-expansive.⁸⁷ The Proposed Project would not expose people or the new school buildings to significant adverse effects associated with expansive soils. Impacts would be less than significant. No mitigation measures or further study are required.

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

⁸⁵ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁸⁶ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

⁸⁷ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

No Impact. The existing school does not use septic tanks or other alternative wastewater disposal systems, and no impact would occur.

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

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to greenhouse gas emissions where future projects would be implemented under the SUP. Applicable SCs related to greenhouse gas emissions impacts associated with the Proposed Project are provided in the table below.

LAUSD Standard	Conditions of Approval
SC-USS-1	School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.
	Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.
SC-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.
Note: Text in italics sho	ws specific requirement identified in the criteria or condition.

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

The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane, and O_3 —that are the likely cause of an increase in global average

temperatures observed within the 20th and 21st centuries. The primary source of these GHGs is fossil fuel use. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide, sulfur hexafluoride, hydro fluorocarbons, perfluorocarbons, and chlorofluorocarbons (CFCs).⁸⁸

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

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

A typical school project could generate GHG emissions from construction activities, energy use (directly through fuel consumed for building heating), area sources (e.g., consumer products, coatings), mobile sources (e.g., vehicle trips associated with the new students), and from water usage, and solid waste generation. However, similar to the operation-phase criteria air pollutants as discussed in Section III(b) of this IS/MND, it is anticipated that the net change in operation-phase GHG emissions associated with the Proposed Project would be nominal due to the number of students remaining the same (i.e., no project related growth), a net decrease in total building space, and the newer buildings being more energy efficient. The new buildings would be designed and constructed to comply with and/or exceed Title 24 Building Energy Efficiency Standards as outlined in EE 1.0, EE 2.0, EE 3.0, EE 5.0, and SC-GHG-5. Consistent with OM 3.0, the school will track its energy use over time to analyze energy performance of the facility. Also, as outlined in WE 1.0, WE 2.0, SC-GHG-1, the Proposed Project would be designed to reduce potable water use, wastewater generation, and outdoor water use. Thus, for the purpose of this analysis, only quantified construction-related GHG emissions are provided. Table 7 provides both the total and amortized projectrelated construction emissions. The amortized emission rate is based on total construction emissions amortized over 30 years per SCAQMD methodology.⁸⁹ As shown in the table, amortized construction emissions would be substantially below the proposed SCAQMD bright-line threshold of 3,000 MTCO₂e/year. Furthermore, implementation of SC-USS-1, which requires construction waste recycling, would contribute to further minimizing construction-related GHG emissions. In addition, and as previously stated, it is anticipated that operation-phase GHG emissions would be nominal and would not cause an exceedance of the SCAQMD bright-line threshold. Therefore, the Proposed Project's cumulative contribution to GHG emissions is less than significant. No mitigation measures or further study are required.

 $^{^{88}}$ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

⁸⁹ South Coast Air Quality Management District. 2009, November 19. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting 14. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqasignificance-thresholds/year-2008-2009/ghg-meeting-14/ghg-meeting-14-main-presentation.pdf?sfvrsn=2

Table 7 Project-Related Construction GHG Emissions

	GHG
Source	MTons
Total Construction Emissions ¹	1,591 MTCO ₂ e
Amortized Construction Emissions ²	53 MTCO ₂ e/Yr
Proposed SCAQMD Bright-Line Threshold	3,000 MTCO ₂ e/Yr
Exceeds Bright-Line Threshold	No

Source: CalEEMod, Version 2016.3.1. Totals may not equal to the sum of the values as shown due to rounding

Notes: MTons: metric tons; MTCO₂e: metric ton of carbon dioxide equivalent

¹ Implementation of SC-USS-1, which focuses on construction waste recycling, would contribute in further minimizing construction-related GHG emissions.

² Total construction emissions are amortized over 30 years per SCAQMD methodology.

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

Less Than Significant Impact. The California Air Resources Board's (CARB's) Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target. In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts. On January 20, 2017, CARB released the 2017 Climate Change Scoping Plan to address the new interim GHG emissions target under Senate Bill 32, which requires the state to reduce its greenhouse gas emissions 40 percent below 1990 levels by 2030.⁹⁰ The *2017 Climate Change Scoping Plan* provides the strategies for the state to meet the 2030 GHG reduction target as established under SB 32.

Statewide strategies to reduce GHG emissions in the 2017 Scoping Plan include: implementing Senate Bill 350, which expands the Renewables Portfolio Standard to 50 percent by 2030 and doubles energy efficiency savings; expanding the Low Carbon Fuel Standard to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementation of the Sustainable Freight Action Plan; implementation of the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluoricarbons 40 percent below 2013 levels by 2030 and black carbon emissions 50 percent below 2013 levels by 2030; continuing to implement Senate Bill 375; creation of a post-2020 Cap-and-Trade Program; establishing a new regulation to reduce GHG emissions from the refinery sector by 20 percent; and development of an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.⁹¹

New buildings, like those constructed as a part of the Proposed Project, are required to comply with the 2016 Building Energy Efficiency Standards and 2016 California Green Building Standards Code (CALGreen). Additionally, the proposed new school building facilities would be designed and constructed to meet the

⁹⁰ California Air Resources Board. 2017, January 20. The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

⁹¹ California Air Resources Board. 2017, January 20. The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CHPS criteria and LAUSD Standard Conditions of Approval. With implementation of these regulations and standards, the Proposed Project's GHG emissions would exceed the reductions that would be achieved through statewide measures.

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the Regional Transportation Plan (RTP)/SCS was adopted in April 2016.⁹² The Proposed Project would result in improvements to an existing school only and would not result in an increase to the number of students and would not result in generating additional vehicle trips. Therefore, the Proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS and the impacts would be less than significant. No mitigation measures or further study are required.

⁹² Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project	ct:			
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
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?			\boxtimes	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			\boxtimes	
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?			\boxtimes	
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?				
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 project area?				
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				\square
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?				

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to hazards and hazardous materials where future projects would be implemented under the SUP. No SCs related to hazards and hazardous materials were required for the Proposed Project. This section is based, in part, on the following studies:

- Phase I Environmental Site Assessment prepared by Alta Environmental dated May 16, 2016 (see Appendix E-1)
- Final Preliminary Environmental Assessment Equivalent Investigation Report prepared by Alta Environmental dated April 10, 2017 (see Appendix E-2), and

- Removal Action Workplan for Soil prepared by Alta Environmental dated May 3, 2017 (see Appendix E-3).
- 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.

Hazardous Materials That Would Be Used on Campus

Construction

Construction may involve activities requiring the transport, storage, use, or disposal of small quantities of hazardous substances for activities such as fueling and servicing construction equipment and applying paints and other coatings. The use of these materials during project construction would be short term in nature and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

Existing Hazardous Materials Present or Potentially Present on or near the Campus

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.⁹³

Onsite

Soil samples were collected throughout the Site at various depths and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), polychlorinated byphenyls (PCBs), semi-VOCs (SVOCs), polyaromatic hydrocarbons (PAHs), organochlorine pesticides (OCPs), dioxins and furans, arsenic, lead, and Title 22 metals.⁹⁴

The following RECs were identified on campus:95

• Diesel fuel release from a 3,178-gallon leaking underground storage tank (LUST) site affected soil. The tank—mapped north of the existing Power Plant Building—was removed in 1987, and the case was closed in 1996.

⁹³ ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

⁹⁴ Alta Environmental. May 3, 2017. Removal Action Workplan for Soil.

⁹⁵ Alta Environmental. May 16, 2016. Phase I Environmental Site Assessment prepared by Alta Environmental.
- Current storage and use of hazardous materials onsite: two 55-gallon drums of gasoline fuel and one 55gallon drum of diesel fuel stored in a locked flammable liquid storage building onsite, south of the existing Power Plant Building.
- Chemical use/storage and open floor drains in the Welding Shop, in the southeast part of the campus.
- Historical uses and operations (former use/storage of hazardous materials, and generation of hazardous waste) at the campus including:
 - Solvents, gasoline, and diesel fuel
 - Former operation of the existing onsite solvent paint spray booth
 - Former use of a clarifier onsite
 - Former operation of heavy machinery, mechanical systems, incinerator, and fuel oil-powered boiler systems, within onsite buildings.
- Based on the age of historical and current structures at the school, arsenic, lead-based paint, asbestos, and pesticides may have been used in the past. As a result, there is a potential for the presence of lead-based paint, arsenic, and pesticides in the shallow soils, including the area where the property formerly was occupied by residential development until the mid-1920s and in areas onsite where historic school structures exist, or have been demolished, and the site has been redeveloped.

Offsite

The following RECs were identified off campus:

- Henry Company at 2911 Slauson Avenue opposite from the northeast school boundary: Cleanup Program site. Multiple contaminants including: asphalt, hydrocarbons (gasoline, diesel fuel, and oil), and several volatile organic compounds (VOCs). The case is open, remediation was ongoing in 2015, and deed restrictions and land use covenants apply to the site.
- Trico Industries Site (The Home Depot Store No. 1002) at 3040 Slauson Avenue about 415 feet east-northeast of the school: a release of petroleum and VOCs from a leaking UST resulted in impacts to subsurface soil, soil vapor, and groundwater in 1995. Groundwater was monitored until 2002 for closure by natural attenuation. The 2002, groundwater monitoring report cited concentrations of VOCs in groundwater samples, including perchloroethylene (PCE) and trichloroethylene (TCE), collected from a groundwater monitoring well located a few feet east of the school boundary. The case was referred by the Regional Water Quality Control Board to the DTSC in 2006, citing a potential impact to the nearby school. The case is open.

Other Environmental Database Listings

Onsite

A Preliminary Environmental Assessment Equivalent (PEA-E) for the Huntington Park High School comprehensive modernization area located on the northeastern, northwestern, and southern portion of the Site was conducted by Alta Environmental (Alta) on behalf of the LAUSD.⁹⁶ Soil samples were collected throughout the site at various depths and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), polychlorinated byphenyls (PCBs), semi-VOCs (SVOCs), polyaromatic hydrocarbons (PAHs), organochlorine pesticides (OCPs), dioxins and furans, arsenic, lead, and Title 22 metals. While several analytes were detected at concentrations exceeding laboratory detection limits, only lead, arsenic, and chlordane were detected in soil samples exceeding residential screening levels. A Removal Action Workplan (RAW; Appendix E-2) was recommend for the Proposed Project to address shallow soils impacted with chlordane, lead, and/or arsenic in the areas located throughout the campus.

