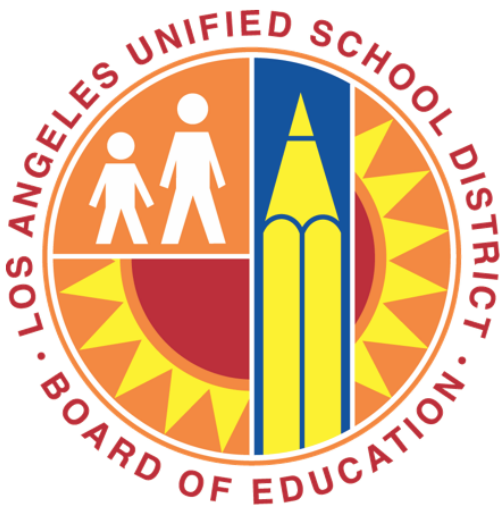


May 2018 | Initial Study/Mitigated Negative Declaration



# THOMAS JEFFERSON HIGH SCHOOL

Comprehensive Modernization Project

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May 2018 | Initial Study/Mitigated Negative Declaration

# **THOMAS JEFFERSON HIGH SCHOOL**

Comprehensive Modernization Project



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## Abbreviations and Acronyms

### ABBREVIATIONS AND ACRONYMS

|                  |   |
|------------------|---|
| AAQS             | ambient air quality standards   |
| AB               | Assembly Bill   |
| ACM              | Asbestos Containing Materials   |
| ADA              | Americans with Disabilities Act                                       |
| APN              | Assessor Parcel Number  |
| AQMP             | air quality management plan   |
| BMP              | best management practices   |
| BOE              | Board of Education  |
| CalEPA           | California Environmental Protection Agency                            |
| CALGreen         | California Green Building Code  |
| Caltrans         | California Department of Transportation                               |
| CAPCOA           | California Air Pollution Control Officers Association                 |
| CARB             | California Air Resources Board  |
| CBC              | California Building Code  |
| CCR              | California Code of Regulations  |
| CDE              | California Department of Education                                    |
| CDFM             | Character-Defining Features Memorandum (CDFM)                         |
| CDFW             | California Department of Fish and Wildlife                            |
| CEQA             | California Environmental Quality Act                                  |
| CERCLA           | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR              | Code of Federal Regulations   |
| CHPS             | Collaborative for High Performance Schools                            |
| CHR              | California Historic Register  |
| CNDDDB           | California Natural Diversity Database                                 |
| CNEL             | community noise equivalent level                                      |
| CNPS             | California Native Plant Society                                       |
| CO               | carbon monoxide   |
| COC              | Contaminant of Concern  |
| CO <sub>2e</sub> | carbon dioxide equivalent   |
| dBA              | decibels  |
| CPA              | Los Angeles Community Plan Area                                       |

## Abbreviations and Acronyms

|                     |   |
|---------------------|---|
| DPM                 | diesel particulate matter   |
| DSA                 | Division of the State Architect (under the California Department of General Services) |
| DTSC                | Department of Toxic Substances Control  |
| EIR                 | Environmental Impact Report   |
| EOP                 | Emergency Operations Plan   |
| FEMA                | Federal Emergency Management Agency   |
| FETU                | Facilities Environmental Technical Unit   |
| FHWA                | Federal Highway Administration  |
| FTA                 | Federal Transit Administration  |
| GHG                 | greenhouse gases  |
| HAPs                | Hazardous Air Pollutants  |
| HCP                 | Habitat Conservation Plan   |
| HFCs                | hydrofluorocarbons  |
| HRA                 | health risk assessment  |
| IS                  | Initial Study   |
| LACM                | Natural History Museum of Los Angeles County  |
| LACSD               | Los Angeles County Sanitation District  |
| LADOT               | City of Los Angeles Department of Transportation                                      |
| LADPW               | Los Angeles Department of Public Works  |
| LADWP               | City of Los Angeles Department of Water and Power                                     |
| LAFD                | Los Angeles Fire Department   |
| LAPD                | City of Los Angeles Police Department   |
| LAPL                | Los Angeles Public Library  |
| LASPD               | Los Angeles School Police Department  |
| LAUSD               | Los Angeles Unified School District   |
| LBP                 | Lead-based Paint  |
| LID                 | Low Impact Development  |
| LST                 | localized significance thresholds   |
| MBTA                | Migratory Bird Treaty Act   |
| MCD                 | Modified Consent Decree   |
| mgd                 | million gallons per day   |
| MMT                 | million metric tons   |
| MMTCO <sub>2e</sub> | million metric tons of CO <sub>2e</sub>   |

## Abbreviations and Acronyms

|                    |   |
|--------------------|---|
| MND                | Mitigated Negative Declaration                                |
| MTCO <sub>2e</sub> | metric ton of CO <sub>2e</sub>                                |
| N <sub>2</sub> O   | nitrous oxide   |
| NAAQS              | National Ambient Air Quality Standards                        |
| NAHC               | Native American Heritage Commission                           |
| ND                 | Negative Declaration  |
| NOI                | Notice of Intent  |
| NPDES              | National Pollutant Discharge Elimination System               |
| O <sub>3</sub>     | Ozone   |
| OCPs               | Organochlorine pesticides                                     |
| OEHS               | Office of Environmental Health and Safety                     |
| OHP                | Office of Historic Preservation                               |
| OPSC               | California Office of Public School Construction               |
| OSHA               | Occupational Safety and Health Administration                 |
| PCBs               | Polychlorinated biphenyls                                     |
| PDF                | project design features                                       |
| PFCs               | perfluorocarbons  |
| PM                 | Particulate Matter  |
| ppm                | parts per million   |
| ppv                | peak particle velocity  |
| PRC                | Public Resources Code   |
| PSHA               | pipeline safety hazard assessment                             |
| RAW                | Removal Action Workplan                                       |
| RCRA               | Resource Conservation and Recovery Act                        |
| RMS                | Root mean square  |
| RTP/SCS            | Regional Transportation Plan/Sustainable Communities Strategy |
| RWQCB              | regional water quality control board                          |
| SAB                | State Allocation Board  |
| SCAG               | Southern California Association of Governments                |
| SCAQMD             | South Coast Air Quality Management District                   |
| SCGC               | Southern California Gas Company                               |
| SCS                | sustainable communities strategy                              |
| SCs                | Standard Conditions of Approval                               |

## Abbreviations and Acronyms

|       |   |
|-------|---|
| SEA   | Significant Ecological Areas            |
| SF    | Square Feet                             |
| SF6   | sulfur hexafluoride                     |
| SoCAB | South Coast Air Basin                   |
| SUP   | School Upgrade Program                  |
| SWPPP | stormwater pollution prevention plan    |
| SWRCB | State Water Resources Control Board     |
| TAC   | Toxic Air Contaminants                  |
| USFWS | United States Fish and Wildlife Service |
| USGS  | United States Geologic Survey           |
| TPH   | petroleum hydrocarbons                  |
| UWMP  | Urban Water Management Plan             |
| UST   | underground storage tank                |
| VMT   | vehicle miles traveled                  |
| VOC   | volatile organic compounds              |

# 1. Introduction

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## 1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD) is proposing a comprehensive modernization of Thomas Jefferson High School, located at 1319 East 41st Street, City of Los Angeles, Los Angeles County, California. The Thomas Jefferson High School (Jefferson HS) Comprehensive Modernization Project (Project) is designed to address the most critical physical needs of the building and grounds at the campus through building replacement, renovation, modernization, and reconfiguration. The Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This initial study provides an evaluation of the potential environmental consequences associated with this proposed Project.

## 1.2 BACKGROUND

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

On December 10, 2013, the District refined its 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.<sup>2</sup> Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.<sup>3</sup>

On March 10, 2015, LAUSD's Board approved pre-design and due diligence activities necessary to develop a project definition for a Comprehensive Modernization Project at Thomas Jefferson High School. The proposed Project is intended to provide facilities that are safe, secure, and better aligned with the instructional program. On December 8, 2015, the Board approved the Project definition for Thomas Jefferson High School (Project Site or Campus). This approval authorized LAUSD's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory studies including those required under CEQA.

Since March 2015, the Project team, which is comprised of but is not limited to: Jefferson HS administrators and staff; District staff and consultants (including but not limited to: a range of technical specialists, design

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

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

<sup>3</sup> 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).

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managers, architects, planners, historic architects, structural specialists, etc.); and the Jefferson HS community at-large (i.e., students, alumni, parents, neighbors, etc. – who have attended at least one or more of the three community meetings regarding this Project that the District has held to date), have worked to complete pre-design and due diligence activities for the Project.

### 1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA<sup>4</sup> and the State CEQA Guidelines.<sup>5</sup> 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, 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) is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An IS is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.<sup>6</sup>

When an IS identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,<sup>7</sup> however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.<sup>8</sup>

### 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.

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<sup>4</sup> California Public Resources Code (PRC) Sections 21000 et seq.

<sup>5</sup> California Code of Regulations (CCR), Title 14, Sections 15000 et seq.

<sup>6</sup> 14 CCR Section 15063.

<sup>7</sup> 14 CCR Section 15064.

<sup>8</sup> 14 CCR Section 15070.



## 1. Introduction

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

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

### 1.4.1 Initial Study

This IS was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the Project could have a significant impact on the environment. The purposes of this IS, as described in the State CEQA Guidelines Section 15063, are to: 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in 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 IS have determined that an MND is the appropriate level of environmental documentation for this Project.

### 1.4.2 Mitigated Negative Declaration

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

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process for this Project provides several opportunities for the public to participate through public notice and public review of CEQA documents. A Notice of Intent (NOI) to adopt an MND will be published in both an English and Spanish language newspaper; posted at the Project-Site and with the local and State repositories; and direct mailed and/or distributed to Parents/Guardians of students, tenants, and property-owners within a 0.25 mile radius. Copies of this IS/MND will be available at multiple repositories including Jefferson HS and online at the Office of Environmental Health and Safety website at: <http://achieve.lausd.net/ceqa>. In addition to the community meetings held by the District including those on November 5, 2015, December 14, 2016, and March 18, 2017, the District will host a CEQA public meeting for the Project. Additionally, LAUSD will respond to Draft IS/MND public comments in the Final MND.

## 1. Introduction

### 1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.<sup>9</sup> LAUSD's Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The certified Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.<sup>10</sup> The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.<sup>11</sup>

The Program EIR is applicable to all projects implemented under the School Upgrade Program. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.<sup>12</sup> Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:<sup>13</sup>

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

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

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<sup>9</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>10</sup> Ibid.

<sup>11</sup> CEQA Guidelines Section 15152(a).

<sup>12</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015, at 4-8.

<sup>13</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015, at 1-7.





## 1. Introduction

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

### 1.4.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen),<sup>14</sup> LAUSD Standard Conditions of Approval, and the Collaborative for High-Performance Schools (CHPS) criteria.<sup>15</sup>

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

**Project Design Features.** 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 (SCs) are uniformly applied development standards and were adopted by the LAUSD Board in November 2015.<sup>16</sup> The SCs have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws,

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<sup>14</sup> California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

<sup>15</sup> 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.

<sup>16</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. (see Table 4-1 and Appendix F of the Program EIR).

## 1. Introduction

regulations and the LAUSD's standard policies, practices and specifications. The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).<sup>17</sup> For each SC, 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; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

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

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.<sup>18</sup> Federal, State, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and LAUSD SCs are considered part of the Project and are included in the environmental analysis.<sup>19</sup>

## 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.

---

<sup>17</sup> As of September 2016, an additional environmental topic has since been required by the State Office of Planning and Research (Tribal Cultural Resources). The LAUSD Environmental Checklist now has 19 topics.

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

<sup>19</sup> Where the LAUSD Standard Conditions of Approval identifies actions to be taken, it is understood that the Project proponent would implement all LAUSD actions for this Project.



## 1. Introduction

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

## 1.6 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

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

**Appendices** have data supporting the analysis or contents of this CEQA IS.

- A. Air Quality Technical Report
- B1. Protected Tree Report
- B2. California Department of Fish and Wildlife, California Natural Diversity Database
- C1. Historical Resources Technical Report
- C2. Archeological and Paleontological Resources Report
- D. Preliminary Geotechnical Report

## 1. Introduction

- E. Phase I Environmental Site Assessment
- F. Preliminary Environmental Assessment - Equivalent Report
- G. Removal Action Workplan
- H. Noise and Vibration Technical Report
- I. Traffic and Pedestrian Safety Memorandum



## 2. Environmental Setting

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### 2.1 PROJECT LOCATION

Jefferson HS is located on an 18.9-acre site in a residential area, approximately two miles south of downtown Los Angeles and approximately 15 miles east of the Pacific Ocean (*Figure 1, Project Vicinity*). Specifically, the campus is located at 1319 East 41st Street within the southeast portion of the City of Los Angeles (Project Site). The campus comprises an entire block and is bounded by Compton Avenue to the east, East 41st Street to the south, Hooper Avenue to the west,<sup>20</sup> and residences and East 33rd Street to the north (*Figure 2, Project Location*). The Assessor's Parcel Number (APN) for the Project Site is 5114-03-6900. Project implementation would not occur across the entire school campus, but on selected areas undergoing various levels of renovation over multiple phases. *Figure 3, Existing Site Plan* shows the existing site plan and buildings.

Direct access to the Project Site is provided by Hooper Avenue, East 41st Street, and Compton Avenue. Currently, the campus' main public entrance is located at the corner of East 41st Street and Compton Avenue, while the campus' student entrance is located on the corner of East 41st Street and Hooper Avenue.

Regional transportation facilities serving the Project vicinity include Interstate 110 (I-110), located approximately 1.75 miles west of the Project Site, and Interstate 10 (I-10) located approximately one-mile north of the Project Site. Local access to the I-110 is provided by Martin Luther King Jr. Boulevard and Jefferson Boulevard, and the I-10 is accessed by Long Beach Avenue.

Transit service to the Project Site is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Lines: 55/355 and 102, and the DASH Southeast Line which is operated by the Los Angeles Department of Transportation (LADOT). Regional service is provided by the Metro Blue Line, along Long Beach Avenue. The closest station to the Project Site is the Vernon Station, approximately 0.7-mile southeast of the Project Site.

### 2.2 SURROUNDING LAND USES

The campus is predominately surrounded by single- and multi- family residences on all sides, with the exception of a small limited industrial use to the east of the Project Site, along Compton Avenue. Morning Star Baptist Church is located south of the campus at the intersection of East 41st Street and Compton Avenue, residences surround the northern boundary of the campus and the Emmanuel Church of God in Christ is located across East 33rd Street on the corner of East 33rd Street and Compton Avenue alongside residences and an industrial site.

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<sup>20</sup> Also South Hooper Avenue.



SOURCE: Los Angeles County GIS.

LAUSD Jefferson Comp Mod Project . D160789.01

**Figure 1**  
Project Vicinity





Path: U:\GIS\GIS\Projects\211xxx\211085\_LAUSD\_CulturalTask\Cultural\Jefferson\Fig2\_Jefferson\_Aerial.mxd, Jpl, 2/24/2016

## 2. Environmental Setting

### 2.3 CAMPUS HISTORY

The campus was initially constructed in 1917. The campus was essentially rebuilt following the Long Beach Earthquake in 1933. The primary period of significance for the campus is between 1935 and 1937 when the campus was rebuilt in the Streamline Moderne style. Buildings at the Project Site include: a two-story Administrative and Main Classroom Building, Assembly Building (Auditorium), Cafeteria Building, Science Building, two Gymnasiums, lunch shelter/service building, Mechanical Arts Building, Music Building, Homemaking Building, Industrial Arts Building, several additional buildings including the Metal Shop and Power and Pump Vaults, portable buildings, and modular structures.<sup>21</sup>

During the Phase I Getty Survey conducted on March 15, 2002, Jefferson HS was recommended eligible for the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) through survey evaluation and assigned California Historic Register (CHR) Status Codes of 3S and 3CS.<sup>22</sup> Jefferson HS was evaluated again in 2004, as a result of Section 106 of the National Historic Preservation Act of 1966 (Section 106) review, and formally determined eligible as an individual property for the National Register through consensus with the State Historic Preservation Office (SHPO), automatically listed in the California Register, and assigned a CHR Status Code of 2S2.<sup>23</sup> Lastly, Jefferson HS was re-evaluated by SurveyLA in March 2012 during the Office of Historic Resources' historic resources survey of the Southeast Los Angeles Community Plan Area (CPA), recommended eligible for the national, State, and local level as an individual resource and was assigned CHR Status Codes of 3S, 3CS, and 5S3.<sup>24</sup>

### 2.4 EXISTING CONDITIONS

Jefferson HS is an operational high school serving students in grades 9 through 12. After the traditional high school hours, the campus is used for the Jefferson Adult School. As previously noted, buildings at the Project Site include: a two-story Administrative and Main Classroom Building, Assembly Building (Auditorium), Cafeteria Building, Science Building, two Gymnasiums, lunch shelter/service building, Mechanical Arts Building, Music Building, Homemaking Building, Industrial Arts Building, several additional buildings including the Metal Shop and Power and Pump Vaults, portable buildings, and modular structures (see *Figure 3, Existing Site Plan*).

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<sup>21</sup> LAUSD. July 28, 2015. Character-Defining Features Memorandum (CDFM) for Thomas Jefferson High School, 1319 East 41st Street, Los Angeles, California 90011. Los Angeles, CA.

<sup>22</sup> Leslie J. Heumann, SAIC, DPR Primary Record Form for Thomas Jefferson High School (March 15, 2002).

<sup>23</sup> Office of Historic Preservation Historic Resources Inventory, Directory of Properties in the Historic Property Data File for Los Angeles County (April 5, 2012): 325.

Jefferson High School (Property Number of 146101) was assigned a CHR status code of 2S2 as result of a historic resources survey (DOR-19-04-0019-0000) and Project review (FEMA031024A) on March 16, 2004.

<sup>24</sup> Galvin Preservation Associates, *Historic Resources Survey of Southeast Los Angeles: Historic Districts, and Multi-Property Resources*, Prepared for Office of Historic Resources, Department of City Planning (March 2012): 44-47, [http://preservation.lacity.org/files/SELAAAppendixCFinal3\\_12.pdf](http://preservation.lacity.org/files/SELAAAppendixCFinal3_12.pdf), accessed August 11, 2017.







## 2. Environmental Setting

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## 2. Environmental Setting

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities'. The zoning for the school property is [Q]PF-1XL. PF (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools. [Q] means additional restrictions on building design, landscape buffer, signs, etc.; '1' is Height District No. 1; and 'XL' is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building or structure exceed 30 feet in height. The Project includes a new Gym that is 45.5 feet in height to the campus.

However, LAUSD anticipates that in accordance with Government Code Section 53094, the Board of Education, by a two-thirds vote of its members, will exempt the proposed Project from the City of Los Angeles Zoning Ordinance..

### 2.5 AGENCY REVIEWS AND APPROVALS

It is anticipated that the reviewing agencies that would review the IS for technical adequacy or may issue ministerial approvals or permits for the proposed Project would include, but may not be limited to, the following:

#### **Reviewing Agencies**

- 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 Transportation (Caltrans). Transportation permit for oversized vehicles on State highways
- State Office of Historic Preservation (OHP). May review of the IS/MND and Historic Resources Technical Report
- Los Angeles Regional Water Quality Control Board. Approval of water quality management plan
- South Coast Air Quality Management District. May review the applicable technical analyses, and review/file submittals for rules (as applicable)
- State Water Resources Control Board. Review of applicable permit coverage. General Construction Permit regulates stormwater and nonstormwater discharges associated with construction activities
- City of Los Angeles, Public Works Department. Permit for curb, gutter, and connections to offsite improvements (offsite improvements are not anticipated for this Project)
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation
- City of Los Angeles, Department of Transportation. Approval of haul route

## 2. Environmental Setting

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## 3. Project Description

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### 3.1 PROPOSED PROJECT

The proposed Project would include demolition, renovations, modernizations, and new construction at Jefferson HS; including the demolition and removal of existing buildings totaling approximately 116,000 square feet (sf), construction of new facilities totaling approximately 110,000 sf, and modernization of approximately 53,000 sf of buildings. *Table 3-1, Characteristics of Existing Buildings*, shows the buildings and modular buildings that would be demolished and removed and the buildings that would be renovated as a result of the proposed Project. Figure 3 shows the plot plan for the Project Site, including existing buildings and features on the site. *Figure 4, Preliminary Demolition Plan* provides an overview of the proposed building demolition, construction, and modernization.

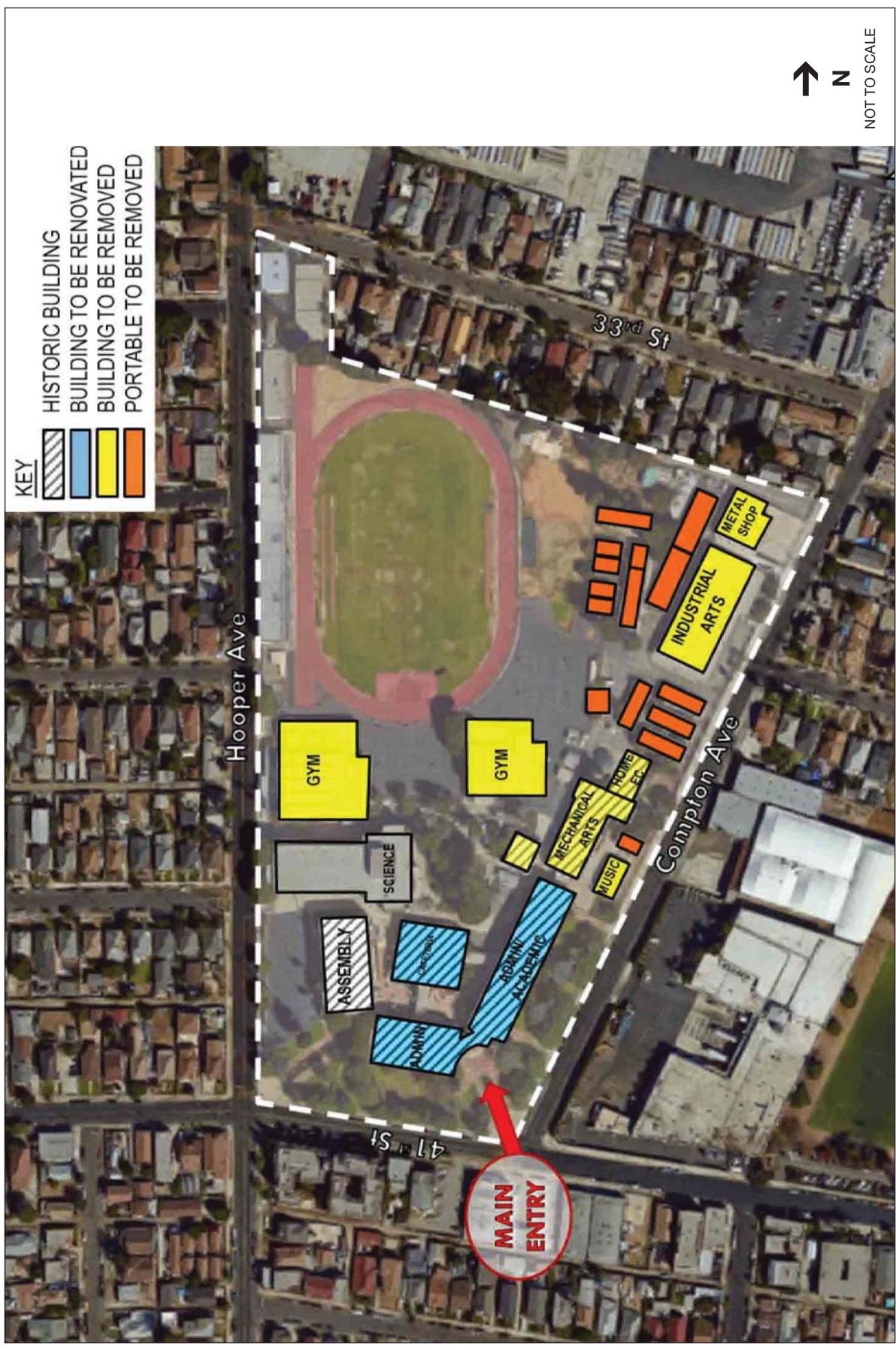
As outlined in Table 3-1 and shown in Figure 4, the proposed Project would include demolition of the following:

- Music Building
- Home Economics Building<sup>25</sup>
- Gymnasium Building (Practice and Competitive)<sup>26</sup>
- Metal Shop Building
- Mechanical Arts Building
- Power House (Utility Building)
- Industrial Arts Building
- Lunch Shelter/Service Building
- Approximately 30 classrooms located in relocatable (or portable) buildings.

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<sup>25</sup> Also referred to as the Homemaking Building

<sup>26</sup> Practice and competitive gymnasium spaces (also referred to as the Girls' Gymnasium Building and Boys' Gymnasium Building respectively).



LAUSD Jefferson Comp Mod Project. D160789.01  
**Figure 4**  
 Preliminary Demolition Plan

SOURCE: LAUSD, FSD, 2015



### 3. Project Description

**TABLE 3-1  
 CHARACTERISTICS OF EXISTING BUILDINGS**

| Building/Site Plan Number                                      | Building Name                    | Year Built | Building Type |
|--|----------------------------------|------------|---------------|
| <b>Permanent Buildings/Structures to be Demolished/Removed</b> |                                  |            |               |
| Building 12/010DAM   | Music Building                   | 1951       | Permanent     |
| Building 16/011DAP   | Home Economics <sup>27</sup>     | 1960       | Permanent     |
| Building 6/005BAN  | Gymnasium Building (Competitive) | 1955       | Permanent     |
| Building 25/023DAP   | Metal Shop                       | 1964       | Permanent     |
| Building 11/009BAJ   | Mechanical Arts Building         | 1938       | Permanent     |
| Building 7/006BAN  | Gymnasium Building (Practice)    | 1957       | Permanent     |
| Building 8/007C0E  | Power House (Utility Building)   | 1915       | Permanent     |
| Building 21/016BAN   | Industrial Arts Building         | 1959       | Permanent     |
| Building 34 / 015D0N   | Pump House                       | 1959       | Permanent     |
| 012D0N   | Storage #1                       | 1938       | Permanent     |
| 004D0N   | Storage #2                       | 1959       | Permanent     |
| 014B0M   | Flammable Storage                | 1953       | Permanent     |
| 013B0M   | Flammable Storage                | 1961       | Permanent     |
| Building 10/P0191K   | Lunch Shelter Building           | 1941       | Permanent     |
| Building 9/008D0F  | Lunch Service Building           | 1920       | Permanent     |
| <b>Portable Buildings to be Removed</b>                        |                                  |            |               |
| X0217J   | AA-217                           | 1935       | Portable      |
| X0243J   | AA-243                           | 1935       | Portable      |
| A0497L   | A-497                            | 1949       | Portable      |
| A0548M   | A-548                            | 1950       | Portable      |
| A1245W   | A-1245                           | 1988       | Portable      |
| A1246W   | A-1246                           | 1988       | Portable      |
| A1247W   | A-1247                           | 1988       | Portable      |
| M0607L   | M-607                            | 1946       | Portable      |
| X0909M   | AA-909                           | 1950       | Portable      |
| X209P  | AA-2096                          | 1960       | Portable      |
| A1248W   | A-1248                           | 1988       | Portable      |
| X0960M   | AA-960                           | 1950       | Portable      |
| X2382P   | AA-2382                          | 1962       | Portable      |
| X0323L   | AA-323                           | 1947       | Portable      |
| X0306L   | AA-306                           | 1946       | Portable      |

<sup>27</sup> Also referred to as the Homemaking Building.

### 3. Project Description

| Building/Site Plan Number                                   | Building Name                       | Year Built | Building Type |
|---|-------------------------------------|------------|---------------|
| <b>Permanent Buildings to be Modernized and/or Upgraded</b> |                                     |            |               |
| Building 1/001BCJ   | Administrative Building             | 1936       | Permanent     |
| Building 4/001BCJ   | Academic Building                   | 1936       | Permanent     |
| Building 2/003BCJ   | Auditorium (Assembly Hall) Building | 1937       | Permanent     |
| Building 3/002CAJ   | Cafeteria Building                  | 1936       | Permanent     |
| <b>Permanent Buildings/Structures to Remain</b>             |                                     |            |               |
| Building 5/025BES   | Science and Classroom Building      | 1936       | Permanent     |
| Building 33/019DAG  | Bleachers Building                  | 1926       | Permanent     |
| 019G0G  | Bleachers                           | -          | Permanent     |

SOURCE: LAUSD, 2016

#### 3.1.1 Project Objectives

Projects developed under LAUSD’s SUP, which includes Comprehensive Modernization Projects are intended to provide facilities that improve student health, safety, and educational quality.

More specifically, the Board approved SUP goals and principals are:

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

Furthermore, six core objectives have been established for Comprehensive Modernization Projects undertaken under the SUP:

- The buildings that have been identified as requiring seismic upgrades must be addressed.
- The buildings, grounds and site infrastructure determined to have significant/severe physical conditions that already do, or are highly likely (in the near future) to pose a health and safety risk or negatively impact a school’s ability to deliver the instructional program and/or operate must be addressed.
- The school’s reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.
- Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).





### 3. Project Description

- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.
- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved.

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

- Ensure that the buildings that have been identified as requiring seismic upgrades are addressed..
- Improve the overall functionality and utility of the campus.
- Direct limited bond funds to facilities with the greatest need, particularly at aged campuses where significant seismic/structural challenges and deterioration were identified by the District's Facilities Condition Assessment.
- Eliminate the reliance on portable classrooms.
- Maximize the use of limited bond funds to provide modern and permanent classroom facilities.
- Reconstruct and modernize Jefferson High School to provide an educational facility for students in the 21 century and beyond.
- Replace buildings and infrastructure that have reached the end of their useful lives.
- Reduce amount of stormwater runoff drainage and improve quality of runoff by increasing pervious surfaces on campus.
- Improve campus access and circulation especially for emergency vehicles and personnel.
- Provide upgrades throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
- Create a less congested campus to increase the safety and supervision of students.
- Increase energy efficiency of the campus by upgrading or replacing facilities and incorporating standards developed by the Collaborative for High Performance Schools (CHPS).

### 3. Project Description

The proposed Project would include construction of the following facilities that would be designed, constructed, and furnished/equipped to current code requirements and District design standards. *Figure 5, Proposed Site Plan:*

- New Athletics Building (Gymnasium): a new Gymnasium would be constructed generally within the location of the existing Mechanical Arts Building and Practice Gymnasium.
- New Lunch Pavilion and Quad: these areas would be remodeled to include a new outdoor amphitheater and green spaces.
- Baseball/Softball Field: A combined baseball/softball field would be created in the northeastern portion of the campus.
- New Classroom Building: This 2-story classroom building would provide general and specialty classrooms and support spaces. Additionally, a wellness center would be located in this building off Hooper Avenue and would be a part of the New Classroom Building.

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

- Administrative Building (Building 1)<sup>28</sup>: Interior remodeling would be completed throughout this building (including the Library) to accommodate relocated classroom and the exterior would be painted. The upgrades would also entail interior ADA programmatic access and structural (seismic) retrofits/improvements.<sup>29</sup>
- Main Classroom Building (Building 4)<sup>30</sup>: Interior remodeling would be completed throughout this building to accommodate relocated classroom and the exterior would be painted. The upgrades would also entail interior ADA programmatic access and structural (seismic) retrofits/improvements.
- Cafeteria Building (Building 3): Structural (seismic) improvements would be completed within this building. The exterior of this building would also be painted.
- Auditorium (Assembly Hall) Building (Building 2): ADA programmatic access improvements would be completed within this building. Several rows of seats may be removed and the building's exterior would be painted.

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<sup>28</sup> Also referred to along with the Main Classroom Building, Administrative Building, and the Administration and Academic Building (usually in conjunction with Building 4). Various documents for the Project Site that reference this building also refer to it as the: Administrative and Main Classroom Building, Administration Building, Administrative/or Administration/Library Building and Main Classroom Building.

<sup>29</sup> HMC Architects with input from TTG Engineers, 2017. Thomas Jefferson High School Comprehensive Modernization Final Schematic Design, Structural Analysis.

<sup>30</sup> Also referred to as the Academic Building.





**LEGEND**

- (E) BUILDINGS
- A1 ACADEMIC BUILDING
  - A2 ADMINISTRATION / ACADEMIC BUILDING
  - A3 CAFETERIA BUILDING
  - B ASSEMBLY BUILDING
  - C SCIENCE / CLASSROOM BUILDING
  - 33 STADIUM / BLEACHERS

**KEYNOTES**

- 1 MAIN ENTRY
- 2 STUDENT ENTRY
- 3 HISTORIC 'GREAT LAWN'
- 4 SERVICE YARD
- 5 QUAD
- 6 STAGE
- 7 ELECTRICAL ENCLOSURE
- 8 HARDCOURTS
- 9 PLAYFIELDS
- 10 (E) TRACK & FIELD
- 11 GARDEN
- 12 STORAGE CONTAINERS
- 13 IRRIGATION CONTROLS
- 14 TENNIS COURTS
- 15 FLAMMABLE STORAGE
- (P#) PARKING AREA

**PARKING COUNT**

- (P1) 44 PARKING SPACES
- (P2) 12 PARKING SPACES
- (P3) 88 PARKING SPACES
- (P4) 36 PARKING SPACES
- TOTAL: 177 PARKING SPACES**

NOTE: \*The building names are for reference with this figure only. Building names are not commensurate to the building names used by the District or in the report.