The RAW proposes excavation and off-site removal as a part of the Proposed Project for the site.⁹⁷ Excavation was determined to be the preferred removal action (RA) remedy based on accessibility to the majority of the identified impacted soil. The excavation and removal would focus on the removal and disposal of the majority of soils impacted with the contaminants of concerns (COCs) identified during PEA-E activities.⁹⁸

The school is also listed on the following environmental databases:

- Haznet (hazardous materials shipments manifests): Reported waste categories included laboratory waste chemicals, asbestos-containing waste, other inorganic solids, other organic solids, unspecified organic liquid mixture, waste oil and mixed oil, PCBs and materials containing PCBs, off-specification aged or surplus organics, halogenated solvents, oil/water separation sludge, and phytochemicals/photo processing waste.
- Los Angeles County Hazardous Materials System (HMS): Facility status listed as "Removed."
- Recovered Government Archive (RGA) LUST
- Small Quantity Generator of hazardous wastes (SQG) on the US Environmental Protection Agency RCRAinfo [Resource Conservation and Recovery Act] database.
- Historical Cortese: historic database of underground storage tanks, solid waste facilities, and cleanup sites.
- San Antonio Continuing Education High School is listed as a large quantity generator of hazardous wastes (LQG) on the RCRAinfo database.

⁹⁶ Alta Environmental. May 16, 2016. Phase I Environmental Site Assessment prepared by Alta Environmental.

⁹⁷ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

⁹⁸ Ibid.

Offsite

- Andrade's Auto Service at 6210 Miles Avenue, about 425 feet south-southwest from the project site, is listed on the Statewide Environmental Evaluation and Planning System (SWEEPS) UST database.
- All Star, 3050 East Slauson Avenue, about 500 feet east-northeast of the site, is listed on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) NFRAP (No Further Remedial Action Planned) database. Site assessment has been completed, and the EPA is not placing the site on the National Priorities List.
- Pacific Pumps Division & Ingersol/Dresser Industries and Pump Co., 5715 Bickett Street, about 560 feet north-northeast of the project site, is listed on several databases, including LUST (diesel release affected soil; case closed 1990); historic UST databases; and as an SQG.

Demolition of the school buildings would require routine transport and disposal of hazardous demolition waste material and soil off the school campus. A Preliminary Environmental Assessment Equivilant (PEA-E) was prepared to further determine the extent to which soils on the campus were impacted by COCs and Recognized Environemtnal Conditions (RECs).⁹⁹ The RAW outlines measures for excavation, loading, and transport of impacted soils that are in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403, and related guidelines intended for prevention, reduction, and dust/contamination control, and management in order to limit and avoid potential impacts associated with the COCs and RECs.¹⁰⁰

Polychlorinated Biphenyls

PCBs were once used as coolants, insulating materials, and lubricants in electrical materials such as transformers. Pad-mounted transformers are onsite, and pole-mounted transformers are along the outside perimeter of the school.¹⁰¹ PCBs were also used widely in caulking and elastic sealant materials, particularly from 1950 through the 1970s, until PCBs were banned in 1979. Additionally, PCBs can leach into the soil near exterior caulking in buildings and adjacent unpaved areas. Based on the soil testing, PCBs are not found in concentrations that would cause human health risk.¹⁰²

Asbestos

Asbestos is the name of a group of silicate minerals that are heat resistant and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).¹⁰³ Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety

⁹⁹ Alta Environmental. Final - Preliminary Environmental Assessment Equivalent Investigation Report. April 10, 2017.

¹⁰⁰ Alta Environmental. Final - Preliminary Environmental Assessment Equivalent Investigation Report. April 10, 2017 and Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

¹⁰¹ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

¹⁰² Alta Environmental. Final - Preliminary Environmental Assessment Equivalent Investigation Report. April 10, 2017.

¹⁰³ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.¹⁰⁴

Additionally, buildings must be reviewed by LAUSD's Facilities Environmental Technical Unit (FETU) for asbestos prior to project commencement.¹⁰⁵ A survey of campus buildings identified ACMs and asbestoscontaining construction materials (ACCM).¹⁰⁶ During demolition and renovation of permanent buildings and removal of portable buildings, asbestos would be removed, contained, and disposed. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs. In addition, LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of ACM and ACCM, in compliance with applicable health and safety and hazardous materials regulations. The proposed modernization would not subject people to substantial hazards from ACM or ACCM, and impacts would be less than significant.

Lead-Based Paint

Lead was formerly used as an ingredient in paint (before 1978) and as a gasoline additive; both of these uses have been banned. Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the development of the nervous system and blood cells in children.¹⁰⁷ Lead-based paint is defined in Code of Federal Regulations Title 40 Part 745 as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Those demolishing pre-1978 structures may presume the buildings contain lead-based paint without having an inspection.

Due to the ages of the buildings to be demolished, all coated surfaces (paint, varnish, or glazed) are assumed to contain lead; therefore, they must be reviewed by LAUSD's FETU for lead-based paint prior to project commencement.108 Lead was identified in soil samples in excess of residential screening levels.¹⁰⁹

All lead-containing material abatement/removal work must comply with the EPA, US Occupational Safety and Health Administration, and SCAQMD regulations. Lead must be contained during demolition activities (California Health & Safety Code sections 17920.10 and 105255). Title 29 Code of Federal Regulations (CFR) Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring. In addition, LAUSD Section 13282 (Lead Abatement and Lead Related Construction Work) and LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of lead-based paint

¹⁰⁴ US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos. https://www.epa.gov/asbestos/us-federal-bans-asbestos.

¹⁰⁵ FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

¹⁰⁶ Panacea, Inc. Asbestos Engineering Assessment. Huntington Park High School (8700) Comprehensive Modernization Project August 2, 2016

¹⁰⁷ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

¹⁰⁸ FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

¹⁰⁹ Alta Environmental. Final - Preliminary Environmental Assessment Equivalent Investigation Report. April 10, 2017.

and building materials, in compliance with applicable health and safety and hazardous materials regulations. The proposed modernization would not subject people to substantial hazards from lead-based paint, and impacts would be less than significant.

Pesticides

Due to the ages of the buildings, organochlorine pesticides (OCP) may have been used in the buildings for termite control, and could also be present in the southeast corner of the site that was in residential use until the 1920s.¹¹⁰ Arsenic is used as a pesticide, primarily in wood; but was also used in rat poisons, and poisons, and weed killers.¹¹¹ Arsenic may have been historically used at the campus.

The PEA-E included soil sampling and testing soils for organochlorine termiticides and arsenic. Chlordane (an OCP) and arsenic were identified in soil samples in excess of residential screening levels. LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of chlordane and arsenic, in compliance with applicable health and safety and hazardous materials regulations.¹¹²

Soil Import and Export

Soil samples were collected throughout the campus at various depths. While several concentrations were found at levels in excess of laboratory detection limits, only lead, arsenic, and chlordane were identified in soil samples in excess of residential screening levels.

A Human Health Screening Evaluation was conducted to estimate the cumulative carcinogenic risk and hazard index posed to campus occupants by contact with lead, arsenic, or chlordane impacted soils. The cumulative carcinogenic risk based on the maximum concentrations exceeds the DTSC's target risk value, and the estimated hazard index is also above the benchmark level for noncancer effects.¹¹³

Ten areas with shallow soil impacted by lead, arsenic, or chlordane in excess of residential screening levels physically defined the areas of impact at the campus. The total estimated amount of impacted soil at the campus is estimated to be approximately 116.70 cubic yards. A Removal Action Workplan (RAW) for the contaminated sites was prepared.¹¹⁴ The RAW outlines the removal and disposal of the of soils impacted with the contaminants of concern identified in the PEA-E. Contaminated soil would be removed in compliance with the RAW, along with applicable health and safety and hazardous materials regulations, and under oversight of DTSC.

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials

¹¹⁰ Organochlorine termiticides previously used in the United States include lindane, aldrin, dieldrin, DDT (dichlorodiphenyltrichloroethane), chlordane, and heptachlor; none of those pesticides are still used as termiticides in the United States. Grace, et al. 1993. Persistence of Organochlorine Pesticides for Formosan Subterranean Termite (*Isoptera: Rhinotermitidae*) Control in Hawaii. In *Journal of Economic Entomology*, Vol. 86, No. 3. http://manoa.hawaii.edu/ctahr/termite/aboutcontact/grace/pdfs/068.pdf.

 ¹¹¹ National Pesticide Information Center, Oregon State University. 2015, December 18. Arsenic. http://npic.orst.edu/ingred/ptype/treatwood/arsenic.html.

¹¹² Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

¹¹³ Alta Environmental. Final - Preliminary Environmental Assessment Equivalent Investigation Report. April 10, 2017.

¹¹⁴ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

Testing.¹¹⁵ This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2. The proposed modernization would not subject people to substantial hazards from lead, arsenic, or chlordane, and impacts would be less than significant.

Existing Hazardous Substances Used

Hazardous materials that are currently being handled, used, transported, or disposed of include: standard cleaning products; pesticides and herbicides; and paints, fuels, and lubricants used in association with existing campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts (wood, metal, electronics), currently involve the use of small quantities of chemicals, fuels and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would require management in accordance with standard LAUSD policies and practices. Most hazardous materials stored on campus present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

Hazardous materials are regulated by several agencies, including the EPA, the California Department of Toxic Substances Control, California Division of Occupational Safety and Health, and the Huntington Park Fire Department. The requirements of these agencies would be incorporated into the design and operation of the Proposed Project. These requirements include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Remediation and verification testing/monitoring would be required before CDE approval of the project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2. Project development would not subject people or the environment to substantial hazards related to hazardous materials sites listed on regulatory agency databases.

All materials and substances that would be used after project completion are already being used on the campus; therefore, no change would occur. Hazards to the public, the students, or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The use, handling, storage, and disposal of hazardous materials in the course of project construction and operation would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at the school, including training school staff to safely contain and clean

¹¹⁵ LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing. October 1, 2011.

up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies onsite; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Impacts from reasonably foreseeable upset and accident conditions would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. In addition to Huntington Park High School the following schools are within 0.25 mile of the construction site:

- Pacific Boulevard School, 940 feet northwest
- Aspire Clarendon Academy, 1,310 feet west
- Gage Middle School, 1,260 feet south¹¹⁶

The Proposed Project would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Hazardous materials expected at the existing school would be associated with janitorial, maintenance, and repair activities. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, construction materials and site cleanup would comply with existing regulations. Operation of construction equipment and heavy trucks during project construction would generate diesel emissions, which are considered hazardous; however, the project construction period would be temporary. Health risk is based upon the conservative assumption that exposure is continuous and occurs over a 70-year lifetime. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at the site or at any of the schools within 0.25 mile of the project site due to the short-term of the construction activities. Additionally, the RAW outlines a plan for the safe transport of hazards from the project site.¹¹⁷ Impacts would be less than significant. No mitigation measures or further study are required.

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

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

- hazardous waste facilities subject to corrective action
- hazardous waste discharges for which the State Water Resources Control Board (SWRCB) has issued certain types of orders

¹¹⁶ United States Geological Survey (USGS). 2017, March 17. The National Map. https://viewer.nationalmap.gov/viewer/.