LAUSD Jefferson Comp Mod Project . D160789.01  
**Figure 5**  
 Proposed Site Plan

### 3. Project Description

Seismic retrofitting would be completed in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, California Building Code, DSA, and CDE. A more detailed discussion of the approach describing the treatment, rehabilitation, and approach for each of these remaining historic building are provided in the following section 3.1.2.

Site upgrades that would be completed throughout the campus include:

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

Improvements as required by the ADA, DSA, CEQA, Department of Toxic Substances Control (DTSC), Office of the Independent Monitor for ADA program accessibility, and any other required improvements or mitigations to ensure compliance with local, State, and/or federal facilities requirements.

#### 3.1.2 Historic Resources Treatment/Approach

As discussed in the HRTR the landscapes and buildings at the Jefferson HS campus were originally classified as significant contributing and non-contributing with CDFs identified for each individual building and landscape. To facilitate planning efforts, the District identified each building, structure, and landscape in the Character-Defining Features Memorandum (CDFM) as “primary” (significant), “secondary” (contributing), and “tertiary” (contributing) character-defining features. These descriptors were used at times to inform the design process. The character-defining buildings and landscapes are the physical representations of the historical resource (potential Historic District) and as such are the most important features to retain. The current effort has determined that the campus is better defined as a potential historic district and the buildings and landscape features have been broken out into contributing and non-contributing resources. These classifications align with the determinations in the CDFM. The Project has been designed to preserve and enhance the majority of the contributing buildings and landscape. The design team included a qualified Historic Architect who worked to ensure that the specifications for design and implementation of the Project complied with the applicable historic preservation standards to achieve the Project objectives while also retaining the CDFs. Additionally, the proposed Project is designed to be implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.<sup>31</sup> The proposed Project is broken down into three distinct Project components that include a combination of restoration and rehabilitation of the majority of the contributing historic buildings alongside modernizations and seismic retrofits of the campus; site upgrades and landscape design improvements; and new construction, as described further below.

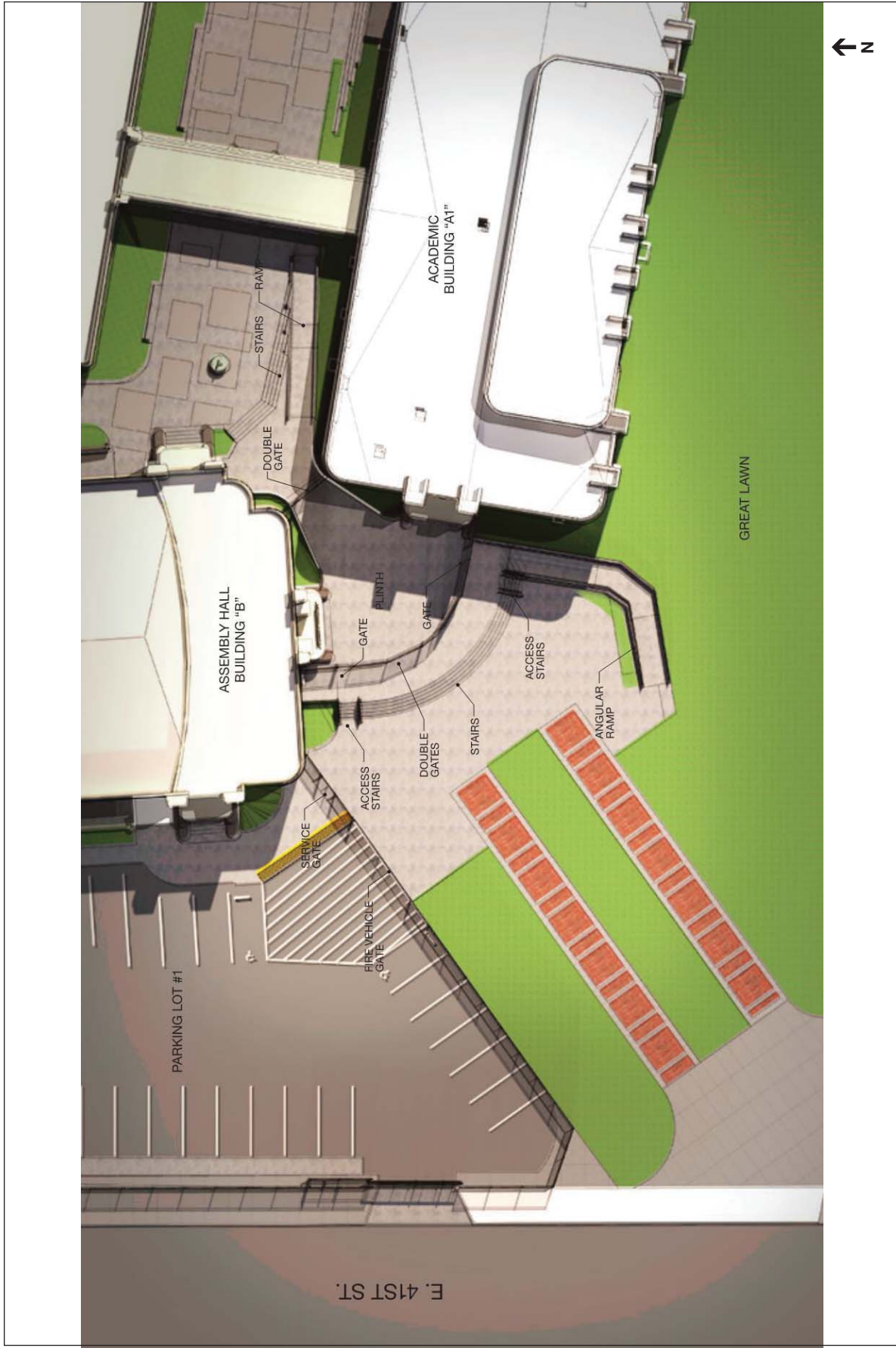
Figures 6, 7, 8, 9, and 10, *Contributing Buildings and Landscape Treatment/Approach* provide a preliminary draft depiction of the intended treatment/approaches for many of the restoration, repairs, and improvements outlined in this section for the site plan and landscape, Building 1, Building 2, Building 3, and Building 4.

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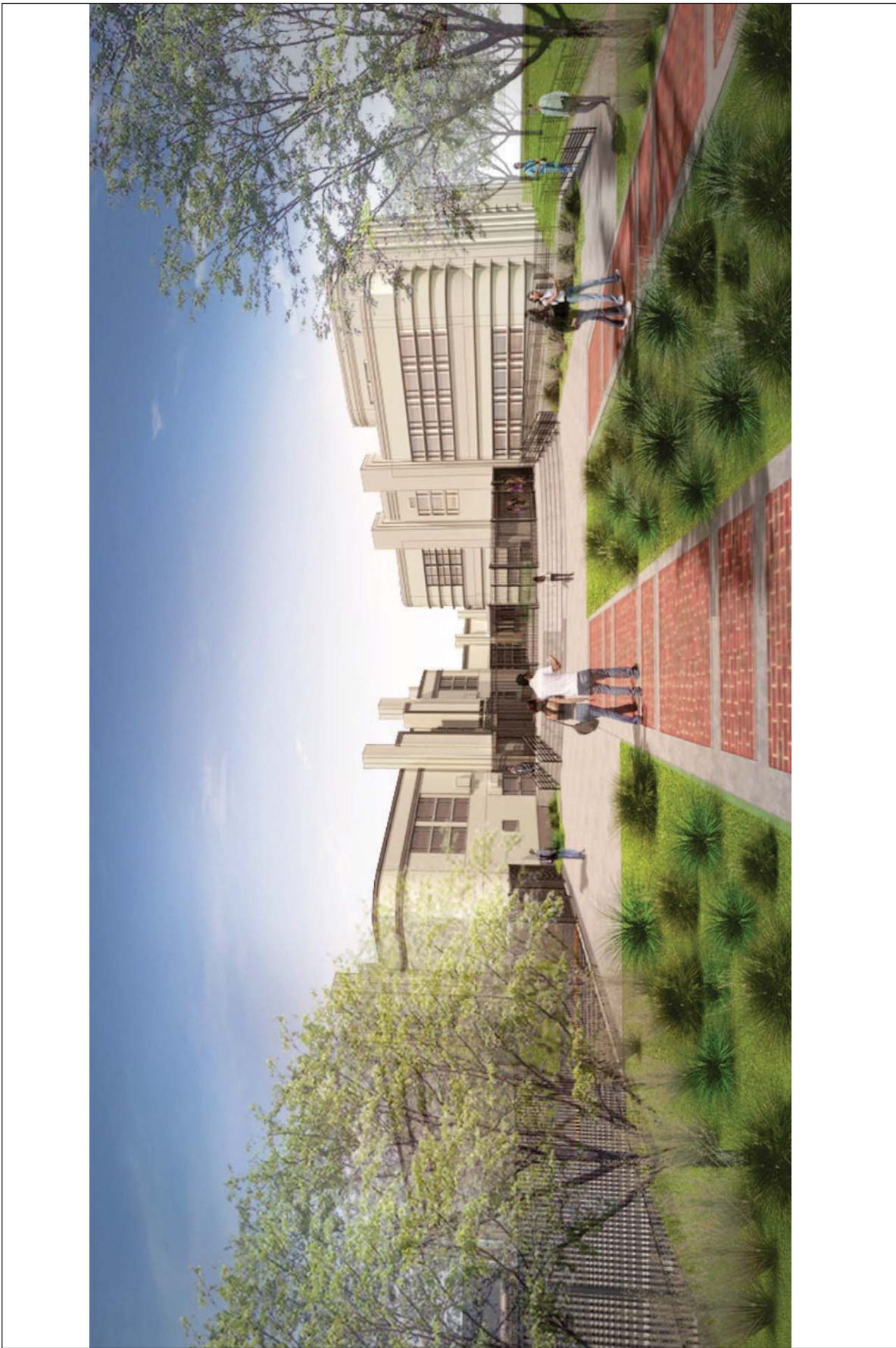
<sup>31</sup> LAUSD. January 2015. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. Los Angeles, CA.







**Figure 6**  
 Historic Landscape and Buildings Treatment/Approach: Assembly Building  
 (Auditorium) and Academic Building – Plinth Concept Plan

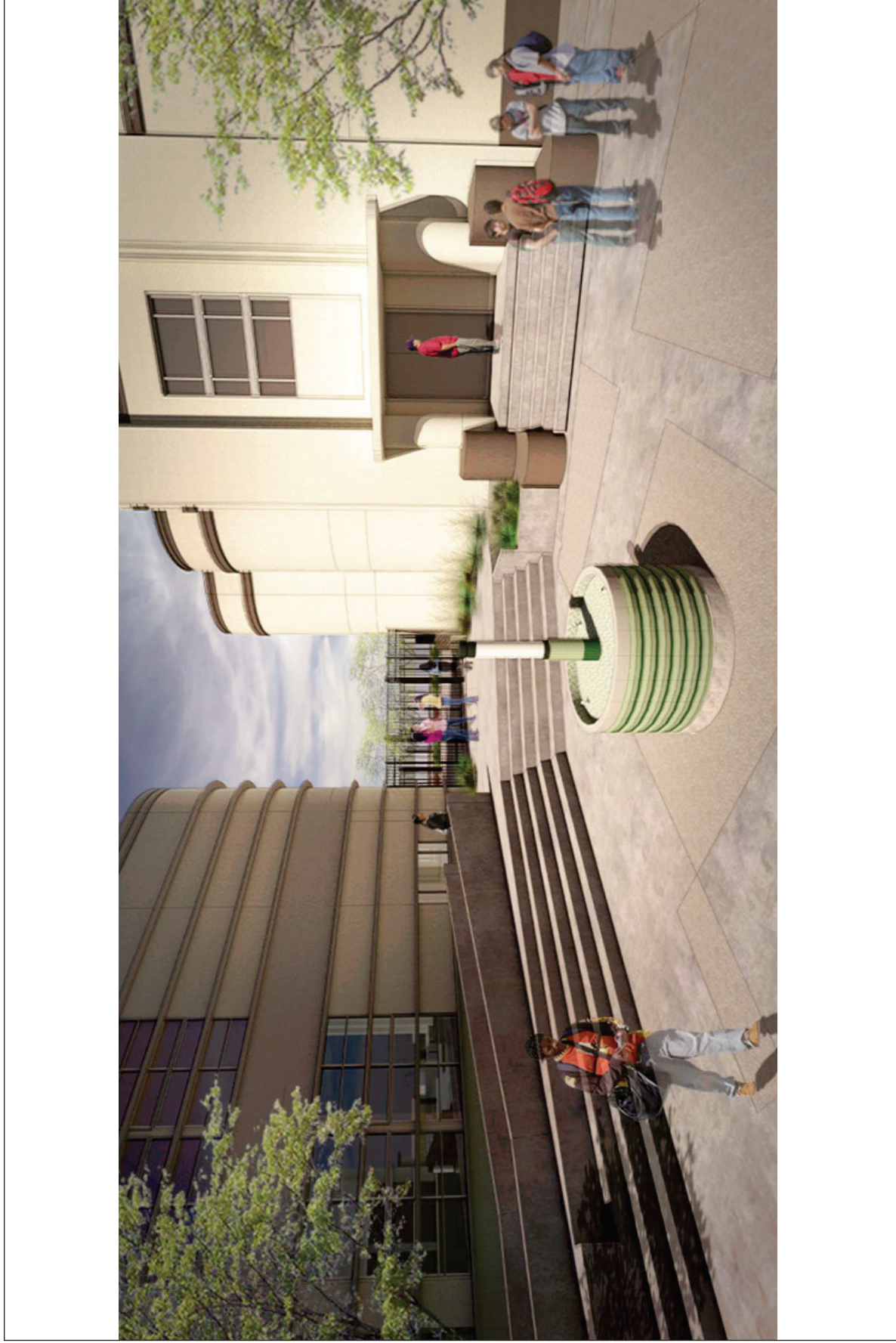


SOURCE: HMC Architects

LAUSD Jefferson Comp Mod Project . DT160789.01

**Figure 7**  
Historic Landscape and Buildings Treatment/Approach: Student Entry –  
Corner of Hooper Avenue Perspective

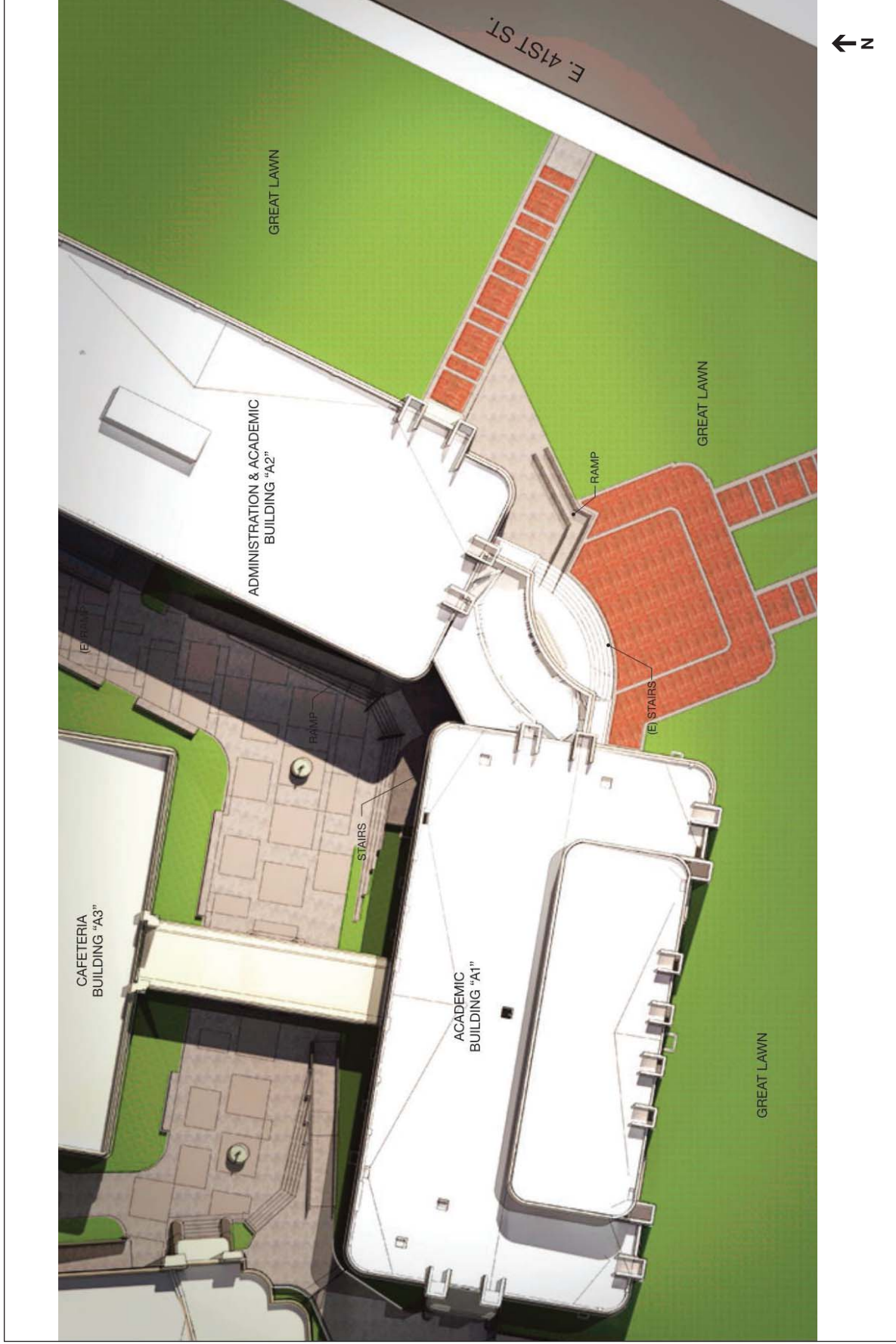




SOURCE: HMC Architects

LAUSD Jefferson Comp Mod Project . DT160789.01

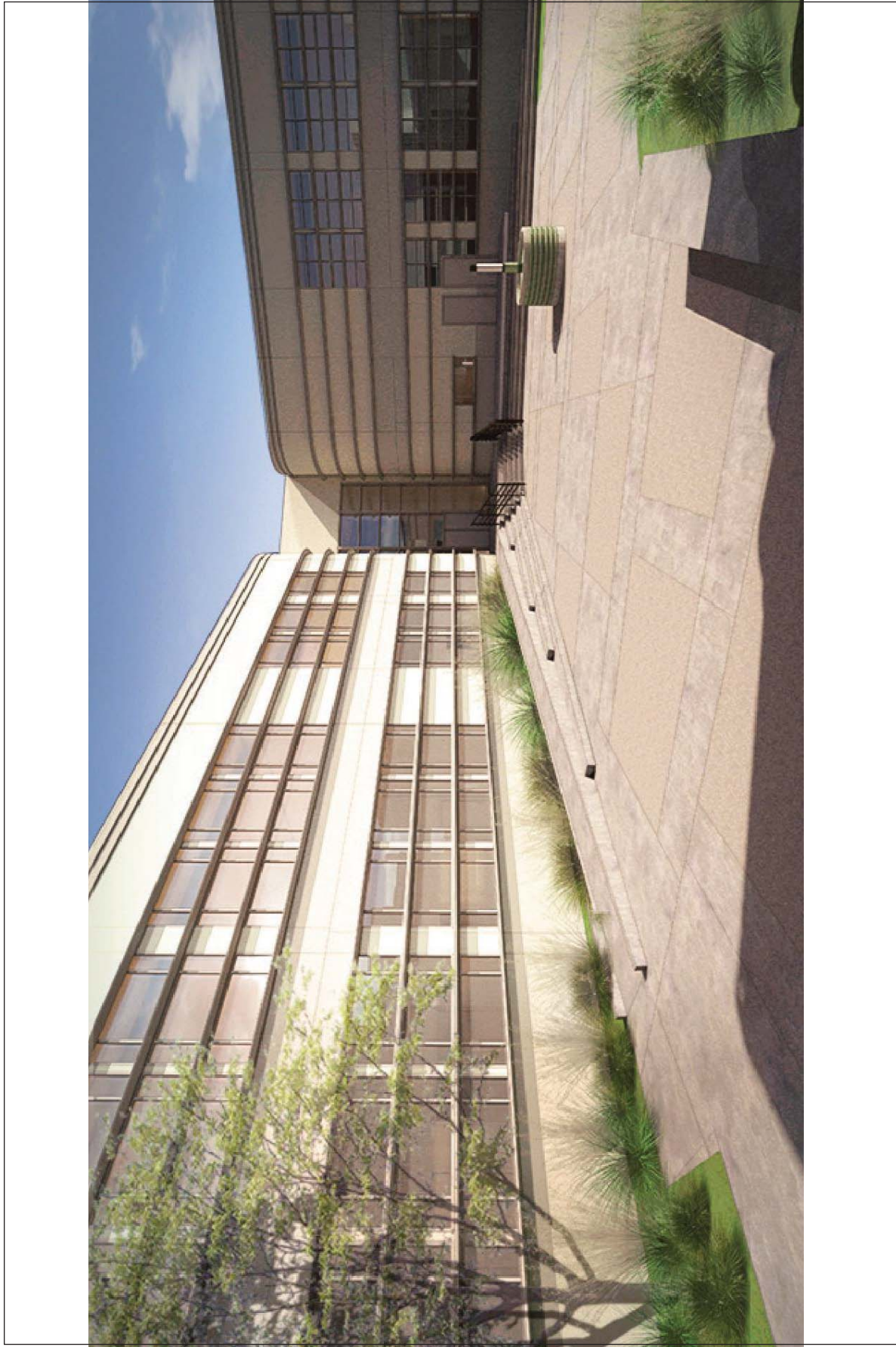
**Figure 8**  
Historic Landscape and Buildings Treatment/Approach: View to Backside of Plinth



SOURCE: HMC Architects

LAUSD Jefferson Comp Mod Project . D160789.01  
**Figure 9**  
Historic Landscape and Buildings Treatment/Approach: Administration and Academic Buildings – Circulation Concept Plan





SOURCE: HMC Architects

LAUSD Jefferson Comp Mod Project . DT160789.01

**Figure 10**  
Historic Landscape and Buildings Treatment/Approach: Administration and Academic Buildings – Stairs and Ramp View

### 3. Project Description

The District worked to balance the Project goals and objectives with the District's use of limited bond funds to upgrade and modernize the educational facilities with the greatest need in order to ensure that they are equitably available throughout the District (particularly at aged campuses where significant seismic/structural challenges and deterioration were identified by the District's Facilities Condition Assessment).<sup>32</sup> At Jefferson HS, 7 buildings are listed on the District's Assembly Bill (AB)-300 Criteria building List.<sup>33</sup> The Administrative and Classroom Building (Building 1 and Building 4), Auditorium Building (Building 2), Cafeteria Building (Building 3) along with both Gymnasium Buildings (Buildings 6 and 7), the Mechanical Arts Building (Building 11), Science & Classroom Building (Building 5), and Industrial Arts Building (Building 21), are all listed on the State of California's AB 300 List; a list identifies kindergarten through 12<sup>th</sup> grade school buildings that require detailed seismic evaluations to determine if they would be able to achieve the required life-safety performance metrics (which include a range of evaluations from structural support, foundation system, load resisting), during a seismic event.<sup>34,35</sup>

#### Site Plan and Landscape

- No changes are proposed to the trapezoid-shaped irregular lot
- The U-shaped relationship between Buildings 2, 1, and 4 (surrounding the west, east, and south sides of Building 3) would be retained
- The passageways (brick and concrete hardscape walkways) and drinking fountains at the courtyard would remain and be protected in place
- A raised plinth would be added between Buildings 1, and 2 leading into the courtyard and incorporating programmatic access requirements
- Irrigation would be added to the great lawn but the lawn (consisting of the green grass, mature trees, and planting layout) would be retained. In the event that it is impossible to replace the landscape shrubs comparable plants would be selected by the design team as replacements
- The temporary accessible ADA ramp would be removed from the front of Building 1 and a code compliant ramp would be added to the front of Building 4

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<sup>32</sup> LAUSD. 2017. Facilities Condition Assessment and AB 300 List for Jefferson HS. Los Angeles, CA.

<sup>33</sup> LAUSD (AE Services). 2017. LAUSD AB-300 Criteria Building List. Los Angeles, CA.

<sup>34</sup> Division of State Architects (DSA). Accessed 2017. AB 300. Available at: <http://www.dgs.ca.gov/dsa/AboutUs/ab300.aspx>

<sup>35</sup> The Jefferson HS AB 300 List includes 62 buildings. All of which, with the exception of those noted, require no further action.



## 3. Project Description

### Administrative and Classroom Building 1

#### Exterior Alterations

- A new concrete, ADA-compliant (and DSA approved; building use and occupancy required)<sup>36</sup> exit would be provided at the interior quad side
- The exterior plaster above windows would be removed to restore original window conditions. The exterior windows would be reconstructed where required, and ground floor windows would be replaced and repaired to match the original design
- All roofing and mechanical equipment would be replaced

#### Interior Alterations

- Alterations would be completed in the interior for a new concrete shear wall. The Ross Dickinson mural in the library and existing plaster would be affected by this new wall. The Ross Dickinson mural would be repaired and restored in-place by a conservation artist, safely removed and stored offsite during modernization, and reinstalled when the library construction is complete. A conservation plan has been prepared by a Conservator of Paintings to ensure the safe treatment, removal, storage, and replacement of this mural<sup>37</sup>
- The existing gypsum plaster above the shelving in the library would be removed and mitigated
- The elevator (that was not a part of the original building) would be removed to allow the lobby to be expanded. The alterations to the interior campus (quad side) entry to lobby would retain the curved walls connection between Building 1 and 4 and would insert the addition of an accessible and securable entrance that incorporates windows to allow natural light to access the lobby
- The floor circulation, stairs and corridors shall remain. The 2nd floor of the Library would be expanded to incorporate what originally was the 2nd floor corridor
- The interior design would incorporate design elements that would distinguish boundaries where previous corridor walls used to be
- Portions of the terrazzo floors on the first floor would require removal and abatement during the seismic upgrades. Prior to removal, the existing terrazzo floor would be photographed, and each color would be tested. Samples of the flooring would be removed in 2-foot sections for the purposes of comparing/matching to samples for replication purposes. These pieces would be replicated to match the existing design, color, texture, and other qualities, such as materials to the extent feasible
- No changes would occur to the curved concrete stairwells, with exception of added code compliant handrails

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<sup>36</sup> Per and consistent with the 2016 CHBC Section 8-501.3 and Section 8-102.1.5.

<sup>37</sup> ConserveArt Associates, Inc. 2017. Condition Report and Proposal for Treatment. Culver City, CA.

### 3. Project Description

#### **Auditorium Building 2**

- A lift for access to the 2nd floor control room would be added to the Auditorium Foyer
- The existing restrooms would be altered to ensure that they are ADA-compliant and California Building Code-compliant facilities to allow single-occupant and gender-neutral single occupant use
- The Auditorium stage would be modified to remove the south stairs and add a new lift for access to the stage

#### **Cafeteria Building 3**

- Seismic upgrades are required in this building and would entail strengthening the building's structure (i.e., providing anchorage, strengthening an exit door, and installing a roof diaphragm) through the ceiling in order to avoid or to minimally altering the building
- The exterior of the building would not be altered (it would only be painted along with all of the other remaining buildings)

#### **Classroom Building 4**

- A new concrete, code-required exit at interior quad side would be provided
- The interior would be altered for the addition of a new concrete shear wall
- All roofing and mechanical equipment would be replaced
- The textured plaster and smooth concrete exterior walls would be patched and repaired, where necessary
- The exterior plaster above the windows to repair original window conditions.
- The windows would be weatherproofed, rehabilitated where required, and replaced and repaired to match the original design
- The existing streamline passageway would remain intact with no changes, other than roof replacement
- The major building features would be restored as necessary but would not be altered



## 3. Project Description

### 3.1.3 Site Access, Circulation, and Parking

Currently, the school's main public entrance is located at the corner of East 41st Street and Compton Avenue, while the school's student entrance is located on the corner of East 41st Street and South Hooper Avenue. The proposed Project is designed to improve internal circulation, access (including the path of travel), and increase parking at the campus to ensure sufficient parking is available for the current need at the campus. Internal circulation routes would include vehicular access to adult education and community areas. The main public access point to the school would continue to be off of East 41st Street and Compton Avenue and the main student entry point would continue to be off East 41st Street and Hooper Avenue. Additional parking would be provided within the Project Site along Compton Avenue and along Hooper Avenue. In addition, the Project's provision for alternative transportation storage such as racks for bikes, scooters, and skateboards and onsite parking spaces to meet the campus demand would ease traffic congestion in the surrounding neighborhood by reducing the need to find on-street parking spaces. Figure 5 shows the proposed site plan and internal site circulation.

### 3.1.4 Campus-wide Landscape Improvements

The Jefferson HS campus is developed with: 1) buildings; 2) paved areas including parking lots, hardcourts, and walkways; and 3) landscaped areas, including turf playfields (i.e., football field and baseball/softball field) and ornamental landscaping with trees, shrubs, and/or grass. The proposed Project would include improvements to each of these areas. Landscape improvements may include repair or replacement of irrigation systems including lawn sprinklers and sprinkler controls, trees, shrubs and other vegetation; landscaping plant material; utilitarian landscape components, such as sprinkler piping; fencing and freestanding exterior walls. The proposed Project would remove two oak trees (which are protected by the City of Los Angeles) from the interior of the campus and up to 77 non-protected trees of various species.<sup>38</sup>

### 3.1.5 Infrastructure

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

#### **Existing Storm Water Drainage Distribution**

Stormwater sheet flows above ground and flows over the public sidewalks surrounding the campus. There are existing drain inlets, which are located in low spots, around the campus. As part of the Project, improvements to these areas would be completed. The existing campus synthetic running track and turf field was installed in 2011. A new underground drainage system was constructed at that time to convey the stormwater in this area so no changes to this new system are proposed as a part of the Project. Stormwater exits the campus north of the Boys Gymnasium and south of the bleachers into an existing 30-inch storm drain main in Hooper Avenue.

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<sup>38</sup> Carlberg Associates. 2017. City of Los Angeles Protected Tree Report Thomas Jefferson High School. Los Angeles, CA.

### 3. Project Description

As part of the new onsite stormwater improvements, stormwater would be collected by way of sheet flowing, and collection through catch basins and routing to new underground storm collection chambers. During an over flow event, the rain water would then be allowed to overflow and connect to existing offsite storm drainage system at Compton Avenue and Hooper Avenue. During construction, a pump system would be installed to pump water and to route it as necessary to the existing storm-water system.

Based on the findings from the geotechnical evaluation and infiltration testing, prepared by Gorian & Associates, Inc. in 2015, the upper soils of the site (from 6 to 9 feet) are suitable for the construction of a stormwater infiltration system (greater than 0.5 inches/hour).<sup>39</sup>

#### **Proposed Low Impact Development Best Management Practices**

The Project would include Low Impact Development (LID) best management practices (BMPs) such as multiple installations of hydrodynamic separators which are pre-treatment BMPs using swirl concentration and continuous deflective separation to screen, separate and trap: trash, debris, sediment, and hydrocarbons from stormwater runoff. Underground storm water management chambers would also be installed as a stormwater retention chamber where water infiltrates into the sub-soils and is stored and percolates into the soil.

#### **Water**

Existing domestic water services, meters, backflow assemblies, pressure regulators (if needed) and onsite pipe systems would be upgraded. All existing underground water distribution pipes would be replaced to meet current LAUSD specification section 33 11 00 “Site Water Distribution Utilities” requirements. A new dedicated fire water looped system would be installed on campus including three new campus fire hydrants. Two new fire services, minimum 6-inches, would be constructed to service the looped fire water system. One would be installed along Compton Avenue and the other Hooper Avenue. Los Angeles Department of Water and Power (LADWP) would install the water services within the streets and stop at the property line where the school’s contractor would pick up the work.

#### **3.1.6 Utility Providers**

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

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<sup>39</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.





## 3. Project Description

### 3.1.7 Security and Safety Features

With the exception of the front lawn, the perimeter of the campus is currently surrounded by an 8-foot metal security fence. The improvements to the Project Site would include similar fencing. Additionally, new internal fencing would be installed to allow the athletic areas to be distinctly apart from the academic core of the campus to allow for off-hour community access. A wellness center would also have a separate entrance off Hooper Avenue, apart from the main campus. All new structures would be equipped with fire suppression sprinkler systems and lighting on the exterior walls. All entries would be illuminated to provide safe access. The new/expanded parking lots and fields would have lighting that would be focused on the parking area and shielded to reduce glare and light spill-over. PDFs would be incorporated to ensure that these new sources would not create light spill-over greater than 2-foot candles onto adjacent residences (per SC-AE-7). Further, site lighting would be designed to have minimal offsite impact and contribution to sky glow. Outdoor lighting of architecture and landscape features and interior lighting would be designed to minimize light trespass to the outside from the point of focus or interior.

### 3.1.8 Sustainability Features

LAUSD is committed to sustainable construction principles, and has been a member of the Collaborative for High Performance Schools (CHPS) since 2001. CHPS has established criteria for the development of high performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs.