¹¹⁷ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

- public drinking water wells containing detectable levels of organic contaminants
- underground storage tanks with reported unauthorized releases
- solid waste disposal facilities from which hazardous waste has migrated

The Phase I ESA for the Proposed Project included a regulatory agency environmental database search. The project site is not included on any list compiled pursuant to California Government Code Section 65962.5. The findings are discussed in further detail in Section VIII(a). Impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or 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 school is the Compton Woodley Airport, approximately 6.6 miles south of the school.¹¹⁸ The school campus is not within the airport influence area or the airport land use planning area of the Compton Woodley Airport.¹¹⁹ Project development would not result in a new use that would interfere with air traffic patterns, or increase traffic levels or change traffic locations such that it would result in a safety risk. No impact would occur.

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. There are no private airstrips or heliports within two miles of the school campus.¹²⁰ The new buildings would not create a safety hazard. No impact would occur.

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

No Impact. The emergency response plan in effect in the City of Huntington Park is the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012. The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with the District's "safe school plans." The proposed renovation and new construction would not

¹¹⁸ Caltrans. 2016, March. 2016 California Public Use Airports and Federal Airfields.

http://dot.ca.gov/hq/planning/aeronaut/documents/maps/PublicUseAirports_MilitaryAirfieldsMap.pdf.
 Los Angeles County Department of Public Works. 2017, March 17. Los Angeles County Airports.
 http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13163703.149727825,4013268.8423409513,-

http://dpw.lacounty.gov/avi/arrports/map.aspx?extent=-13163/03.149/2/825,4013268.8423409. 13161868.661048933,4014797.5829066955.

¹²⁰ Airnav.com. March 17, 2017, Airport Information. http://www.airnav.com/airports/.

interfere with any other existing emergency response plans or emergency evacuation plans. No emergency response impact would occur.

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?

No Impact. The school campus is in a built-out urban area, and there is no wildland susceptible to wildfire on or near the site. The nearest Very High Fire Hazard Severity Zone to the site mapped by the California Department of Forestry and Fire Prevention is over five miles north in hills northeast of downtown Los Angeles.¹²¹ Project development would not place people or structures at risk from wildfire; no impact would occur.

¹²¹ California Department of Forestry and Fire Prevention (CAL FIRE). 2011, September. Very High Fire Hazard Severity Zones in LRA: Los Angeles. http://www.fire.ca.gov/fire_prevention/fhsz_maps/FHSZ/los_angeles/Los_Angeles.pdf.

	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?			\boxtimes	
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)?				
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?				
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 an manner which would result in flooding on- or off-site?				
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?			\boxtimes	
f. Otherwise substantially degrade water quality?			\boxtimes	
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?				
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				\square
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?			\boxtimes	
j. Inundation by seiche, tsunami, or mudflow?			\boxtimes	

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to hydrology and water quality 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 the table below.

LAUSD Standard Condition	ons of Approval
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). These

LAUSD Standard Conditions of Approval				
	guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirement and the 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			

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

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

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

The Proposed Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. Currently, stormwater is collected by engineered storm drains and directed ultimately to the Los Angeles River, approximately 1.5 miles north of the school, which flows south and discharges into the Pacific Ocean at Long Beach.

Construction Phase

Construction projects of one acre or more are regulated under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 6. The school campus is 22.5 acres; however, because of active school operation, less than 5 acres (contiguous) on campus would be disturbed at any one time. The project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. Additionally, LAUSD will incorporate CHPS criteria SS 4.0, Construction Site Runoff Control / Sedimentation, to reduce erosion. Construction phase soil erosion impacts would be less than significant.

Operation Phase

After completion of the Proposed Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The project would incorporate LAUSD Standard Condition of Approval SC-HWQ-1, which requires compliance with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.¹²² The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

The LID Standards Manual was developed as part of the municipal stormwater program to address stormwater pollution from new developments and redevelopment projects.¹²³ LID stormwater management would be incorporated into the project design. LID principles are described further in Section VI, *Geology and Soils*, of this Initial Study. LAUSD would comply with existing regulations and Standard Conditions of Approval SC-HWQ-1. Operational phase soil erosion impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The campus is over the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin.¹²⁴ The City of Huntington Park Water Department supplies water to the school campus and the surrounding community. Groundwater from the Central Subbasin comprised about 71 percent of the City's water supply in 2015 and is forecast to comprise about 79 percent of City supplies over the 2020-2040 period.¹²⁵ The project does not propose groundwater wells that would extract groundwater from the aquifer. Construction and operation of the school improvements would not lower the groundwater table or deplete groundwater supplies. Groundwater at the project site would be encountered at approximately 100 feet bgs.¹²⁶ Furthermore, the 22.5-acre school does not provide intentional groundwater recharge; therefore, the project would not interfere with groundwater recharge. Impacts would be less than significant. No mitigation measures or further study are required.

¹²² LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

¹²³ City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. http://www.lastormwater.org/greenla/standard-urban-stormwater-mitigation-plan/.

¹²⁴ Department of Water Resources (DWR). 2017, March 24. Groundwater Information Center Map Interactive Map Application. https://gis.water.ca.gov/app/gicima/.

¹²⁵ City of Huntington Park. 2016, June. 2015 Urban Water Management Plan. https://wuedata.water.ca.gov/public/uwmp_attachments/7003034293/FINAL%20Huntington%20Park%20UWMP%20June% 202016%2Epdf.

¹²⁶ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

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 a substantial erosion or siltation on- or off-site.

Less Than Significant Impact. There are no streams or rivers on the campus. One Los Angeles County Flood Control District storm drain, a 51-inch reinforced concrete pipe (RCP), extends east-west in Slauson Avenue next to the north campus boundary; another, 24-inch RCP extends east-west in Randolph Street next to the southern campus boundary.¹²⁷ These storm drains are part of a network of drains discharging into the Los Angeles River—a reinforced concrete channel—about 3.7 miles southeast of the campus.¹²⁸ The Los Angeles River continues about 13 miles south before discharging into the Pacific Ocean at Long Beach. The Proposed Project would not change the drainage pattern of the school campus or its surroundings.

Construction Phase

During construction, erosion and siltation from the disturbed areas may occur. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. Such activities include removal of vegetation, grading, and trenching. Additionally, construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction, significant quantities of sediment may enter storm drains. The project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This requirement is also required under LAUSD Standard Condition of Approval SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion control to ensure soils do not migrate off campus. Construction impacts would be less than significant.

Operation Phase

Upon project completion, drainage from the school would continue to be captured on campus or conveyed to the Los Angeles River via the same storm drains as existing conditions. During operation, there would be no large areas of soil exposed to erode off campus. The entire school campus would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 Low Impact Development Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed by retaining stormwater onsite. Thus, project development would

¹²⁷ Los Angeles County Department of Public Works (LACDPW). 2017, March 24. Los Angeles County Storm Drain System. http://dpw.lacounty.gov/fcd/stormdrain/index.cfm.

¹²⁸ Ibid.

not cause substantial erosion. Operation impacts would be less than significant. No mitigation measures or further study are required.

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?

No Impact. Drainage pattern would be similar to existing conditions, as described above in item (c). Pursuant to low impact development standards, the proposed on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, project development would not result in substantial flooding on- or off-site, and no impacts would occur.

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

Less Than Significant Impact. Project development would not result in runoff exceeding the capacity of the municipal storm drain system, as discussed under item (c). Development of the Proposed Project would not cause substantial water pollution, as substantiated above in items (a) and (c). Runoff water impacts would be less than significant. No mitigation measures or further study are required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact would occur if the Proposed Project would substantially degrade water quality. The Proposed Project would be required to comply with applicable federal, state, and local regulations, as well as obtain necessary permits from the RWQCB. Therefore, the project would not otherwise degrade water quality; impacts would be less than significant. No mitigation measures or further study are required.

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. The Proposed Project would not develop housing. No impact would occur.

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

No Impact. The school campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency,¹²⁹ and therefore the project buildings would not impede or redirect flood flows. No impact would occur.

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. The school campus is dam inundation zones for Hansen Dam and Sepulveda Dam.¹³⁰ Hansen Dam is on Big Tujunga Creek about 21 miles northwest of the project site;

¹²⁹ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

Sepulveda Dam is on the Los Angeles River about 19 miles northwest of the site. However, these reservoirs, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design; construction practices; and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake. Impacts would be less than significant. No mitigation measures or further study are required.

j) Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact.

Seiche. A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The City of Huntington Park Slauson Water Yard is next to the northwest school boundary. The Water Yard has three reservoirs—one aboveground steel tank and two inground concrete reservoirs—for a total capacity of about 7.2 million gallons.¹³¹ Project development would not directly or indirectly exacerbate flood hazards due to potential failure of the reservoirs.¹³² No significant flood impact would occur.

Tsunami. Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The school campus is at an elevation of approximately 175 feet above mean sea level and is approximately 13 miles inland from the Pacific Ocean. Therefore, the campus is outside the tsunami hazard zone and is not anticipated to be inundated by a tsunami.¹³³ No impacts would occur.

Mudflow. A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. There are no slopes on or next to the school campus that could generate a mudflow, and no impact would occur.

¹³⁰ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

¹³¹ City of Huntington Park. 2016, June. 2015 Urban Water Management Plan. https://wuedata.water.ca.gov/public/uwmp_attachments/7003034293/FINAL%20Huntington%20Park%20UWMP%20June% 202016%2Epdf.

¹³² The scope of CEQA regarding analysis of existing hazards potentially affecting a project site was clarified by the California Supreme Court in 2015 (62 Cal.4th 369). Many effects of the environment on a project site are now excluded from CEQA. Whether a project would *exacerbate* an existing hazard – directly, indirectly, or cumulatively – remains within the purview of CEQA. Office of Planning and Research. 2016, October 21. Consideration of Significant Effects and Hazards in the CEQA Guidelines. https://www.opr.ca.gov/docs/Proposed_Amendments_to_Section_15126.2a_Regarding_Hazards_10212016.pdf.

¹³³ Geocon West, Inc. December 28, 2016. Geotechnical Investigation: Proposed Campus Improvements, Huntington Park High School, 6020 Miles Avenue, Huntington Park, California.

	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?				\boxtimes
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?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				\square

Explanation:

The SUP EIR did not include Standard Conditions of Approval (SCs) for minimizing impacts to land use and planning. Likewise, no SCs are identified for the Proposed Project.

a) Physically divide an established community?

No Impact. The school campus and surrounding land is fully developed with urban land uses, including residential, commercial, industrial, and utility. The Proposed Project would take place within the school campus boundaries and would not divide an established community. No impact would occur.

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. The project site is zoned Public Facilities.¹³⁴ Public schools are permitted in the Public Facilities zoning district.¹³⁵ The General Plan land use designation for the site is assumed to be Public Facilities.¹³⁶ New construction on the school campus would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. No impact would occur.

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

No Impact. The school campus is completely developed and located in an urbanized area; it is not in a habitat conservation plan or natural community conservation plan.¹³⁷ No impact would occur.

¹³⁴ City of Huntington Park. 2015, March 3. Zoning Map. http://www.hpca.gov/DocumentCenter/View/3772.

¹³⁵ City of Huntington Park Municipal Code Section 9-4.401.

¹³⁶ City of Huntington Park. 1996. General Plan. Huntington Park General Plan Map. http://www.hpca.gov/DocumentCenter/View/407.

¹³⁷ California Department of Fish and Wildlife. 2016. Summary of NCCPs. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=15329&inline

VI MINERAL RESOLIRCES Would the project:		
AI, WITTERAL 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?		\bowtie
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?		

Explanation:

The SUP EIR did not include Standard Conditions of Approval (SCs) for minimizing impacts to mineral resources. Likewise, no SCs are identified for the Proposed Project.

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

No Impact. The school campus is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is in an area where significant mineral deposits are known to be absent, or where there is considered to be little likelihood for the presence of such deposits.¹³⁸ No active mines are mapped within several miles of the project site.¹³⁹ There are no oil fields near the school campus. The closest active gas and oil production well is approximately two miles southeast and operated by Cudahy Community Oil Association.¹⁴⁰ The school campus is fully developed and is not available for mining. Therefore, development of the Proposed Project would not cause a loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur.

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

No Impact. No mining sites are identified in the City of Huntington Park General Plan.¹⁴¹ Therefore, development of the Proposed Project would not cause a loss of availability of a mining site, and no impact would occur.

¹³⁸ California Geological Survey (CGS). 1994a. Generalized Mineral Land Classification Map of Los Angeles County: South Half. Open File Report 94-14, Plate 1B. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf.

 ¹³⁹ Office of Mine Reclamation (OMR). 2017, March 27. Mines Online. http://maps.conservation.ca.gov/mol/mol-app.html.
 ¹⁴⁰ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2017, March 27. DOGGR Well Finder.

http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx.

¹⁴¹ City of Huntington Park. 1996. Huntington Park General Plan. http://www.hpca.gov/DocumentCenter/View/407.

	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 levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?			\boxtimes	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	
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?				
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?				\boxtimes

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to noise where future projects would be implemented under the SUP. Applicable SCs related to noise impacts associated with the Proposed Project are provided in the table below.

LAUSD Sta	ndard Conditions of Approval
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 noise is not generated by unmaintained equipment.
SC-N-5	LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-6	The LAUSD shall require the construction contractor to minimize blasting for all construction and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.
SC-N-8	 LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the construction contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building. The construction contractor shall implement alternative methods identified in the preconstruction meeting during
	demolition, excavation, and construction for work done within 25 feet of the historic building.

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•	 The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-9 L If L c ir S	AUSD shall prepare a noise assessment. I site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then AUSD shall implement all feasible measures to reduce below applicable noise ordinances. If exterior construction noise avels exceed local noise standards, policies, or ordinances at noise-sensitive receptors, LAUSD shall mandate that onstruction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following: <u>Source Controls</u>
	 Time Constraints – prohibiting work during sensitive nighttime hours Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM) Equipment Restrictions – restricting the type of equipment used Noise Restrictions – specifying stringent noise limits Substitute Methods – using quieter methods and/or equipment Exhaust Mufflers – ensuring equipment have quality mufflers installed Lubrication & Maintenance – well maintained equipment is quieter Reduced Power Operation – use only necessary size and power Limit Equipment On-Site – only have necessary size and power Quieter Backup Alarms – manually-adjustable or ambient sensitive types Noise Compliance Monitoring – technician on site to ensure compliance Quieter Backup Alarms – manually-adjustable or ambient sensitive types Noise Curtains – flexible intervening curtain systems hung from supports Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment Receptor Controls Window Treatments – reinforcing the building's noise reduction ability Community Participation – open dialog to involve affected residents Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise ensitive tage and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise complaints LAUSD shall monitor noise from the construction activity to ensure that construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints LAUSD shall monitor noise

Noise and vibration background and modeling data are included as Appendix F of this Initial Study.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference; physiological responses; and annoyance. Based on these known adverse effects of noise, the federal government, state, City, and LAUSD have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact.

Mobile-Source Noise

The project would not increase student capacity and therefore would not increase traffic-generated noise levels on local roadways. Traffic noise levels would remain the same as current conditions, and would therefore not violate any applicable portions of the City's noise element or municipal code. No mobile-source noise impact would occur.

Stationary-Source Noise

Stationary noise sources would include school buzzers or bells, landscaping equipment, outdoor activities, and heating, ventilation and air conditioning (HVAC) systems. For school buzzers/bells, and landscaping activities, there would be no changes after completion of the comprehensive modernization project. These stationary sources would be the same as the current conditions in and around the school campus. Outdoor activities would also be the same at the athletic fields and the hardcourts in the northern campus. Although the softball field along Miles Avenue would be relocated to the east side of the track and field, no significant noise impacts would occur because there are no sensitive noise receptors adjacent to the new location. Additionally, the new location (an outdoor play field) is currently being used by students. Noise at single-family homes along Miles Avenue would be reduced with the removal of the field.

The project would add new sources of stationary HVAC noise at the two new classroom buildings and the gymnasium, but these would be comparable or quieter than other, similar sources at the existing campus and would not result in notable changes on- or off-campus. Additionally, HVAC noise would be considerably lower than ambient noise levels, which are dominated by traffic. LAUSD Standard Condition of Approval SC-N 2 has restrictions on HVAC noise to limit potential noise impacts. Permanent stationary source noise increases would be less than significant. No mitigation measures or further study are required.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Operations Vibration

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

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction

equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures, but can achieve levels in buildings close to a construction site that are perceptible.¹⁴² Table 8 lists vibration levels for different types of commonly used construction equipment.

Equipment	Approximate VdB ¹ level at 25 feet	Approximate PPV ² at 25 feet
Pile Driver, Impact (Upper Range)	112	1.518
Pile Driver, Impact (Typical)	104	0.644
Pile Driver, Sonic (Upper Range)	105	0.734
Pile Driver, Sonic (Typical)	93	0.170
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Crane-Mounted Auger Drill	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

Table 8 Typical Construction Equipment Vibration Levels

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, May 2006.

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

² PPV – peak particle velocity measured in inches/second

Construction vibration effects are typically assessed in terms of either architectural damage or annoyance to people nearby. Construction equipment such as pile drivers, jackhammers, high-power or vibratory tools, and heavy rolling stock equipment (tracked vehicles, compactors, etc.) could generate vibration in the immediate vicinity of their use. Typical construction equipment rarely exceeds vibration levels that are perceptible at 25 feet away from the source of the vibration.¹⁴³ Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.¹⁴⁴

¹⁴² Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.

¹⁴³ As measured at a distance of 25 feet from an individual piece of equipment perceptible vibration would be 0.1 peak particle velocity (PPV) in inches per second. Architectural damage at typical building structures may occur at 0.2 to 0.5 PPV in inches per second.

¹⁴⁴ Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

Construction Vibration-Induced Annoyance

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is 78 VdB for residential uses.¹⁴⁵

Off-Campus Receptors

The nearest sensitive receptors to the constructuion areas are the single-family residences to the west across Miles Avenue, approximately 275 feet from the center of construction activities; residences to the east across Oak Street (approximately 380 feet); and residences to the south across Randolph Street (approximately 725 feet).¹⁴⁶ Table 9 shows the vibration levels from construction equipment at nearby off-campus sensitive receptors. As shown, vibration from construction activities is not anticipated to be perceptible at the nearest off-site receptors.

Equipment	Homes to West; across Miles Ave (VdB at 275 Feet) ¹	Homes to East; across Oak St (VdB at 380 Feet)¹	Homes to South; across Randolph St (VdB at 725 Feet)¹
Vibratory Roller	63	59	50
Caisson Drill	56	52	43
Large bulldozer	56	52	43
Small bulldozer	27	23	14
Jackhammer	48	44	35
Loaded trucks	55	51	42
Courses Federal Transit Administration (FTA	Trensit Maine and Minutian Immed An	accoment May 2006	

Table 9 Project-Related Construction Equipment Vibration Annoyance

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, May 2006.

Note: Values do not exceed 78 VdB FTA annoyance threshold.

¹ Distance to the nearest receptors are measured from the center of the construction site to represent the average vibration level.

² A large bulldozer is above an operating weight of 85,000 pounds (represented by a Caterpillar D8-class or larger); medium bulldozer has an operating weight range of 25,000 to 60,000 pounds (such as a Caterpillar D6- or D7-class); and a small bulldozer has an operating weight range of 15,000 to 20,000 pounds (such as a Caterpillar D3-, D4-, or D5-class).

Generally, heavy equipment would only operate at the project boundary for brief periods. As heavy construction equipment moves around the construction zone, average vibration levels at the nearest structures would diminish with increasing distance between structures. Construction-generated, average vibration levels would not exceed 78 VdB at any offsite sensitive residential receptors, and therefore would not exceed the threshold for human annoyance. Thus, annoyance vibration impacts to offsite receptors would be less than significant. No mitigation measures or further study are required.

¹⁴⁵ Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

¹⁴⁶ Annoyance Vibration: Because construction activities are typically distributed throughout the project site, and since mobile construction equipment tends moves around the project site throughout the day, distances from sensitive receptors to noise generating equipment will vary throughout the work day. Therefore, to represent the average vibration annoyance level, distances to the nearest receptor buildings are measured from a spatially averaged point, i.e. the center of the construction site.

On-Campus Receptors

Because construction activities would take place while school is in session and the nearest classrooms would be within about 35 feet of the of the construction zone, the educational environment may be affected by construction activities. There would be several construction zones and active classrooms throughout the campus; therefore, it is not possible to provide a specific vibration level for each possible scenario over the course of the entire construction period. Generally, students in classrooms may experience vibration levels in excess of 78 VdB when large equipment operates within 50 feet of the classrooms, and 84 VdB within 35 feet.¹⁴⁷ At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 50 feet from classrooms would not be felt or heard.

Implementation of LAUSD Standard Conditions of Approval SC-N-5, SC-N-6, and SC-N-8 provide requirements for: discussions between construction contractor and school administrators prior and throughout construction to schedule high vibration producing activities at times that minimize disruption to classes (N-5); the use of less-vibration-intensive construction equipment for demolition adjacent to fragile structures, such as historic buildings (N-6); and alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts (N-8). Compliance with LAUSD Standard Conditions of Approval SC-N-5, SC-N-6, and SC-N-8 would reduce construction vibration and annoyance to staff and students in adjacent buildings. Impacts would be less than significant. No mitigation measures or further study are required.

Construction Vibration-Induced Architectural Damage

A threshold commonly used to assess when there could be a risk of architectural damage is 0.2 peak particle velocity (PPV) in inches per second for typical residential and school buildings.¹⁴⁸

Off-Campus Buildings. The nearest off-campus buildings are the residences to the east across Oak Street, at approximately 60 feet from the boundary of construction activities, and residences to the west across Miles Avenue (100 feet).¹⁴⁹

On-Campus Buildings. Some buildings, such as the cafeteria, would be less than 20 feet from demolition and construction activities.