School facilities seeking CHPS-certification complete a scorecard and must achieve a certain number of points to be certified. The proposed Project has exceeded the minimum requirements to qualify as a CHPS-certified school. Some of the sustainable design features that would be incorporated into the proposed Project include easy access to public transportation, onsite treatment of stormwater runoff, “cool-roof” building materials, lighting which reduces light pollution, water and energy efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials. The proposed Project’s new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficient standards.

### 3.1.9 Removal Action Workplan

A Preliminary Environmental Assessment Equivalent (PEA-E) was prepared for the northern portion of the campus.<sup>40</sup> Lead and arsenic were detected in soil samples exceeding residential screening levels. A Removal Action Workplan (RAW)<sup>41</sup> prepared for the Project outlines the proposed action at the campus which includes

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<sup>40</sup> Alta Environmental. 2017. Draft Preliminary Environmental Assessment Equivalent Investigation Report, Thomas Jefferson High School Comprehensive Modernization, 1319 E. 41<sup>st</sup> Street, Los Angeles, California 90255,

<sup>41</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California.

### 3. Project Description

soil excavation, removal and disposal of the majority of soils impacts with contaminants of concern (COCs), lead and arsenic, identified during the PEA-E activities.

The RAW outlines remedial goals developed and adopted for contaminated media at the Project Site that would achieve the following objectives:

- Minimize exposure of humans to the COCs in shallow soil through inhalation, dermal absorption, and ingestion;
- Minimize potential for migration of the COCs from the shallow soil to other media; and,
- Remove the majority of accessible impacts soils that exceed the established site-specific cleanup goals.

Soil excavation at the campus would include removal and disposal of soil containing the COCs (arsenic and lead) that exceed the cleanup goals listed in Table 1 of Appendix G of this IS/MND. The maximum assumed soil to be excavated and removed is approximately 300 cubic yards.<sup>42</sup> Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls. Excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an onsite “holding area” using rubber-tire backhoe or similar equipment (e.g., wheel loader).<sup>43</sup> Excavated impacted soils would be transported to an appropriate landfill permitted to accept this waste type. Clean, imported soil and/or other fill material would include certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.<sup>44</sup> The RAW would be completed prior to construction for the comprehensive modernization.

#### 3.1.10 Construction Phasing and Equipment

##### Construction Phasing

The proposed Project would be developed in five phases over approximately 5.5 years.<sup>45</sup> The construction schedule would have limited to no overlap between phases. Construction activities are anticipated to be initiated in 2019 and to be completed in 2025.

##### Construction (Comprehensive Modernization Phases 1 to 5)

- **Phase 1:** This phase is anticipated to be completed in approximately 6 months. During Phase 1, portable buildings and structures located along Compton Avenue in the eastern portion of the site would be demolished and removed, as shown on Figure 4. After demolition and grading, this area

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<sup>42</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California.

<sup>43</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California.

<sup>44</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California.

<sup>45</sup> The analysis provided in this IS/MND conservatively assumes that construction will be completed within a 5-year construction period.





### 3. Project Description

would be used for construction staging and would include an electrical enclosure. The area east of the playing field would include the interim housing buildings.

- **Phase 2:** This phase is anticipated to be completed in approximately 24 months. During Phase 2, the portable buildings northeast of the playing field would be demolished. The Industrial Arts Building and Metal Shop Building interiors would be demolished as required for new proposed interim spaces. The interiors of the Industrial Arts and Shop Buildings would be remodeled. New portable buildings would be provided as interim housing in the same area.
- **Phase 3:** This phase is anticipated to be completed in approximately 24 months. During Phase 3, portable buildings, the Home Economics Building, Music Building, Mechanical Arts Building, Gymnasium Building, and Power House would be demolished. After demolition and grading activities, the development of the New Classroom Building, New Athletics Building, and new parking lots would be construction during this phase on the southeastern corner of the campus. The existing Administrative/Library Building interior remodeling would be completed during this phase. The new buildings would be built in two phases and would require the New Athletics Building construction to be finished before demolition of the existing Gymnasiums to allow for construction of the new Classroom Building.
- **Phase 4:** This phase is anticipated to be completed in approximately 24 months. During Phase 4, the Gymnasium (Boys' Gymnasium) would be demolished. The existing Administrative/Library Building interior would be demolished and remodeled during this phase. Improvements, including programmatic access and structural upgrades, for the Cafeteria Building and Auditorium Building would be completed during this phase. The new Lunch Pavilion and Quad would be constructed during this phase.
- **Phase 5:** This phase is anticipated to be completed in approximately six months. This phase would include the entire demolition of the interim housing area in the northeast portion of the campus and the buildings in the northwest corner of the campus. These areas would be redeveloped for parking, athletic courts and fields. The new parking area would be constructed internal to the campus along the Compton Avenue. The new tennis courts would be construction on the northwest corner of the campus the hardcourts and playing field and green house would be constructed in the eastern-northeastern area of the campus.

*Table 3-2* describes the off-road construction equipment assumed to be used during construction activities. This list is based on assumptions provided by LAUSD, defaults generated using the CalEEMod model, and experience with other similar projects, as appropriate.

### 3. Project Description

**TABLE 3-2  
 CONSTRUCTION EQUIPMENT**

| <b>Description</b>  | <b>Off-Road Equipment Type</b> | <b>Number</b> |
|---|--------------------------------|---------------|
| Utilities By-Pass and Interim Housing                               | Cranes                         | 1             |
|   | Forklifts                      | 1             |
|   | Generator Sets                 | 1             |
|   | Tractors/Loaders/Backhoes      | 1             |
|   | Haul Trucks/Pickups            | 1             |
| Demolition of Existing Structures and Development of New Structures | Concrete/Industrial Saws       | 1             |
|   | Rubber Tired Dozers            | 2             |
|   | Tractors/Loaders/Backhoes      | 4             |
|   | Graders                        | 1             |
|   | Forklifts                      | 2             |
|   | Generator Sets                 | 2             |
|   | Cement and Mortar Mixers       | 2             |
|   | Pavers                         | 1             |
|   | Rollers                        | 1             |
|   | Water Trucks                   | -             |
| Haul Trucks/Pickups   | -                              |               |
| Renovations/Remodeling, Removal of Temporary Buildings              | Concrete/Industrial Saws       | 1             |
|   | Rubber Tired Dozers            | 2             |
|   | Tractors/Loaders/Backhoes      | 3             |
|   | Graders                        | 1             |
|   | Forklifts                      | 1             |
|   | Generator Sets                 | 1             |
|   | Cement and Mortar Mixers       | 1             |
|   | Pavers                         | 1             |
|   | Rollers                        | 1             |
|   | Water Trucks                   | -             |
| Haul Trucks/Pickups   | -                              |               |



## 4. Environmental Checklist and Analysis

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### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

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### DETERMINATION

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**On the basis of this initial evaluation:**

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- 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.
- 
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## **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 offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation 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.
- 11) See Appendix D of the SUP Program EIR for Special CEQA Requirements Under State School Facility Program. This additional analysis is found under ENVIRONMENTAL IMPACTS, Sections III. AIR



**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1?** No Native American tribes have requested notification or consultation through the Public Resources Code Section 21080.3.1 process. LAUSD has received project-specific comment letters (which do not constitute Public Resources Code Section 21080.3.1 requests for consultation) from tribal representatives and have responded to these letters through the applicable CEQA process and/or coordinated with the tribal representatives, as appropriate.

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.<sup>46</sup>*

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<sup>46</sup> Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form. 2016, September 29. The AB 52 regulations adopted by the California Natural Resources Agency were approved by the Office of Administrative Law, and will appear in the California Code of Regulations. Copies of the rulemaking materials can be found at: <http://resources.ca.gov/ceqa>.

## 4.1 AESTHETICS

|   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>I. AESTHETICS.</b> Would the project:  |                                |  |                                     |                                     |
| a. Have a substantial adverse effect on a scenic vista?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

## Discussion

The Program EIR includes Standard Conditions of Approval (SCs) for minimizing impacts to the 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 below in *Table 4.1-1*.

TABLE 4.1-1  
 AESTHETIC RESOURCES STANDARD CONDITIONS OF APPROVAL

| Applicable SCs | Description   |
|----------------|---|
| SC-AE-1        | <b>School Design Guide.</b><br>This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade Project. Architectural quality must consider compatibility with the surrounding community.   |
| SC-AE-2        | <b>School Design Guide</b><br>This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.  |
| SC-AE-3        | LAUSD shall assess a proposed Project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings. |
| SC-AE-7        | LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.   |



| Applicable SCs | Description   |
|----------------|---|
| SC-AE-8        | <p>Design site lighting and select lighting styles and technologies to have minimal impact offsite and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.</p> <p>International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZO-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</p> <ul style="list-style-type: none"> <li>• Limit the amount of light that can be used</li> <li>• Minimize glare by controlling the amount of light that tends to create glare</li> <li>• Minimize sky glow by controlling the amount of uplight</li> <li>• Minimize the amount of offsite impacts or light trespass</li> </ul>  |
| SC-CUL-1       | <p><b>Design Team to Include Qualified Historic Architect</b></p> <p>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).</p> <p>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.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.</p>  |
| SC-CUL-2       | <p><b>Role of Historic Architect on Design Team</b></p> <p>The tasks of the Historic Architect on the Design team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal Project components and</li> </ol> |



| Applicable SCs | Description  |
|----------------|--|
|                | <p>treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the Project.</p> <p>6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.</p> <p>7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or onsite storage. This shall include detailed instructions on maintaining and protecting in place relevant features.</p> <p>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.</p> |

## Impact Analysis

Would the Project:

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

**No Impact.** Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest. The Project Site is located south of downtown Los Angeles, and there is no single predominant pattern in the area extending south and west from downtown Los Angeles. The area's land uses are diverse, including industrial uses among large tracts of medium-density housing. Downtown Los Angeles is highly urbanized, featuring a blend of commercial, light and heavy industry, and skyscraper/office land uses. The urban nature of downtown Los Angeles represents a regional aesthetic resource, with a distinctive skyline that is widely visible throughout the region, and from the Project Site.<sup>47</sup> Construction of the new buildings (particularly the New Athletics Building) would enhance views of the downtown Los Angeles skyline. The campus upgrade is specifically designed to incorporate and to provide multiple views of the downtown Los Angeles skyline from the campus where it is currently not visible. The Project would occupy a similar visual field as the current conditions and would not significantly impact existing street views or other scenic vistas in the surrounding area. Therefore, the Project would have no impact on scenic vistas. No mitigation or further study is required.

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

**No Impact.** The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways. The Program EIR lists highways and corridors considered eligible

<sup>47</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



for Scenic Highway Designation in Table 5.1-1.<sup>48</sup> The Project Site is not located within or immediately near a Scenic Highway, Byway, Route, or Corridor designated by the California Department of Transportation (Caltrans) or the Los Angeles County General Plan.<sup>49</sup> The nearest designated State scenic highway to the site is State Route 2 (SR-2; Angeles Crest Highway) more than 10 miles to the north.<sup>50</sup> 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. No mitigation or further study is required.

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

**Less Than Significant Impact.** The entire campus meets the definition of a historical resource under CEQA. In a 2015 Character-Defining Features Memorandum (CDFM) for Jefferson HS, landscapes and buildings on the campus were evaluated and classified contributing and non-contributing buildings, structures, and features.<sup>51</sup> The CDFM and the Historic Resources Technical Report (HRTR) are found in Appendix C of this IS/MND. The primary period of significance for Jefferson High School was identified as the period between 1935 and 1937 when the campus was rebuilt in the Streamline Moderne style following the Long Beach earthquake of 1933. The CDFM identified the U-shaped site plan of Buildings 1, 2, 3, and 4 (historic core); the landscape, hardscape, and open space fronting East 41<sup>st</sup> Street and Compton Avenue and surrounding the historic core. Jefferson HS is designed in the Streamline Moderne style, and character-defining features of the campus generally include the site plan of the 1930s-era buildings, landscape, and hardscape as well as the curving forms, long horizontal lines, and smooth exterior walls of the buildings themselves. Additional interior character-defining features of the Administration and Auditorium Buildings (Buildings 1 and 2) include circulation plans, various Streamline Moderne-style decorative elements, oil paintings by Ross Dickinson, terrazzo floors, and light fixtures.

The proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. For example, the Project design team included a qualified historic architect who provided input on the design throughout the planning phase. The Project objectives and designs have been extensively reviewed over several years by the design team to provide a design that was sensitive to the historic nature of the campus and that met the current and future academic, programmatic, and operational needs of the students and campus. The new buildings have been designed to be fully integrated with Jefferson HS in terms of scale, materials, and landscaping.

The Project would also implement SCs that are designed to retain the visual character and quality of the site. Implementation of SC-AE-1 requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for school upgrades. SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1, reuse rather than destruction

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<sup>48</sup> Ibid.

<sup>49</sup> CalTrans, Scenic Highways, Los Angeles County. Available at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/), accessed August 15 2017.

<sup>50</sup> California Department of Transportation (Caltrans). 2011, September 7. California Scenic Highway Mapping System. Available at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed August 15 2017.

<sup>51</sup> LAUSD (PCR Services), Character-Defining Features Memorandum (CDFM) for Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California 90011, Prepared for Los Angeles Unified School District (LAUSD), July 28, 2015.

of historic resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible. SC-AE-3 would also help minimize the likelihood of degraded visual character or quality during Project implementation. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to the campus layout, height of buildings, and/or architectural style of buildings. LAUSD SC-CUL-1 and SC-CUL-2 would ensure the proposed modernization of contributors and the design of new buildings would conform to the Secretary of the Interior's Standards for Rehabilitation, specifically Standards 9 and 10 for new construction (as discussed in the Historic Resources Technical Report for the Project Appendix C1), and LAUSD requirements and guidelines for the treatment of historical resources under the guidance of a qualified historic architect.

The Project would occupy a similar visual field as the current conditions and would not significantly impact existing street views or other scenic vistas in the surrounding area. The Project would incorporate recommendations from the LAUSD School Design Guide to protect unique or historic features. Implementation of SC-CUL-1, SC-CUL-2, SC-AE-1, and SC-AE-2 would ensure that impacts to visual character or quality would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** The proposed Project would result in less-than-significant impacts related to light and glare for the following reasons.

### Light Impacts

The campus contains two primary sources of light: 1) light emanating from building interiors that passes through windows and 2) light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Depending upon the location of the light source and its proximity to adjacent light-sensitive use (e.g., residences), light introduction can be a nuisance, affecting adjacent areas and further diminishing the view of the clear night sky in an urban setting like the Project Site. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties.

The Project Site is located within a commercial and residential area. Existing lighting conditions in the Project area include light emanating from building interiors, security lights and the surrounding commercial and residential land uses, as well as nearby street lighting. There are residential uses located north, east, south and west of the Project Site.

The perimeter of the proposed new Classroom Building and Gymnasium would have new light fixtures attached to exterior walls. All entries would be illuminated to provide safe access. The new parking lot along the eastern boundary of the Project Site would also have security lighting on poles, that would be focused and shielded downward to reduce glare and light spillover. With use of shields and the orientation of the lights,



site lighting would be designed to have minimal off-site impact and contribution to sky glow. Interior lighting would be designed to minimize light trespass to the outside from the interior. PDFs and SCs (which require that light intrusion is minimized) would be incorporated to ensure that these new sources would not create light spill-over greater than 2-foot candles onto adjacent residences. The Project's proposed parking and security, landscaping, and softball field lighting is expected to contribute to ambient nighttime illumination in the Project vicinity. However, lighting would be consistent with the existing lighting surrounding the campus and LAUSD SCs would also be included to reduce the potential for light spillover to adjacent properties. Implementation of LAUSD SC-AE-7 and SC-AE-8 would ensure that site lighting would have minimal undesired offsite impacts. No mitigation or further study is required.

### **Glare Impacts**

Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The proposed facilities would be constructed with limited high-glare materials. Implementation of SC-AE-6 and SC-AE-7 would reduce glare impacts to pedestrians, residences, drivers and sports teams. Given the minimal use of high-glare materials, reflective glare impacts would be less than significant. No mitigation or further study is required.

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## 4.2 AGRICULTURE AND FORESTRY RESOURCES

|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <b>II. AGRICULTURE AND FORESTRY RESOURCES.</b>   |                                |  |                              |                                     |
| 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, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |



## Impact Analysis

Would the Project:

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

**No Impact.** The Project Site is currently developed and void of any agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles identified the Project Site as urban and built-up land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Project Site.<sup>52</sup> Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. No mitigation or further study is required.

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

**No Impact.** A Williamson Act contract is an agreement between private landowners and their city and/or county where the landowner voluntarily restricts their land to agriculture and compatible open-space uses. The Project Site is void of agricultural uses and does not include land enrolled in a Williamson Act contract.<sup>53</sup> Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation or further study is required.

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

**No Impact.** The proposed Project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The Project area is currently zoned as [Q]PF-1XL. The proposed Project does not involve any changes to current General Plan land use or zoning designations for forest land, or timberland. Additionally, there are no timberland-zoned production areas within the Project Site or surrounding areas.<sup>54</sup> Therefore, no impact to forest land or timberland would occur. No mitigation or further study is required.

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<sup>52</sup> California Department of Conservation (CDC), 2017. California Important Farmland Finder. Available at: <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed August 15, 2017.

<sup>53</sup> CDC, 2016. Los Angeles County Williamson Act FY 2016/2016 Map. 2016.

<sup>54</sup> Los Angeles County Department of Regional Planning, 2017. Planning and Zoning Information, GIS-Net 3. SEA Layer. Available at: [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed April, 2018.

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

**No Impact.** The Project Site and surrounding areas contain no forest land. Thus, implementation of the proposed Project would result in no impacts related to the loss or conversion of forest land to non-forest use. No mitigation or further study is required.

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

**No Impact.** As discussed in II. a.-d., the Project Site does not contain agricultural or forest uses. The Project Site is developed with school facilities. No changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur. No mitigation or further study is required.

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### 4.3 AIR QUALITY

|   | Potentially<br>Significant Impact | Less Than<br>Significant with<br>Mitigation<br>Incorporated | Less Than<br>Significant Impact     | No Impact                |
|---|-----------------------------------|---|-------------------------------------|--------------------------|
| <b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:  |                                   |   |                                     |                          |
| a. Conflict with or obstruct implementation of the applicable air quality plan?   | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?  | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?   | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### Discussion

The Program EIR includes SCs for reducing impacts to air quality in areas where future projects would be implemented under the SUP. Applicable SCs related to Project air quality impacts are provided in *Table 4.3-1*, below. The analysis below is based on the Air Quality Technical Report<sup>55</sup> prepared for the proposed Project (Appendix A).

**TABLE 4.3-1  
 AIR QUALITY STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description  |
|----------------|--|
| SC-AQ-2        | LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.   |
| SC-AQ-3        | LAUSD's construction contractor shall: <ul style="list-style-type: none"> <li>• Maintain slow speeds with all vehicles.</li> <li>• Load impacted soil directly into transportation trucks to minimize soil handling.</li> <li>• Water/mist soil as it is being excavated and loaded onto the transportation trucks.</li> </ul> |

<sup>55</sup> ESA, 2018. Los Angeles Unified School District, Thomas Jefferson High School Comprehensive Modernization Project. Prepared for Los Angeles Unified School District. April, 2018.

| Applicable SCs | Description  |
|----------------|--|
|                | <ul style="list-style-type: none"> <li>• Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.</li> <li>• Minimize soil drop height into transportation trucks or stockpiles during dumping.</li> <li>• During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.</li> <li>• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.</li> <li>• Place stockpiled soil on polyethylene sheeting and cover with similar material.</li> <li>• Place stockpiled soil in areas shielded from prevailing winds.</li> </ul>   |
| SC-AQ-4        | <p>LAUSD shall prepare an air quality assessment:</p> <p>If site-specific review of a school construction Project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District (SCAQMD) regional and localized significance thresholds.</p> <p>LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> <li>• Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).</li> <li>• Consolidate truck deliveries and/or limit the number of haul trips per day.</li> <li>• Route construction trucks off congested streets.</li> <li>• Employ high pressure fuel injection systems or engine timing retardation.</li> <li>• Utilize ultra-low sulfur diesel fuel, containing 15 parts per million (ppm) sulfur or less (ULSD) in all diesel construction equipment.</li> <li>• 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.</li> <li>• Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.</li> <li>• Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.</li> <li>• Utilize electric or alternatively fueled equipment, if feasible.</li> <li>• Utilize construction equipment with the minimum practical engine size.</li> <li>• Utilize low-emission on-road construction fleet vehicles.</li> <li>• Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.</li> </ul> <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> <li>• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more).</li> <li>• Replace ground cover in disturbed areas as quickly as possible.</li> <li>• 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).</li> <li>• 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.</li> <li>• 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.</li> <li>• Pave all construction access roads for at least 100 feet from the main road to the Project Site.</li> <li>• Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.</li> </ul> |



| Applicable SCs | Description   |
|----------------|---|
|                | <ul style="list-style-type: none"> <li>• 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.</li> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).</li> <li>• Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.</li> <li>• Limit traffic speeds on unpaved road to 15 mph or less.</li> <li>• Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.</li> <li>• Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> <li>• Limit the amount of daily soil and/or demolition debris loaded and hauled per day.</li> </ul> <p><u>General Construction</u></p> <ul style="list-style-type: none"> <li>• Utilize ultra-low volatile organic compounds (VOCs) or zero-VOC surface coatings.</li> <li>• Phase construction activities to minimize maximum daily emissions.</li> <li>• Configure construction parking to minimize traffic interference.</li> <li>• Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).</li> <li>• Develop a trip reduction plan for construction employees.</li> <li>• Implement a shuttle service to and from retail services and food establishments during lunch hours.</li> <li>• Increase distance between emission sources to reduce near-field emission impacts.</li> <li>• Require construction contractors to document compliance with the identified mitigation measures.</li> </ul> |

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** The Project Site is located within the Air Basin. The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, PM10, and PM2.5). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards.<sup>56</sup> These strategies are developed, in part, based on regional population, housing and employment projections prepared by the SCAG, the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. The Project is not designed for growth and as such is not a large, regionally significant project that would affect the regional growth projections made by the SCAG and used by the

<sup>56</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), Final 2016 AQMP, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed April 2018.

SCAQMD in formulating its AQMP. The student and faculty population at the school would not increase as a result of the Project.

Key elements of the AQMP include implementing fair-share emissions reductions strategies at the federal, State, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas, energy, transportation and other planning efforts.<sup>57</sup> The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal non-attainment pollutants O<sub>3</sub> and PM<sub>2.5</sub>.<sup>58</sup> Provisions of the 2016 AQMP would not affect the proposed Project's consistency with the AQMP.

## Construction

Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based. The proposed Project would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the 2016 AQMP as MOB-08 and MOB-10, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The Project would not conflict with implementation of these strategies. Additionally, the Project would comply with the California Air Resources Board (CARB) requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 and implement SC-AQ-2 through SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. These methods would include: maintain slow speeds for vehicles, applying water/mist to dirt as it is loaded and unloaded, minimize soil drop heights, covering haul truck loads, and using polyethylene sheeting during to cover excavated areas and dirt stockpiles. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features including but not limited to: restricting diesel engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel fuel, utilizing off-road construction equipment that is compliant with Tier 4 engine standards, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the Project would not conflict with the control strategies intended to reduce emissions from construction

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<sup>57</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), Final 2016 AQMP, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed April 2018.

<sup>58</sup> South Coast Air Quality Management District, *NAAQS/CAAQS and Attainment Status for South Coast Air Basin*, (2016), <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2>. Accessed April 2018.



equipment, the Project would not conflict with or obstruct implementation of the AQMP. Additionally, the projected emissions from the project would not exceed the SCAQMD's regional significance thresholds, as discussed below. Thus, the Project would not be considered by SCAQMD to be a substantial source of air pollutant emissions, and would not conflict or obstruct implementation of the AQMP. Therefore, impacts would be less than significant. No mitigation or further study required.

## Operations

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP.

The proposed Project is a comprehensive modernization of the existing Jefferson HS. The student and faculty population at the school would not increase as a result of the Project. The land use would stay the same and thus be consistent with the AQMP. Additionally, the proposed Project would not significantly increase vehicle trips to the Project Site. As a result, the proposed Project would not result in long-term operational population or employment growth that exceeds planned growth projections in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)<sup>59</sup> or the AQMP<sup>60</sup> or result in employment growth that would substantially add to traffic congestion. As the proposed Project would not conflict with the growth projections in the AQMP, impacts would be less than significant. No mitigation or further study required.

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

As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project's location. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

## Construction

**Less Than Significant Impact.** For the purpose of this analysis, it was estimated that construction of the proposed Project would start in 2019 and finish in 2025. Preliminary design and scheduling information from LAUSD was used in conjunction with CalEEMod to estimate the number of days needed to execute Comprehensive Modernization Phases 1-5, as described in the Project description section of this IS/MND.

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<sup>59</sup> Southern California Association of Governments, Final 2016-2040 RTP/SCS, <http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed April 2018.

<sup>60</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), Final 2016 AQMP, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed April 2018.

Construction of the proposed Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from worker trips and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO<sub>x</sub>, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on-and off-road vehicles. The input values used in the CalEEMod modeling analysis were adjusted based on construction equipment and schedule information from similar land use development projects in the LAUSD. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix A.

The worst-case daily emissions were calculated as maximum daily construction emissions for each phase by year. The maximum daily emissions are predicted values for the worst-case day and do not represent the emissions that would occur for every day of construction. Detailed emissions calculations are provided in Appendix A. Results of the criteria pollutant calculations are presented in *Table 4.3-2, Maximum Daily Unmitigated Regional Construction Emissions*. As shown therein, construction-related daily emissions for the criteria and precursor pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) would be below the SCAQMD numeric indicators. These calculations include appropriate dust control measures required to be implemented during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust) and SC-AQ-2 through SC-AQ-4. As discussed previously, SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features including utilizing off-road construction equipment that is compliant with Tier 4 engine standards and applying soil stabilizers. Therefore, with respect to regional emissions from construction activities, impacts would be less than significant. No mitigation or further study is required.



**TABLE 4.3-2  
 MAXIMUM DAILY UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)**

| <b>Phase</b>   | <b>Source</b>         | <b>VOC</b> | <b>NO<sub>x</sub></b> | <b>CO</b>  | <b>SO<sub>2</sub></b> | <b>PM10<sup>b</sup></b> | <b>PM2.5<sup>b</sup></b> |
|--|-----------------------|------------|-----------------------|------------|-----------------------|-------------------------|--------------------------|
| Phase 1  | Soil Removal          | 2          | 47                    | 24         | <1                    | 5                       | 2                        |
|  | Demolition            | 1          | 2                     | 23         | <1                    | 2                       | 1                        |
|  | Grading               | 1          | 1                     | 14         | <1                    | 4                       | 1                        |
|  | Building Construction | 1          | 5                     | 16         | <1                    | 2                       | 1                        |
| Phase 2  | Demolition            | 1          | 2                     | 22         | <1                    | 2                       | 1                        |
|  | Grading               | 1          | 1                     | 14         | <1                    | 3                       | 1                        |
|  | Building Construction | 1          | 5                     | 15         | <1                    | 2                       | 1                        |
| Phase 3  | Demolition            | 1          | 5                     | 22         | <1                    | 2                       | 1                        |
|  | Grading               | 1          | 1                     | 12         | <1                    | 3                       | 1                        |
|  | Building Construction | 1          | 4                     | 14         | <1                    | 2                       | 1                        |
|  | Paving                | 1          | 1                     | 9          | <1                    | 2                       | <1                       |
|  | Architectural Coating | 33         | 1                     | 7          | <1                    | 2                       | <1                       |
| Phase 4  | Demolition            | 1          | 2                     | 20         | <1                    | 2                       | 1                        |
|  | Grading               | 1          | 1                     | 12         | <1                    | 3                       | 1                        |
|  | Building Construction | 1          | 3                     | 13         | <1                    | 2                       | 1                        |
|  | Paving                | 1          | 1                     | 9          | <1                    | 2                       | <1                       |
|  | Architectural Coating | 33         | <1                    | 6          | <1                    | 2                       | <1                       |
| Phase 5  | Demolition            | 1          | 3                     | 20         | <1                    | 2                       | 1                        |
|  | Grading               | 1          | 1                     | 13         | <1                    | 4                       | 1                        |
|  | Building Construction | 1          | 2                     | 6          | <1                    | 2                       | 1                        |
|  | Paving                | 1          | 1                     | 8          | <1                    | 2                       | <1                       |
| <b>Overlapping Phases</b>  |                       |            |                       |            |                       |                         |                          |
| Phase 2 Building Construction+Phase 3 Demolition+Phase 3 Grading               |                       | 3          | 11                    | 50         | <1                    | 8                       | 3                        |
| Phase 2 Building Construction+Phase 3 Demolition+Phase 3 Building Construction |                       | 3          | 13                    | 52         | <1                    | 6                       | 2                        |
| Phase 2 Building Construction+Phase 3 Building Construction                    |                       | 2          | 9                     | 30         | <1                    | 4                       | 1                        |
| Phase 3 Paving+Phase 3 Architectural Coating+Phase 4 Demolition                |                       | 2          | 3                     | 30         | <1                    | 4                       | 1                        |
| <b>Maximum Daily Emissions</b>   |                       | <b>33</b>  | <b>47</b>             | <b>52</b>  | <b>&lt;1</b>          | <b>8</b>                | <b>3</b>                 |
| <b>SCAQMD Significance Thresholds</b>  |                       | <b>75</b>  | <b>100</b>            | <b>550</b> | <b>150</b>            | <b>150</b>              | <b>55</b>                |
| <b>Exceeds Threshold?</b>  |                       | <b>No</b>  | <b>No</b>             | <b>No</b>  | <b>No</b>             | <b>No</b>               | <b>No</b>                |
| NOTE: Detailed emissions calculations are provided in Appendix A.              |                       |            |                       |            |                       |                         |                          |



With respect to all SUP projects, including the proposed Project, the Program EIR states that construction activities may generate short-term emissions that exceed significance thresholds. Though construction emissions for this Project are not expected to exceed regional thresholds, the District would implement SCs AQ-2, SC-AQ-3, and AQ-4 to ensure that construction emissions would have minimal impacts. Also, criteria pollutant emissions would occur outside of SCAQMD's jurisdiction during transportation of contaminated soil to Buttonwillow, California. The Project would be substantially below the San Joaquin Valley Air Pollution District's Thresholds of Significance for all criteria pollutants. No mitigation or further study is required.

## Operations

**Less Than Significant Impact.** With respect to SUP modernization projects, the Program EIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools and net project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years and operational emissions are not expected to increase in the long-term.<sup>61</sup>

The proposed Project would replace or upgrade facilities on the campus of Thomas Jefferson High School, but it would not increase the number of students or faculty at the high school, and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other onsite sources. Therefore, there would be no net increase in regional emissions of any criteria pollutant, and the impact would be less than significant. Additionally, the District is required to comply with all applicable SCs, and would implement SC-AQ-5 to further reduce Project-related operational impacts. No mitigation or further study is required.

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

Short-term pollutants would be generated by construction of the proposed Project. The Project Site currently operates as a high school and would continue do so after construction. The proposed Project would not introduce any new long-term pollutants when operational. Therefore, only short-term construction emissions were evaluated for cumulative impacts.

## Construction

**Less Than Significant Impact.** The proposed Project would result in the emission of criteria pollutants for which the area is in non-attainment during construction. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As stated in the Program EIR, SUP-related

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<sup>61</sup> Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



construction activities may generate short-term emissions that exceed significance thresholds and cumulatively contribute to the Air Basin's non-attainment designations.

Emissions from proposed Project construction are not predicted to exceed the SCAQMD regional or localized impact thresholds and therefore, are not expected to cause or substantially contribute to ground level concentrations that exceed the NAAQS or CAAQS. Furthermore, the District would implement SC-AQ-2, SC-AQ-3, and SC-AQ-4 to ensure that construction emissions would have minimal offsite impacts.<sup>62, 63</sup> Therefore, the Project would not result in a cumulatively considerable net increase for non-attainment pollutants or O<sub>3</sub> precursors and would result in a less than significant impact for construction emissions. No mitigation or further study is required.

## Operations

The Program EIR states that operational activities would be less than significant for all SUP modernization projects, including the proposed Project, and are not expected to cumulatively contribute to non-attainment designations in the Air Basin.<sup>64</sup> As discussed above, there would be no net increase in regional operational emissions of any criteria pollutant. Additionally, the District would implement SC-AQ-5 to further reduce Project-related operational impacts. Therefore, the emissions of non-attainment pollutants and precursors generated by Project implementation would be less than significant. No mitigation or further study is required.

### d) Expose sensitive receptors to substantial pollutant concentrations?

The proposed Project could expose sensitive receptors (i.e., sensitive populations or land uses) to elevated pollutant concentrations during construction. Sensitive receptors include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, or already weakened by other disease or illness, and persons engaged in strenuous work or exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: 1) long-term health care facilities, 2) rehabilitation centers, 3) convalescent centers, 4) retirement homes, 5) residences, 6) schools, 7) parks and playgrounds, 8) child care centers, and 9) athletic fields. The nearest sensitive receptors to the Project Site are existing students at Jefferson HS and residences surrounding the campus.