Table 10 shows the potential vibration levels that could be generated by heavy construction equipment at the nearest receptors.

¹⁴⁷ 78 VdB is the limit for daytime vibration annoyance at residential buildings.

¹⁴⁸ FTA category "non-engineered timber and masonry buildings"

¹⁴⁹ Vibration Damage: Because architectural damage from construction vibration sources can be a one-time event, vibration damage distances are measured from the nearest likely location at the construction site to the nearest façade of the receptor buildings.

Table 10 Pr	oject-Related Construction Equipme	alated Construction Equipment Vibration Damage Potential			
	Homes to East; Across Oak St. (PPV at 60 Feet) ¹	Homes to West; Across Miles Ave. (PPV at 100 Feet) ¹	On-Campus Buildings (PPV at < 20 Feet) ¹		
Vibratory Roller	0.056	0.026	>0.293		
Caisson Drill	0.024	0.011	>0.124		
Large bulldozer	0.024	0.011	>0.124		
Small bulldozer	0.001	0.000	>0.004		
Jackhammer	0.009	0.004	>0.049		
Loaded trucks	0.020	0.010	>0.106		

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment. May 2006.

Note: Values in bold indicate vibration levels in exceedance of 0.200 PPV in/sec FTA threshold.

¹ For architectural damage, the maximum vibration levels at the closest distance to construction equipment is used.

As shown in Table 10, operation of large heavy construction equipment (most notably, vibratory rollers, but potentially also large bulldozers or loaded trucks) would not result in vibration-induced architectural damage at off-site buildings. However, operation of heavy equipment close to onsite buildings may exceed the FTA's 0.2 PPV in/sec criteria threshold and may result in vibration-induced damage to the building façade.

As part of the project, implementation of LAUSD Standard Condition of Approval SC-N-6 requires that "if demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques."

Implementation of LAUSD Standard Conditions of Approval SC-N-8 provides requirements for the use of alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. Compliance with LAUSD Standard Conditions of Approval SC-N-6 and SC-N-8 would reduce vibration-induced architectural damage to adjacent buildings. Construction impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. As described in section (a) above, increases in operational noise levels related to the project would not increase the existing noise environment. Therefore, permanent noise impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the

transport of workers, material deliveries, and debris/soil hauling and (2) on-site noise from use of construction equipment. Demolition and construction activities are anticipated to start in Q1-2020 and would last approximately three years.

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along site access roadways. The primary regional access route for construction vehicles to the school campus would be Miles Avenue. It is anticipated that construction-related activities would generate, as a worst-case during the most active phase of construction, a maximum of 160 construction trips per day.¹⁵⁰ Compared to the traffic generated by the school with 1,800 students at HPHS (estimated at 3,512 average daily trips [ADT]), 160 trips per day is negligible.¹⁵¹ Additionally, truck trips would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with LAUSD Standard Condition of Approval SC-T-4.

Thus, the number of construction-related trips would not significantly increase traffic noise when compared to the level of noise currently generated on the roadways. While individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, these occurrences would be infrequent and primarily during nonpeak traffic periods. Therefore, noise impacts from construction-related traffic would be less than significant.

Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 11 shows the average noise levels from individual pieces of construction equipment.

Type of Equipment	Average Measured Sound Levels (dBA at 50 feet)	Type of Equipment	Average Measured Sound Levels (dBA at 50 feet)
Pile Driver, Impact	101	Jack Hammers	88
Pile Driver, Sonic	96	Pneumatic Tools	85
Ballast Tamper	83	Pumps	76
Compactor	82	Dozer, Small	80
Concrete Mixer	85	Dozer, Large	86
Crane, Mobile	83	Hydraulic Backhoe	85
Crane, Derrick	88	Hydraulic Excavators	82
Loader, Large	85	Graders	85
Loader, Front-End	79	Air Compressors	81
Paver	89	Trucks	91
Scraper	89		

 Table 11
 Average Construction Equipment Noise Levels

Sources: US Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared by Bolt, Beranek & Newman, December 1971; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

¹⁵⁰ During the most intensive construction phase, it is anticipated that a maximum of 119 worker trips and an average of 41 truckloads of soil export per day. Trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

¹⁵¹ Based on the ITE Trip Generation Manual 9th Edition. Public school daily trip rates: High School -2,024 students at 1.71 = 3,512 trips.

Similarly, Table 12 shows the maximum operational noise levels of heavy construction equipment.

Type of Equipment	Range of Maximum Sound Levels Measured (dBA at 50 ft.)	Suggested Maximum Sound Levels for Analysis (dBA at 50 ft.)
Jack Hammers	75–88	82
Pneumatic Tools	78–88	85
Pumps	74–84	80
Dozers	77–90	85
Pile Driver, Impact	95–110	105
Pile Driver, Sonic	90-105	100
Scrapers	83–91	87
Haul Trucks	83–94	88
Cranes	79–86	82
Portable Generators	71–87	80
Rollers	75–82	80
Tractors	77–82	80
Front-End Loaders	77–90	86
Hydraulic Backhoe	81–90	86
Hydraulic Excavators	81–90	86
Graders	79–89	86
Air Compressors	76–89	86
Trucks	81–87	86

Table 12	Maximum He	eavy Equipment	Noise Levels
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Source: US Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared by Bolt, Beranek & Newman, December 1971.

Construction Noise

Construction equipment typically moves around the site and under variable power levels. Noise from construction equipment decreases by 6 to 7.5 dB with each doubling of distance between the source and receptor. For example, the noise levels from a bulldozer that generates 85 dBA at 50 feet would measure 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet (conservatively using a 6 dB per doubling of distance attenuation factor). Also, noise levels are typically reduced from this value due to usage factors as well as the barrier effects provided by physical structures once erected.

In order to aggregate individual equipment items into sets of common processes/activities, while taking into account typical variations in movements, loading, and usage factors, composite construction noise by phase has been characterized by Bolt Beranek and Newman.¹⁵² In their study, construction noise for ground clearing, excavation, foundations, erection, and finishing are aggregated by class of activity. For commercial projects (including school projects), the loudest phases are typically the excavation and finishing phases, each of which has an aggregate of 89 dBA L_{eq} (equivalent continuous sound level, in decibels when measured at a distance of 50 feet from the summed construction effort). This summed value takes into account both the

¹⁵² US Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared by Bolt, Beranek & Newman, December 1971.

number of pieces and the spacing of the heavy equipment used in the construction effort. Noise levels are typically reduced from this value due to usage factors as well as the barrier effects provided by the physical structures themselves (once erected). The 89 dBA L_{eq} is the value used for representing most construction activities.

Off-Campus

The nearest sensitive receptors are the single-family residences to the west across Miles Avenue, approximately 275 feet from the center of construction activities; residences to the east across Oak Street (380 feet); and residences to the south across Randolph Street (725 feet). Table 13 shows the average construction noise levels at nearby sensitive receptors from use of typical construction equipment.

Equipment	Homes to West; Across Miles Ave (dBA at 275 Feet)	Homes to East; Across Oak St (dBA at 380 Feet)	Homes to South; Across Randolph St (dBA at 725 Feet)		
Standard Construction Activities	74	71	65		
Sources: US Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared by Bolt, Beranek & Newman, December 1971; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.					

 Table 13
 Project-Related Construction Noise Levels

As shown in Table 13, the construction noise levels would average between 65 and 74 dBA L_{eq} at the nearest residences. Thus, construction activity would not exceed the noise ordinance's limit of 75 dBA on a day-today or week-to-week basis. However, there may be short periods on any given day when a noisy piece of equipment could be near the campus boundary. In these sporadic cases, noise levels at nearby receptors may intermittently and temporarily exceed the noise ordinance's limit of 75 dBA. Additionally, for some construction activities, noise would be attenuated (reduced) by school buildings between the construction zone and residents.

According to Section 9.3506 of the Huntington Park Municipal Code, construction or repair work is allowed between 7:00 AM and 7:00 PM, Monday through Saturday. Construction is not allowed on Sundays or holidays. Therefore, a significant impact would occur if construction were to occur outside of the allowable hours. The District contractor would comply with permitted construction hours, and noise reduction measures have been incorporated into the project. Based on estimated noise levels, impacts to surrounding residents would be less than significant.

On-Campus

Classrooms located within 50 feet of construction activities and direct sightline, may experience exterior noise levels in excess of 70 dBA L_{eq} . With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may exceed 45 dBA L_{eq} . Classrooms that are within 100 feet of construction could experience interior noise levels as high as 58 dBA L_{eq} (exterior noise level of 83 dBA L_{eq}). 45 dBA Leq is LAUSD's interior noise threshold, and therefore, interior levels above 45 dBA L_{eq} could be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions. Additionally, for some construction activities, noise would be attenuated (reduced) by buildings between the construction zone and classrooms.

Implementation of LAUSD Standard Conditions of Approval SC-AQ-2, SC-N-5, SC-N-8 and SC-N-9 provide requirements for: construction equipment that is properly tuned and maintained to ensure excessive noise is not generated (AQ-2); discussions between construction contractor and school administrators prior to and throughout construction to schedule high noise producing activities at times that minimize disruption to classes (N-5); and alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts (N-8) (this measure would also reduce noise in classrooms). Additionally, in compliance with SC-N-9 requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers), and/or receptor controls (notification and noise complaint process) to reduce noise impacts.

Compliance with LAUSD Standard Conditions of Approval SC-AQ 2, SC-N-5, SC-N-8 and SC-N-9 would reduce noise levels to active classrooms. Construction noise impacts would be less than significant. No mitigation measures or further study are required.

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

No Impact. The nearest public airport to the school is Compton/Woodley Airport, located 6.6 miles to the south. Other airports include Jack Northrop Field/Hawthorne Municipal Airport (7 miles west-southwest), El Monte Airport (12 miles northeast), and Los Angeles International Airport (10 miles west-southwest).¹⁵³ At these distances, aircraft operations noise would not be expected to notably affect the noise environment at the school. The Proposed Project would not expose students to excessive noise levels from airports above existing levels. No impact related to noise from public airports would occur.

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 school is not located within the immediate vicinity of a private airstrip or heliport. There are no private airports within 10 miles of the school. There are 29 heliports within 5 miles of the school, and 57 within 10 miles.¹⁵⁴ Goodyear Blimp Base Airport is 10 miles southwest in Carson. The Proposed Project would not expose students to excessive noise levels from private airstrip or heliports above existing levels. No impact related to noise from heliports or private airstrips would occur.

¹⁵³ Airnav.com. 2017, January 27. Airport Information. http://www.airnav.com/airports/.

¹⁵⁴ Airnav.com. 2017, January 27. Airport Information. http://www.airnav.com/airports/.

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

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to pedestrian safety where future projects would be implemented under the SUP. Applicable SCs related to pedestrian safety impacts associated with the Proposed Project are provided in the table below.