## Construction-Criteria Pollutants

**Less Than Significant Impact.** The localized effects from the onsite portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance threshold (LST) methodology. Demolition, grading, and construction activities requiring heavy equipment and earthwork for each individual phase, would be performed on a portion of the 18.9-acre site. The construction phases have been designated so active construction areas are less than five acres. As such, the LST mass rate look-up methodology can be used to determine whether onsite emissions of NO<sub>x</sub>,

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<sup>62</sup> Los Angeles Unified School District, 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. Pgs 5.3-28 to 5.3-30.

<sup>63</sup> Los Angeles Unified School District, 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. Pgs. 5.3-27 to 5.3-28.

<sup>64</sup> Los Angeles Unified School District, 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. Pgs. 5.3-29

CO, PM10, and PM2.5 would cause violations of ambient air quality standards. As a conservative estimate, it was assumed that construction activities would be occurring on an area of one acre on a daily basis with sensitive receptors within 25 meters. As such, the LST mass rate look up methodology can be used to determine whether the emissions would cause violations of ambient air quality standards for the nearby SCAQMD Central Los Angeles monitoring station.

The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in *Table 4.3-3, Maximum Unmitigated Localized Construction Emissions*. As shown therein, maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for NO<sub>x</sub>, CO, PM10, and PM2.5. Therefore, with respect to localized construction emissions, impacts would be less than significant. No mitigation or further study is required.

**TABLE 4.3-3  
 MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY) <sup>A</sup>**

| <b>Source</b>  | <b>NO<sub>x</sub></b> | <b>CO</b> | <b>PM10<sup>b</sup></b> | <b>PM2.5<sup>b</sup></b> |    |
|--|-----------------------|-----------|-------------------------|--------------------------|----|
| Phase 1  | Soil Removal          | 1         | 10                      | <1                       | <1 |
|  | Demolition            | 1         | 15                      | <1                       | <1 |
|  | Grading               | 1         | 7                       | 2                        | 1  |
|  | Building Construction | 1         | 8                       | <1                       | <1 |
| Phase 2  | Demolition            | 1         | 15                      | <1                       | <1 |
|  | Grading               | 1         | 7                       | 2                        | 1  |
|  | Building Construction | 1         | 8                       | <1                       | <1 |
| Phase 3  | Demolition            | 1         | 15                      | <1                       | <1 |
|  | Grading               | 1         | 7                       | 2                        | 1  |
|  | Building Construction | 1         | 8                       | <1                       | <1 |
|  | Paving                | <1        | 4                       | <1                       | <1 |
|  | Architectural Coating | <1        | 2                       | <1                       | <1 |
| Phase 4  | Demolition            | 1         | 15                      | <1                       | <1 |
|  | Grading               | 1         | 7                       | 2                        | 1  |
|  | Building Construction | 1         | 8                       | <1                       | <1 |
|  | Paving                | <1        | 4                       | <1                       | <1 |
|  | Architectural Coating | <1        | 2                       | <1                       | <1 |
| Phase 5  | Demolition            | 1         | 15                      | <1                       | <1 |
|  | Grading               | 1         | 9                       | 2                        | 1  |
|  | Building Construction | <1        | 2                       | <1                       | <1 |
|  | Paving                | <1        | 4                       | <1                       | <1 |
| <b>Overlapping Phases</b>  |                       |           |                         |                          |    |
| Phase 2 Building Construction+Phase 3 Demolition+Phase 3 Grading               | 3                     | 30        | 2                       | 1                        |    |
| Phase 2 Building Construction+Phase 3 Demolition+Phase 3 Building Construction | 4                     | 32        | <1                      | <1                       |    |
| Phase 2 Building Construction+Phase 3 Building Construction                    | 3                     | 16        | <1                      | <1                       |    |
| Phase 3 Paving+Phase 3 Architectural Coating+Phase                             | 2                     | 20        | <1                      | <1                       |    |



| Source  | NO <sub>x</sub> | CO        | PM10 <sup>b</sup> | PM2.5 <sup>b</sup> |
|---|-----------------|-----------|-------------------|--------------------|
| <b>Maximum Daily Emissions</b>  | <b>4</b>        | <b>32</b> | <b>2</b>          | <b>1</b>           |
| Localized Significance Thresholds <sup>c</sup>  | 74              | 680       | 5                 | 3                  |
| Exceeds Threshold?  | No              | No        | No                | No                 |
| <sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.<br><sup>b</sup> Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.<br><sup>c</sup> The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles) for a 1-acre site within a 25-meter receptor distance. |                 |           |                   |                    |

With respect to all SUP projects, the Program EIR states that construction activities may generate short-term emissions that exceed LSTs. Though construction emissions for this Project are not expected to exceed thresholds, the District would implement SC-AQ-2 to ensure that sensitive receptors would have minimal exposure to construction emissions. Additionally, emissions from Project-related construction activities would fall below both localized and regional SCAQMD significance thresholds and would not violate an air quality standard or contribute to an existing or projected air quality violation. Therefore, localized air quality impacts from Project-related construction would be less than significant. No mitigation or further study is required.

### Construction -Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs), or in federal parlance, hazardous air pollutants (HAPs), are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

**Less Than Significant Impact.** Project-related construction has the potential to expose sensitive receptors to substantial pollutant concentrations of TACs. TACs are pollutants for which neither California nor the federal government have set ambient air quality thresholds but which still pose health risks to sensitive individuals. The primary TAC of concern from construction is diesel particulate matter (DPM) as well as potential intake of arsenic and lead from removal of contaminated soil from the Project Site. Inhalation of DPM has been linked to increased cancer risk and chronic health hazards. Three classes of sensitive receptors were evaluated for this Project: offsite residents, onsite staff, and onsite students.

### *Contaminated Soil Removal*

The proposed Project would require approximately one week to remove about 230 cubic yards of contaminated soil. During soil removal activities, dust emissions containing lead and arsenic could be inhaled, ingested, and/or absorbed. Dispersion modeling used area sources located in areas where soil excavation, handling and storage would take place. Receptors were placed at residential receptors in the immediate vicinity of the Project Site in addition to an onsite receptor to represent student and teacher exposures. This source receptor configuration was used to be representative of the worst-case scenario in terms of pollutant exposure.

Cancer and chronic health impacts are based on exposure to pollutants on an annual basis, while acute health impacts are based on a maximum hourly exposure. DPM and lead do not have acute RELs, only arsenic has an acute REL, therefore acute impacts for arsenic would be evaluated.

In order to account for sensitivity of younger age groups, risks were calculated for children and adults. In accordance with OEHHA guidance, child risk assumes exposure starting at 3<sup>rd</sup> trimester of pregnancy, while adult risk assumes exposure starting at 16 years of age. The minimum exposure duration the HARP model allows is a half year. Since actual exposure duration is one week, the HARP results would overestimate actual exposure. Impacts for residents offsite and students onsite were evaluated. *Table 4.3-4, Lead and Arsenic Health Impact Summary*, shows the results of the HARP2 model for impacts of lead and arsenic emissions. Lead does not have chronic or acute impacts; therefore, chronic and acute impacts are only presented for arsenic.

**TABLE 4.3-4  
 LEAD AND ARSENIC HEALTH IMPACT SUMMARY**

| Receptor Type            | Cancer Risk per Million |                        |                        | Chronic Hazard Index   | Acute Hazard Index     |
|--------------------------|-------------------------|------------------------|------------------------|------------------------|------------------------|
|                          | Lead                    | Arsenic                | Total                  | Arsenic                | Arsenic                |
| Offsite Resident         | 2.2 x 10 <sup>-7</sup>  | 3.9 x 10 <sup>-6</sup> | 4.1 x 10 <sup>-6</sup> | 1.9 x 10 <sup>-6</sup> | 5.7 x 10 <sup>-8</sup> |
| Students                 | 5.0 x 10 <sup>-6</sup>  | 8.9 x 10 <sup>-5</sup> | 9.4 x 10 <sup>-5</sup> | 4.3 x 10 <sup>-5</sup> | 7.1 x 10 <sup>-7</sup> |
| Staff                    | 1.2 x 10 <sup>-6</sup>  | 2.0 x 10 <sup>-5</sup> | 2.1 x 10 <sup>-5</sup> | 1.4 x 10 <sup>-5</sup> | 7.1 x 10 <sup>-7</sup> |
| SCAQMD Threshold         | –                       | –                      | 10                     | 1.0                    | 1.0                    |
| Exceed SCAQMD Threshold? | –                       | –                      | No                     | No                     | No                     |

SOURCE: ESA 2018

### *Blood Lead*

Although health risk estimates calculated above analyze exposure to heavy metals, lead exposure was further analyzed to determine potential impacts on child and fetal (pregnant adult) development. Potential blood lead concentrations in children and pregnant adults were estimated using the DTSC LeadSpread 8 model. Maximum concentrations of airborne lead were calculated using AERMOD dispersion modeling. Results of this model show that the incremental increase in child and pregnant adult blood lead concentrations would be 0.75 µg/dL for children and 0.13 µg/dL for adults, below the threshold of 1.0 µg/dL, and therefore, less than significant.

### *Construction Diesel Emissions*

To evaluate health risks, off-road (onsite) construction equipment DPM emissions were estimated using the CalEEMod model. In accordance with SC-AQ-4, the Project would use construction equipment rated by the United States Environmental Protection Agency as having Tier 4 emission limits for engines between 50 and 750 horsepower. DPM emissions were analyzed for construction equipment having Tier 4 engines. On-road



(offsite) equipment emissions within a quarter-mile of the site were included in this assessment. The next step involved estimating Project-related DPM concentrations at sensitive receptor locations. The AERMOD dispersion modeling was used to estimate DPM concentrations using several inputs: DPM emission rates per unit of time, five years of hourly meteorological data, and sensitive receptor locations. The DPM concentrations produced by AERMOD were converted to cancer risks and chronic health hazards using guidance issued by the California Office of Environmental Health Hazards and Assessment.<sup>65</sup> The SCAQMD has established a maximum incremental cancer risk of 10 in a million (1.0E-05) for CEQA projects and the OEHHA also sets a typical risk management level as 10 in a million.

The Project’s health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance, which incorporates the algorithms, variables, and equations of the guidance, and incorporates the AERMOD dispersion model.

For carcinogenic exposures, the cancer risk from DPM emissions from construction of the Project is estimated to result in a maximum carcinogenic risk of approximately 5.4 per million.<sup>66</sup> The maximum impact would occur at the residential property south west of the Project Site. Cancer risk to students and staff onsite would be 0.39 per million and 0.07 per million, respectively. As discussed previously, the lifetime exposure under OEHHA guidelines takes into account early life (infant and children) exposure. The calculated cancer risk assumes sensitive receptors (residential and school uses) would not have any mitigation, such as mechanical filtration and exposure would occur with windows open.

Table 4.3-5, *Project Maximum Health Impact Summary*, summarizes the maximum impacted sensitive receptors. Values in the table incorporate the results of health impacts from DPM, as well as the impacts from lead and arsenic found in Table 4.3-4.

**TABLE 4.3-5  
 PROJECT MAXIMUM HEALTH IMPACT SUMMARY**

| Receptor Type                    | Maximum Incremental Cancer Risk per Million | Chronic Hazard Index | Acute Hazard Index   |
|----------------------------------|---|----------------------|----------------------|
| Offsite Resident                 | 5.4   | $5.5 \times 10^{-5}$ | $5.7 \times 10^{-8}$ |
| Students                         | 0.38  | $7.0 \times 10^{-5}$ | $7.1 \times 10^{-7}$ |
| Staff                            | 0.07  | $4.0 \times 10^{-5}$ | $7.1 \times 10^{-7}$ |
| SCAQMD Threshold                 | 10  | 1.0                  | 1.0                  |
| <b>Exceeds SCAQMD Threshold?</b> | <b>No</b>                                   | <b>No</b>            | <b>No</b>            |

Notes Offsite residents assumed to be exposed for the entire 5.5 years of Project construction. Onsite school staff assumed to be exposed to the entire 5.5 years of Project construction. Students assumed to be exposed for a maximum of 4 years.

SOURCE: ESA 2018

<sup>65</sup> Office of Environmental Health Hazard Assessment, 2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>

<sup>66</sup> The residential cancer risk is higher compared to staff and students due to conservative parameters used for early development stages of childhood (3<sup>rd</sup> trimester of pregnancy and 0-2 years old). These parameters include higher daily breathing rates, a fraction of time at home of 1.0 (meaning children would be at home 100 percent of the time, thus exposed to 100 percent of emissions), and an age sensitivity factor of 10. The residential scenario assumed a pregnant and nursing mother located approximately 50 feet from the Project Site for the duration of construction.

The process of assessing health risks and impacts includes a degree of uncertainty, which is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All health risk assessments (HRA) rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly. As shown in Table 4.3-5, cancer risk for nearby sensitive receptors would remain below significance thresholds. These short-term emissions would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Therefore, the proposed Project would result in a less than significant impact related to construction TAC emissions. No mitigation or further study is required.

### Operational-Criteria Pollutants

The proposed Project would replace or upgrade facilities on the campus of Jefferson HS, but it would not increase the number of students or faculty at the high school, and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other onsite sources. Therefore, there would be no net increase in local operational emissions of any criteria pollutant, and the impact to sensitive receptors would be less than significant. No mitigation or further study is required.

### Carbon Monoxide Hotspots

The Program EIR states the operation of SUP projects would not expose sensitive receptors to substantial pollutant concentrations because stationary sources at schools have nominal emissions related to the use of natural gas heaters and boilers, landscaping equipment, and consumer products (cleaning products).<sup>67</sup> Because minimal to no new vehicle trips would be generated by the proposed Project, SUP-related CO hotspot impacts would be less than significant according to the Program EIR.<sup>68</sup> In addition, the District would implement SC-AQ-5, and long-term Project impacts would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with substantial odors.

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<sup>67</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>68</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.





## Construction

**Less Than Significant Impact.** Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the proposed Project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Therefore, construction of the Project would result in less than significant impacts. No mitigation or further study is required.

## Operations

**Less Than Significant Impact.** According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, the Project would not create adverse odors affecting a substantial number of people and impacts would be less than significant. No mitigation or further study is required.

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## 4.4 BIOLOGICAL RESOURCES

|   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>IV. BIOLOGICAL RESOURCES.</b> Would the Project:   |                                |  |                                     |                                     |
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

## Discussion

The analysis below is based in part on the Arborist Protected Tree Report<sup>69</sup> prepared for the proposed Project (Appendix B).

The Program EIR includes SCs for minimizing Project impacts to biological resources. Applicable SCs related to potential biological resource impacts associated with the proposed Project are provided in *Table 4.4-1*.

<sup>69</sup> Cy Carlberg, 2017. City of Los Angeles Protected Tree Report, Thomas Jefferson High School. Prepared for LPA, Inc. February 27, 2017.



**TABLE 4.4-1  
 BIOLOGICAL RESOURCES STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description  |
|----------------|--|
| SC-BIO-1       | <p>LAUSD qualified biologist shall identify sensitive species and their habitat within or near proposed Project Site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the Project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• United States Fish and Wildlife Service (USFWS)</li> <li>• National Marine Fisheries Services (NMFS)</li> <li>• California Department of Fish and Wildlife (CDFW)</li> <li>• California Native Plant Society (CNPS)</li> <li>• County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.</li> <li>• CNDDDB</li> <li>• CNPS Rare Plant Inventory</li> <li>• Local Audubon Society</li> <li>• Los Angeles County Department of Regional Planning for information on Significant Ecological Areas</li> <li>• California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with Project sites.</li> </ul> <p>Biological Resources Report</p> <p>If the LAUSD qualified biologist determines that a school construction Project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific Project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.</p> <ul style="list-style-type: none"> <li>• Information on regional setting that is critical to the assessment of rare or unique resources</li> <li>• A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project Site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.</li> <li>• A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.</li> <li>• An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.</li> </ul> |

- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address Project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project Site.
- Discussions about direct and indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.
- Mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:
  - location of the mitigation site
  - plant species to be used, container sizes, and seeding rates
  - schematic depicting the mitigation area
  - planting schedule
  - irrigation method
  - measures to control exotic vegetation
  - specific success criteria
  - detailed monitoring program
  - contingency measures should the success criteria not be met
  - identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.

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

SC-BIO-2 LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.

SC-BIO-3 LAUSD shall comply with the following:

- Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates<sup>70</sup>) should occur outside of avian breeding season to avoid take of birds or their eggs.<sup>71</sup> 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

<sup>70</sup> Substrate is the surface on which a plant or animal lives.

<sup>71</sup> Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.



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within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the Project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and federal laws pertaining to the protection of native birds.

- If the qualified biologist determines that a narrower buffer between the Project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) shall be submitted to LAUSD Office of Environmental Health and Safety (OEHS) Project manager. Construction contractors can then reduce the demarcated buffer.
- No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted 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.

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SC-BIO-4

LAUSD shall comply with the following:

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

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|          |  |
|----------|--|
|          | one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings.  |
|          | LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.   |
| SC-BIO-5 | LAUSD shall comply with CDFW recommendations as listed below: <sup>72</sup> <ul style="list-style-type: none"><li>• Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage.</li><li>• All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to onsite and offsite wildlife populations.</li><li>• A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition.</li></ul> Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors. |

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## Description of Baseline Conditions

The Project Site is an active high school campus that has been previously disturbed, cleared of native vegetation, and currently contains school buildings, facilities, and scattered landscaped vegetation. An arborist survey was completed for the proposed Project.<sup>73</sup> The survey inventoried 139 trees and noted that up to two coast live oak trees (which are protected by the City of Los Angeles) and up to 77 non-protected trees of various species would be removed as a part of the proposed Project.<sup>74</sup> The District would incorporate the City's tree replacement policy, which requires any tree removal to be offset by the planting of landscaping trees at a minimum 4:1 ratio that are a 24" box or larger. The replacement trees (and plants as applicable) would be species that is included in the LAUSD Approved Plant List and appropriate sizes at maturity for the space planted. Three coast live oak trees that are located along the southernmost portion of the campus, as part of the historic lawn (specifically, at the intersections of Hooper Avenue and 41<sup>st</sup> Street and Compton Avenue and 41<sup>st</sup> Street), would not be removed.<sup>75</sup>

The trees (buildings and structures) on the campus have the potential to serve as nesting sites for birds and bats; however, the Project Site is located in a highly urbanized area of the City of Los Angeles (City). The campus has been fully developed and does not contain any habitat to support candidate, sensitive or special status species, riparian habitat or other natural habitats such as wetlands. Special-status plant and wildlife species are those that are candidates, proposed or listed as threatened or endangered by the US Fish & Wildlife Services (USFWS) or the California Department of Fish and Wildlife (CDFW), and plant species that are considered sensitive by the California Native Plant Society (CNPS). According to a CDFW California Natural Diversity Database (CNDDB) search of the Hollywood, California USGS 7.5-minute topographic quadrangle map, and surrounding 8 quads, there are 95 species in the vicinity of the Project Site that are considered special-

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<sup>72</sup> Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.

<sup>73</sup> Cy Carlberg, 2017. City of Los Angeles Protected Tree Report, Thomas Jefferson High School. Prepared for LPA, Inc. February 27, 2017.

<sup>74</sup> Ibid.

<sup>75</sup> Ibid.



status by local, State and federal agencies (Appendix B). However, the Project Site does not contain suitable habitat necessary to support special status wildlife species. To manage the preservation of these species, and the more than 180 species identified as threatened or endangered by the City of Los Angeles General Plan, Significant Ecological Areas (SEAs) have been identified throughout the City on the basis of existing known habitats of sensitive or endangered species. The Project Site is not located near or within an SEA and the nearest SEA is Puente Hills and is located approximately 11 miles east of the Project Site.<sup>76</sup>

## Impact Analysis

Would the Project:

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

**No Impact.** The Project Site is located on an active high school campus that contains no native vegetation capable of supporting any special-status plant or wildlife species. The Project Site is entirely developed and surrounded by residential development to the north, south, east and west, as well as industrial/commercial development to the north, east, and south. The Project Site and immediate area are not within a SEA.<sup>77</sup> The Project Site does not contain any species that are identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by the CDFW or USFWS (Appendix B).<sup>78</sup> The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Project Site is extremely low. Therefore, the Project would have no impact on special-status species. No mitigation or further study is required.

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

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

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<sup>76</sup> Los Angeles County Department of Regional Planning, 2017. Planning and Zoning Information, GIS-Net 3. SEA Layer. Available at: [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed August 16, 2017.

<sup>77</sup> Ibid.

<sup>78</sup> CDFW, California Natural Diversity Database. 2017.



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

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

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

**Less Than Significant Impact.** The Project Site does not contain any water courses or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. The nearest identified habitat linkage occurs in the Santa Monica Mountains, which are approximately 7.5 miles northwest, outside the potential impact area for the proposed Project. Therefore, the proposed Project would have no impact on the movement of any wildlife species or impede the use of migratory wildlife corridors.

Tree removal and building demolition may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season (February 1 through August 31). Construction related noise and vibration also have the potential to disrupt birds during the avian breeding season. Additionally, the Project Site contains buildings that may be used by bats as nursery sites during the bat maternity roosting season of March through August. Therefore, construction activities (including demolition) have the potential to impact nesting birds or maternity roosting bats. However, the proposed Project would implement SC-BIO-3 as necessary. Following the completion of a pre-construction clearance survey, implementation of SC-BIO-3 would reduce impacts to less than significant. These measures include commencing tree removal and demolition activities outside of avian nesting season and bat maternity roosting season. The proposed Project would result in less than significant impacts and no mitigation or further study is 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 Project Site is located within an entirely developed area surrounded by residential, commercial, and industrial development within the City and is not located within any SEA protecting biological resources. The Project Site does contain trees for landscape fronting East 41<sup>st</sup> Street and Compton Avenue that are considered significant character-defining features of the Project Site. Additionally, the Project Site contains trees that are considered protected under the City of Los Angeles Municipal Code



Sections 46.00 et seq, including two coast live oak trees which would be removed as a part of the proposed Project. The District would adhere to the City's tree replacement policy, which requires any tree removal to be offset by the planting of landscaping trees at a minimum 4:1 ratio that are a 24-inch box or larger. Compliance with the City's tree replacement policy be consistent with the City of Los Angeles Municipal Code. Impacts related to conflicts with local policies or ordinances protecting biological resources would be less than significant. No mitigation or further study is required.

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

**No Impact.** The Project Site is not located within a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or similar plan.<sup>79</sup> The closest area protected by a HCP or NCCP is the City of Rancho Palos Verdes, located approximately 4.8 miles west of the Project Site. The Project Site is not located within or proximate to any SEA, Land Trust, or Conservation Plan. Therefore, no impact resulting from a conflict with an adopted conservation plan would occur. No mitigation or further study is required.

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<sup>79</sup> CDFW, 2017. California Regional Conservation Plans. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 16, 2017.

## 4.5 CULTURAL RESOURCES

|   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <b>V. CULTURAL RESOURCES:</b> Would the Project:  |                                |  |                                     |                          |
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?    | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of dedicated cemeteries?                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### Discussion

This analysis incorporates information from the Character-Defining Features Memorandum (CDFM) for Thomas Jefferson High School; the LAUSD Historic Context Statement, 1870 to 1969; CEQA Historic Resources Technical Report (HRTR); and the Archaeological and Paleontological Resources Report prepared by ESA for the Thomas Jefferson High School Comprehensive Modernization Project, City of Los Angeles, California.<sup>80,81,82</sup> The CDFM, HRTR, and the Archaeological and Paleontological Resources Report are provided in Appendix C of this IS/MND.

The Program EIR included Standard Conditions of Approval (SCs) for minimizing impacts to cultural resources in areas where future projects would be implemented under the SUP. Applicable SCs related to cultural resource impacts associated with the proposed Project are provided in *Table 4.5-1*, below.

<sup>80</sup> LAUSD. July 28, 2015. Character-Defining Features Memorandum (CDFM) for Thomas Jefferson High School, 1319 East 41st Street, Los Angeles, California 90011. Los Angeles, CA.

<sup>81</sup> LAUSD, March 2014, Historic Context Statement, 1870 to 1969.

<sup>82</sup> Thomas Jefferson High School Comprehensive Modernization Project, City of Los Angeles, California: Archaeological and Paleontological Resources Report prepared by ESA April 2017 (Ortiz, Vanessa and Michael Vader, 2017).



**TABLE 4.5-1  
 CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description   |
|----------------|---|
| SC-CUL-1       | <p>Design Team to Include Qualified Historic Architect</p> <p>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).</p> <p>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.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the 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.</p>  |
| SC-CUL-2       | <p>Role of Historic Architect on Design Team</p> <p>The tasks of the Historic Architect on the Design team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> <li>1. The Historic Architect shall work with the Design 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 throughout the design process to develop Project options that facilitate compliance with the applicable historic preservation standards.</li> <li>2. For new construction, the Historic Architect shall work with the Design 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.</li> <li>3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.</li> <li>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.</li> <li>5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal Project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project.</li> <li>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.</li> <li>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.</li> <li>8. The Design and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</li> </ol> |
| SC-CUL-3       | <p>School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design team 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</p>  |

| Applicable SCs | Description  |
|----------------|--|
|                | <p>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.</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include:</p> <ul style="list-style-type: none"> <li>• Retain and preserve the historic character of buildings, structures, landscapes, and site features that are historically significant.</li> <li>• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance.</li> <li>• Avoid removing, obscuring, or destroying character-defining features and materials.</li> <li>• Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.</li> <li>• Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.</li> <li>• 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.</li> </ul>  |
| SC-CUL-4       | <p>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.</p> <p>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.</p> <p>The specifications for the HABS-like package follow:</p> <p>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 details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.</p> <p>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.</p> <p>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.</p> <p>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.</p> |



| Applicable SCs | Description  |
|----------------|--|
| 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       | If historical or unique archaeological resources are discovered during construction activities, 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-9       | LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique archaeological resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.  |
| SC-CUL-10      | If evidence of prehistoric or historic cultural resources is uncovered, 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-CUL11       | 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-CUL12       | If archeological resources qualifying as unique archaeological resources are discovered and LAUSD determines not to avoid them by abandoning the site or redesigning the Project, LAUSD will 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 the 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 will 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 will 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. |
| SC-CUL-13      | If evidence of Native American resources is uncovered during construction, then 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-CUL14       | 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  |

| Applicable SCs | Description  |
|----------------|--|
| SC-CUL-15      | <p>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.</p> <p>The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be 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 insure the protection of any other resources that may be in the area.</p> |

## Background and Setting

### *Thomas Jefferson High School Campus History*

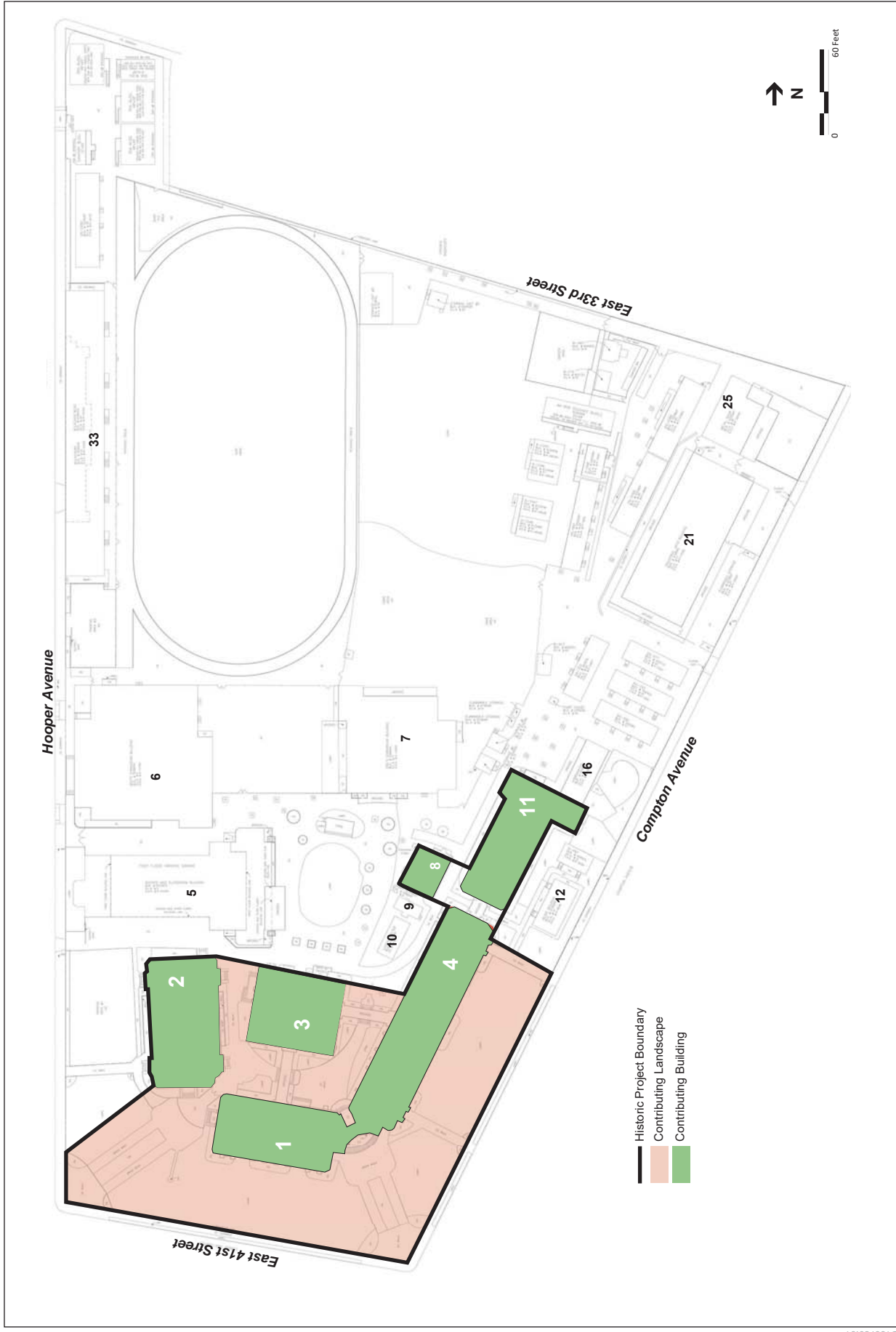
Thomas Jefferson High School was originally constructed in 1917; however, the campus was essentially rebuilt following the 1933 Long Beach Earthquake. The new campus, built between 1935 and 1937, was designed in the Streamline Moderne style by architect Stiles O. Clements. Only the Power House (Building 8), constructed in 1917, remains from the school’s original construction (*Figure 11, Contributing Buildings and Landscapes*). During the Phase I Getty Survey conducted on March 15, 2002, Jefferson High School was recommended eligible for the National Register and California Register through survey evaluation and assigned California Historic Register (CHR) Status Codes of 3S (appears eligible for the National Register as an individual property through survey evaluation) and 3CS (appears eligible for the California Register as an individual property through survey evaluation).<sup>83</sup> Jefferson High School was evaluated again in 2004, as a result of Section 106 review, and formally determined eligible as an individual property for the National Register through consensus with the SHPO, automatically listed in the California Register, and assigned a CHR Status Code of 2S2 (Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR). Lastly, Jefferson High School was re-evaluated by SurveyLA in March 2012 during the Office of Historic Resources’ historic resources survey of the Southeast Los Angeles Community Plan Area (CPA), recommended eligible for the national, State, and local level as an individual resource and was assigned CHR Status Codes of 3S, 3CS, and 5S3 (appears to be individually eligible for local listing or designation through survey evaluation).<sup>84</sup> *Table 4.5-2* includes the building name and number, the year it was constructed, and the historic status (contributing/non-contributing) of all permanent building/structures that are currently on the campus.

<sup>83</sup> Leslie J. Heumann, SAIC, DPR Primary Record Form for Thomas Jefferson High School (March 15, 2002).

<sup>84</sup> Galvin Preservation Associates, *Historic Resources Survey of Southeast Los Angeles: Historic Districts, and Multi-Property Resources*, Prepared for Office of Historic Resources, Department of City Planning (March 2012): 44-47, [http://preservation.lacity.org/files/SELAAAppendixCFinal3\\_12.pdf](http://preservation.lacity.org/files/SELAAAppendixCFinal3_12.pdf), accessed August 11, 2017.







SOURCE: Los Angeles Unified School Districts, 2002; ESA, 2018

Thomas Jefferson High School Comprehensive Modernization Project  
**Figure 11**  
 Contributing Buildings and Landscapes



D160789.01

TABLE 4.5-2  
 THOMAS JEFFERSON HIGH SCHOOL CAMPUS BUILDINGS

| Current Building Name<br>(Historic Name, if different)               | Year Constructed | Alterations/Repairs | Historic Status  |
|--|------------------|---------------------|------------------|
| Administrative Building<br>(Administrative and Classroom Building 1) | 1936             | 1981, 1986          | Contributing     |
| Auditorium<br>(Building 2)   | 1936             | N/A                 | Contributing     |
| Cafeteria<br>(Classroom Building 3)                                  | 1935             | 1990                | Contributing     |
| Main Classroom Building<br>(Classroom Building 4)                    | 1935             | 1986                | Contributing     |
| Science Building   | N/A              | N/A                 | Non-Contributing |
| Boy's Gymnasium<br>(Competitive)                                     | 1955             | 1981 (fire damage)  | Non-Contributing |
| Girl's Gymnasium<br>(Practice)                                       | 1957             | N/A                 | Non-Contributing |
| Utility Building<br>(Power House – Building 8)                       | 1917             | N/A                 | Contributing     |
| Mechanical Arts Building<br>(Building 11)                            | 1938             | 1990                | Contributing     |
| Music Building   | 1951             | N/A                 | Non-Contributing |
| Homemaking Building<br>(Home Economics)                              | 1960             | 1977 (Fire Damage)  | Non-Contributing |
| Industrial Arts Building   | 1959             | N/A                 | Non-Contributing |
| Metal Shop   | 1964             | N/A                 | Non-Contributing |
| Landscape  | 1936             | Unknown             | Contributing     |

The contributing buildings and landscape have a uniform appearance defined by the post-earthquake reconstruction and Streamline Moderne style. The period of significance (1935-1937) and contributing and non-contributing buildings, structures and features have been defined by the CDFM and the HRTR.<sup>85,86</sup> This information was verified for this IS/MND and is summarized below to facilitate the analysis.