LAUSD Star	ndard Conditions of Approval
SC-T-2	School Design Guide.
	Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic:
	Parking Space Requirements
	General Parking Guidelines
	Vehicular Access and Pedestrian Safety
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

The information in this section is based partly on the Traffic and Circulation Background and Data memo prepared for Huntington Park High School, prepared by PlaceWorks, dated August 2017. A complete copy of this report is included as Appendix G to this Initial Study.

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

Less Than Significant Impact. The school campus is in a densely developed urban area characterized by residential, industrial, and commercial land uses. Incompatible uses for a school would include agricultural operations or logistic distribution centers that have large tractors, semi-trailer trucks, and oversized equipment consistently traveling the local roadways that may create a hazard to cars or pedestrians. The school has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways.

Project design features that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. These typically consist of new roads or driveways on busy roadways with left or

right turns that force cross-traffic and create conflicts between cars and people. The Proposed Project would not create new roads or driveways, although new staff parking areas and additional campus access would be provided. Student access and drop-off and pick-up locations would remain the same as existing conditions.

Construction of the Proposed Project may be considered an incompatible use because it would require the use of haul trucks, equipment, worker vehicles, and construction activities on the school campus while students are on the campus.

The construction and demolition activities would result in a temporary increase in truck activity on the roadway network, but the trucks would not exceed the size and weight limits for public roadways and would not travel during peak traffic hours. Because the construction staging area would be along Miles Avenue, vehicles and equipment would limit travel on small residential streets (Belgrave Avenue and Oak Street). Construction activity would not require roadway or sidewalk closures and/or traffic detours on school days.

To avoid conflicts between construction activities and students, a multi-phased plan has been developed to ensure student safety. Temporary (interim) student classrooms would be placed as far as possible from the construction zones. The fenced construction staging (i.e., storage of equipment and materials) and truck access would be from Miles Avenue near the gymnasium.

Because the project would construct new parking areas, LAUSD Standard Condition of Approval SC-T-2 requires vehicular access and parking designs to comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, including vehicle and pedestrian access and pedestrian safety.

Additionally, under Standard Condition of Approval SC-T-4, LAUSD's construction contractor would prepare a construction worksite traffic control plan prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic on the school campus and in the neighborhood. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction zones on the campus would include fencing to separate construction zones from students and to ensure safety. Additionally, the construction contractor would work closely with the school administration during all construction to coordinate activities and ensure students are safe. Compliance with LAUSD SC-T-2 and SC-T-4 would reduce vehicle, pedestrian, and bicycle impacts during construction. Impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The Proposed Project would not create unsafe routes to schools for students walking from local neighborhoods. The Proposed Project would not bring more students to the school campus. The campus would continue to house the existing school programs and continue to serve the same current and future students after project implementation. The Proposed Project would not alter the existing pedestrian routes to school. During construction, pedestrian routes on campus may be temporarily altered by construction activities or the reorientation of campus components. However, alternative pedestrian routes would be provided (consistent with SC-T-4) for temporary alterations to the pedestrian routes in the

surrounding neighborhood, including streets and sidewalks, would not be affected. Routes to school impacts would be less than significant. No mitigation measures or further study are required.

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

Less Than Significant Impact. The construction area is on the HPHS school campus. There are no freeways adjacent or near the school. The closest freeways are the I-710 at 2.5 miles east, and the I-5, I-10, 101, SR-60 interchange 3 miles to the north.

The school campus is adjacent to Slauson Avenue, which is classified as a Major Arterials by the City of Huntington Park; Miles Avenue and Randolph Street are Secondary Arterials.¹⁵⁵ However, the project would not change existing operations at the school. The school would continue to house the existing school programs and continue to serve the same current and future students after project completion. Student routes to school would not be changed by the Proposed Project. The Proposed Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant. No mitigation measures or further study are required.

¹⁵⁵ City of Huntington Park General Plan, Circulation Element. http://www.hpca.gov/DocumentCenter/View/407

	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)?				\boxtimes
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				\boxtimes
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				\boxtimes

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to population and housing where future projects would be implemented under the SUP. No applicable SCs related to population and housing would be associated with the Proposed Project.

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

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

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

No Impact. No housing would be displaced, and no replacement housing would be required. The Proposed Project would modernize an existing high school campus and there is no residential housing on the campus. No housing impacts would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As previously noted, there are no residents onsite. No impact would occur.

		Less Than		
Potenti:	tially	Significant	Less Than	No
Impac	act	Incorporated	Impact	Impact

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

a.	Fire protection?		\boxtimes	
b.	Police protection?		\boxtimes	
c.	Schools?			\square
d.	Parks?		\boxtimes	
e.	Other public facilities?			\square

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to public services where future projects would be implemented under the SUP. Applicable SCs related to public services impacts associated with the Proposed Project are provided in the table below.

LAUSD Standard (LAUSD Standard Conditions of Approval				
SC-PS-1	LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.				

a) Fire protection?

Less Than Significant Impact. The Los Angeles County Fire Department (LACoFD) currently provides fire protection and emergency medical services to the school. The nearest two LACoFD stations to the school campus are Station 164 at 6301 South Santa Fe Avenue in Huntington Park about 0.7 mile to the west, and Station 165 at 3255 Saturn Avenue in Huntington Park about 0.8 mile to the southeast. The Proposed Project would not make any programmatic changes at the campus and would not increase the intensity of use of the school; therefore, the Proposed Project would not increase the need for fire protection services. The LAUSD is required to coordinate with the LACoFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with LAUSD SC-PS-1. Additionally, modernization of the school would not require construction of new or expanded fire stations; impacts would be less than significant. No mitigation measures or further study are required.

b) Police protection?

Less Than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) focuses on improving campus safety and creating safe school passages for students, staff, and the school community.¹⁵⁶ The school is in the LASPD's East Division. The East Division station is on the Wilson High School campus, 4500 Multnomah Street in the City of Los Angeles.¹⁵⁷ If required, LASPD would request assistance from the City of Huntington Park Police Department (HPPD). HPPD's station is at 6542 Miles Avenue in Huntington Park, about 0.4 mile south of the school.¹⁵⁸ The Proposed Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. The construction areas would be fenced, and the school campus is currently fenced and would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. General campus activities are under the supervision of the administrators and staff at the school. The Proposed Project would not introduce a growth in population, an increased demand, or a new adverse impact on existing police service. Impacts would be less than significant. No mitigation measures or further study are required.

c) Schools?

No Impact. The Proposed Project would not have an adverse physical impact on any existing schools. The Proposed Project would make physical changes to the existing campus to enhance existing school programs. The modernized campus would not induce growth in the community, increase enrollment or capacity at the school, or otherwise increase demand for school services. No impacts to schools would occur.

d) Parks?

Less Than Significant Impact. The Proposed Project would not have an adverse physical impact on any parks or necessitate the construction of new parks. The project includes construction of a new gymnasium building. The current gymnasium building would generally remain accessible during construction of the new gymnasium building to the extent feasible. There may be several months during which an interim gymnasium or alternate location (such as Salt Lake Park one mile to the southeast) is used; however, this would not result in the need for construction of new recreational facilities. The Proposed Project would not induce growth in the community, increase enrollment or capacity at the school, or otherwise increase the use of or demand for parks. Less than significant impacts to parks would occur. No mitigation measures or further study are required.

e) Other public facilities?

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

¹⁵⁶ Los Angeles School Police Department (LASPD). 2017, March 27. About LASPD. http://achieve.lausd.net/Page/8851.

¹⁵⁷ Los Angeles School Police Department (LASPD). 2017, March 27. East Division. http://achieve.lausd.net/Page/9415.

¹⁵⁸ City of Huntington Park. Police Department. http://www.hpca.gov/600/Police-Department.

	W. RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ	VI. 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?			\boxtimes	
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?				\square

Explanation:

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?

Less Than Significant Impact. The Proposed Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities. The Proposed Project would not an increase enrollment or capacity of the school and would not increase population in the surrounding community. The project includes the construction of a new gymnasium building. The current gymnasium building would generally remain accessible during construction of the new gymnasium building to the extent feasible. There may be several months during which an interim gymnasium or alternate location (such as Salt Lake Park one mile to the southeast) is used; however, this would not result in the need for construction of new recreational facilities. Therefore, it would not cause physical deterioration of these facilities. Less than significant impacts to existing parks would occur. No mitigation measures or further study are required.

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

No Impact. The Proposed Project includes improvements to the existing athletic facilities at the school, including construction of a new gymnasium. The environmental effects of the construction and operation of these proposed changes to existing recreational facilities on the campus is considered throughout the environmental analysis. The Proposed Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. No impacts related to recreational facilities would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X	VII. TRANSPORTATION AND 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?				
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?			\boxtimes	
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?				\boxtimes
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e.	Result in inadequate emergency access?				\boxtimes
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?				\boxtimes

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to traffic and circulation where future projects would be implemented under the SUP. Applicable SCs related to traffic and circulation impacts associated with the Proposed Project are provided in the table below.

LAUSD Standard C	onditions of Approval
SC-T-2	 School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic: Parking Space Requirements General Parking Guidelines
	Vehicular Access and Pedestrian Safety
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.
The information in this section is based partly on the Traffic and Circulation Background and Data memo prepared for Huntington Park High School, prepared by PlaceWorks, dated August 2017. A complete copy of this report is included as Appendix G to this Initial Study.

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?

Less Than Significant Impact.

Existing Conditions

The school serves 9th through 12th grades. Students attend classes from August through June from 8:00 AM to 3:14 PM. The school has after-school programs for the students that end later than 3:14 PM.¹⁵⁹

Roadways

Existing roadways in the project study area are described below:

Miles Avenue is a north-south roadway along the western school boundary and is classified as a Secondary Arterial in the City of Huntington Park General Plan. It has two lanes in each direction and the posted speed limit is 25 miles per hour (mph). Miles Avenue continues north of Slauson Avenue as Soto Street.

Slauson Avenue is an east-west roadway along the north school boundary and is designated a Major Arterial in the General Plan. It has two lanes in each direction with a two-way median turn lane, with a posted speed limit of 35 mph. The intersection of Miles Avenue with Slauson Avenue is signalized.

Randolph Street is an east-west divided roadway classified as a Secondary Arterial in the General Plan. There are two lanes in each direction and the posted speed limit is 35 mph. The eastbound and westbound halves of the street are separated by a Union Pacific Railroad track. The signalized intersection of Miles Avenue with Randolph Street is split into two halves separated by an at-grade railroad crossing.

Oak Street is a north-south two-lane local roadway; the speed limit is 25 mph.

Belgrave Avenue is an east-west two-lane local roadway; the speed limit is 25 mph. Belgrave Avenue makes a 90-degree turn southward next to the southeast campus boundary and continues as Oak Street.

Soto Street, the continuation of Miles Avenue north of Slauson Avenue, is a north-south roadway classified as a Major Arterial in the General Plan. It has two lanes in each direction with a two-way median turn lane and a posted speed limit of 25 mph.