### *Eligible Historic Resources*

Jefferson HS was determined eligible for inclusion in both the National Register and is listed on the California Register of Historical Resources because it embodies the distinctive characteristics of the Streamline Moderne style of architecture; has retained integrity of setting, design, materials, workmanship, location, feeling, and association; and for the quality of its design by master architect Stiles O. Clements. There are six contributing

<sup>85</sup> LAUSD. July 28, 2015. Character-Defining Features Memorandum (CDFM) for Thomas Jefferson High School, 1319 East 41st Street, Los Angeles, California 90011. Los Angeles, CA.

<sup>86</sup> LAUSD. May 2018. Thomas Jefferson High School Modernization Project: CEQA Historic Resources Technical Report.



buildings and one contributing landscape, as identified in the table above, to the potential Jefferson High School Historic District. Figure 11 shows the location of each of the contributing buildings and landscape described below.

**Administration and Classroom Building (Building 1).** Originally constructed in 1936 in the Streamline Moderne style, Administration and Classroom Building (Building 1) underwent modernization and repairs from fire damage in the mid-1980s. The building retains a high degree of integrity, especially on the exterior, to its original construction. Exterior character-defining features include reinforced concrete construction; rectangular plan; two-story, horizontal box-like massing with rounded corners; symmetrical facades with strong sense of horizontality evoked through rows of windows and raised plaster bands; flat roof with coping; varied roof heights; textured (combed plaster) and smooth concrete exterior walls; four raised bands running along first and second floors of primary elevations over rows of windows; rows of windows consisting of four-over-four and multi-light awning metal-framed windows (alteration, covered with metal security screens); flat pilasters separating window channels; streamline canopies above entrances; pipe railings along exterior staircases, building set back behind a front lawn; and crescent shaped primary entrance bay connects Buildings 1 and 4 at the corner of East 41st Street and Compton Avenue. Interior character-defining features include the circulation plan, terrazzo floors, curved concrete stairwells with pipe railings, and curved interior walls. Interior features of the second floor library include four oil canvas paintings signed by artist Ross Dickinson and dated 1937, Streamline Moderne style curved walls accentuated by horizontal bands, engaged columns separating canvas paintings, reeded crown molding, and wood panel doors. Alterations include the replacement of the majority of the exterior doors and alterations to the rear (north) elevation including service windows, rectangular canopy, and concrete stairs. Overall the building retains a high degree of physical integrity.

**Auditorium (Assembly Hall; Building 2).** The Auditorium was originally constructed in 1936 in the Streamline Moderne style. Character-defining features include reinforced concrete construction, rectangular plans and box-like two-story massing with rounded corners set back from Hooper Avenue, flat roof with coping, textured (combed plaster) and smooth concrete exterior walls, primary entrance on south elevation recessed within a Streamline style concrete surround and canopy crowned by “Auditorium” signage, concrete stairs lead to two-sets of double doors (alteration - doors replaced), two side entrances on both the west and east elevations accentuated by pilasters soaring above the roofline that flank single-doors and the primary entrance is covered by Streamline style canopy supported by engaged columns, and multi-light metal-framed awning windows. Exterior alterations include the replacement of the majority of the exterior doors and infill of some window openings. Interior character-defining features of the lobby include the circulation plan and sequence of spaces (lobby, auditorium, and stairwells), terrazzo flooring, recessed circular lighting covers, rounded walls, curved concrete stairwell and pipe railings. Alterations to the interior include the addition of signage on north wall of the lobby and the tiled-water fountain bays. Overall the building retains a high degree of physical integrity.

**Cafeteria Building (Building 3).** The Cafeteria was originally constructed in 1935 in the Streamline Moderne style. Character-defining features include reinforced concrete construction; rectangular plan and one-story box-like massing; symmetrical facades with strong sense of horizontality evoked through rows of windows and raised plaster bands; flat roof with coping; four-over-four and multi-light awning metal-framed windows; flat pilasters separating window channels; two Streamline Moderne style reinforced concrete covered passageways spanning the interior courtyard at the south and east elevations connecting Buildings 1 and 4; grand entrance on west elevation underneath prominent Streamline canopy supported by heavy, round columns; and concrete stairs and low wall. Alterations include re-stucco and re-painting of the exterior, windows covered with metal security screens, addition of roll-up metal windows and concrete ramps with metal handrails, the majority of exterior doors replaced, and various mechanical equipment has been attached to the north elevation. Overall the building retains a high degree of physical integrity.

**Classroom Building (Building 4).** The Classroom Building was originally constructed in 1935 in the Streamline Moderne style. Character-defining features include the set back behind the front lawn, reinforced concrete construction, rectangular plan and horizontal box-like two-story massing with rounded corners, symmetrical facades with strong sense of horizontality evoked through rows of windows and raised plaster bands, flat roof with coping, textured (combed plaster) and smooth concrete exterior walls, four raised bands running along first and second floors of primary elevations over rows of windows, four-over-four and multi-light awning metal-framed windows, flat pilasters separating window channels, streamline canopies above entrances, two side entrances on east elevation accentuated by pilasters soaring above the roofline that flank double-doors and a column of windows, streamline style canopy above the entrance, secondary entrance on north elevation accentuated by Streamline style pilasters that extend above roofline with a canopy connecting Mechanical Building and Classroom Building and Streamline style reinforced concrete covered passageway connecting the Mechanical Building and the Classroom Building at the north elevation. Alterations include metal security screens over windows, door and window openings filled in on east elevation, and the addition of a concrete ramp on the north elevation. Overall the building retains a high degree of physical integrity.

**Power House (Utility Building; Building 8).** The Power House was originally constructed in 1917. Character-defining features include reinforced brick construction, square plan and massing, Renaissance Revival style wood cornice with dentils at roofline below parapet, wood belt course, and three and four-light metal-framed transom windows. Alterations include replacement doors, door and window openings infilled, structurally retrofit and braced with concrete on exterior, and parapet extended above roofline. Because of the high degree of alterations, the Power House was found to have low integrity.

**Mechanical Arts Building (Building 11).** Character-defining features include the irregular L-shape plan, rectangular one-story massing with rounded corners, textured (combed plaster) and smooth concrete exteriors, main entrance made prominent by two pilasters rising above roofline and covered by a canopy connected to Classroom Building, vents below roofline, and multi-light metal-framed windows. The utilitarian Home Economics Building is attached to the north elevation and is a non-contributing addition/building; the original mechanical arts buildings dating from 1910 and 1922 were removed. Other alterations include the infilling of numerous window bays, windows covered by metal security screens, and exterior doors replaced. Due to a number of alterations, Classroom Building (Building 4) was found to lack integrity.



**Landscape.** The contributing landscape is located at the southern end of campus around Buildings 1, 2, 3, and 4. Character-defining features of the contributing landscape include the trapezoid-shaped irregular lot; the U-shaped site plan of the Administration and Classroom Building, Auditorium, Classroom Building, and Mechanical Arts Building with the buildings fronting the west, south, and east sides of the parcel and Cafeteria Building sited at the center of the U-shaped site plan; the paved interior courtyard and two tiled drinking fountains between the Administration and Classroom Building, Auditorium, Cafeteria Building, and Classroom Building; a Streamline style reinforced concrete covered passageway connecting the Administration and Classroom Building and Cafeteria Building; a Streamline style reinforced concrete covered passageway connecting the Cafeteria Building and Classroom Buildings; landscape in-front of the Administration and Classroom Building and the Classroom Building fronting East 41st Street and Compton Avenue (expanses of green grass, mature trees and plantings); hardscape and walkways consisting of brick and concrete at corner of Compton Avenue and East 41st Street leading to primary school entrance; the rectangular planting bed near the southern end; hardscape, steps, and walkways constructed of brick and concrete at corner of Hooper Avenue and East 41st Street leading to primary entrance Auditorium Building 2 and side entrance of the Administration and Classroom Building; the rectangular planting bed near the southern end; and two walkways extending from secondary entrances of Building 4 to Compton Avenue. These landscape elements retain a high degree of integrity.

Jefferson HS was determined eligible for listing on the National Register and is listed in the California Register; therefore, the contributing elements are considered historical resources under CEQA. The other buildings on campus are considered non-contributing as listed in Table 4.5-2, and are not considered historical resources under CEQA.

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** Jefferson HS was determined eligible for inclusion in the National Register through consensus and is listed in the California Register because it is associated with the rebuilding of LAUSD Schools following the 1933 Long Beach Earthquake; embodies the distinctive characteristics of the Streamline Moderne style of architecture; represents a significant work of master architect Stiles O. Clements; and has retained integrity of setting, design, materials, workmanship, location, feeling, and association from its period of significance (1935-1937). The Administration and Classroom Building (Building 1), Auditorium (Building 2), Cafeteria Building (Building 3), and Main Classroom Building (Building 4), Mechanical Arts Building (Building 11) and Power House (Building 8) were determined contributors to the potential Historic District, as well as the majority of the landscape surrounding these Buildings 1 and 4.

The proposed Project would include renovations, modernizations, and new construction on the campus, in addition to the demolition of contributing and non-contributing buildings and structures. The proposed Project includes seismic retrofitting and/or modernization of four contributing buildings; the Administrative and Classroom Building (Building 1), the Auditorium Building (Building 2), and Classroom Building (Building 4). The exterior of the Cafeteria (Building 3) is only proposed to be painted. Furthermore, the proposed Project includes demolition of the contributing Mechanical Arts Building (Building 11) and the contributing Power House Building (Building 8), which would both be replaced under the Project with a new Athletics Building and lunch pavilion with landscaped courtyard. While these buildings are contributors to the potential Historic District they are not the most visually or functionally prominent buildings. Lastly, a new Classroom Building would be constructed in the place of the non-contributing Competitive and Practice Gymsnasiums.

With the incorporation of SC-CUL-1, SC-CUL-2, and SC-CUL-3, the majority of the contributing buildings, as well as the contributing landscape, to the extent feasible, have been designed and would be rehabilitated in conformance with the SOI Standards for Rehabilitation, LAUSD Design Guidelines and Treatment Approaches for Historic Schools, and LAUSD's requirements and guidelines for the treatment of historical resources under the guidance of a qualified Historic Architect. Therefore, with the implementation of SC-CUL-1, SC-CUL-2, and SC-CUL-3, the proposed renovations of the Administrative and Classroom Building (Building 1), Cafeteria Building (Building 3), Classroom Building (Building 4), Auditorium Building (Building 2), and associated landscape would conform to the SOI Standards for Rehabilitation, the buildings and landscape would retain their integrity, and Thomas Jefferson HS would remain eligible for the National Register and California Register.

The demolition of the Mechanical Arts Building (Building 11) and the Power House (Building 8), contributing buildings to the potential Historic District, would result in the removal of contributing elements to the potential Historic District. The two buildings are contributing and would result in a loss of historic fabric; however, their removal would not materially impair or significantly detract from the overall site plan such that it would no longer be eligible as a potential Historic District. As such, removal of these buildings would not constitute a substantial adverse change in the historic significance or integrity of the potential Historic District. The implementation of SC-CUL-4 would require the recordation/documentation of these buildings in a HABS-like package.

The potential Historic District would retain sufficient integrity through the preservation of the majority of the contributing buildings and the contributing landscape. The CDFs of these contributing buildings would be restored or, in limited instances, replaced in-kind, ensuring the integrity of the historical resource and maintaining its eligibility for the National Register and California Register.

The Project would result in construction of two new buildings, the new Classroom Building and new Athletics Building, as well as a lunch pavilion with landscaped courtyard. With implementation of SC-CUL-1, SC-CUL-2, and SC-CUL-3, the proposed new construction would comply with SOI Standards 9 and 10, would be compatible with the size, scale and height of the Streamline Moderne style contributing buildings, features, and landscape that would remain, and would not destroy spatial relationships that characterize the potential Historic District.



Under the CEQA Guidelines, the significance of a historical resource is materially impaired when a project alters, in an adverse manner, those physical characteristics that account for its eligibility as a historical resource. The potential Historic District is seen as a single resource with the buildings, structures and other features, such as landscaping, as either contributing or non-contributing elements, or pieces, of a historic district. Therefore, with implementation of SC-CUL-1 through SC-CUL-6, Jefferson HS would retain sufficient integrity to remain eligible for the National Register and California Register as majority of the contributing buildings and landscapes would be rehabilitated in conformance to the SOI Standards, new construction would conform to SOI Standards 9 and 10, and the two contributing buildings planned for demolition would be documented in a HABS-like recordation document and their CDFs would be salvaged per LAUSD SC-CUL-1 to SC-CUL-6 resulting in a less-than-significant impact. No mitigation or further study is required.

While the impact would be considered less than significant, LAUSD has proposed the following voluntary mitigation measure to further reduce the impacts of the loss of historic fabric that will result from the demolition of Mechanical Arts Building (Building 11) and the Power House (Building 8) as well as other alterations, discussed above, that would result in the loss of CDFs.

**MM-CUL-1:** To communicate stories, information, and experiences pertinent to the history/historic events that took place on the Jefferson High School campus, an Interpretive Exhibit (and program) shall be developed in collaboration with the Jefferson High School community (i.e. students, staff, alumni, community members, etc.). The Interpretive Exhibit shall be located in a publically accessible area on campus (such as the school library) and shall describe the history of Jefferson High School prior to the Project; specifically, the period of significance (1935–1937) and key historical events that were relevant to Jefferson High School shall be highlighted through historical photographs, aerials, Sanborn maps, student photographs, yearbooks, newspapers, artifacts, and written narrative that visually demonstrate the physical appearance, activities, and architecture style of the school. A District-approved representative or a qualified architectural historian or historic preservation professional shall provide input and oversight to the contents, design, and installation of this Interpretive Exhibit (as applicable).

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

**Less Than Significant Impact.** A project may have a significant effect on the environment if it impacts archaeological resources that meet the definition of either historical resources (CEQA Guidelines Section 15064.5[a]) or unique archaeological resources (CEQA PRC Section 21083.1[g]). A records search conducted at the South Central Coastal Information Center (SCCIC) on January 26, 2016<sup>87</sup> included a review of all previous cultural resources studies and previously documented archaeological resources within a ½-mile radius of the Project Site. Two archaeological resources (P-19-003822 and P-19-003889) have been previously documented within the ½-mile radius. Resource P-19-003822 consists of historic-period refuse deposits

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<sup>87</sup> SCCIC File No. 15983.2090

identified during construction monitoring.<sup>88</sup> Resource P-19-003889 consists of a multicomponent archaeological site with historic-period refuse and one prehistoric chert core.<sup>89</sup>

### *Additional Archival Research*

Additional archival research included a review of historic aerial photographs from 1948, 1952, 1964, 1980, 1989, and 1994,<sup>90</sup> historic topographic maps from 1896, 1900, 1902, and 1921,<sup>91</sup> and Los Angeles Public Library archives. Archival research indicates that the Project Site was the location of the “Old Coliseum” or “Stadium East Grounds” prior to the construction of the original school buildings in 1917.<sup>92</sup> The grounds held an amphitheater capable of seating about 20,000 to 25,000 individuals. The stadium appears to have been first erected in 1913<sup>93</sup> and modified or re-configured in 1914 or 1915.<sup>94</sup> It was used to host rodeos,<sup>95</sup> charity events,<sup>96</sup> demonstrations, plays and filming,<sup>97</sup> and pageants.<sup>98</sup> The bullfighting scene from the 1915 movie *Carmen*, directed by Cecil B. de Mille, was filmed at the stadium with the audience serving as the spectators in the stands.<sup>99</sup> In 1915, the stadium was used to host events designed to entertain tourists traveling between the Panama-California Exposition in San Diego and the Panama-Pacific International Exposition in San Francisco.<sup>100</sup> Later in 1915, the Project Site was identified as the location of the future Thomas Jefferson High School. The original school plans consisted of six buildings, including classics, science, manual arts, administration, and gymnasium buildings.<sup>101</sup> A substantial part of the grounds were used for agricultural and horticultural activities in the early days of the school’s history,<sup>102</sup> as evident on a Sanborn Fire Insurance Map from 1922.<sup>103</sup> The original school buildings were severely damaged by the 1933 Long Beach Earthquake and the school was reconstructed in 1936.

Background research conducted for the Project indicates that the Project Site has a low sensitivity for prehistoric archaeological resources, but a higher sensitivity for historic-period archaeological resources (specifically resources associated with the early 1900s). There is potential for the unanticipated discovery of archaeological resources associated with early 1900s uses of the Project Site related to recreational and educational activities, including refuse deposits and building or structural foundations, which could be present

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<sup>88</sup> Warren, K. 2009. Site Record for P-19-003822. Document on file at SCCIC.

<sup>89</sup> Covert, J., E. Game, and G. King. 2007. Site Record for P-19-003889. Document on file at SCCIC.

<sup>90</sup> NETR Online, 2016. Historic Aerials from 1948, 1952, 1964, 1980, 1989, and 1994. Available at: <http://www.historicaerials.com/>, accessed February 22, 2016.

<sup>91</sup> U.S. Geologic Survey, 2016. The National Map: Historical Topographic Collection. Available at: <http://nationalmap.gov/historical/index.html> accessed February 22, 2016.

<sup>92</sup> Los Angeles Times. 1915. “Magnificent Educational Group to be Built in Southeast Los Angeles.” Los Angeles Times, July 4, 1915, pg. V1.

<sup>93</sup> Los Angeles Times. 1913. “Two Hundred Riders to Appear in Rodeo Stunts.” Los Angeles Times, February 6, 1913, pg. III3.

<sup>94</sup> Los Angeles Times. 1914. “Weld Old West with the New.” Los Angeles Times, December 11, 1914, pg. III2.

<sup>95</sup> Los Angeles Times. 1915. “Rodeo Plans Now Complete.” Los Angeles Times, March 31, 1915, pg. III3.

<sup>96</sup> Los Angeles Times, 1913. “Sit Tight and Hold Your Hay.” Los Angeles Times, March 17, 1913, pg. II2.

<sup>97</sup> Los Angeles Times. 1915. “Fair Youth in Gay Chariots.” Los Angeles Times, June 2, 1915, pg. III1.

<sup>98</sup> Los Angeles Times. 1915. Golden West as Pageant.” Los Angeles Times, April 2, 1915, pg. II2.

<sup>99</sup> Los Angeles Times. 1915. “Bullfight Scene From ‘Carmen’ Will Be Unique.” Los Angeles Times, July 9, 1915, pg. III4

<sup>100</sup> Los Angeles Times. 1915. “Los Angeles Fully Prepared.” Los Angeles Times, April 11, 1915, pg. III1

<sup>101</sup> Los Angeles Times. 1915. “Jefferson ‘High’ to Cost Quarter-Million.” Los Angeles Times, July 4, 2015, pg. V1.

<sup>102</sup> *ibid*

<sup>103</sup> Sanborn Fire Insurance Map, 1922. Vol. 4, Sheet 499j. Document on file at Los Angeles Public Library.





in open spaces or capped under paved areas, as indicated by the geotechnical investigation prepared for the Project<sup>104</sup> which indicates that the Project is underlain by up to 2.5 feet of fill containing “debris”.<sup>105</sup> Since the Project includes ground disturbance, it could result in the unanticipated discovery of archaeological resources that qualify as historical resources or unique archaeological resources under CEQA. The Project requires compliance with SC-CUL-7 through SC-CUL-13 in order to reduce impacts to less than significant. These measures include retention of an on-call qualified archaeologist, implementation of an archaeological resources monitoring program, halting and re-directing work in the event of a discovery until it is evaluated for significance, cultural resources sensitivity training, and Phase III Data Recovery/Mitigation Program in the event that a significant resource is discovered and cannot be avoided. After implementation of these conditions, potential impacts related to archaeological resources would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** A paleontological records search was conducted by the Natural History Museum of Los Angeles County (LACM) on January 27, 2016.<sup>106</sup> The results indicate that no fossil localities are located within a ½-mile radius of the Project Site. Surficial deposits within the Project Site are composed of younger Quaternary alluvium (Qa) derived from floodplain deposits of the Los Angeles River that flows within the Project Site. These younger deposits typically do not contain significant vertebrate fossils; however, they are likely underlain by older Quaternary fluvial deposits (Qoa) which typically do contain significant vertebrate fossil remains.

The LACM reported several vertebrate fossil localities in older Quaternary deposits near the Project Site. The nearest fossil locality in these deposits is LACM 1755 and yielded a fossil specimen of horse (*Equus*) at unknown depth below the current ground surface. The next closest vertebrate locality is LACM 7758 and produced fossil specimens of three-spine stickleback (*Gasterosteus aculeatus*), meadow vole (*Microtus*), deer mouse (*Peromyscus*), pocket gopher (*Thomomys*), and pocket mouse (*Perognathus*) at a depth of 16 feet below the surface. LACM 7701-7702 produced fossil specimens of threespine stickleback (*Gasterosteus aculeatus*), salamander (*Batrachoseps*), lizard (Lacertilia), snake (Colubridae), rabbit (*Sylvilagus*), pocket mouse (*Microtus*), harvest mouse (*Reithrodontomys*), and pocket gopher (*Thomomys*), at depths of 11 to 34 feet below grade. According to the records search results, substantial excavation below the uppermost layers and into the older Quaternary (Qoa) deposits has the potential to unearth significant vertebrate fossils.<sup>107</sup>

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<sup>104</sup> Gorian and Associates 2015. Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California.

<sup>105</sup> Debris includes concrete and other building materials and may indicate the presence of subsurface historic-period archaeological deposits.

<sup>106</sup> McLeod, S. 2016, Paleontological Resources for the Proposed Thomas Jefferson High School Comprehensive Modernization Project, ESA Project # 211085.23, in the City of Los Angeles, Los Angeles County, Project Area. Paleontological Records Search from the Natural History Museum of Los Angeles County, January 27, 2016.

<sup>107</sup> Ibid

A desktop review was conducted to identify nearby paleontological localities from late Pleistocene (approximately 126,000-12,000 years ago) sediments similar to those underlying the Project Site. The review revealed more than a dozen Pleistocene vertebrate localities yielding a multitude of ice age animals, including but not limited to: mammoths, giant ground sloths, horses, camels, bison, saber-tooth cats, rodents, birds, reptiles, and amphibians.<sup>108</sup> The closest locality is located about 7 miles east-southeast from the Project Site. No unique geologic features were identified in the Project Site.

The results of a geotechnical investigation prepared for the Project were reviewed to further inform the paleontological analysis.<sup>109</sup> The investigation included five geotechnical borings drilled to depths of approximately 26 to 51½ feet below the existing ground surface (bgs) to evaluate the underlying soil conditions of the Project. The borings indicate that artificial fill containing some concrete debris and asphaltic debris is present at varying depths up to approximately 2.5 feet bgs. Beneath pavement, fill, or grass, alluvial deposits were encountered to the maximum depth of each boring.

No paleontological resources were identified within the Project Site. Background research conducted for the Project indicates that the proposed Project is underlain by younger Quaternary alluvium derived from floodplain deposits, which are likely underlain by older Quaternary fluvial deposits. The younger deposits do not typically contain significant fossil specimens; however, the older fluvial deposits have been shown to contain significant vertebrate fossil remains. Shallow excavations (<10 feet) are not likely to impact older sediments that have high potential to yield paleontological resources; and the new buildings would be developed in areas that have been previously disturbed with buildings and infill for the existing campus. However, given the preponderance of ice age mammals from similar sediments in the vicinity (about 15 miles) of the Project Site, there is a potential for encountering paleontological resources at deeper depths (>10 feet) and the proposed Project could result in a significant impact to unique paleontological resources under CEQA. The Project requires compliance with SC-CUL-14 and SC-CUL-15 in order to reduce impact to less than significant. The SCs measures include retention of an on-call qualified paleontologist, paleontological resources sensitivity training, implementation of a paleontological resources monitoring program, and halting and re-directing work in the event of a discovery until it is evaluated for significance. Implementation of these SCs would ensure that potential impacts to paleontological resources would be less than significant. No further study is required.

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<sup>108</sup> Jefferson, G. T. 1991a. A Catalogue of Late Quaternary Vertebrates from California: Part One, nonmarine lower vertebrate and avian taxa. Natural History Museum of Los Angeles County Technical Reports no. 5.

Jefferson, G. T. 1991b, A catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals. Natural History Museum of Los Angeles County Technical Reports no. 7.

Miller, W.E. 1971, Pleistocene Vertebrates of the Los Angeles Basin and Vicinity (Exclusive of Rancho La Brea). Los Angeles County Museum of Natural History Bulletin, Science: No. 10.

<sup>109</sup> Gorian and Associates 2015. Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California



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

**Less Than Significant Impact.** No known cemeteries or other burial places are known to exist within the Project Site and the proposed Project is unlikely to disturb human remains. However, because the proposed Project would involve ground disturbing activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. In the event that human remains are encountered, the District would comply with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 resulting in a less than significant impact. Impacts would be less than significant. No mitigation or further study is required.

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## 4.6 GEOLOGY AND SOILS

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

## Discussion

The following evaluation of geology and soils is based, in part, on the Preliminary Geotechnical Hazards Evaluation prepared for the Project Site in July 2015.<sup>110</sup> This Preliminary Geotechnical Hazards Evaluation, which is included as Appendix D of this IS/MND, evaluates geologic and soil conditions at and in the immediate vicinity of the proposed Project Site, as well as providing site-specific recommendations for geotechnical seismic design and onsite soil expansiveness and corrosivity.<sup>111</sup>

<sup>110</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California, July 9, 2015.

<sup>111</sup> Ibid.



The Program EIR SCs for minimizing impacts to geology and soils of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided in *Table 4.6-1*.

**TABLE 4.6-1  
 GEOLOGY AND SOILS STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description   |
|----------------|---|
| SC-GEO-1       | <b>OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work.</b><br>This document outlines the procedures and scope for LAUSD geohazard assessments.   |
| SC-HWQ-1       | <b>Stormwater Technical Manual</b><br>This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the National Pollutant Discharge Elimination System (NPDES) program requirements |
| SC-HWQ-2       | <b>Compliance Checklist for Storm Water Requirements at Construction Sites.</b><br>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 Stormwater Pollution Prevention Plan (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.  |

## Impact Analysis

Would the Project:

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

**No Impact.** The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. There are no active faults crossing the Project Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.<sup>112</sup> The closest historically active surface faults are

<sup>112</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California, July 9, 2015.

the Newport Inglewood fault zone located approximately 6 miles southwest of the Project Site and the Hollywood fault located approximately 7 miles northwest of the Project Site.<sup>113</sup> Therefore, there would be no impact associated with rupture of a known earthquake fault. No mitigation or further study is required.

**ii) Strong seismic ground shaking?**

**Less Than Significant Impact.** The Project Site is located in a seismically active region. The City, as with all of Southern California, is subject to strong ground shaking. The closest major active faults are the Newport-Inglewood fault located approximately 6 miles southwest of the Project Site, and the Hollywood fault located approximately 7 miles northwest of the Project Site. These faults could have the potential to generate strong seismic ground shaking at the Project Site during an earthquake event.<sup>114</sup> The proposed facilities would be required to comply with the geotechnical and seismic design requirements of the most recent version of the California Building Code (CBC) (Title 24), which requires structural design that can accommodate ground accelerations expected from known active faults. In addition, implementation of the proposed Project would seismically retrofit the Administrative and Academic Building (including the Library), Main Classroom Building, and Cafeteria Building. Seismic retrofitting would be in compliance with the seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, CBC, Division of State Architect, and California Department of Education, as required by SC-GEO-1. The retrofitting activities would include, but would not be limited to bracing, construction, and reinforcing of walls. Therefore, implementation of the proposed Project would result in less-than-significant impacts associated with strong seismic ground shaking. No mitigation or further study is required.

**iii) Seismic-related ground failure, including liquefaction?**

**No Impact.** Liquefaction is a seismic phenomenon where unconsolidated and/or near saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The geotechnical evaluation for the proposed Project determined that the site is not within an area zoned by the State as being susceptible to liquefaction.<sup>115</sup> In addition, the historic high groundwater is deeper than 50 to 70 feet below grade, keeping the potential for soil saturation low.<sup>116</sup> Therefore, no impacts associated with liquefaction would occur. No mitigation or further study is required.

**iv) Landslides?**

**No Impact.** The geotechnical evaluation for the proposed Project determined that no landslide hazards are present within or near the Project Site, nor are any shown on regional geologic maps.<sup>117</sup>

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<sup>113</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California, July 9, 2015.

<sup>114</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California, July 9, 2015.

<sup>115</sup> Ibid.

<sup>116</sup> Ibid.

<sup>117</sup> Ibid.



Further, LAUSD policy dictates that schools will not be constructed in areas that are prone to landslides. LAUSD conducts a comprehensive site-specific geotechnical investigation, which also includes an assessment of existing landslide potential on and next to the Project Site, as well as the potential for the Project to increase landslide hazards on or adjacent to the site. Implementation of the Project would not expose people or structures to substantial adverse hazards due to landslides, and there would be no impact in this regard. No mitigation or further study is required.

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

**Less Than Significant Impact** The proposed Project would include grading and earthmoving activities at the Project Site that could expose soils to erosion from heavy winds, rainfall, or runoff. As Project construction would disturb more than 1 acre of soil, the Project operator would be required to comply with SC-GEO-1 Geohazard Assessment Scope of Work, including the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In compliance with this permit and SC-HWQ-1 and SC-HWQ-2, a Storm Water Pollution Prevention Program (SWPPP) would be prepared and implemented, as applicable. It would require erosion control, sediment control, and BMPs to minimize loss of topsoil or substantial erosion. Construction contractors are responsible for implementation of the SWPPP, which includes maintenance, inspection, and repair of erosion and sediment control measures and water quality BMPs throughout the construction period. Once constructed, disturbed areas would be protected by coverings such as structures, pavement, concrete, or vegetation, and the potential for long-term erosion or loss of topsoil would be reduced to less than significant. Therefore, with implementation of these requirements and associated BMPs, erosion related to construction activities and operation of the proposed Project would be less than significant. No mitigation or further study is required.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?**

**Less Than Significant Impact.** The geotechnical evaluation for the proposed Project determined that there is a low potential for hydro-collapse of the underlying soils to a depth of 50 feet below the existing ground surface.<sup>118</sup> The geotechnical evaluation also determined that onsite soils are moderately corrosive to negligibly corrosive.<sup>119</sup> Further, based on the soil properties of the Project Site, seismically induced settlement on the order of approximately 1 inch could be anticipated.<sup>120</sup> While settlement is anticipated to be minor, soils could become unstable over time. Per the Project design and SC-GEO-1, prior to the issuance of a grading permit, the applicant shall demonstrate that all recommendations contained in the Project specific Preliminary Geotechnical Hazards Evaluation (geotechnical report) are incorporated into the Project design prior to construction. These recommendations may include, but are not limited to, soil compaction, foundation design,

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<sup>118</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.

<sup>119</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.

<sup>120</sup> Gorian & Associates. 2015, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.

and subgrade preparation details. Adherence to the recommendations contained in the Project-specific geotechnical report would reduce the risks associated with unstable soils. Impacts associated with unstable soils would be less than significant. No mitigation or further study is required.

**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 a shrink-swell characteristic that can result in structural damage over a long period of time. Expansive soils expand in volume when water is absorbed and shrink when dried. The geotechnical evaluation for the proposed Project determined that the underlying native alluvial materials are very low in soil expansion potential.<sup>121</sup> However, some of the existing fill soils on the Project Site have a medium expansion potential. This medium expansive material could result in significant impacts related to the risks to life or property. However, implementation of SC-GEO-1 (described above) would reduce impacts regarding expansive soil by incorporating all geotechnical recommendations into the design of the proposed Project. Recommendations include, but are not limited to, concrete placement and cracking, under-slab treatment, conventional footings, and moisture content tests. After implementation of SC-GEO-1 potential impacts associated with expansive soils would be less than significant. No mitigation or further study is required.

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

**No Impact.** The proposed Project would not include the installation or use of septic tanks or alternative wastewater disposal systems. The proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact associated related to alternative wastewater disposal systems would occur. No mitigation or further study is required.

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<sup>121</sup> Ibid.





## 4.7 GREENHOUSE GAS EMISSIONS

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

### Discussion

The Program EIR includes SCs for minimizing impacts related to greenhouse gas (GHG) emissions in areas where future Projects would be implemented under the SUP. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided in *Table 4.7-1*. The analysis below is based in part on the Air Quality Technical Report<sup>122</sup> prepared for the proposed Project (Appendix A).

**TABLE 4.7-1  
 GREENHOUSE GAS EMISSIONS STANDARD CONDITIONS OF APPROVAL**

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

Operational GHG emissions from land use projects such as schools primarily result from transportation and building energy use. With respect to SUP modernization projects, the Program EIR states that operational

<sup>122</sup> ESA, 2018. Los Angeles Unified School District, Thomas Jefferson High School Comprehensive Modernization Project. Prepared for Los Angeles Unified School District. April, 2018.

activities would be less than significant, because these projects would not increase capacity of existing schools and net project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years and operational emissions are not expected to increase in the long term.

Further, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts related to climate change within the LAUSD service area with the incorporation of SCs. The Project-specific analysis provided below determined that implementation of the proposed Project would have less than significant impacts related to climate change with the incorporation of SCs.

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), ozone (O<sub>3</sub>), water vapor, nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth toward space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts related to agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires. There continues to be significant scientific uncertainty concerning the extent to which increased concentrations of GHGs have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

No individual project is large enough to single-handedly result in a significant increase in global concentrations of GHGs, as GHG emissions related to a project are not confined to a particular air basin but are dispersed worldwide. As such, by their nature, project-related climate change impacts contribute cumulatively to this impact, through direct and indirect GHG emissions.<sup>123</sup>

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<sup>123</sup> LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.7-15 to 5.7-18.



When GHGs exceed natural concentrations in the atmosphere, the greenhouse effect may be intensified. CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O occur naturally and through human activity. Emissions of CO<sub>2</sub> are largely by-products of fossil fuel combustion, whereas CH<sub>4</sub> results from off-gassing associated with agricultural practices and landfills. Other human-generated GHGs include fluorinated gases such as SFCs, PFCs and SF<sub>6</sub>, which have much higher heat-absorption potential than CO<sub>2</sub>, and are byproducts of certain industrial processes.

CO<sub>2</sub> is the reference gas for climate change because it is the predominant GHG emitted. The effect that each greenhouse gas can have on global warming is a combination of their mass and their global warming potential (GWP). GWP indicates, on a pound-for-pound basis, how much a gas contributes to global warming relative to how much warming would be caused by the same mass of CO<sub>2</sub>. For example, CH<sub>4</sub> and N<sub>2</sub>O are substantially more potent GHGs than CO<sub>2</sub>, with GWPs of 21 and 310 times that of CO<sub>2</sub>, respectively.

In emissions inventories, GHG emissions are typically reported as pounds or metric tons of CO<sub>2</sub> equivalents (MTCO<sub>2</sub>e). CO<sub>2</sub>e is calculated as the product of the mass emitted of a given GHG multiplied by its specific GWP. While CH<sub>4</sub> and N<sub>2</sub>O have much higher GWPs than CO<sub>2</sub>, CO<sub>2</sub> is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO<sub>2</sub>e, both from residential/commercial developments and human activity in general.

As discussed in the Program EIR, for projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, the SCAQMD proposed a “bright-line” screening-level threshold of 3,000 MTCO<sub>2</sub>e annually for all land use projects. The SCAQMD proposed this “bright-line” screening-level threshold “to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors.”<sup>124</sup> In the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* white paper (January 2008), CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the “objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future Statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative Statewide GHG emissions.”<sup>125</sup> A 90 percent capture rate would “exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions.”<sup>126</sup> The SCAQMD’s proposed screening level of 3,000 MTCO<sub>2</sub>e per year is a South Coast Air Basin-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option and is consistent with the Program EIR. Therefore, this threshold is used to evaluate project GHG emissions.

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<sup>124</sup> South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Appendix E, p. 2-6, (2008). Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2). Accessed October 2017.

<sup>125</sup> California Air Pollution Control Officer’s Association, *CEQA and Climate Change*, (2008) 42-43.

<sup>126</sup> California Air Pollution Control Officer’s Association, *CEQA and Climate Change*, (2008) 43-44.

## Construction

The proposed Project would replace and modernize existing structures at the Thomas Jefferson High School campus. *Table 4.7-2* shows the proposed Project’s GHG emissions. Although construction activities would increase GHG emissions, those emissions would be relatively minor, and would cease after completion of construction. As shown in *Table 4.7-2*, the highest anticipated construction-related emissions associated with the proposed Project would be 864 MTCO<sub>2e</sub> in Phase 2 of the Project. Typically, GHG construction emissions are amortized over 30 years and added to operational emissions. The proposed Project is expected to add a total of 3,027 MTCO<sub>2e</sub> over the construction duration. The total Project GHG emissions amortized over 30 years would be the equivalent of 101 MTCO<sub>2e</sub> over the course of a 30-year period and would be less than the SCAQMD’s interim threshold of 3,000 MTCO<sub>2e</sub> per year. Therefore, construction impacts would be less than significant. No mitigation or further study is required.

**TABLE 4.7-2  
 PROJECT-SPECIFIC CONSTRUCTION GHG EMISSIONS (METRIC TONS)**

| <b>Emissions Source</b>                  | <b>CO<sub>2e</sub> (metric tons) <sup>a</sup></b> |
|--|---|
| Phase 1 Construction (with soil removal) | 313   |
| Phase 2                                  | 856   |
| Phase 3                                  | 864   |
| Phase 4                                  | 806   |
| Phase 5                                  | 187   |
| <b>Total</b>                             | <b>3,027</b>                                      |
| <b>Annual (Amortized over 30 years)</b>  | <b>101</b>  |

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations  
 SOURCE: ESA, 2017

## Operation

The proposed Project would replace or upgrade facilities on the Jefferson HS campus, but it would not increase the number of students or faculty at the high school, and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating/cooling and other onsite sources. Therefore, there would be no net increase in regional GHG emissions as a result of Project implementation. GHG emissions are likely to be less than existing after Project implementation as the improved buildings would be required to meet the California Energy Commission’s most recent energy standards (Title 24) and would require that the new buildings use less energy per square foot compared to existing buildings. As discussed above, operational emissions would not change as a result of Project implementation and when added to amortized construction emissions, an increase of 101 MTCO<sub>2e</sub> would occur, which is well below the 3,000 MT CO<sub>2e</sub>, SCAQMD interim threshold. Additionally, the District is required to comply with all applicable SCs, and would implement SCs GHG-1 through GHG-5, which would further reduce Project-related GHG impacts. Therefore, the



cumulative contribution to GHG emissions would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** As described in the Program EIR, implementation of the SUP would be consistent with plans adopted for the purpose of reducing GHG emissions, such as the SCAG RTP/SCS, California Assembly Bill 32, CARB Scoping Plan, and other Statewide strategies to reduce GHG emissions.<sup>127</sup> Development of the proposed Project would replace and modernize facilities at Jefferson HS, but it would not increase the number of students or faculty at the school and therefore, would not result in an increase in vehicle trips to the school. As such, GHG emissions related to vehicle trips would not increase as a result of the proposed Project and the Project would not conflict with the goals of the RTP/SCS.

Additionally, SUP-related projects, including the proposed Project, would comply with the District's GHG emission reduction measures. LAUSD's School Design Guide requires construction contractors to reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction, as materials recovery would minimize the need to produce and transport new materials, thereby reducing emissions from mobile sources and energy use.<sup>128</sup> With respect to all SUP projects, implementation of SCs GHG-1 through GHG-5 would ensure that the proposed Project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, with implementation of SCs GHG-1 through GHG-5 and compliance with Title 24, the Project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant. No mitigation or further study is required.

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<sup>127</sup> Ibid. Pgs 5.7-18 to 5.7-19.

<sup>128</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.. Pg. 5.7-18 to 5.7-19.

## 4.8 HAZARDS AND HAZARDOUS MATERIALS

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

### Discussion

The following evaluation of hazards and hazardous materials is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project Site in May 2016, the Draft PEA-E prepared for the Project Site in February 2017, and the RAW prepared for the Project Site in May 2017. The Phase I ESA



(Appendix E), PEA (Appendix F), and RAW (Appendix G) of this IS provide an assessment concerning environmental conditions as they exist on the Jefferson HS property.

The Program EIR evaluated the potential for implementation of SUP-related projects to result in impacts related to hazards and hazardous materials and determined that projects implemented under the SUP are anticipated to have less-than-significant impacts with regard to hazards and hazardous materials within the LAUSD service area.

Projects implemented under the Program EIR are anticipated to have less than significant impacts related to hazards and hazardous materials within the LAUSD service area. The Project-specific analysis provided below determined that implementation of the proposed Project would also have less than significant impacts related to hazards and hazardous materials in the Project area.

## Impact Analysis

Would the Project:

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

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

Long-term operation of the proposed Project would involve very little transport, storage, use, or disposal of hazardous materials and substances. LAUSD's OEHS developed and implemented a Chemical Hygiene Plan to minimize employee and student exposure to hazardous chemicals in schools with laboratories. Site

Administrators are required to appoint a Chemical Safety Coordinator to implement the Chemical Hygiene Plan and to assist the Site Administrator in complying with hazardous material management, conducting employee trainings, and established laboratory safety protocols. The types of hazardous materials associated with operation of a school would generally be limited to those associated with janitorial, maintenance, and repair activities, such as commercial cleansers, paints, aerosol cans, lubricants, and automotive supplies (by-products), etc. The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, State, and local health and safety requirements. Such requirements would be incorporated into the design and operation of the Project. The requirements may include: providing for and maintaining safety data sheets, appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation or further study is required.

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

**Less Than Significant Impact.** Hazardous materials that would be used during construction (e.g., petroleum-based products, paints, solvents, sealers, etc.) would be transported, used, stored, and disposed of compliant with all applicable federal, State, and local regulations. This would ensure affixing appropriate warning signs and labels, installing emergency wash areas, providing well ventilated areas and special plumbing, and maintaining adult supervision. Compliance with applicable laws, regulations and standard LAUSD policies and practices during Project construction and operation would ensure that impacts associated with upset or accident conditions which could cause a release of hazardous materials into the environment are less than significant. Consequently, the potential for a significant release involving these materials is relatively low.

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

The Administrative and Academic Building and Cafeteria Building, located in the southern portion of the Project Site, were constructed in 1935. The Mechanical Arts Building was constructed in 1937, and the Home Economics Building was constructed in 1959. Implementation of the proposed Project would renovate the Administrative and Academic Building, Cafeteria Building, and demolish the Mechanical Arts and Home Economics Buildings. Asbestos and lead materials were phased out in the mid to late 1970s, and therefore due to the age of the structures, asbestos and lead materials could be present in the structures. An asbestos survey was completed for the campus in 2017.<sup>129</sup> Based on the results of the survey, asbestos was detected in the Administrative and Academic Building, Cafeteria Building, Assembly Building, Boys' Gymnasium, Girls'

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<sup>129</sup> Citadel Environmental Services, Inc., 2017, Asbestos Engineering Assessment, Jefferson High School, 1319 E. 41<sup>st</sup> Street, Los Angeles, California 90011 Comprehensive Modernization Project.





Gymnasium, Power Vault Building, Mechanical Arts Building, Music Building, Home Economics Building, Industrial Arts Building, Metal Shop Building, Science and Classroom Building, Potential accidental release of hazardous materials could result in exposure of construction workers and the environment to hazardous building materials, such as asbestos and lead-based paint, during renovation and demolition activities.<sup>130</sup>

The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763) requires local education agencies to inspect their school buildings for asbestos-containing building materials, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU). The proposed Project would be reviewed for presence of potential ACM prior to Project initiation, and materials that are suspected of containing asbestos would be tested. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using specific handling procedures. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance" during any project where ACM may be disturbed. Compliance with federal and State regulations and the District guidelines and procedures would ensure the reduced risk of release of hazardous building materials into the environment. Therefore, impacts associated with the handling and disposal of ACM would be less than significant. No mitigation or further study is required.

As with asbestos, the proposed Project would be reviewed by the District's FETU for the presence of potential lead-based paint (LBP) prior to the Project being started. Specific procedures for handling building materials that may contain lead include, but are not limited to, lead abatement performed by contractors certified by the California Department of Public Health, review of assessment reports addressing the impact to lead-based materials, written approval by the District's environmental representative of the abatement work plan, and transportation of lead-related waste under a Uniform Hazardous Waste Manifest. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work" during any project where lead-containing materials may be disturbed. Compliance with federal and State regulations and the District guidelines and procedures would ensure that impacts associated with the handling and disposal of LBP would be less than significant. No mitigation or further study is required.

Polychlorinated biphenyls (PCBs) were historically used as coolants, insulating materials and lubricants in electrical materials, such as transformers. PCBs were also used widely in caulking and elastic sealant materials, particularly from 1950 through the 1970's until PCBs were banned in 1979. DTSC guidance indicates that PCBs may exist in soil near exterior caulking present in buildings meeting the age criteria and adjacent unpaved areas.<sup>131</sup> The Phase I Environmental Site Assessment Report (Phase I ESA) for the proposed Project indicated

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<sup>130</sup> Ibid.

<sup>131</sup> Partner Engineering and Science, Inc. 2016. Phase I Environmental Site Assessment Report, Thomas Jefferson High School. Los Angeles, CA.

that there were three onsite pad-mounted transformers observed on the property.<sup>132</sup> The transformers were not labeled as containing PCB contents and no staining or leakage was observed in the vicinity of the transformers.<sup>133</sup> The Phase I ESA concluded that based upon the condition of the transformers on the site, as well as subsequent observations, certifications, and research, the potential for any PCB-containing electrical equipment to remain onsite appears to be low.<sup>134</sup> Nevertheless, prior to rehabilitation activities, sampling would be completed for additional potentially PCB containing material including caulking, etc., in accordance with the District's policies regarding PCBs.<sup>135</sup> If PCBs are identified during demolition and construction activities on the Project Site, District protocols would be followed for the proper identification, handling, and removal of such materials as appropriate.

According to the Phase I ESA the Project Site contained industrial arts classrooms including two auto engine and auto body repair. The Project Site is equipped with two below grade hydraulic lifts located within the south end of the former industrial arts building and with a spray booth on the north end of the building. The lifts were reportedly installed during building construction in the 1960s and the spray booth was installed in the 1980s. Three oil/water separators (clarifiers) are located to the north and east of the industrial arts building and are connected to floor drains in the spray booth and in the repair areas. A shop area in the industrial arts building was previously used for metal, electrical, wood-working, and printing classrooms. One hazardous materials storage enclosure contains 55-gallon drums of gasoline and diesel fuel and is located in the west of the current arts building. Another hazardous materials storage enclosure used to store waste oil, filters, and coolant in 55-gallon drums is located on the east of the industrial arts building. A boiler house was constructed in 1916 and formerly housed fuel oil boilers and an incinerator. The Project Site appears to have been used for agriculture until the 1950s or 1960s.<sup>136</sup> Organochlorine pesticides may have been used historically in these areas.

Investigation of the soil throughout the Project Site at various depths was conducted in July 2016 through November 2016. Soil samples were collected throughout the Site at various depths and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), arsenic, lead, and Title 22 metals.<sup>137</sup> While several analytes were found at levels in excess of laboratory detection limits, only lead and arsenic were identified in soil samples in excess of residential screening levels.<sup>138</sup>

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<sup>132</sup> Ibid.

<sup>133</sup> Ibid.

<sup>134</sup> Ibid.

<sup>135</sup> LAUSD OEHS. "Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, Office of Environmental Health and Safety, October 2016." Available at <http://achieve.lausd.net/Page/3495> and LAUSD OEHS. "LAUSD Design Standards, Specification Document 02 8400, Polychlorinated Biphenyl (PCB) Remediation, Rev 3.0, Revised February 1, 2017." Available at <http://achieve.lausd.net/Page/3495>.

<sup>136</sup> Partner Engineering and Science, Inc. 2016. Phase I Environmental Site Assessment Report, Thomas Jefferson High School. Los Angeles, CA.

<sup>137</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California. May 10.

<sup>138</sup> Alta Environmental. 2017. Draft Removal Action Workplan for Soil, Thomas Jefferson High School, 1319 East 41<sup>st</sup> Street, Los Angeles, California. May 10.



Implementation of the proposed RAW would mitigate the potential threat to human health and the environment posed by affected soils at the Project Site. The RAW estimates that the proposed Project would include removal and offsite disposal of an estimated 230 cubic yards of contaminated soil.

Due to the historic use of hazardous materials onsite, there is the potential for the release of hazardous material or exposure of the public to hazardous materials. However, because the affected soils onsite would be removed, implementation of the RAW would ensure the safety of construction workers, employees, students, and staff during construction and operation of the proposed Project. The proposed Project would result in excavation and removal of up to 230 cubic yards of impacted soils and replacement with clean, engineered fill. The soil would be removed using backhoes and/or excavators equipped with bladed buckets and would be either directly loaded to open end dump trucks for immediate offsite transport or staged in temporary stockpiles on plastic liners next to the excavation. All RAW contractors and subcontractors would be responsible for operating in accordance with the most current requirements of Title 8, CCR (i.e., General Industry and Construction Safety Orders) ([Section 5129]), Title 29 of the Code of Federal Regulations (i.e., Standards for Hazardous Waste Operations and Emergency Response [Section 1910.120] and Construction Industry Standards [Section 1926]), and other applicable federal, State and local laws and regulations. All personnel would operate in compliance with all California OSHA requirements.

Compliance with regulatory requirements would ensure that the proposed Project would result in less than significant impacts. No mitigation or further study is required.

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

**Less Than Significant Impact.** The proposed Project is located on the site of an existing school campus. The proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. Removal of impacted soil would be completed in conformance with federal, State, and local hazardous waste/materials regulations, as well as with any applicable District standards. Compliance with regulatory requirements would ensure that the proposed Project would not result in hazardous emissions, materials or substances within 0.25 miles of an existing school and impacts would be less than significant. No mitigation or further study is required.

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

**No Impact.** Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992, and information regarding the Cortese List is now compiled on the websites of DTSC, the California State Water Resources Control Board (SWRCB), and CalEPA. DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies

potentially hazardous sites where cleanup actions (such as removal action) or extensive investigations are planned or have occurred. Review of the EnviroStor database showed that the Project Site is not identified on any of the above database lists. Also, the State Water Board maintains the GeoTracker database which is a groundwater quality monitoring database. According to both the EnviroStor and GeoTracker databases, there are no documented hazardous materials at the Project Site.<sup>139,140</sup> The proposed Project would not be located on a site that is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5, and therefore no impact would occur. No mitigation or further study is required.

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

**No Impact.** The nearest airport to the Project Site is Los Angeles International Airport (LAX), located approximately 9 miles southwest of the Project Site. The proposed Project is not located within the LAX Land Use Plan Airport Influence Area.<sup>141</sup> Therefore, the proposed Project would not create a safety hazard from proximity to a public airport, and no impact would occur. No mitigation or further study is required.

**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 54 private-use heliports within the City of Los Angeles.<sup>142</sup> The Project Site does not include a private-use heliport. The nearest private helipad, the Jay Stephen Hooper Memorial Heliport (City-owned, private-use) located approximately 3.3 miles northeast of the Project Site. Demolition and new construction on the existing school site would not create any new safety hazards associated with heliport operations. Therefore, the proposed Project would not create a safety hazard from proximity to a private airstrip, and no impact would occur. No mitigation or further study is required.

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

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

Upon completion of the proposed Project, District-wide emergency response plans, policies, and guidance developed by LAUSD would be extended to the new facilities. In addition, LAUSD developed a district-wide

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<sup>139</sup> DTSC, 2017. EnviroStor Database. Available at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed August 16, 2017.

<sup>140</sup> SWRCB, 2017. GeoTracker Map. Available at: <https://geotracker.waterboards.ca.gov/>, accessed August 28, 2017.

<sup>141</sup> Los Angeles County Airport Land Use Commission (ALUC). 2003. Los Angeles International Airport: Airport Influence Area Map.

<sup>142</sup> Airnav.com. 2016. Airports in Los Angeles. Available: <http://www.airnav.com/airports/get>. Accessed February 23, 2016.



Emergency Operations Plan (EOP) that assigns responsibilities and provides a framework for coordination of response and recovery efforts in the event of an emergency. District schools are also required to comply with California Code Sections 32281-32289, dealing with the preparation of Safe School Plans (SSPs), which must be reviewed and updated every year. As noted in the Program EIR, the proposed Project would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan; such as the EOP or SSP for the campus or for the surrounding City of Los Angeles, these plans include but are not limited to: the City's Emergency Operations Master Plan, Local Hazard Mitigation Plan, the Los Angeles County Operational Area Emergency Response Plan, and the County All-Hazards Mitigation Plan. All construction, modernization, and repair work would not impede emergency access into the surrounding community.

Public schools are considered critical community facilities and are often used as evacuation centers during disasters. Project construction would be completed in phases which would allow partial use of the campus in the event of an emergency. Implementation of the proposed Project includes seismic retrofits to the Administrative and Academic Building and Cafeteria Buildings resulting favorably on emergency response by making improvements that would comply with current seismic standards and making buildings that could be used as evacuation points in the event of a disaster. Therefore, impacts associated with implementation of or interference with adopted emergency evacuation and response plans would be less than significant. No mitigation or further study is required.

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

**No Impact.** The Project Site is located within a highly urbanized area of the City and does not contain dense vegetation (flammable brush) considered to be wildlands. In addition, the Project Site is not located within or adjacent to a California Department of Forestry and Fire (CalFire) Fire Hazard Severity Zone.<sup>143</sup> Therefore, the risk for wildland fire is low and implementation of the proposed Project would not expose people or structures to a significant risk involving wildland fires, and no impact would occur. No mitigation or further study is required.

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<sup>143</sup> California Department of Forestry and Fire (CalFire). 2011. Very High Fire Hazard Severity Zones: Los Angeles.

## 4.9 HYDROLOGY AND WATER QUALITY

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



## Discussion

The Program EIR includes SCs for minimizing impacts related to hydrology and water quality of the existing environment in areas where future projects would be implemented under the SUP. The Program EIR evaluated the potential for implementation of SUP-related projects to result in impacts related to hydrology and water quality and determined that projects implemented under the SUP are anticipated to have less-than-significant impacts with regard to hydrology and water quality within the LAUSD service area. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided in *Table 4.9-1*.

**TABLE 4.9-1  
 HYDROLOGY AND WATER QUALITY STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description   |
|----------------|---|
| SC-HWQ-1       | <p><b>Stormwater Technical Manual</b></p> <p>This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.</p> |
| SC-HWQ-2       | <p><b>Compliance Checklist for Storm Water Requirements at Construction Sites.</b></p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>  |

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** The Project Site is located within a dense urban area of the City of Los Angeles, and is currently connected to the City’s network of stormwater drainage facilities which ultimately convey surface water runoff to the Pacific Ocean. Construction of the proposed Project would include site grading. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities; hydrocarbons from leaks or spills of fuels, oils, and other fluids associated with construction equipment; and paints, concrete slurries, asphalt materials, and other hazardous materials. Storm water and non-storm water runoff could potentially carry these pollutants offsite and into the City’s drainage system. However, all earthwork activities would be completed in accordance with LAUSD SCs and applicable regulations pertaining to stormwater runoff. The Program EIR requires all new SUP construction projects to comply with regulatory requirements if they would disturb greater than 1 acre, as would occur for the proposed Project.

LAUSD would implement SC-HWQ-1 and SC-HWQ-2, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit. All new construction Projects would be required to prepare and implement a sediment and erosion control plan that follows the BMPs outlined by the SWRCB to comply with a NPDES Construction General Permit (NPDES Permit), including development of a Storm Water Pollution Prevention Plan (SWPPP), as required by the Los Angeles Regional Water Quality Control Board (RWQCB).<sup>144</sup> The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants, including, but not limited to, the following:

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

LAUSD developed a program-wide SWPPP in 2005, with updates completed in 2007 and 2009.<sup>145</sup> LAUSD's construction contracting protocol for new and existing sites that would undergo land disturbance provides BMPs designed to prevent or minimize stormwater pollution, including submission of a SWPPP.

Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, construction-related impacts to water quality would be less than significant. No mitigation or further study is required.

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<sup>144</sup> LAUSD, 2009. Stormwater Technical Manual, Prepared for Los Angeles Unified School District by Geosyntec Consultants. October 2009.

<sup>145</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.





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

**Less Than Significant Impact.** The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. According to its Urban Water Management Plan (UWMP), LADWP's three main sources of water are the Los Angeles Aqueducts, local groundwater, and imported supplemental water purchased from the Metropolitan Water District of Southern California. In 2009/2010, the City relied on approximately 75,000 acre-feet of groundwater, meeting approximately 14 percent of the City's total annual demand.<sup>146</sup>

Although overall square footage of buildings would decrease, it is assumed that water demand would remain the same as the existing conditions due to no increase in capacity, landscaping and associated irrigation systems. Therefore, there would be no net deficit in aquifer volume or lowering of the groundwater table near the Project Site as the proposed Project would result in water demands that are similar to existing conditions. SUP-related projects would not result any substantial changes in the quantity of groundwater supplies. Furthermore, no groundwater extraction activities would occur under the proposed Project, nor would any wells be constructed. The groundwater levels are deep (greater than 50 feet below ground surface); therefore, dewatering is not anticipated. The proposed Project would replace the existing impervious surfaces with other impervious surfaces. As such, compliance with applicable laws, regulations, and LAUSD standards during Project construction and operation would ensure impacts associated with groundwater supply and groundwater recharge would be less than significant. No mitigation or further study is required.

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

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

The Project Site is located within a dense urban area within the City of Los Angeles with an existing network of stormwater drainage facilities, which ultimately convey surface water to the Pacific Ocean. Currently, the Project Site is developed with buildings, landscaping, and paved parking areas. Implementation of the

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<sup>146</sup> LADWP. 2015. Urban Water Management Plan. April, 27, 2016.

proposed Project would not significantly change surface drainage at the Project Site, as similar uses would be constructed compared to existing uses.

The proposed Project would employ CHPS criteria which are intended to avoid water quality impacts and velocity increases where possible. Implementation of the CHPS criteria and LAUSD standard BMPs, requiring the collection of surface runoff in stormwater collection system designed for 25-year peak runoff rates, would reduce siltation or erosion impacts to a less than significant level. SUP projects, including the proposed Project, would employ features outlined in the LAUSD Technical Manual to reduce the impacts of erosion and siltation, including incorporation of CHPS standards and BMPs relating to the use of native and drought-tolerant landscaping.<sup>147</sup>

Compliance with applicable laws, regulations, and SC-HWQ-2 during Project construction and operation would ensure that impacts associated with drainage and erosion are less than significant. No mitigation or further study is 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 onsite or offsite?**

**Less Than Significant Impact.** As stated previously in Response 4.9 (c), the proposed Project would not substantially alter the local drainage pattern. The proposed Project would use minimal water during construction and operation and would thereby not generate a large amount of runoff as a result of site activities. No stream or river traverses the Project Site. The previously discussed BMPs (including: proper storage, use, and disposal of construction materials; removal of sediment from surface runoff before it leaves the Project Site by silt fences; protection of all storm drain inlets onsite or downstream; protection or stabilization of stockpiled soils) would control drainage onsite, thereby reducing its potential to cause flooding from occurring on or offsite. Therefore, flooding impacts resulting from drainage pattern alteration would be less than significant. No mitigation or further study is required.

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

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

Implementation of the proposed Project would not substantially change pervious and impervious surface area ratios; as similar uses would be constructed compared to existing uses. In addition, in accordance with NPDES

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<sup>147</sup> LAUSD, 2009. Stormwater Technical Manual, Prepared for Los Angeles Unified School District by Geosyntec Consultants. October



requirements, the proposed Project would be required to control the rate of surface runoff, and ensure that runoff would not exceed the capacity of the existing or planned stormwater drainage system on site. Thus, no long-term runoff would be created that would exceed the capacity of the existing and planned stormwater drainage system and impacts would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** Refer to Response 4.9 (a). Construction of the proposed Project would include site grading and excavation. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris/trash and other materials generated during construction activities. Stormwater and non-stormwater runoff could potentially carry these pollutants offsite and into the City's drainage system. However, all earthwork activities would be completed in accordance with LAUSD standards and applicable regulations pertaining to stormwater runoff. SC-HWQ-1, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit. All new construction Projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by the SWRCB so as to comply with the NPDES Permit, including development of a SWPPP.<sup>148</sup> Adherence to LAUSD standards and applicable regulations, compliance with the NPDES Permit, and preparation and implementation of a SWPPP prior to construction, would identify site-specific BMPs for erosion control, sediment, and other potential construction-related pollutants. The NPDES Permit and SWPPP would maintain water quality in accordance with the RWQCB standards, such that construction of the proposed Project would not violate any water quality standards. Construction impacts with regards to water quality would be less than significant. No mitigation or further study is 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.** No housing would be developed as part of the proposed Project. According to the Project-specific geotechnical evaluation, the Project Site is not located within a Federal Emergency Management Agency (FEMA) mapped flood hazard zone.<sup>149</sup> The Project Site is located within Zone X, which is defined by FEMA as areas determined to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures in a 100-year flood hazard area and no impacts to housing from flooding would occur. No mitigation or further study is required.

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

**No Impact.** As discussed in Response 4.9 (g), the proposed Project is not located within a FEMA mapped flood hazard zone. The Project Site is located within Zone X, which is defined by FEMA as areas determined

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<sup>148</sup> LAUSD, 2009. Stormwater Technical Manual, Prepared for Los Angeles Unified School District by Geosyntec Consultants. October

<sup>149</sup> FEMA, Flood Insurance Rate Map (FIRM) Los Angeles County, CA Panel 1620 of 2350, <https://msc.fema.gov/portal/search?AddressQuery=1319%20e%2041st%20street%2C%20los%20angeles#searchresultsanchor>, 2008, accessed August 16, 2016.

to be outside of the 0.2 percent annual chance flood plain. Therefore, the proposed Project would not result in placing structures within 100-year flood hazard areas that would impede or redirect flood flows. Thus, no impacts to structures from flooding would occur from the Project. No mitigation or further study is required.

**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?**

**No Impact.** According to the Project-specific geotechnical evaluation, the Project Site is not within a dam inundation zone.<sup>150</sup> Therefore, there would be no impacts related to flooding including failure of a levee or dam. No mitigation or further study is required.

**j) Inundation by seiche, tsunami, or mudflow?**

**No Impact.** Seiches are seismically or wind induced tidal phenomena that occur in enclosed bodies of water. The Project Site is not located adjacent to or near a standing body of water. The nearest body of water is the Silver Lake Reservoir, located approximately 5 miles northwest of the Project Site. Due to its distance from the reservoir, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche. Therefore, no impact from inundation by seiche would occur.

A tsunami is a sea wave of local or distant origin that results from large-scale seafloor displacements associated with earthquakes, major submarine landslides, or exploding volcanic islands. Tsunamis generally affect coastal communities and low-lying river valleys. According to the Project-specific geotechnical evaluation, the Project Site is located 12 miles east of the Pacific Ocean and is not within a tsunami inundation zone.<sup>151</sup> No impact from tsunamis would occur.

Mudflows occur on steep slopes where vegetation is not sufficient to prevent rapid erosion, or on gentle slopes if other conditions are met such as large sudden rainfall events. Mudflows contain large amounts of water, silt, sand, boulders, organic material, and other debris. The Project Site and immediate surrounding area are relatively flat and do not contain major hills or steep slopes. Therefore, the Project Site is not at risk for mudflows. No impact from mudflows would occur. No mitigation or further study is required.

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<sup>150</sup> Gorian & Associates. 2016, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.

<sup>151</sup> Gorian & Associates. 2016, Preliminary Geotechnical Hazards Evaluation, Jefferson High School, 1319 East 41st Street, Los Angeles, California.



## 4.10 LAND USE AND PLANNING

|   | Potentially<br>Significant Impact | Less Than<br>Significant with<br>Mitigation<br>Incorporated | Less Than<br>Significant Impact | No Impact                           |
|---|-----------------------------------|---|---------------------------------|-------------------------------------|
| <b>X. LAND USE AND PLANNING.</b> Would the Project:   |                                   |   |                                 |                                     |
| a. Physically divide an established community?  | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?   | <input type="checkbox"/>          | <input type="checkbox"/>                                    | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

### Discussion

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

### Impact Analysis

Would the Project:

**a) Physically divide an established community?**

**No Impact.** The proposed Project does not include any action that could divide an established community. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The proposed Project lies entirely on an existing campus within an established LAUSD school boundary. The Project area is zoned as public facilities (PF)<sup>152</sup> and would not result in any zoning changes or changes in usage. Because the proposed Project would be constructed on an established school campus, no impact related to the physical division of an established community would occur. No mitigation or further study is required.

<sup>152</sup> City of Los Angeles, 2017. Zone Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>, accessed November 29, 2017.

**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 student and faculty population at the school would not increase as a result of the Project. The land use would stay the same and thus be consistent with the AQMP. Additionally, the proposed Project would not significantly increase vehicle trips to the Project Site. As a result, the proposed Project would not result in long-term operational population or employment growth that exceeds planned growth projections in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The proposed Project’s consistency with the SCAQMD’s air quality management plan is discussed in detail in the Air Quality section 4.3 of this IS/MND.

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

Even if it were not exempt, the City of Los Angeles General Plan designation for the Project Site is “Public Facilities”. The City of Los Angeles Municipal Code – Zoning Plan has designated the proposed Project as PF: Public Facilities, or a zone for the use and development of publicly owned land, including public elementary and secondary schools. As such, the proposed Project would be consistent with all applicable land use plans.<sup>153</sup> No impacts would occur as a result of the Project. No mitigation or further study is required.