¹⁵⁹ LAUSD. 2017. Bell schedules (website). http://hpspartans.org/apps/bell_schedules/index.html.

Public Transit, Pedestrian and Bicycle Facilities

There are several bus routes that operate in the vicinity of the proposed school site. Metropolitan Transportation Authority of Los Angeles County (Metro) Lines 108 and 358 run on Slauson Avenue between the City of Pico Rivera on the east and the Community of Venice in the City of Los Angeles on the west.¹⁶⁰ The Huntington Park Express shuttle operates on Slauson Avenue and Miles Avenue adjacent to the school.¹⁶¹

Paved sidewalks are on both sides of all surrounding streets (Miles Avenue, Slauson Avenue, Oak Street, Belgrave Avenue and Randolph Street), and no midblock crosswalks are present. There are no existing bicycle facilities on the segments of roadways adjacent to the school. A planned Class III (signed) bicycle route on Miles Avenue is included in the City of Huntington Park Bicycle Transportation Master Plan.¹⁶²

Parking

The school has 164 parking spaces in three on-campus parking lots: 22 spaces along Randolph Street adjacent to the Classroom Building 1 (Building 25), 73 spaces adjacent to Science and Classroom Building (Building 30), and 69 spaces between the San Antonio High School and the Huntington Park-Bell Community Adult School. Curbside public parking is available along both sides of Miles Avenue with parking limits, Slauson Avenue and Belgrave Avenue, and on the residential side of Oak Street.

Operational Phase Impacts

The planned enrollment for the campus is 1,800 students.¹⁶³ There would be no increase in this planned enrollment with the Proposed Project, and therefore no net increase in vehicular trips. The project would not change the existing student drop-off and pick-up areas, or alter any street configurations. The school would continue to function as a school campus.

No changes to traditional school operations, school-related events, or community use would occur as the result of this project. The levels of traffic that would be generated by the school and the geographical distribution of the school traffic on the public street network would remain unchanged compared to existing conditions. The Proposed Project would not change enrollment or capacity, and thus would not change operational trip generation and traffic impacts. The following analysis focuses on construction traffic and the roadways and intersections that would be affected.

Construction Phase Impacts

The comprehensive modernization includes building demolition, new construction, remodel, modernizations, and upgrades. It is anticipated that the project would be built in four phases spanning approximately 36 months, from Q1-2020 to Q1-2023, and would generate construction-related trips from the work crew, haul

¹⁶⁰ Metropolitan Transportation Authority of Los Angeles County (Metro). 2016, December 11. Lines 108/358 Schedule. https://media.metro.net/documents/c4ffcd9c-c131-4c57-b8a8-773a62c68e5d.pdf.

¹⁶¹ City of Huntington Park. 2017, April 12. Huntington Park Express. http://www.hpca.gov/DocumentCenter/View/5466.

¹⁶² Evan Brooks Associates. 2014, February 3. City of Huntington Park Bicycle Transportation Master Plan. http://www.hpca.gov/DocumentCenter/View/4264.

 ¹⁶³ Enrollment at the campus was approximately 1,890 students in the 2015-2016 school year and the current enrollment is approximately 1,611 students.

trips, and equipment and materials delivery. According to Section 9-3.506 of the Huntington Park Municipal Code, construction or repair work is allowed between 7:00 AM and 7:00 PM, Monday through Saturday.

Construction Staging Area

The construction staging area (i.e., storage of equipment and materials) would be just north of the existing gymnasium with access from Miles Avenue via a temporary driveway. Construction staging (i.e., storage of equipment and materials) would be contained on the campus. Construction trucks would enter and exit the school campus via this exclusive driveway and would not affect the existing school driveways or parking lots. Parking for workers is anticipated to be provided onsite and in the staging areas (as available) during all phases of construction. Construction workers would be required to avoid parking on local streets to the extent feasible.

Construction Worker Trips

Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and the different construction activities taking place. The highest number of worker trips would occur during the overlapping building construction and modernization (i.e., building interiors), with an anticipated maximum of approximately 119 worker trips per day.¹⁶⁴ Compared to the traffic generated by the school with approximately 1,800 students at HPHS and 164 students at San Antonio Continuing Education High School (estimated at approximately 3,512 ADT; excluding the trips associated with San Antonio Huntington Park Adult School),¹⁶⁵ 119 worker trips per day is negligible.

Additionally, on most days the number of workers would be less. Based on the anticipated construction schedule, construction workers are expected to arrive at the school between 6:00 AM and 7:00 AM (before peak morning commute hours). Construction workers are not all likely to arrive at the construction site within the same hour, nor would they all leave the site at the same time. Importantly, construction worker trips and construction haul trips would not occur at the same time because workers would arrive before 7:00 AM and hauling cannot start until 7:00 AM. Typical construction hours end after 4:00 PM, after student dismissal times. Construction worker traffic would not significantly impact nearby roadways.

Truck Haul Trips and Deliveries

Construction would include asphalt demolition debris, building demolition debris, relocatable buildings, and equipment and materials. The highest number of haul trips per day would occur during overlapping building construction, site work construction, and asphalt demolition debris haul phases, which would require an average of 41 truckloads per day, for a total of 21 trucks inbound and 20 trucks outbound from the construction site per day.

¹⁶⁴ Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

¹⁶⁵ Based on the ITE Trip Generation Manual 9th Edition. Public school daily trip rates: High School – 2,024 students at 1.71 = 3,512 trips.

Slauson Avenue, Randolph Street, and Soto Street are the nearest designated truck routes identified in the General Plan.¹⁶⁶ The nearest freeway to the project site is the I-710 about 2.3 miles to the east. The shortest route from the school to the I-710 is Slauson Avenue east to Atlantic Boulevard north to the I-710.

Compared to the traffic generated during the day by the school with an estimated at 3,512 ADT, 35 construction-phase haul trips per day is negligible. Additionally, maximum truck trips would be for a short duration and would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with LAUSD Standard Condition of Approval SC-T-4.

Temporary delays in traffic may occur due to oversized vehicles traveling at lower speeds on streets. Such delays would be occasional and of short duration. During the 21-month building construction period, there would be an estimated 12 delivery trucks per day. Given the small number of trips per day and the duration of the construction phases, these temporary and intermittent delays are considered less than significant.

To minimize potential conflicts between construction activity and street traffic, a truck haul program would be submitted as a part of the construction worksite traffic control plan (per SC-T-4) to the City for review. Construction equipment, materials traffic, and haul trucks would be restricted to truck routes approved by the City of Huntington Park Engineering Division. These do not include neighborhood streets. The truck trips would be spread out throughout the workday and would occur during nonpeak traffic periods in accordance with LAUSD SC-T-4.

Construction vehicles would cause only temporary and intermittent increases in traffic on area roadways, and would not contribute to a significant increase in traffic volumes. Construction traffic would be less than significant. No mitigation measures or further study are required.

Public Transit and Pedestrian and Bicycle Facilities

Project construction traffic would not impact public transit bus services on Miles Avenue or Slauson Avenue. The construction worksite traffic control plan would include measures to prevent traffic and pedestrian hazards between trucks entering and exiting the staging area off Miles Avenue and pedestrians on the sidewalk and bicyclists on Miles Avenue. Impacts would be less than significant. No mitigation measures or further study are required.

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?

Less Than Significant Impact. Metro implements the county's congestion management program (CMP). The CMP includes a system of arterial roadways and freeways. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potential regional significance be analyzed. The nearest CMP intersection to HPHS is Alameda Street at Firestone Boulevard, approximately two miles to the

¹⁶⁶ City of Huntington Park. 1991, February 19. City of Huntington Park Circulation Element. http://www.hpca.gov/DocumentCenter/View/407.

south.¹⁶⁷ CMP guidelines require that freeway monitoring locations must be examined if the Proposed Project would add 150 or more trips (in either direction) during either the AM or PM weekday peak hours or 50 or more trips at CMP intersections during the AM or PM weekday peak hour. The Proposed Project would not meet this threshold for preparing a CMP facility traffic impact assessment. No mitigation measures or further study are required.

The Proposed Project would not increase the capacity or enrollment at the school and therefore would not directly contribute to increases in traffic at the CMP intersection during AM and PM peak hour traffic. The project would not alter the traffic patterns in the vicinity of the school or cause a substantial increase in traffic volumes. In addition, traffic during construction would not result in a substantial amount of traffic to the vicinity of the school (see item [a]). No impacts would occur.

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 to the school is the Compton Woodley Airport, approximately 6.6 miles south of the school.¹⁶⁸ The school campus is not within the airport influence area and the airport land use planning area of the Compton Woodley Airport.¹⁶⁹ Project development would not result in a new use that would interfere with air traffic patterns or change traffic locations such that it would result in a safety risk. In addition, the project would not increase demand for air travel or increase air traffic levels. No impact would occur.

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

Less Than Significant Impact. During construction of the project, construction equipment, trucks, and workers would drive to and from the staging area via the temporary exclusive driveway on Miles Avenue. The truck trips would be spread out throughout the workday and would occur during nonpeak traffic periods in accordance with LAUSD SC-T-4. In compliance with SC-T-4, LAUSD's construction contractor would prepare a construction worksite traffic control plan prior to commencement of construction which would be reviewed by the City of Huntington Park. This plan would establish methods to avoid conflicts between the construction traffic and the existing street, pedestrian, and bicycle traffic. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction fencing would be used on campus to separate construction zones from students and to ensure safety. Implementation and compliance with the construction worksite traffic control plan would address potential hazardous conditions. The Proposed Project construction would not create new hazards or

¹⁶⁷ Metropolitan Transportation Authority of Los Angeles County (Metro). 2010, October 28. 2010 Congestion Management Program. http://www.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf.

¹⁶⁸ Caltrans. 2016, March. 2016 California Public Use Airports and Federal Airfields. http://doi.ca.gov/hq/planning/aeronaut/documents/maps/PublicUseAirports_MilitaryAirfieldsMap.pdf.

¹⁶⁹ Los Angeles County Department of Public Works. 2017, March 17. Los Angeles County Airports. http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13163703.149727825,4013268.8423409513,-13161868.661048933,4014797.5829066955.

conflicts, and impacts related to vehicular or pedestrian and bike safety would be less than significant. No mitigation measures or further study are required.

The Proposed Project includes development of two new parking lots, one between Oak Street and the Mechanical Drawing Building (Building #6), the other at the east end of the curve where Belgrave Avenue and Oak Street meet. Neither of the parking lot driveways would create substantial hazards for the following reasons:

- Oak Street and Belgrave Avenue are local streets with low traffic volumes.
- The speed limits on both roadways are 25 mph.
- There are numerous existing driveways along the two streets for the school and residential.
- The affected segment of Oak Street is straight, and thus there is adequate line of sight for drivers exiting the proposed driveway onto Oak Street. The proposed driveway intersection on Belgrave Avenue is next to a 90-degree curve; however, stop signs control northbound traffic on Oak Street, and westbound traffic on Belgrave Avenue, approaching the curve. Therefore, the limited sight line between the proposed intersection and Oak Street would not result in substantial traffic hazards.