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

**No Impact.** No habitat reserves established under the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) are located within the District, and no other habitat conservation plans are in the District.<sup>154</sup> Therefore, the Project Site would not be located in or conflict with a HCP/NCCP and no impacts would occur. No mitigation or further study is required.

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<sup>153</sup> American Legal Publishing Corporation. City of Los Angeles Zoning Code, Section 12.04.09, PF Public Facilities Zone. Available at: [http://library.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:la\\_all\\_mc](http://library.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:la_all_mc), accessed August 11, 2017.

<sup>154</sup> CDFW, 2017. California Regional Conservation Plans. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 16, 2017.



## 4.11 MINERAL RESOURCES

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

### Discussion

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

### Impact Analysis

Would the Project:

**a) & b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact.** There are no known mineral resources within the Project Site, and no known operational mineral resource recovery sites at the Project Site or in the vicinity.<sup>155</sup> The proposed Project is located on an existing school campus. Further, the surrounding area has been developed with residential and public uses. The proposed Project is zoned as PF and the nearest mineral resources recovery site is the Tujunga Alluvial Fan (Tujunga Wash) located approximately 18.5 miles northwest of the campus.<sup>156</sup> The proposed Project would not result in any impacts to mineral resources since it would not result in the loss of identified mineral resources that would be of value to the region or the State. Therefore, no impacts related to mineral resources would occur from the Project. No mitigation or further study is required.

<sup>155</sup> California Geologic Survey, 2010. Update of Mineral Land Classification of Portland Cement Concrete Aggregate in San Gabriel Valley Production-Consumption Region, Los Angeles County, California Available at: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\\_94-14/OFR\\_94-14\\_Text.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf), accessed August 17, 2017.

<sup>156</sup> City of Los Angeles, 2002. General Plan, Conservation Element. Available at: <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>, accessed August 11, 2017.

## 4.12 NOISE

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

## Discussion

The noise and vibration analysis is based upon the noise technical study prepared for the proposed Project (Appendix G).

The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse noise impacts to students and faculty at the upgraded school sites and to the surrounding areas.

The Program EIR included SCs for minimizing noise impacts on the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to noise impacts associated with the proposed Project are provided in *Table 4.12-1*.





**TABLE 4.12-1  
NOISE STANDARD CONDITIONS OF APPROVAL**

| Reference Number | Topic                    | Trigger for Compliance   | Implementation Phase                   | Standard Conditions   |
|------------------|--------------------------|--|--|---|
| SC-N-1           | Exterior Campus Noise    | Exterior noise levels are or would be greater than 70 dBA L <sub>10</sub> or 67 dBA L <sub>eq</sub>          | During Project design                  | LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L <sub>10</sub> or 67 dBA L <sub>eq</sub> .  |
| SC-N-2           | Interior Classroom Noise | Interior classroom noise levels would be greater than 55 dBA L <sub>10</sub> or 45 dBA L <sub>eq</sub>       | During Project design                  | <p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 55 dBA L<sub>10</sub> or 45 dBA L<sub>eq</sub> with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features in order to achieve the noise standards.</p> <ul style="list-style-type: none"> <li>• The District should acknowledge the ANSI (American National Standards Institute) S12 standard as a District goal that may presently not be achievable in all cases.</li> <li>• Where economically feasible, new school design should achieve classroom acoustical quality consistent with the ANSI standard and in no event exceed the current CHPS (California High Performance Schools) standard of 45 dBA.</li> <li>• Where economically feasible, new HVAC (Heating, Ventilating, and Air Conditioning) installations should be designed to achieve the lowest possible noise level consistent with the ANSI standard. In no event should these installations exceed the current CHPS standard of 45 dBA.</li> <li>• To promote the development of lower noise emitting HVAC units, the District's purchase of new units should give preference to manufacturers producing the lowest noise level at the lowest cost.</li> <li>• Existing HVAC units operating in excess of 50 dBA should be modified.</li> </ul> |
| SC-N-3           | Traffic Noise            | Project-related traffic noise level exceeds local noise standards, policies, or ordinances                   | Prior to Project approval              | LAUSD shall require an acoustical analysis to identify feasible measures to reduce traffic noise increases to 3 dBA community noise equivalent level (CNEL) or less at the noise-sensitive land use. LAUSD shall implement recommended measures to reduce noise.  |
| SC-N-4           | Operational Noise        | Operational noise levels exceeds local noise standards, policies, or ordinances at noise-sensitive land uses | During Project design and construction | LAUSD shall incorporate long-term permanent noise attenuation measures between playgrounds, stadiums, and other noise-generating facilities and noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to:   |

| Reference Number | Topic  | Trigger for Compliance  | Implementation Phase   | Standard Conditions   |
|------------------|--|---|--|---|
|                  |  |   |  | <ul style="list-style-type: none"> <li>• buffer zones</li> <li>• berms</li> <li>• sound barriers:               <ul style="list-style-type: none"> <li>– buildings</li> <li>– masonry walls</li> <li>– enclosed bleacher foot wells</li> <li>– other site-specific Project design features.</li> </ul> </li> </ul>  |
| SC-N-5           | Construction Noise and Vibration (Annoyance) | Construction on an existing school campus   | Prior to construction  | 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           | Vibration (Structural Damage)                | Rock blasting or demolition activities  | During construction  | 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-7           | Vibration (Structural Damage)                | Pile driving or heavy vibration activities  | During construction (Construction)                             | For Projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.   |
| SC-N-8           | Vibration (Structural Damage)                | Vibration intensive activities are planned within 25 feet of a historic building or structure | Prior to and during demolition and construction (Construction) | <p>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.</p> <ul style="list-style-type: none"> <li>• Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building.</li> <li>• 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.</li> <li>• The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building.</li> <li>• During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any</li> </ul> |



| Reference Number | Topic              | Trigger for Compliance  | Implementation Phase               | Standard Conditions  |
|------------------|--------------------|---|------------------------------------|--|
|                  |                    |   |                                    | <p>ground impacting operation associated with demolition and construction of a new building.</p> <p>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.</p>   |
| SC-N-9           | Construction Noise | Exterior construction and the use of large, heavy or noisy construction equipment | During construction (Construction) | <p>LAUSD shall prepare a noise assessment.</p> <p>If site-specific review of a school construction Project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>• Time Constraints – prohibiting work during sensitive nighttime hours</li> <li>• 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)</li> <li>• Equipment Restrictions – restricting the type of equipment used</li> <li>• Noise Restrictions – specifying stringent noise limits</li> <li>• Substitute Methods – using quieter methods and/or equipment</li> <li>• Exhaust Mufflers – ensuring equipment have quality mufflers installed</li> <li>• Lubrication &amp; Maintenance – well maintained equipment is quieter</li> <li>• Reduced Power Operation – use only necessary size and power</li> <li>• Limit Equipment OnSite – only have necessary equipment onsite</li> <li>• Noise Compliance Monitoring – technician on site to ensure compliance</li> <li>• Quieter Backup Alarms – manually-adjustable or ambient sensitive types</li> </ul> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> <li>• Noise Barriers – semi-permanent or portable wooden or concrete barriers</li> <li>• Noise Curtains – flexible intervening curtain systems hung from supports</li> <li>• Enclosures – encasing localized and stationary noise sources</li> <li>• Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment</li> </ul> |

| Reference Number | Topic | Trigger for Compliance | Implementation Phase | Standard Conditions  |
|------------------|-------|------------------------|----------------------|--|
|                  |       |                        |                      | <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>Window Treatments – reinforcing the building's noise reduction ability</li> <li>Community Participation – open dialog to involve affected residents</li> <li>Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the Project area. The notice shall State specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.</li> <li>Temporary Relocation – in extreme otherwise unmitigatable cases. Temporarily move residents or students to facilities away from the construction activity.</li> </ul> |

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

Noise impacts of projects implemented under the Program EIR are anticipated to be less than significant with the incorporation of SCs. The project-specific analysis provided below determined that noise impacts related to implementation of the proposed Project would also be less than significant with incorporation of SCs N-1 through N-9.

## Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. According to the General Plan, residential areas are to be the most sensitive type of land use to noise and industrial/commercial areas are considered to be the least sensitive. Existing noise sensitive uses in the immediate vicinity of the Project Site include:

- School classrooms
- North: a mix of single- and multi-family residences between the Project Site and 33rd Street.
- East: single-family residences are located along Compton Avenue.
- South: Morning Star Baptist Church and multi-family residences located along 41st Street.
- West: single-family residences are located along Hooper Avenue.



## Ambient Noise Levels

The predominant existing noise source surrounding the Project Site is vehicular traffic noise from local roadways. Ambient noise was not measured. Instead, the population-based methodology described in the Federal Transit Administration's (FTA) Transit Noise and Vibration Assessment document was used. The FTA's document indicates that the ambient noise level for the population per square mile between 3,000 and 10,000 would be 55 dBA. The population per square mile for the City of Los Angeles is 8,092.3 based on the 2010 Census data. Therefore, for the assessment, the ambient noise level in the vicinity of the Project site Site is determined to be 55 dBA.

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** A significant impact may occur if the proposed Project would generate noise that exceeds the noise level standards set forth in the respective General Plan Noise Elements and Noise Ordinances of the City of Los Angeles. Potential Project-related noise impacts were assessed for: 1) Project construction on the adjacent sensitive receivers; 2) offsite noise impact due to the Project operation; and 3) onsite noise impact to the Project Site.

## Construction

Construction of the proposed Project would occur in multiple phases within the campus boundary and is expected to last approximately 5.5 years. Construction activities would be implemented in five phases, with limited to no overlap between phases. Soil Removal would take place throughout the campus. Phase 1 would take place at the area between the Homemaking Building and the Industrial Arts Building. Phase 2 would take place at the area east of the playing field. Phase 3 would take place at the Administration and Academic Building, Mechanical Arts building, Gymnasium Building, and Homemaking Building. Phase 4 would take place at the Assembly Hall Building, Cafeteria Building, and Science and Classroom Buildings. Phase 5 would take place at the clinic in the northwest corner and remove portable classrooms that were placed east of the playing field with green spaces and tennis courts.

Construction activities occurring during each of these phases would require the use of heavy equipment (e.g., excavators, backhoes, loaders, tractors, etc.) along with the use of smaller power tools, generators, and other sources of noise. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. As such, construction activity noise levels during each phase would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Table 4.12-5, *Construction Equipment Usage and Noise Levels*, lists the type, maximum noise level, quantity, usage factor, and estimated noise levels of construction equipment to be used for each phase of construction. It should be noted that maximum noise levels associated with construction equipment would only be generated when the equipment is operated at full power. Typically, the operating cycle for a piece of construction equipment would involve one or two minutes of full power operation followed by three or four minutes at lower power settings. As such, the maximum noise levels shown in Table 4.12-5 would occur occasionally throughout the construction day.

TABLE 4.12-5  
 CONSTRUCTION EQUIPMENT USAGE AND NOISE LEVELS

| Phase and Equipment                          | Maximum Noise Level at 50 feet (dBA) <sup>b</sup> | Equipment Quantity (per Phase) | Usage Factor <sup>b</sup> |
|--|---|--------------------------------|---------------------------|
| <b>Soil Removal</b>                          |   |                                |                           |
| Rubber Tired Loader                          | 79  | 2                              | 40%                       |
| Tractor/Loader/Backhoes                      | 80  | 2                              | 40%                       |
| <b>Phases 1-5 (equipment per each phase)</b> |   |                                |                           |
| Air Compressor (Phases 4-5)                  | 78  | 1                              | 50%                       |
| Concrete/Industrial Saw                      | 90  | 1                              | 20%                       |
| Crushing/Processing Equipment                | 85  | 1                              | 50%                       |
| Rubber Tired Dozers                          | 85  | 2                              | 40%                       |
| Tractors/Loaders/Backhoes                    | 78  | 2                              | 40%                       |
| Grader                                       | 85  | 1                              | 40%                       |
| Forklift (Phases 1-4)                        | 80  | 1                              | 40%                       |
| Forklifts (Phase 5)                          | 80  | 2                              | 40%                       |
| Generator Set (Phases 1-4)                   | 82  | 1                              | 50%                       |
| Other Construction Equipment                 | 85  | 1                              | 50%                       |
| Paver (Phases 3-5)                           | 85  | 1                              | 50%                       |
| Roller (Phases 3-5)                          | 85  | 1                              | 20%                       |
| Crane (Phases 1-4)                           | 81  | 1                              | 40%                       |
| Welder (Phases 1-4)                          | 74  | 1                              | 40%                       |

<sup>a</sup> Maximum Noise Levels and Usage Factor are derived from Federal Highway Administration's (FHWA) Roadway Construction Noise Model User's Guide. Noise levels for those equipment not included in this User's Guide are estimated based on similar equipment.

SOURCE: LAUSD 2016, ESA 2017

As discussed previously, the Project Site is bounded by 33<sup>rd</sup> Street to the north, Hooper Avenue to the west, East 41<sup>st</sup> Street to the south, and Compton Avenue to the east. Noise-sensitive receptors to the north, east, and west of the Project Site consist of residential uses. The closest receptors to the south of the Project Site are Morning Star Baptist Church and residential uses. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which the loudest equipment were assumed to be located at the construction area boundary closest to sensitive receptors. The remaining construction equipment were assumed to be located at the approximate mid-point within the construction area boundary and at the furthest point within the construction area boundary relative to the sensitive receptor. Distances between the closest



construction site and the receptors with estimated noise levels per construction phase are presented in *Table 4.12-6, Estimated Construction Noise Levels at Sensitive Receptors*. These noise levels do not account for noise shielding effects such as the use of construction noise barriers. The maximum construction noise impacts are associated with primarily with demolition activities.

**TABLE 4.12-6  
 ESTIMATED CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS**

| <b>Phase</b> | <b>Receptor Direction</b> | <b>Estimated Closest Distance (feet)</b> | <b>Estimated Maximum Noise Levels (dBA L<sub>eq</sub>)</b> |
|--------------|---------------------------|--|--|
| Soil Removal | Classroom                 | 25                                       | 84   |
|              | North                     | 150                                      | 70   |
|              | West                      | 370                                      | 62   |
|              | South                     | 430                                      | 61   |
|              | East                      | 70                                       | 75   |
| Phase 1      | Classroom                 | 25                                       | 87   |
|              | North                     | 30                                       | 86   |
|              | West                      | 600                                      | 66   |
|              | South                     | 650                                      | 65   |
|              | East                      | 75                                       | 80   |
| Phase 2      | Classroom                 | 115                                      | 79   |
|              | North                     | 50                                       | 81   |
|              | West                      | 485                                      | 67   |
|              | South                     | 750                                      | 63   |
|              | East                      | 100                                      | 80   |
| Phase 3      | Classroom                 | 160                                      | 76   |
|              | North                     | 360                                      | 70   |
|              | West                      | 420                                      | 68   |
|              | South                     | 480                                      | 67   |
|              | East                      | 130                                      | 78   |
| Phase 4      | Classroom                 | 25                                       | 87   |
|              | North                     | 500                                      | 67   |
|              | West                      | 50                                       | 81   |
|              | South                     | 200                                      | 74   |
|              | East                      | 480                                      | 67   |
| Phase 5      | Classroom                 | 50                                       | 86   |
|              | North                     | 25                                       | 80   |
|              | West                      | 50                                       | 81   |
|              | South                     | 700                                      | 64   |
|              | East                      | 50                                       | 81   |

NOTE: Distances shown represent the closest distance to the nearest receptor. Noise modeling accounted for equipment placed at the approximated closest, midpoint, and furthest points of the phase area.

SOURCE: ESA 2017

Noise impacts are considered potentially significant when construction noise levels exceed the ambient noise levels by 5 dBA or more. As it is described under subheading Ambient Noise Levels, above, the ambient noise level is estimated to be 55 dBA. Therefore, the exterior noise significance threshold for offsite residential uses would be 60 dBA for this Project. The exterior noise significance threshold for school sites would be 67 dBA as established in the LAUSD SUP Program EIR per Education Code Section 17215. The estimated maximum construction noise levels presented in Table 4.12-6 would potentially exceed the 60 dBA exterior threshold for offsite residential uses and the 67 dBA exterior threshold for school sites. Therefore, the impact would be considered potentially significant. The proposed Project requires compliance with the Program EIR SCs, as shown in Table 4.12-1. SC-N-1 requires the use of noise-reduction features such as sound walls. SC-N-9 requires site-specific noise control measures, which can include time and scheduling constraints for noise-generating activities, equipment restrictions, substituting quieter construction methods and/or equipment, ensuring equipment is well maintained, reducing the power and size of the equipment, and other features as needed in order to reduce impacts to less than significant. To reduce the construction noise levels to less-than-significant levels, the noise level would be required to be reduced to below 60 dBA (ambient + 5 dBA) for offsite residential uses and 67 dBA for school sites. As shown in Table 4.12-6, since certain construction activities would occur at relatively close distances to offsite residential uses and onsite school uses, the construction noise level could be as high as 87 dBA during maximum construction noise-generating activities (i.e., such as demolition activities). The addition of 20-foot high noise barrier with acoustical barriers or blankets can reduce noise levels by up to 20 dBA. Per SC-N-9, the Project would be required to ensure that contractor(s) equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. For example, absorptive noise mufflers are commercially available feasible technology that can achieve state-of-the-art noise reduction for heavy-duty construction equipment.<sup>157</sup> The City of Los Angeles recognizes that the use of mufflers can achieve in practice noise reductions of 1 to 3 dBA.<sup>158</sup> In addition, per SC-N-9, the Project would limit the use of noise-generating construction equipment in close proximity to occupied onsite classrooms and offsite residences. During demolition activities, which generates the highest noise levels, noisy equipment such as concrete/industrial saws would not be used within approximately 50 feet of occupied onsite classrooms or within approximately 100 feet offsite residences. The use of other heavy-duty noise-equipment such as grading equipment would be minimized within 50 feet of occupied onsite classrooms and offsite residences and used only when necessary or substituted with smaller grader equipment models that generate less noise. Other less mobile equipment such as generators and cranes would be situated as far from occupied onsite classrooms and offsite residences as possible (at least 50 feet away). Implementation of these Standard Conditions (other than noise barriers) would achieve at least a 12 dBA additional reduction in noise levels. Furthermore, pursuant to SC-N-9, the contractor(s) would perform 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) and would conduct noise compliance monitoring to ensure compliance with Standard Conditions. After implementation of the Standard Conditions identified above, potential impacts with regard

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<sup>157</sup> United Muffler Corp, <https://www.unitedmuffler.com/>; Auto-jet Muffler Corp, <http://mandrelbending-tubefabrication.com/index.php>; AP Exhaust Technologies, <http://www.apexhaust.com/>.

<sup>158</sup> City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, Exhibit I.1-2, (2006).





to construction noise would be reduced to less than less than significant. No mitigation or further study is required.

### *Offsite Construction Traffic Noise*

Construction related vehicular traffic, including hauling activities, would generate higher noise levels to the receptors along the access routes (i.e., S. Hooper Ave. and E. 41<sup>st</sup> St.). Per the Federal Highway Administration's (FHWA) Traffic Noise Model (TNM), Version 2.5, the noise level of one heavy truck passing by at 35 miles per hour (mph) would be 45 dBA at 50 feet. The maximum number of haul trucks accessing the Project Site each day for the Soil Removal Phase would be 50 trucks. Based on this information, it was assumed that the maximum number of haul trucks entering and exiting the site during a peak hour would be seven. The noise level from five heavy trucks passing by during a peak hour would be 58 dBA at 50 feet, which would not exceed the ambient noise level (55 dBA) plus 5 dBA threshold. Therefore, the offsite construction traffic noise impacts would be less than significant. No mitigation or further study is required.

### **Operations**

The Project would result in potentially significant impacts if there is a permanent increase of over 3 dBA in ambient noise levels within the Project vicinity above existing levels without the Project. To increase the future ambient noise by 3 dBA, in general, it would be necessary to double the number of students, double the school activities over existing conditions, or double the traffic volumes. Project implementation would not provide for an increase in the number of students attending the school, staff required to operate the school, or traffic volumes. In addition, new constructed structures would have stationary noise sources, such as a generator or air conditioning units. Because the Project would comply with SC-N-4, the impact would be less than significant. Additionally, LAUSD considers exterior areas (playgrounds, playfields, lunch shelters) to be conditionally acceptable in a noise environment of 67 dBA Leq, while interior areas should achieve a noise environment of 45 dBA Leq.

The future ambient noise at the proposed Project Site would be dominated by roadway traffic on 33<sup>rd</sup> Street, Hooper Avenue, 41<sup>st</sup> Street, and Compton Avenue. The Project includes development of exterior areas, such as baseball/softball field, tennis courts and basketball courts, and new classroom buildings, which could result in a significant impact. However, the Project requires compliance with SC-N-1 and SC-N-2, and the impact would be considered less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** Ground-borne vibration would be generated from the operation of heavy construction equipment at the Project Site, which could potentially affect the existing sensitive land uses surrounding the site, as well as the students on the campus. Upon completion of construction there would be no operational sources of ground-borne vibration.

Construction equipment could be close to the residential structures in the Project vicinity. However, it should be noted that the existing structures on campus would be closer than those residential structures. The construction equipment could be as close as 10 feet from existing structures.

Ground-borne vibration levels resulting from construction activities at the Project Site were estimated using data published by the Federal Transit Administration (FTA) in its Transit Noise and Vibration Impact Assessment (2006) document. The Program EIR has adopted vibration standards that are used to evaluate potential human annoyance and architectural damage impacts related to construction activities.

The various peak particle velocity (PPV) expressed in inches per second (in/sec) and root mean square (RMS) velocity expressed in VdB levels for the general construction equipment that would operate during the construction of the proposed Project are identified in *Table 4.12-4*. Note that it is assumed that impact activities, such as pile driving, would not be used for this proposed Project while school is in session.

**TABLE 4.12-4  
 VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

| <b>Equipment</b> | <b>Approximate PPV (in/sec)<br/>at 25 feet</b> | <b>Approximate RMS (VdB)<br/>at 25 feet</b> |
|------------------|--|---|
| Large Bulldozer  | 0.089  | 87  |
| Loaded Trucks    | 0.076  | 86  |
| Jackhammer       | 0.035  | 79  |
| Small Bulldozer  | 0.003  | 58  |

SOURCE: FTA, 2006.

### *Structure Damage*

Construction activities associated with the proposed Project would have the potential to impact the existing school buildings and surrounding offsite structures.

For existing school buildings, the construction equipment could be located within 15 feet of structures. However, the proposed Project would require compliance with SC-N- 6 through SC-N-8, which would require that activities that have the potential to result in significant vibration are minimized or avoided through alternative methods of demolition and construction if feasible and necessary. Therefore, impacts would be less than significant with the incorporation of SC-N-6 through SC-N-8.

The offsite structures are considered to be non-engineered timber structure. The vibration impact threshold for the offsite structures would be 0.2 in/sec PPV. The PPV level of a large bulldozer at 25 feet would be 0.089 in/sec PPV. In order to exceed 0.2 in/sec PPV, a large bulldozer would need to be as close as 15 feet from the offsite structures. The closest offsite structure to the Project Site is located 50 feet away. Therefore, there would be no offsite structures within 15 feet of construction and impacts would be less than significant. No mitigation or further study is required.



### *Human Annoyance*

Construction-related vibration could annoy students onsite and residents within the properties surrounding the campus (particularly those to the north of the campus). . However, this annoyance would be temporary and would only be associated with certain aspects of the construction. While various stages of construction have the potential to result in varied levels of vibration, the proposed Project would require compliance with SC-N-5. Implementation of SC-N-5 would require LAUSD to 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. Therefore, implementation of SC-N-5 would reduce impacts to less than significant. No mitigation or further study is required.

### *Operation*

Once construction activities have been completed, there would be no new sources of vibration at the Project Site. Therefore, no impact would occur and no mitigation or further study is 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 Response (a), the proposed Project would not result in a 3 dBA increase in noise over existing ambient conditions. This impact would be less than significant. No mitigation or further study is 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.** As described in Response (a), the proposed Project would be expected to result in temporary increases in ambient noise levels during construction. However, implementation of SC-N-1 and SC-N-5 through SC-N-9 would reduce noise levels at receptors and impacts would be less than significant. No mitigation or further study is required.

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

**No Impact.** The proposed Project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest public airport (LAX) is approximately 9 miles from the Project Site. Therefore, no airport land use plan-related impacts would occur. No mitigation or further study is required.

**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.** There is no private airstrip within 10 miles of the Project Site. Therefore, no impact would occur. No mitigation or further study is required.

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## 4.13 PEDESTRIAN SAFETY

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

### Discussion

The following evaluation of pedestrian safety is based on the technical study for the Project entitled “Traffic/Pedestrian Safety Study for the Thomas Jefferson High School Comprehensive Modernization Project” (“Traffic/Pedestrian Safety Study”).<sup>159</sup> The Traffic/Pedestrian Safety Study, which is included as Appendix I of this MND, evaluates the proposed Project’s potential transportation, traffic circulation, and pedestrian safety impacts for the Project Site and vicinity.

The Program EIR includes SCs for minimizing impacts to pedestrian safety in the existing environment in areas where future Projects would be implemented under the SUP. The applicable SC related to Project-specific pedestrian safety impacts are provided in *Table 4.13-1*.<sup>160</sup>

**TABLE 4.13-1  
 PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description  |
|----------------|--|
| SC-T-4         | LAUSD shall require its contractors to submit a construction worksite traffic control plan to LAUSD and/or the applicable 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. |

<sup>159</sup> ESA, Thomas Jefferson High School Comprehensive Modernization Traffic and Pedestrian Safety Analysis, November 20, 2017

<sup>160</sup> Pedestrian Safety Standard Conditions of Approval SC-PED-1 through SC-PED-4 would not apply to the pedestrian safety analysis for the proposed Project because the Trigger for Compliance is if the Project would increase student capacity by more than 25% or 10 classrooms.

Projects implemented under the Program EIR are anticipated to have less-than-significant impacts to pedestrian safety within the LAUSD service area. The Project-specific analysis provided below determined that implementation of the proposed Project would also have less-than-significant impacts to pedestrian safety.

## Impact Analysis

The Project Site is developed with existing school uses. The campus comprises an entire block and is bounded by Compton Avenue to the east, East 41<sup>st</sup> Street to the south, South Hooper Avenue to the west, and residences and East 33<sup>rd</sup> Street to the north. Pedestrian access and circulation is provided on sidewalks on the west side of Compton Avenue, north side of East 41<sup>st</sup> Street, and east side of South Hooper Avenue. The South Hooper Avenue/East 41<sup>st</sup> Street intersection is controlled by a traffic signal with school crosswalk pavement markings on all four approaches to the intersection. The Compton Avenue/East 41<sup>st</sup> Street intersection is controlled by stop signs on all three approaches to the intersection. There are school crosswalk pavement markings on the eastbound (East 41<sup>st</sup> Street) and southbound (Compton Avenue) approaches to this intersection; there are also “Pedestrian Crossing” warning signs for East 41<sup>st</sup> Street traffic. There are additional school crosswalk pavement markings at the site surrounding intersections of South Hooper Avenue/East 40<sup>th</sup> Place (signalized), South Hooper Avenue/East 33<sup>rd</sup> Street (signalized), and Compton Avenue/East Martin Luther King, Jr. Boulevard (all-way stop control).

The school’s main public entrance connects with the northeast corner of East 41<sup>st</sup> Street/Compton Avenue, while the school’s student entrance connects with the northwest corner of East 41<sup>st</sup> Street/South Hooper Avenue. Student drop-off/pickup currently occurs along the west (school) side of Compton Avenue. The proposed Project would not change the school entrances or drop-off/pickup zone. The Project would increase the number of onsite parking spaces, which would reduce the demand for on-street parking spaces. The number of driveways crossing sidewalks, however, would not change from existing conditions.

Would the Project:

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

**Less Than Significant Impact.** The proposed Project would occur on the existing Jefferson HS campus (with no increase in enrollment); it would not include changes to existing roadways (including sidewalks); and it would be designed to enhance path of travel, accessibility, and other pedestrian travel throughout the campus. The Project design (including the addition of a new on-campus parking lot in front of the new Gymnasium) would employ standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards.<sup>161</sup> In addition, the projects would provide emergency vehicle access for the City of Los Angeles Fire Department (LAFD). Conformance to District policies and local ordinances would ensure that adequate access would be maintained.

Traffic generated during Project construction would be compatible with the mix of vehicle types (autos and trucks) currently using local roadways. As shown in Table 13-1, LAUSD requires its contractors to submit a

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<sup>161</sup> LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.13-10 to 5.13-11.



construction worksite traffic control plan (including strategies to safely accommodate pedestrian movements) to the Los Angeles Department of Transportation (LADOT) for review prior to construction, as required by SC-T-4. In addition, as required by Caltrans, applicable transportation-related safety measures shall be implemented during construction of the proposed Project. Additionally, LADOT converted the traffic control at the unsignalized intersection of East 41<sup>st</sup> Street and Compton Avenue from the existing side-street stop control (a stop sign only on the Compton Avenue approach) to all-way stop control (requiring installation of stop signs on the 41<sup>st</sup> Street approaches) to improve safety for students walking to the campus from local neighborhoods. Therefore, the proposed Project would not substantially increase vehicular and/or pedestrian safety hazards. As such, impacts would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** The proposed Project would be implemented at an existing campus and would not directly or indirectly eliminate sidewalks, crosswalks or traffic control devices at intersections. Per SC-T-4, LAUSD requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction. While the proposed Project would not increase potential safety hazards for students, LAUSD further anticipates that conditions surrounding the campus would be improved for students walking to the campus from local neighborhoods (with the LADOT-authorized all-way stop control of East 41<sup>st</sup> Street and Compton Avenue). Therefore, the proposed Project would not create unsafe routes to school for students walking from local neighborhoods. As such, impacts would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** The I-110 freeway is located approximately 1.5 miles west of the Project Site, and the I-10 freeway is located approximately 1 mile north of the Project Site. The proposed Project would be implemented at an existing campus, which is bounded by Hooper Avenue (a four-lane arterial roadway), and by East 41<sup>st</sup> Street and Compton Avenue (two-lane local streets). As previously described, there are sidewalks on each street adjacent to the Project Site. The South Hooper Avenue/East 41<sup>st</sup> Street intersection is signalized, with pedestrian crossing signals and school crosswalk pavement markings. The Compton Avenue/East 41<sup>st</sup> Street intersection is unsignalized, with stop sign control on all three approaches to the intersection. There are school crosswalk pavement markings on the eastbound (East 41<sup>st</sup> Street) and southbound (Compton Avenue) approaches to this intersection; there are also “Pedestrian Crossing” warning signs for East 41<sup>st</sup> Street traffic. There are additional school crosswalk pavement markings and pedestrian crossing signals at the site-surrounding signalized intersections of South Hooper Avenue/East 40<sup>th</sup> Place and South Hooper Avenue/East 33<sup>rd</sup> Street, and school crosswalk pavement markings at the all-way stop-controlled intersection of Compton Avenue/East Martin Luther King, Jr. Boulevard. No mitigation or further study is required.

While temporary construction activities (including trucks accessing the campus) may result in congestion for those traveling along the streets that bound the campus, the campus location would not change. The proposed Project would not directly or indirectly alter the configuration of the adjacent arterial, including the sidewalks, crosswalks or traffic control devices at intersections. As such, implementation of the proposed Project would not pose a new safety hazard, as compared to current conditions.<sup>162</sup> The Project would implement SC-T-4 which would limit the potential for construction related hazards. Therefore, implementation of the proposed Project would not pose a safety hazard related to being on a site that is adjacent to a major arterial roadway or freeway, and impacts would be less than significant. No mitigation or further study is required.

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<sup>162</sup> LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.13-11 to 5.13-12.





## 4.14 POPULATION AND HOUSING

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

### Impact Analysis

**a)- c) No Impact.** The Project Site is currently an operational high school serving students in grades 9 through 12. The proposed Project would not be designed or intended to increase the student population, rather the proposed Project is intended to provide the appropriate facilities for the current student capacity. No direct or indirect population growth in the area is anticipated. There are no residents on the Project Site, and the proposed Project would not result in population or housing displacement of the surrounding community. Students that are displaced by classroom demolition during construction would be relocated/housed in vacant classrooms or temporary onsite (interim relocatable) classrooms while the new facilities are being constructed. Therefore, no impacts related to population and housing would occur. No mitigation or further study is required.

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## 4.15 PUBLIC SERVICES

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

### Impact Analysis

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

**a) Fire protection?**

**Less Than Significant Impact.** Fire protection services would be provided by the LAFD. Fire Station 14, located 0.6 miles from the Project Site at 3401 South Central Avenue Los Angeles, CA 90011, would be the primary responder.<sup>163</sup>

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

<sup>163</sup> LAFD, official website, <http://www.lafd.org/>, accessed February 5, 2016.



Project would be required to comply with LAFD and City of Los Angeles Department of Building and Safety regulations for water availability, fire hydrant pressure, and accessibility for firefighting equipment. Compliance with applicable State, City and District requirements, including installation of fire sprinklers, fire alarm devices, emergency access and evacuation procedures would also ensure that impacts to fire protection services would remain less than significant. As such, no new or expanded fire protection services or facilities would be required. Therefore, impacts related to fire protection would be less than significant. No mitigation or further study is required.

**b) Police protection?**

**Less Than Significant Impact.** LAUSD operates its own police department, the Los Angeles School Police Department (LASPD), which provides security for the schools and centers within its jurisdiction. The Project Site lies within the Central Division of the LASPD. The City of Los Angeles Police Department (LAPD) would be the secondary provider of police protection within the Project area. The Newton Community Police Station located at 3400 South Central Avenue in Los Angeles, approximately 0.6 miles from the Project Site, would supplement police protection along with the LASPD.<sup>164</sup>

Demands for police protection are generally generated by an increase in the population within a service area. The proposed Project would not increase student capacity at Jefferson HS. Implementation of the proposed Project would not generate increased demand for police services, as the Project is growth accommodating, not growth inducing, since it would accommodate existing and expected students that already reside within the enrollment boundaries of the school. During construction, the proposed Project has the potential to result in temporary demands for police services during construction from possible trespass, theft, and/or vandalism. However, 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 the construction of new or expanded police facilities. Further, the Project would comply with LAUSD Standards regarding emergency response procedures and school safety, as required. Therefore, the proposed Project would not result in an increase of student capacity nor would it result in new operations requiring additional police protection. No mitigation or further study is required.

**c) Schools?**

**Less Than Significant Impact.** The proposed Project would not increase the student population nor would it displace the current student population to offsite locations. Students temporarily displaced by construction activities would be placed in interim classrooms onsite. No other LAUSD campuses or facilities outside of Jefferson HS would be impacted by the proposed Project. Therefore, impacts would be less than significant. No mitigation or further study is required.

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<sup>164</sup> LAPD, official website, [http://www.lapdonline.org/77th\\_street\\_community\\_police\\_station](http://www.lapdonline.org/77th_street_community_police_station), accessed February 5, 2016.  
LASPD, official website, <http://www.laspd.com/about.html>, accessed February 5, 2016.  
LAUSD, official website, <http://achieve.lausd.net/Page/2649>, accessed February 5, 2016.

**d) Parks?**

**No Impact.** The proposed Project would not interfere with or have adverse impacts related to parks. The proposed Project would not involve new housing or long-term employment opportunities that would increase the population or lead to an increase in the need for new or altered parks. In the event that the new athletic facilities are not available for use, interim facilities on campus or at nearby facilities (e.g., Ross Snyder Recreation Center, located at 1501 E 41st Street) would be used. The proposed Project would enhance the existing recreational facilities in the area through the new baseball/softball field. The recreational facilities on the campus are available to the community for use pursuant to the Civic Center Act (CA Ed. Code Sections 38130 – 38139). No impacts would occur. No mitigation or further study is required.

**e) Other public facilities?**

**No Impact.** The proposed Project would not result in substantial adverse impacts associated with the need for new or physically altered public facilities and/or services. The Project would not involve the construction of homes or result in an increase in population. The surrounding residential area would not be affected by the proposed Project, and therefore, no impact would occur. No mitigation or further study is required.

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## 4.16 RECREATION

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

### Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** The proposed Project would include a new baseball/softball field. As a result, the recreational facilities in the area would be enhanced by providing two improved spaces that would be accessible to the community. It is anticipated that the current athletic facilities on campus would remain available during most of the construction. However, in the event that the new athletic facilities are not available for use, interim facilities on campus or at nearby facilities (e.g., Ross Snyder Recreation Center, located at 1501 E 41<sup>st</sup> Street or other District campuses) would be used. This use would entail limited activities and would temporarily occur during a fraction of the construction duration. During operation, the new recreational facilities on the campus are available to the community for use pursuant to the Civic Center Act (CA Ed. Code Sections 38130 – 38139). The proposed Project would not increase the number of students enrolled at the campus and is not growth inducing. Therefore, the Project would not increase the use of regional facilities such that substantial physical deterioration of the facility would occur. Impacts would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** The proposed Project includes improvements to the existing recreational facilities; however, it would not require the construction or expansion of recreational facilities outside existing LAUSD-owned property. The proposed Project would include upgrades to athletic facilities on the Jefferson HS campus. These improvements at the campus would enhance the existing recreational facilities (including

the playfields) that are available to the campus and the community, who may request access to the Campus facilities and grounds pursuant to the Civic Center Act (CA Ed. Code Sections 38130-38139). Potential environmental impacts associated with the proposed Project (which includes improvements to the recreational facilities) are analyzed in this IS/MND, and no significant adverse physical effect on the environment is expected as a result of the proposed Project. Therefore, environmental impacts related to community recreational facilities would be less than significant. No mitigation or further study is required.

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## 4.17 TRANSPORTATION AND CIRCULATION

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

### Discussion

The following evaluation of transportation and circulation is based on the technical study for the Project entitled “Traffic/Pedestrian Safety Study for the Thomas Jefferson High School Comprehensive Modernization Project” (“Traffic/Pedestrian Safety Study”).<sup>165</sup> The Traffic/Pedestrian Safety Study, which is included as Appendix I of this MND, evaluated the proposed Project’s potential transportation, traffic circulation, and pedestrian safety impacts for the Project Site and vicinity.

The Program EIR evaluated the potential for SUP-related projects to result in impacts related to transportation and circulation. Most of LAUSD’s campuses, including Jefferson HS, are located in urban areas with established street systems that provide access to the school sites. Vehicular and pedestrian access to Jefferson

<sup>165</sup> ESA, Thomas Jefferson High School Comprehensive Modernization Traffic and Pedestrian Safety Analysis, November 20, 2017

HS is provided via East 41<sup>st</sup> Street, Compton Avenue, and South Hooper Avenue. These access routes for vehicles and pedestrians would not change as a result of construction of the Project. The Project-specific traffic/pedestrian safety study was prepared (Appendix I), and serves as the basis for the transportation and circulation analysis presented herein.

The Program EIR includes SCs for minimizing impacts related to transportation and circulation in the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to Project-specific impacts to transportation and circulation associated with the proposed Project are provided in *Table 4.17-1*.<sup>166</sup>

**TABLE 4.17-1  
 TRAFFIC AND CIRCULATION STANDARD CONDITIONS OF APPROVAL**

| <b>Applicable SCs</b> | <b>Description</b>  |
|-----------------------|---|
| SC-T-2                | <p><b>School Design Guide.</b></p> <p>Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014 (and/or Current Version). The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> <li>• Parking Space Requirements</li> <li>• General Parking Guidelines</li> <li>• Vehicular Access and Pedestrian Safety</li> <li>• Parking Structure Security</li> </ul>  |
| SC-T-4                | <p>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.</p> |

Projects implemented under the Program EIR are anticipated to have less than significant impacts related to transportation and circulation within the LAUSD service area with the incorporation of SCs. The Project-specific analysis provided below determined that implementation of the proposed Project would also have less than significant impacts related to transportation and circulation in the Project area with the incorporation of SCs.

## Impact Analysis

The proposed Project would occur on the existing Jefferson HS campus. Because the proposed Project would not increase capacity for enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project. In addition, the Project’s provision for an increase in onsite parking spaces (from 154 to approximately 188) and well as the installation of bike racks and other spaces for alternative transportation would ease traffic congestion in the surrounding neighborhood by reducing the need for

<sup>166</sup> Transportation and Circulation Standard Conditions of Approval SC-T-1 and SC-T-3 would not apply to the transportation and circulation analysis for the proposed Project because the Trigger for Compliance is if the Project would increase student capacity by more than 25% or 10 classrooms, and additional traffic.





campus staff, students, or visitors to find on-street parking spaces. Therefore, the analysis presented herein only focuses on potential traffic impacts associated with Project construction.

Access to the Project Site is provided by a series of local and regional roads. The roads that would be used by Project-related traffic (construction workers and trucks) are anticipated to be East Martin Luther King Jr. Boulevard, South Central Avenue and South Hooper Avenue (four-lane arterial roads), East 41<sup>st</sup> Street and Compton Avenue (two-lane local streets), and Interstates 10 and 110 (regional freeways, located approximately 1 mile north of, and approximately 1.5 miles west of, the Project Site, respectively). The street intersections on the expected haul routes where Project truck traffic would turn generally are controlled by traffic signals (the exception being the all-way stop-controlled intersection of East 41<sup>st</sup> Street and Compton Avenue). Data available from LADOT indicates the following daily traffic volumes on area roadways:

- East Martin Luther King, Jr. Boulevard = 6,600 vehicles per day
- South Hooper Avenue = 15,000 vehicles per day
- East 41<sup>st</sup> Street = 4,000 vehicles per day
- Compton Avenue = 7,000 vehicles per day

Although roadway and traffic characteristics (e.g., parking, traffic signals) affect the carrying capacity of roadways, for transportation planning purposes, two-lane roadways (like East 41<sup>st</sup> Street and Compton Avenue) have the capacity to accommodate about 15,000 vehicles per day; and the carrying capacity of four-lane arterials (like East Martin Luther King, Jr. Boulevard and South Hooper Avenue) ranges up to 40,000 vehicles per day. As such, the volume-to-capacity (v/c) ratios of the above-cited area roads ranges from 0.267 to 0.467 for East 41<sup>st</sup> Street and Compton Avenue, and 0.165 to 0.375 for East Martin Luther King, Jr. Boulevard and South Hooper Avenue.

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?**

**Less Than Significant Impact.** As stated above, school enrollment would remain the same following construction of the Project, and there would be no permanent increase in traffic generated by the school. Construction activity associated with the proposed Project is not expected to generate a substantial number of vehicle trips (truck trips or otherwise). The proposed Project would be developed in phases, with work spread over approximately 5.5 years.

Construction of the proposed Project would include onsite demolition, excavation, stockpiling, and grading activities. In addition, trucks would intermittently deliver building materials to the site. The proposed Project would require an average of about 50 workers (and a maximum of about 150 workers) onsite on a given day,

generating an average of about 126 one-way trips per day, and a maximum of about 376 one-way trips per day.<sup>167</sup> The work hours would be such that workers would primarily travel to and from the Project Site outside of morning and evening peak traffic hours. The number of daily truck trips would range from 14 to 38 one-way trips per day, except for a one-week period during the pre-construction removal of contaminated soil, when there would be 50 to 100 one-way trips per day; the soil removal would require 4 to 6 workers onsite each day. In most cases, truck loading/unloading would be conducted between the hours of 7:00 a.m. and 6:00 p.m., with truck trips spread over the work hours. Conservatively assuming that the up to 414 one-way vehicle trips (376 worker trips plus 38 truck trips) would travel on all of the study roads, the resulting v/c ratios under Existing with Project conditions would increase by 0.028 or less (i.e., would not exceed the threshold of significance established by LADOT). Street intersections where truck traffic would turn generally are controlled by traffic signals (the exception being the all-way stop-controlled intersection of East 41<sup>st</sup> Street and Compton Avenue). To assist in site ingress and egress, flaggers provided by the Project contractor(s) may be used to assist or direct traffic flows to and from the local streets. The surrounding roadways would be able to support the increase in traffic from construction workers and truck activity (Project-generated traffic would not substantially increase the v/c ratios of the affected roads. Potential Project-related construction traffic impacts would be mitigated by compliance with and incorporation of LAUSD SCs, such as limiting construction-related trucks to off-peak commute periods.

As shown in Table 4.17-1, LAUSD requires its contractors to submit a construction worksite traffic control plan designed to avoid or limit construction related impacts where feasible, prior to construction, as required by SC-T-4. Therefore, the Project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. As such, impacts would be less than significant. No mitigation or further study is 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?**

**No Impact.** Level of service standards established by jurisdictions/agencies are intended to regulate long-term (permanent) traffic increases associated with new development and do not apply to short-term (temporary) traffic increases that occur during construction.<sup>168</sup> As stated above, school enrollment would remain the same following the Project, and there would be no permanent increase in traffic generated by the Project. Potential impacts associated with the proposed Project would be limited to construction activity. Specifically, increased vehicle trips and potential congestion generated by construction-related passenger vehicles and trucks would cease when construction is complete, and implementation of the proposed Project would not result in any long-term, ongoing effects related to traffic and congestion. No impacts would occur. No mitigation or further study is required.

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<sup>167</sup> Daily trips by construction workers would consist of inbound and outbound commute trips (conservatively assumed to be each worker in their own vehicle), plus midday trips (lunch or other errands) by about 25% of the workers.

<sup>168</sup> Per the Los Angeles County 2010 Congestion Management Program, analysis of the cause of a “deficiency” (i.e., when level of service standards are not maintained) shall exclude traffic generated by construction activity.



**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 (LAX) is located approximately 9 miles west of the Project Site. Project construction would not change air traffic patterns. In addition, the proposed Project would not involve the installation of structures that could interfere with air space. No impacts would occur. No mitigation or further study is required.

**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.** The proposed Project would not result in any hazards due to design features or incompatible uses. The proposed Project would be implemented at an existing school site. The proposed new parking areas would be designed to meet the District's School Design Guidelines which provide requirements for campus designs that ensure that potential hazards or incompatible uses are avoided. The Project has been designed to incorporate standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards. Changes to existing roadways are not part of the proposed Project. In addition, traffic generated during Project construction would be compatible with the mix of vehicle types (autos and trucks) currently using the regional and local roadways surrounding the campus. As such, impacts would be less than significant. No mitigation or further study is required.

**e) Result in inadequate emergency access?**

**Less Than Significant Impact.** Jefferson HS is located in a developed urban area with an existing roadway network that accommodates the movements of emergency vehicles that travel in the area. Neither construction nor demolition of the proposed Project would introduce any impedance to access for emergency vehicles to the campus or the surrounding area, and may result in improved points of access on the campus for emergency vehicles. As required by SC-T-4, LAUSD requires its contractors to submit a construction worksite traffic control plan (including strategies to maintain emergency access at all times) prior to construction. Staging areas for construction would be located on school property; therefore, emergency access to the site would not be adversely affected during Project construction. The proposed Project's impact to emergency vehicle access, therefore, would be less than significant. No mitigation or further study is required.

**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?**

**Less Than Significant Impact.** In general, adopted policies, plans, and programs pertaining to public transit, bicycle, and pedestrian travel are intended to be used for long-term planning purposes. The proposed Project would not directly or indirectly eliminate alternative modes of transportation, transportation corridors, or facilities (e.g., bus stops). Further, the proposed Project would not prevent the use of any roads on which public transit routes operate, and as stated above, school enrollment would remain the same following the Project; there would be no permanent increase in traffic generated by the school.

Students, faculty and staff can currently travel to school using public transit routes, bicycles and by walking. As discussed above, there are sidewalks on all streets surrounding the school. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as walking and riding bicycles to school. Transit service to the Project Site is provided by the Los Angeles County Metropolitan Authority (or Metro), which operates Bus Line 55/355 on Compton Avenue and East 41<sup>st</sup> Street (nearest stops on Compton Avenue at East 41<sup>st</sup> Street, and on East 41<sup>st</sup> Street at Compton Avenue. Also, LADOT DASH operates Bus Line 102 on East 41<sup>st</sup> Street (nearest stops on East 41<sup>st</sup> Street at South Hooper Avenue).

During construction activities, the Project may affect sidewalk accessibility within the campus. However, any effects on sidewalk accessibility would be temporary, and the construction contractor would be required to ensure safe alternative routes are available. Pedestrian access to the school during the construction phase would be minimally altered, and as required by SC-T-4, contractors would be required to submit a construction worksite traffic control plan prior to construction.

For the above-stated reasons, there would be no impacts related to conflicts with policies, plans, or programs related to transit, bicycle, or pedestrian travel, and the Project would have a less-than-significant impact on the performance and safety of public transit, bicycle or pedestrian facilities. No mitigation or further study is required.

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## 4.18 TRIBAL CULTURAL RESOURCES

### XVIII. TRIBAL CULTURAL RESOURCES.

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

|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

## Discussion

The Program EIR includes SCs for minimizing impacts related to tribal cultural resources within the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided in *Table 4.18-1*.

**TABLE 4.18-1  
 TRIBAL CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description  |
|----------------|--|
| SC-TCR-1       | All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Tribal representative has been contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District. |

## Impact Analysis

Would the Project:

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

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

**No Impact.** The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on January 25, 2016 to request a search of the SLF. The NAHC responded to the request in a letter dated January 28, 2016 (Appendix C2 of this IS/MND). The SLF results indicate that no Native American cultural resources are known to be located within the Project Site. The letter also included a list of Native American contacts. Contact letters to all individuals and groups indicated by the NAHC as having affiliation with the Project Site were prepared and mailed on February 4, 2016. The letters described the proposed Project and included a map depicting the location of the Project Site. Recipients were requested to reply with any information they are able to share about Native American resources that might be affected by the proposed Project. To date, no responses have been received. While it is not anticipated, in the 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. In the event that a potential tribal cultural resource is uncovered during construction, 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 Tribal representative has been contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in PRC Section 21074. No mitigation or further study is required.

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

**No Impact.** As described above in impact a), LAUSD has not received any requests for notification or consultation from California Native American Tribes regarding resources defined by PRC Section 21074 to date. Further, the NAHC did not identify tribal cultural resources within the Project Site and there is no substantial evidence that Tribal cultural resources have the likelihood of being discovered on the campus. While it is not anticipated, in the 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. In the event that a potential tribal cultural resource is uncovered during construction, 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 Tribal representative has been contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District. Therefore, the proposed Project would have no impact on Tribal cultural resources as defined in PRC Section 21074. No mitigation or further study is required.

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## 4.19 UTILITIES

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

## Discussion

The Program EIR includes SCs for minimizing impacts to utilities and service system in the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to Project-specific impacts to utilities and service systems are provided in *Table 4.19-1*.





**TABLE 4.19-1  
 UTILITIES AND SERVICE SYSTEMS STANDARD CONDITIONS OF APPROVAL**

| Applicable SCs | Description   |
|----------------|---|
| SC-USS-1       | <p><b>School Design Guide.</b><br/>                     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 &amp; Demolition Waste Management.</p> <p><b>Guide Specifications 2004 - Section 01340, Construction &amp; Demolition Waste Management.</b><br/>                     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 &amp; Demolition (C&amp;D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&amp;D waste materials generated onsite, reuse or recycling onsite, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&amp;D waste generated.</p> |
| SC-USS-2       | <p>LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.</p>  |

## Impact Analysis

Would the Project:

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

**Less Than Significant Impact.** The City of Los Angeles Department of Public Works (LADPW) provides wastewater services for the Project Site. The Project Site is located within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), and Los Angeles-Glendale Water Reclamation Plant. The HTP is designed to treat 450 million gallons per day (mgd), but it experiences a lower average dry weather flow, resulting in available treatment capacity.<sup>169</sup>

Construction of the proposed Project would generate a minimal volume of wastewater and would nominally increase wastewater generation. Implementation and operation of the proposed Project would not change the existing uses or introduce new uses that would exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. As discussed above in Section 4.6, Geology and Soils, the proposed Project would be required to prepare a SWPPP outlining the BMPs to be implemented to avoid or minimize runoff discharges. Further, the SWPPP would include erosion control BMPs to control and minimize erosion and sedimentation being discharged from the Project Site. Additionally, any wastewater discharge by the proposed Project would be required to comply with the NPDES permit requirements.

<sup>169</sup> Los Angeles County Sanitation District, 2017. Hyperion Water Reclamation Plant. Available at : [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?\\_afLoop=1003491441621589&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afWindowMode%3D1003491441621589%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dtqz1lyj6p\\_4](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_afLoop=1003491441621589&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afWindowMode%3D1003491441621589%26_afWindowMode%3D0%26_adf.ctrl-state%3Dtqz1lyj6p_4), accessed November 29, 2017.

Therefore, compliance with these existing regulations would result in a less-than-significant impact to wastewater treatment requirements. No mitigation or further study is required.

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

**Less Than Significant Impact.** Construction of the proposed Project would be developed in phases, with work initiated in 2019, and spread over a 5.5 year period (2019 through 2025). The proposed Project is estimated to require on average approximately 150 construction personnel per day for the heaviest period of construction. During construction, water would be required for activities such as dust control; however, these activities would be limited and temporary and would not consume large amounts of water. While wastewater at the Project Site would be generated by construction activities and construction workers, the existing facilities and temporary portable facilities would be used to accommodate the construction related surge. Additionally, due to the temporary nature of the construction activities and the minimal number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, impacts associated with Project construction would be less than significant.

The proposed Project would not result in increased enrollment or capacity. Therefore, implementation of the proposed Project would not increase total water consumption within the District, and would not require construction of new or expanded water treatment facilities, and impacts related to Project operation would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** As discussed above in Section 4.9, Hydrology and Water Quality, construction of the proposed Project would require implementation of a SWPPP, which would outline construction BMPs for site drainage and implement an appropriate combination of monitoring and resource impact avoidance. Operation of the proposed Project would decrease the overall square footage of buildings, therefore increasing the amount of permeable area on the site due to landscaping and the additional baseball/softball field. In addition, the proposed Project would use the existing stormwater drainage facilities and would not alter drainage patterns. The proposed Project would not require or result in construction or expansion of stormwater drainage facilities. The proposed Project Site is located in a developed area of the City of Los Angeles, which contains an existing stormwater collection and conveyance system. The Project Site is an existing school campus, and the proposed Project would increase the pervious surfaces and include landscaping features which would reduce stormwater runoff from the Project Site. In addition to compliance with NPDES permit requirements, applicable laws, regulations, and standard PDFs and practices construction and operation would ensure that impacts associated with runoff would not exceed the capacities of existing stormwater drainage systems. Incorporation of LAUSD SC-USS-1 and SC-USS-2 would ensure that impacts would be less than significant. Therefore, the proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities and impacts would be less than significant. No mitigation or further study is required.



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

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

Although overall square footage of buildings would decrease and efficiencies may reduce the amount of water used in the building, it is assumed that water demand would remain the same as the existing conditions due to the upgrades to the baseball/softball fields associated irrigation systems. Therefore, the demand for non/potable water supply would be accommodated by existing supplies. Therefore, the long-term impact to non/potable water supply would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** During construction of the proposed Project, wastewater at the Project Site would be primarily generated by construction activities and construction workers. However, due to the temporary nature of the construction activities and the low number of construction workers, the amount of construction-related wastewater that would be generated is not expected to be substantial. Therefore, short-term impacts associated with wastewater treatment would be less than significant.

Although overall square footage of buildings would decrease, it is assumed that wastewater demand would remain the same as existing conditions. The proposed Project would not increase student capacity. Therefore, the demand of wastewater and wastewater treatment provided by LADPW would be accommodated by existing conditions. Therefore, the long-term impact to wastewater treatment capacity would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.**

The Project Site is served by the Los Angeles County Sanitation District (LACSD), which includes sanitary landfills, recycle centers, materials recovery/transfer facilities, and energy recovery facilities. The nearest such facility, the Puente Hills Materials Recovery Facility (MRF) accepts construction/demolition waste.

Prior to demolition, activities described in the RAW would be completed at the Project Site. As a part of the RAW and during excavation activities, excavated soil would be either directly loaded into staged trucks (or if applicable, temporarily stockpiled on plastic liners next to the excavation areas until it could be loaded out for offsite disposal). The soil would then be transported offsite to an appropriate licensed facility for disposal,

based on previous waste profile characterization results. The excavated soil would be segregated and managed as non-hazardous, non-RCRA hazardous, or RCRA hazardous waste.

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

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

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

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

Prior to Project construction, demolition of 13 buildings would occur, totaling approximately 84,000 square feet, which could generate up to 5,250 tons of debris. The Puente Hills MRF is permitted to receive up to 4,400 tons per day and accepts on average approximately 2,760 tons per day, which leaves a remaining capacity of approximately 1,640 tons per day.<sup>170</sup> Thus, it is anticipated that the Puente Hills MRF would have sufficient capacity to accept the Project-related debris and would be able to accommodate the proposed Project's solid waste disposal needs during construction. Therefore, the short-term impact associated with construction would be less than significant. No mitigation or further study is required.

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

**Less Than Significant Impact.** The proposed Project would comply with all applicable federal, State, and local statutes and regulations related to the handling and disposal of solid waste materials. Construction debris would be handled and disposed of according to District Specification 01 4524, LAUSD's SCs (including but not limited to: SC-USS-1), and the applicable local and regional standards. Operation of the proposed Project would generate similar quantities of solid waste compared to existing conditions, and would require disposal within a landfill. Compliance with all applicable regulations related to reducing solid waste would ensure the proper handling and disposal of solid waste associated with the proposed Project. The proposed Project would

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<sup>170</sup> County Sanitation Districts of Los Angeles County, 2015, Report of Facility Information, Transfer/Processing Report For The Puente Hills Materials Recovery Facility.



comply with the recycling requirement in AB 341, as well as the construction and demolition (C&D) waste recycling/reuse requirement in California Green Building Standards Code Section 5.408, and LAUSD School Design Guide & Specification 01340, Construction and Demolition (C&D) Waste Management, that requires the collection and separation of all C&D waste materials generated onsite, reuse or recycling onsite, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum 75 percent of the C&D waste generated. Therefore, impacts would be less than significant. No mitigation or further study is required.

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## 4.20 MANDATORY FINDINGS OF SIGNIFICANCE

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

### Impact Analysis

Does the Project:

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

**Less Than Significant Impact.** The Jefferson HS campus was formally determined eligible as an individual property for the National Register through consensus with the SHPO, automatically listed in the California Register, and assigned a CHR Status Code of 2S2. As noted in Section V, Cultural Resources, the Administration and Classroom Building (Building 1), Auditorium (Building 2), Cafeteria Building (Building 3), and Main Classroom Building (Building 4), Mechanical Arts Building (Building 11) and Power House (Building 8) were determined contributors to the potential Historic District, as well as the majority of the landscape surrounding these Buildings 1 and 4. As discussed in Section V and as evaluated in the HRTR (Appendix C1), the campus would retain its integrity after implementation of the proposed Project. Jefferson HS would retain



integrity and would remain eligible for the National Register and California Register as the contributing buildings and landscapes would be rehabilitated in conformance with the Standards, new construction would conform to Standards 9 and 10. The two contributing buildings, the Power House (Building 8) and Mechanical Arts Building (Building 11), would be documented in a HABS-like Level II recordation document and their character-defining features and materials would be salvaged. Removal of these buildings would not constitute a substantial adverse change in the historic significance or integrity of the potential Historic District. The potential Historic District would retain sufficient integrity through the preservation of the majority of the contributing buildings and the contributing landscape. The CDFs of these contributing buildings would be restored or, in limited instances, replaced in-kind, ensuring the integrity of the historical resource and maintaining its eligibility for the National Register and California Register.

with implementation of SC-CUL-1 through SC-CUL-6, Jefferson HS would retain sufficient integrity to remain eligible for the National Register and California Register as majority of the contributing buildings and landscapes would be rehabilitated in conformance to the SOI Standards, new construction would conform to SOI Standards 9 and 10, and the two contributing buildings planned for demolition would be documented in a HABS-like recordation document and their CDFs would be salvaged per LAUSD SC-CUL-1 to SC-CUL-6 resulting in a less-than-significant impact.

While the impact would be considered less than significant, LAUSD has proposed the following voluntary mitigation measure to further reduce the impacts of the loss of historic fabric that will result from the demolition of Mechanical Arts Building (Building 11) and the Power House (Building 8) as well as other alterations, discussed above, that would result in the loss of CDFs.

**MM-CUL-1:** To communicate stories, information, and experiences pertinent to the history/historic events that took place on the Jefferson High School campus, an Interpretive Exhibit (and program) shall be developed in collaboration with the Jefferson High School community (i.e. students, staff, alumni, community members, etc.). The Interpretive Exhibit shall be located in a publically accessible area on campus (such as the school library) and shall describe the history of Jefferson High School prior to the Project; specifically, the period of significance (1935–1937) and key historical events that were relevant to Jefferson High School shall be highlighted through historical photographs, aerials, Sanborn maps, student photographs, yearbooks, newspapers, artifacts, and written narrative that visually demonstrate the physical appearance, activities, and architecture style of the school. A District-approved representative or a qualified architectural historian or historic preservation professional shall provide input and oversight to the contents, design, and installation of this Interpretive Exhibit (as applicable).

As noted in Section V, Cultural Resources, the records search indicated that a total of two archaeological resources (P-19-003822 and P-19-003889) have been previously documented within a ½-mile radius of the Project Site, neither of which are within the boundaries of the Project Site. As noted in Section V, Cultural Resources, background research conducted for the Project indicates that the Project Site has a low sensitivity for prehistoric archaeological resources, but a higher sensitivity for historic-period archaeological resources (specifically resources associated with the early 1900s). Because the proposed Project includes ground disturbance, there is potential for the discovery of unanticipated archaeological resources associated with early

1900s uses of the Project Site related to recreational and educational activities, including refuse deposits and building or structural foundations. . The Project requires compliance with the standard conditions SC-CUL-7 through SC-CUL-13 in order to reduce impacts to less than significant. These measures include retention of an on-call qualified archaeologist, implementation of an archaeological resources monitoring program, halting and re-directing work in the event of a discovery until it is evaluated for significance, and Phase III Data Recovery/Mitigation Program in the event that a significant resource is discovered and cannot be avoided.

As discussed in Section 3.4, Biological Resources, the Project Site is located on an active high school campus that contains no native vegetation capable of supporting any special status plant or wildlife species. The Project Site is entirely developed and surrounded by residential development to the south, east, and west, and industrial development to the north and east. An arborist survey was completed for the proposed Project.<sup>171</sup> The survey inventoried 139 trees and noted that up to two coast live oak trees (which are protected by the City of Los Angeles) and up to 77 non-protected trees of various species would be removed as a part of the proposed Project.<sup>172</sup> Three coast live oak trees that are located along the southernmost portion of the campus, as part of the historic lawn (specifically, at the intersections of Hooper Avenue and 41<sup>st</sup> Street and Compton Avenue and 41<sup>st</sup> Street), would not be removed.<sup>173</sup> The Project Site does not contain any species that are identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or protected by the CDFW or USFWS. Therefore, the proposed Project would not 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 animals.

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

**Less Than Significant Impact.** A cumulative impact could occur if the Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because Project impacts are generally construction-related, the cumulative analysis is generally confined to the immediate vicinity or within a one-mile radius.

As discussed in the Program EIR SUP, each of the environmental topics in the Program EIR assesses the types of projects that may be implemented under the SUP and assumes that more than one may take place at the same time. As an active school campus it is anticipated that there would be ongoing maintenance activities that would occur on the campus. However, none would be anticipated to have the same scope or scale associated with this Project. The District has more than 22 comprehensive modernization, upgrade, or new development projects planned for campuses located within the District’s boundaries but none of these would occur within one mile of the campus.

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<sup>171</sup> Cy Carlberg, 2017. City of Los Angeles Protected Tree Report, Thomas Jefferson High School. Prepared for LPA, Inc. February 27, 2017.

<sup>172</sup> Ibid.

<sup>173</sup> Ibid.





As discussed in Section I, Aesthetic Resources section of this IS/MND, implementation of the proposed Project would not impact any scenic vistas, State scenic highways, or generate substantial light and glare. Impacts related to visual character would be less than cumulatively considerable due to PDFs that would ensure the Project is compatible with existing buildings. The Project does not include any agricultural or mineral resources that could be impacted, and the Project would have no impacts related to general plan and zoning consistency, population, housing, public services, and recreation. As a result, cumulative impacts related to these resources would not occur.

Implementation of the proposed Project would not impact any historic resources. As noted in the Section V, Cultural Resources section of this IS/MND, impacts related to historic resources would be less than cumulatively considerable due to the incorporation of SC-CUL-1 through SC-CUL-6, which would ensure Jefferson HS would retain integrity and would maintain its status in the National Register and California Register as the contributing buildings and landscapes would be rehabilitated in conformance with the Secretary of the Interiors Standards, new construction would conform to Standards 9 and 10, and the two contributing buildings, the Power House (Building 8) and Mechanical Arts Building (Building 11), would be documented in a recordation program that is comparable to the HABS Level II recordation document and their character-defining features and materials would be salvaged.

Implementation of the proposed Project would not impact any significant archaeological resources. Impacts to archaeological resources would be less than cumulatively considerable due to compliance with SC-CUL-7 through SC-CUL-13. These SCs include retention of an on-call qualified archaeologist, implementation of an archaeological resources monitoring program, halting and re-directing work in the event of a discovery until it is evaluated for significance, cultural resources sensitivity training, and Phase III Data Recovery/Mitigation Program in the event that a significant resource is discovered and cannot be avoided.

In addition, as documented in this IS/MND, air quality, greenhouse gas, hazardous material, water quality and traffic impacts that are generated by construction activities would be short-term and limited by minimal construction workers traveling to the site, and a short construction period. The minimal emissions, traffic and water pollutants generated by the Project would also be less than cumulatively considerable due to the location of the Project and limited construction activities and duration occurring at the same time. The chemicals used onsite during Project operation would comply with existing federal, State and local regulations pertaining to hazardous materials use, treatment, storage and disposal. Therefore, the Project's contribution to cumulative impacts would be less than cumulatively considerable. Therefore, the proposed Project would result in less than significant cumulative impacts.

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

**Less Than Significant Impact.** The proposed Project would not result in potentially significant Project-level impacts. The Project would implement SCs related to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, pedestrian safety, transportation and circulation, and tribal cultural resources. Implementation

of these SCs would reduce the Project's potential adverse effects on human beings to less than significant. Therefore, additional mitigation measures and further study are not required.

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