Campus Operation

The Proposed Project would not increase the capacity or enrollment at the school and would therefore not increase operational traffic on or around the campus. The project would not alter the use of the school campus, and no new incompatible uses would be introduced. The streets in the school vicinity have sidewalks, and the signalized intersections are equipped with painted crosswalks, pedestrian signals, and pedestrian push buttons to activate the signals. The number of students and the geographical distribution of the students' residences would remain unchanged. No operational impacts would occur.

e) Result in inadequate emergency access?

No Impact. The Proposed Project would not result in inadequate emergency access. The access and circulation features at the school would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. In addition, new emergency access driveways and internal fire lanes would be provided through the campus to access the school buildings, hardcourts, and playfields. All access features are subject to and must satisfy Los Angeles County Fire Department design requirements. Therefore, there would be no adverse emergency access impacts.

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?

No Impact. The Proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Construction would not create new hazards or conflicts, and impacts related to vehicular or pedestrian and bike safety would be less than significant, as discussed in item (d).

Following construction, the project would be consistent with policies supporting public transit, bicycle, and pedestrian facilities because no changes would occur to bus loading/unloading zones, sidewalks along the streets in the school vicinity, pedestrian crosswalks and signals in the school vicinity, or public transit. The Proposed Project would not, therefore, conflict with policies, plans, or programs regarding transit, bicycle, or pedestrian facilities, and the project would not decrease the performance or safety of such facilities. No operational impacts would occur.

	Potentially	Less Than Significant	Less Than	
	Significant Impact	with Mitigation Incorporated	Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a su tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, fe defined in terms of the size and scope of the landscape, sacred place, or object with cultur that:	ibstantial adv eature, place, eal value to a	verse change in t cultural landsca California Nativ	the significant pe that is geo ve American t	ce of a graphically cribe, and
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?				\square
 b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? 				

Explanation:

The SUP EIR did not include Standard Conditions of Approval (SCs) for tribal cultural resources. However, the applicable SC related to tribal cultural resource impacts associated with the Proposed Project are provided in the table below.

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

a) Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources.¹⁷⁰

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation

¹⁷⁰ California Natural Resources Agency. AB 52 Regulatory Update. http://resources.ca.gov/ceqa/.

concludes when either 1): the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

To date the District has not received any requests to be notified about projects in the District. Additionally, although the school is eligible for listing on the National Register of Historic Places and the California State Register of Historic Places, no specific Tribal resources have been identified and the project site is unlikely to yield sensitive resources during ground disturbance as discussed in Section V, Cultural Resources (b) of this Initial Study. However, in the unlikely event that construction-related ground disturbance results in the discovery of potential resources, SC-TCR-1 would be implemented in order to avoid potential impacts to Tribal resources. No impacts to listed tribal cultural resources would occur.

b) Cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code Section 5024.1(c).

No Impact. To date, LAUSD has not received any requests for notification or consultation from California Native American Tribes regarding resources defined by PRC Section 21074. There is no substantial evidence that tribal cultural resources are present on the existing school campus. Therefore, the Proposed Project would not be expected to result in an impact related to tribal cultural resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			\boxtimes	
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?				
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?				\boxtimes
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?				\square
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?				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes	
g. Comply with federal, state, and local statutes and regulations related to solid waste?				\square

Explanation:

The SUP EIR included Standard Conditions of Approval (SCs) for minimizing impacts to utilities and service systems where future projects would be implemented under the SUP. Applicable SCs related to utilities and services systems impacts associated with the Proposed Project are provided in the table below.

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

LAUSD Standard Conditions of Approval			
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.		
SC-GHG-2	LAUSD shall set automatic sprinklers to irrigate landscaping during the early morning (overhead and drip) and evening (drip only) to reduce water loss from evaporation.		
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the 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.		

a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. The Proposed Project would not exceed wastewater treatment requirements of the Los Angeles RWQCB. The Los Angeles RWQCB sets waste discharge requirements for discharges to municipal storm drains that would apply to the operation phase of the project; construction impacts to stormwater are regulated by the State Water Resources Control Board and are discussed above in Section IX, *Hydrology and Water Quality*. Impacts related to RWQCB requirements would be less than significant. No mitigation measures or further study are required.

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

No Impact. Water treatment facilities filter and/or disinfect water before it is delivered to customers. The City of Huntington Park Water Department supplies water to the school campus and would continue to supply water to the school. The proposed school modernization would serve existing and future students living in the region and would not increase the student population or water treatment demands in the project region. No impact would occur.

The proposed school modernization would not increase the student population or wastewater generation in the project region. Development of the Proposed Project would not require construction of new or expanded wastewater treatment facilities, and no impact would occur.

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

No Impact. Project development would include storm drainage improvements onsite discharging to the existing storm drainage infrastructure. Runoff from the proposed buildings would be conveyed by existing storm drains in the campus to existing storm drains under Slauson Avenue and Randolph Street. Low-impact-development (LID) stormwater management would be incorporated into the project design pursuant to requirements of the County LID Standards Manual and LAUSD Standard Condition of Approval SC-HWQ-01. LID principles are described further in Section VI, *Geology and Soils*, of this Initial Study. Therefore, the on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Construction of

the onsite stormwater management measures would not cause a significant impact on the environment. The Proposed Project would not require the construction of new or expanded storm drains. No impact would occur.

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

No Impact. The school currently serves students living in the region, and school modernization would not increase the student population or long-term water demands in the project region. The City of Huntington Park Water Department forecasts that it will have adequate water supplies to meet demands in its service area through the 2020-2040 period.¹⁷¹ Water may be used on site during construction for dust suppression and similar activities. The small amount of water that would be used for the project construction would not result in the need for new or expanded water entitlements. Installation of landscape and irrigation improvements would comply with SC-USS-2, SC-USS-3, and SC-GHG-1 through SC-GHG-4 for water conservation. Development of the Proposed Project would not require construction of new or expanded water supplies, and no impact would occur.

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

No Impact. Project development would not impact wastewater treatment capacity, as substantiated in (a) and (b) above.

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

Less Than Significant Impact. In 2016, the latest year for which data are available, about 93 percent of the solid waste landfilled from the City of Huntington Park was disposed of at two facilities, the Olinda Alpha Sanitary Landfill near the City of Brea in Orange County, and the Frank Bowerman Sanitary Landfill near the City of Irvine in Orange County.¹⁷² The Proposed Project would not increase the student population and thus would not increase solid waste generation at the school.

There are 33 solid waste disposal and/or processing facilities within a 10-mile radius of ZIP Code 90255, where HPHS is located, that accept construction and demolition waste.¹⁷³

The Proposed Project would require haul and disposal of contaminated soil and/or material (see VIII, *Hazards and Hazardous Materials*). Contaminated soil and/or material would result in an incremental and

¹⁷¹ City of Huntington Park. 2016, June. 2015 Urban Water Management Plan. https://wuedata.water.ca.gov/public/uwmp_attachments/7003034293/FINAL%20Huntington%20Park%20UWMP%20June%

^{202016%2}E.pdf. ¹⁷² California Department of Resources Recycling and Recovery (CalRecycle). 2016. Jurisdictional Disposal by Facility.

http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2016%26ReportName%3dReportEDRSJuris DisposalByFacility%26OriginJurisdictionIDs%3d206

¹⁷³ California Department of Resources Recovery and Recycling (CalRecycle). 2017, March 29. Facility Information Toolbox. http://www.calrecycle.ca.gov/FacIT/Facility/Search.aspx#LIST.

intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities generally within Los Angeles and/or Orange counties. The District would be required to comply with the Sanitation Districts of Los Angeles County and/or OC Waste & Recycling programs for contaminated soil and material.

Demolition and construction waste would be generated and likely disposed of at one or both of the two landfills: Olinda Alpha and Frank Bowerman. Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the 2013 CALGreen Building Standards Code (Title 24, CCR, Part 111, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This is also required by CHPS criteria. Under LAUSD Standard Condition of Approval SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the Proposed Project would adhere to these established standards. Therefore, demolition of existing onsite improvements would not adversely impact such landfills. Impacts would be less than significant. No mitigation measures or further study are required.

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

No Impact. The school administrators and the school district currently comply with federal, state, and local statutes and regulations related to solid waste, and would continue this practice. No impact would occur.

	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 environment, substantially reduce the habitat of fish or wildl species, cause a fish or wildlife population to drop below sel sustaining levels, threaten to eliminate a plant or animal com reduce the number or restrict the range of a rare or endanges or animal or eliminate important examples of the major perio California history or prehistory?	the ife f- munity, red plant ods of			
b. Does the project have impacts which are individually limited cumulatively considerable? ("Cumulatively considerable" me the incremental effects of a project are considerable when vi connection with the effects of past projects, the effects of ot current projects, and the effects of probable future projects)	, but ans that ewed in her			
c. Does the project have environmental effects which will caus substantial adverse effects on human beings, either directly or indirectly?	e 🗌 r		\boxtimes	

Explanation:

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

Potentially Significant Impact. As discussed in Sections I, *Aesthetics*, and IV, *Biological Resources*, the project would neither degrade the quality of the environment nor substantially impact any endangered fauna or flora. The project would demolish and construct new buildings, and modernize others on an existing school campus and would not change the aesthetics in surrounding neighborhoods. Because the school is fully developed and the surrounding area is highly urbanized, the project would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Mandatory compliance with MBTA, Fish and Game Code. and LAUSD Standard Condition SC-BIO-3 would avoid or limit potential impacts to nesting birds.

As discussed under Section V, *Cultural Resources,* impacts related to archaeological and paleontological resources and human remains would be less than significant. However, impacts related to historic resources would be potentially significant. Historic resources will be fully analyzed in the EIR.

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

Less Than Significant Impact. Based on the preceding discussion, with implementation of LAUSD Standard Conditions of Approval and compliance with existing regulations, the Proposed Project is not anticipated to result in significant adverse operational impacts that could contribute to a cumulatively considerable impact. No mitigation measures or further study are required.

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

Less Than Significant Impact. As discussed in the preceding analyses for the Proposed Project, the project would not result in significant direct or indirect adverse impacts or result in substantial adverse effect on human beings. No mitigation measures or further study are required.

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5. List of Preparers

5.1 LEAD AGENCY

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5. List of Preparers

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Appendix

Appendices are on CD

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Arborist / Site Tree Survey
- C. Character-Defining Features Memorandum
- D-1. Preliminary Geotechnical Investigation and Geologic Seismic Hazard Report
- D-2. Site Specific Ground Motion Hazard Analysis
- D-3. Geotechnical Investigation
- E-1. Phase I Environmental Site Assessment
- E-2. Preliminary Environmental Assessment Equivalent
- E-3. Removal Action Workplan
- F. Noise and Vibration Background and Modeling Data
- G. Traffic and Circulation Background and Data

Appendix

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